From: Sharla Arledge on behalf of Comments
To: Kourtney Romine; Mick Thomas

Subject: FW: Title 47, Chapter 3 Written Comment Date: Tuesday, November 23, 2021 02:10:59 PM

From: Stuart Grimes <sgrimes@fruitland.org>
Sent: Tuesday, November 23, 2021 8:46 AM
To: Comments <comments@idl.idaho.gov>
Subject: Title 47, Chapter 3 Written Comment

## To Whom It May Concern,

The City of Fruitland would like to take this opportunity to respectfully submit some brief comments regarding the first draft text of Title 47, Chapter 3.

Under 47-314 "OIL AND GAS CONSERVATION COMMISSION CREATED-POWERS- LIMIT ON LOCAL RESTRICTIONS- ATTORNEY GENERAL" (b) The draft text states "The members appointed by the governor shall serve at the pleasure of the governor and shall be knowledgeable in oil and gas matters." This is a proposed change from "The members appointed by the governor shall serve at the pleasure of the governor and shall have a college degree in geosciences or engineering and at least ten (10) years of experience in the oil and gas industry."

While the current text may make it more difficult to find qualified people to serve as a commissioner, it does ensure that each commissioner will be highly qualified to perform their duties and make well-informed decisions regarding gas and oil in Idaho. The City of Fruitland believes the proposed new text stating "Shall be knowledgeable in oil and gas matters" is incredibly vague and ambiguous. What constitutes "Knowledgeable in oil and gas matters"? This wording leaves it up to a very broad interpretation and the possibility of under-qualified people serving as commissioners.

We ask the commission to consider a more defined description of what traits or background a qualified potential commissioner should possess to be considered for the appointment. We hope you will take our comments into consideration moving forward with any revisions to the current code.

Best Regards,

## **Stuart Grimes**

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