

From: [Kelly O'Neill](#)
To: [Rule Making](#)
Subject: . Protect Taxpayers and the Environment - DOCKET: 20-0302-1901
Date: Thursday, June 20, 2019 3:11:51 PM

Dear Mr. Eric Wilson,

Thank you for the opportunity to provide comment with regard to Minerals Rulemaking Docket: 20-0302-1901.

I urge you to develop a rule that is protective of both the environment and taxpayers. After all, gold prices are remarkably unstable and an apparently solid company one day could be bankrupt the next.

Reclamation and water management plans must be developed by certified professional engineers and must provide certainty with regards to long-term cleanup of mine sites to prevent the release of toxic wastewater, metals or other contaminants into the environment.

Corporate surety bonds should only be accepted from surety companies that are listed to do business in the state of Idaho, on the current US Treasury 570 Circular to ensure that Idaho taxpayers are protected.

Corporate Guarantees (CG) inherently expose Idaho taxpayers to significant risks. As a result, the use of CG should be strictly conditioned, including limitations on the amount of surety that can be covered by a CG (not to exceed 25%), disapproval of any CG from companies with more than 10% of their assets in a foreign country, and disapproval of any CG from companies with a ratio of assets to liabilities of less than 2:1. Finally, post-closure costs should not be covered by CGs.

I appreciate IDL's consideration of these changes. Given the precarious nature of the metals markets, and given the high costs associated with reclamation, it is important to plan for worst-case scenarios and to ensure that Idaho's clean water and financial resources are protected.

Regards,
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