

From: Randy Kauffman [REDACTED]
Sent: Friday, November 16, 2018 1:27:27 PM
To: Mick Thomas
Subject: Written Brief Taking Exception To The Recommended Order by Jason S. Risch, Hearing Officer Docket No. CC-2017-OGR-01-002 November 13, 2018

Mr. Thomas,

As Complainants to the recommended order by Jason S. Risch, Hearing Officer Docket No. CC-2017-OGR-01-002 November 13, 2018, we are communicating with you in your capacity as the Secretary of the OGCC, to take exception to the recommended order by Mr. Risch. Based on the process described in the recommended order, we are submitting this written brief to you via email and request that the exception be dated Friday November 16, 2018.

Please provide to us your written response to confirm you have received and logged this message as received November 16, 2018. We expect the OGCC to issue a final order within 56 days of receipt of this brief, as stated in the order. Our preference is that OGCC act much sooner than 56 days.

We strongly disagree with the November 13, 2018 recommended order from Mr. Risch and believe it is deeply flawed. The information we requested from Alta Mesa (Respondents) is public under the plain language of Idaho law; and, as royalty owners we are entitled to it without being subject to a protective order.

Applicable Idaho code sections include (but are not limited to) the following:
I.C. 47-324. REPORTING REQUIREMENTS.
I.C. 47-326. PUBLIC DATA.
I.C. 47-327. CONFIDENTIALITY OF WELL AND TRADE INFORMATION.
I.C. 47-332. REPORTS TO ROYALTY OWNERS.

As land owners who have waited several years for the attention of the OGCC to respond to our concerns, despite repeated request; and, after waiting for nearly a year for the OGCC to act on our direct request and complaint of December 7, 2017, we respectfully ask the OGCC to act immediately to set aside the recommended order; and, to act under their authority to enforce the clear language of the law as written.

We expect, and the law requires, the OGCC to protect the interest of all Idaho royalty owners,

including the State of Idaho and private landowners. There should be no confusion as to the clear language of Idaho law- transparency is clearly required. As royalty owners, we are entitled to all information related to production from our land- without a protective order. Idaho taxpayers and the State of Idaho are also entitled to this information. Full transparency is required by law, as this is the only way that royalty owners and the State can validate that they are being paid fairly and fully for what is being produced from their land.

Respectfully,

Randy and Thana Kauffman
4040 Little Willow Rd.
Payette, Idaho 83661



Sent from my iPhone