

Hello, my name is Maria Katherman & I am a landowner within the boundaries of the huge Converse County, Wyoming oil/gas development being enabled by the BLM. This is a project that will bring around 5,000 new oil/gas wells to this formerly rural landscape of high desert sagebrush—home to large herds of antelope and one of the few places where one can count on finding Ferruginous Hawks and Burrowing Owls which are both on the endangered/threatened list.

This project includes some private minerals lands, but the majority are federal minerals though sometimes under privately owned surface. As a resident here I am alarmed at the speed of this development where the federal mineral leases have been granted by the BLM without first addressing the issue of inadequate, outdated bond requirements. We who live here now cannot be certain that proper plugging and surface reclamation will be done in a timely manner. As it stands, we may lose this formerly amazing landscape of sagebrush sea and the many wildlife species that depend on it as well as the non-industrial nature of the place.

I joined the Powder River Resource Council 25 years ago precisely because they are one of the few local organizations that tries to hold the fossil fuel industry to account and pushes for best practices during drilling, extraction and production that can help landowners and the non-human residents of our rural area survive. However, the BLM's laughable bonding requirements are pushing in the opposite direction!

Others have made clear that bonding reform is needed to keep pace with the vast increase in the cost of plugging wells and surface reclamation. Hopefully you are number people and this discrepancy will have gotten your attention! But I'll repeat: the BLM sets a minimum blanket bond for 99% of the operators that amounts to about \$,2000 per well, where as the actual cost of plugging and surface reclamation averages about &76,000 – and of course can be much more. This is like incentivizing companies to walk away without reclamation just because it is cheaper. & after all, their point is to make money.

Furthermore, it is also a common practice in the oil industry for the original drilling company to sell completed wells that underperform or are aging-out to smaller & less well-capitalized companies—known as “strippers” who then become

responsible for the reclamation, though often just declare bankruptcy and dodge reclamation entirely. This ridiculous situation has left many thousands of wells across our state orphaned, unplugged and without surface reclamation.

During the previous oil/gas rush ~15 years ago a neighbor with privately owned minerals allowed drilling. The well pad for 3 or 4 pump jacks occupied about 15 acres including an access road. This site proved unproductive, yet all the infrastructure—pumpjacks, storage tanks & so forth remained in place for more than 5 years and finally after plugging and reclamation, the site is just a big square field of weeds.

There can be no justification for the state, the tax-payers or the private surface owners to end up having to pay for what should be the responsibility of the oil & gas industry. This problem is not new or unexpected! These private companies make huge profits on cheap public minerals to begin with. As someone who will be living here long after the current boom has ended, I ask that you at the OMB take a hard look at the public cost incurred by the present bonding system on federal minerals. It is urgent that new rules and rates are enacted right now before any more leasing is allowed and *I'd* like to see those new bonds be applied retroactively to current leases that are not yet developed.