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Subject: Commentary Regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601
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Please ensure 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.

There are numerous concerns over several of the proposed rules but I'll focus on only two:

1. **Section 110. Surface Owner Protections** (P 551) - Specifically subsection .04 Surface Use Bond. Anyone who asked for a quote to do anything substantial on their home and required bonding and insurance verification from the company knows \$5,000 for a bond is pitifully low. The current \$5,000 bond level to protect surface owners should be raised to no lower than \$1M, which will not cost that much more to the state. It's a disservice to the citizens that Idaho does not educate itself from other oil rich states how to properly protect it's citizens and the state from the industry. Educate yourself. Many Idahoans think \$5,000 is a lot of money. **It's Not.** Idaho needs to open their eyes to the bigger picture. May I remind you of the superfund mess in northern Idaho and its current day ramifications. and cost? Would a \$5,000 bond have helped clean it up? Those with any legal background or knowledge knows the landowner and the state, county and/or city will be forced to deal with the aftermath expense and cleanup long after the oil and gas industry has left the drilling/well site.

2. **Section 130. Integration** (P 554) - NO Idaho citizen nor their property should be forced into a mineral production agreement against their will. This will jeopardize their mortgage and insurance policies. I am curious, will IDL or the state of Idaho be purchasing homeowner properties from the bank once the mortgages are in compliance default due to state mandated mineral production agreements and statute? It would be naïve to think "mortgages never go into default over oil drilling". Idaho needs to do their due diligence and research this to see if it's happened in other oil producing states -- don't just take the industry's "word for it that it doesn't". Also, couldn't severing mineral rights from those who outright own them can be considered in direct conflict of constitutional law? Some questions IDL should consider when proposing the rules.

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