

From: [Sherry Gordon](#)
To: [Rulemaking](#)
Subject: IDAPA 20.07.02 Draft I comments...
Date: Sunday, April 14, 2024 3:11:07 PM

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By page number:

Pg. 8: 040 - Public Comment - 15 days is already problematic for -the public- to be both informed and to formulate a response to anything; making it 10 days is like making it none. That extra 5 days is nothing for the industry; for a private commenter (whose jobs -aren't- to do with gas&oil industry or administration), it's a major difference. Please do NOT reduce any public commenting or notification period!

Pg. 10: 100-02-g - It is absurd that only 6"+ diameter trees cut -without permission- would be compensated for to landowners. The author of this may have been thinking of woodlots, but in any other situation, any living tree that was purposefully -planted- by a landowner would cost big bucks to replace; they should -all- be compensated. (You could call it up to -1"- in diameter. Many pricey nursery trees are that small.)

Pg. 19: 03 - No doubt you wish to use "MIT" in place of "mechanical integrity test" here, since you're doing such with other acronyms in the Definitions.

Pg. 20: 220 - Bonding - These Individual well surety bond rates are abysmally low for what they eventually -must- cover; and the Blanket bonds are therefore even more outrageously low... which requires -the taxpayers of Idaho- to fill in whatever is required. It has nothing to do with the gas&oil company, except insofar as the surety insurance company decides that the company is a poor risk for the bond; it has everything to do with the reality of what it -is-, at some point, going to take to plug/reclaim a well - and they will -all- hit that wall at some time or another in our collective futures. These projected prices are already -far- out of alignment with actual costs - and the costs of wages, materials (think cement - !), equipment/operation costs, etc. keep going up and up.

Following are quotes from several articles about the true costs of well plugging. (Note that a great many of the abandoned wells referred to in these situations were likely not terribly deep and were surely mostly conventional wells. Even when some modern fracked wells are factored in, the average true costs mentioned are WAY above the measly \$10,000 each, or \$5000 each for blanket bonds here.)

<https://www.rff.org/publications/journal-articles/decommissioning-orphaned-and-abandoned-oil-and-gas-wells-new-estimates-and-cost-drivers/> (2021)

"We analyze data from up to 19,500 wells and find that median decommissioning costs are roughly \$20,000 for plugging only, and \$76,000 for plugging and surface reclamation. ... Each additional 1000' of well depth increases costs by 20%, ...natural gas wells are 9% more expensive than wells that produce oil..."

<https://hydrocarbonwell.com/how-much-does-it-cost-to-plug-an-oil-and-gas-well/> (current plugging service's webpage)

"Some took a couple weeks, some took several months. Some cost \$20,000. Some cost over \$1,000,000. These prices do not include reclamation or site prep if needed. If you have a shallow well (less than 1000' deep), ...and the well was recently in production, you may very well get it plugged for \$20,000-\$25,000. ...If there is an obstruction (about 25% of the time), ...this usually increases the cost \$20,000+."

<https://www.denver7.com/news/local-news/colorados-costs-to-plug-abandoned-oil-and-gas-wells-shifting-from-taxpayers-to-companies> (2023; Colorado)

"The ECMC estimates that well-plugging costs an average of \$92,000."

<https://coloradosun.com/2023/03/08/oil-gas-companies-plug-remediation-costs/> (2023; Colorado)

"The commission [COGCC] has calculated that the cost of remediating a well site is about \$1000,000 and the cost of plugging a well, dependig on its depth, ranging from \$10,000 to \$40,000, with an average total of \$120,000 per well."

<https://apnews.com/article/business-environment-and-nature-climate-change-7392636504b2763de07ff4b3fe78710e> (2021)

"The cost to plug an orphaned well varies... In North Dakota, where some wells are drilled to depths of more than 20,000', it can cost \$150,000 to plug a single well and restore the land around it. In Pennsylvania, the state budgets about \$33,000 to plug each well."

<https://wyomingtruth.org/blm-plan-would-hike-bond-requirements-on-oil-and-gas-drilling/> (2023)

"Under a proposal introduced [in summer 2023], BLM would raise the amount of money oil and natural gas operators would have to pay in bonds - from \$10,000 to \$150,000 for individual drilling leases..."

(And according to this, that change is imminent:

<https://www.blm.gov/sites/default/files/docs/2024-04/BLM-Final-Onshore-Oil-and-Gas-Leasing-Rule-General-Fact-sheet.pdf>)

Pg. 25: 302 - Accidents and Fire - Local emergency services should be notified of -all- drilling activities!, and be given a copy of the gas&oil company's required emergency response plan. A mere suggestion that the company "coordinates with" them is entirely too wimpy.

Pg. 37: 03 - Plugging Dry Holes - Why on earth would you "require" written notification in 502.02 and then say here that only verbal notification is required? - that's ridiculous. You need a paper trail, period, not person-to-person verbal MIS(perhaps)communication.

Thank you - Sherry Gordon, PO Box 1091, Emmett, ID