



## PUBLIC WORKS DEPARTMENT

MAYOR: Lauren McLean | DIRECTOR: Stephan Burgos

May 10, 2023

IDWR Rules Review Officer  
PO BOX 83720  
Boise, ID 83720  
Comments submitted electronically: [rulesinfo@idwr.idaho.gov](mailto:rulesinfo@idwr.idaho.gov)

Subject: Review Comments for UIC Rules - Docket No. 37-0303-2301

IDWR Rules Review Officer,

The City of Boise appreciates the opportunity to have participated in ZBR IDAPA 37.03.03 (UIC Rules) negotiated rulemaking meeting on April 27<sup>th</sup>, and to provide comments on the draft changes.

The city values IDWR's efforts to update the UIC Rules. The draft rule update clearly meets the objective of EO 2020-01. The draft rules are streamlined, more concise, and the added points of clarification are beneficial.

As a point of clarification, in section number (as identified in draft rule) 37-0303.035.02.h, text states, *"Describe the quality, composition, and quantity of injected fluids"*. Would IDWR please provide additional details on what will be required to define the "composition" of injected fluids as identified in the draft text?

In addition, in section 37.03.03.050.01.a.i, the following text is provided in draft permit section, *"After all application information is received and evaluated, the Director will prepare a draft permit or denial...In preparing the draft permit or denial, the Director shall consider the following factors: i. The availability of economic and practical alternative means of disposal."* Would IDWR please provide clarification on what documentation would be required to prove or disprove the availability of economic and practical alternative means of disposal"?

Please feel free to contact me for further clarification or questions related to these comments.

Sincerely,

Kate Harris  
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Water Quality Programs Manager  
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