

From: director@fracdallas.org
To: [Oil and Gas Conservation Rulemaking](#)
Cc: wasden@cableone.net
Subject: IDL Proposed Rules for Oil and Gas Conservation
Date: Tuesday, October 25, 2016 07:26:30 PM

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October 18, 2016

Eric Wilson, Bureau Chief
Resource Protection and Assistance
Idaho Department of Lands
300 N. 6th Street, Suite 103
P.O. Box 83720
Boise, Idaho 83720

Re: IDL Proposed Rules for Oil and Gas Conservation

Dear Mr. Wilson,

Throughout the negotiated rulemaking sessions you callously disregarded comments made by those who oppose oil and gas exploration and production in densely populated areas and compromised with Alta Mesa routinely to give them rules that do NOT protect the state or its citizens based upon false promises of revenues to the state, which have not materialized in six years.

The following comments, coming in separate e-mails of one issue per e-mail, address specific proposed rules and what I believe the state can and must do to properly monitor the oil and gas industry so that the state can collect appropriate severance taxes and all mineral owners can receive their fair royalty compensation. I know that many comments I submitted in writing never made it into the official public record, which is a violation of federal public records laws, and I am hopeful that the same will not occur with these comments.

While I have fundamental issues with most of the proposed rules I will confine my comments to the most egregious proposed rules that have the greatest potential for negative effect on the state and its citizens. And, I sincerely hope that you will give as much consideration to the opinions and thoughts of citizens who pay your salary as you do to an out-of-state corporation that has, thus far, failed to produce the minerals or revenues that they stated would be generated by rules that were crafted for them and their financial benefit at taxpayer expense.

SUBCHAPTER B - EXPLORATION AND DEVELOPMENT

Section 100

Section 100, subsection 5 - Owner Agreement and Occupant Notification

No entry shall be made by any person to conduct seismic operations, upon the lands where such seismic operations are to be conducted, without the permit holder having first given notice at least thirty (30) calendar days prior to commencement of field seismic operations and having obtained a written agreement with the surface owner and provided written notice to the following parties:

The proposed language strikes out the 30-day notification period to surface owners and other interested parties. Notification 30 days in advance is logical and appropriate considering the nature of seismic operations associated with oil and gas exploration and

production. It is essential that surface owners be made aware of planned seismic testing adequately in advance of such testing to insure proper preparation as may be required to secure persons and property from damages caused as a result of seismic operations.

Please make sure this e-mailed information is included in the official record of public documents submitted to IDL regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601, as required by federal and state laws.

Most sincerely,

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"We only have one environment. When we destroy it we will become as extinct as the dinosaurs!"