

October 15, 2018

Jody Colombie
333 West 7th Avenue,
Anchorage, Alaska 99501

via email: aogcc.customer.svc@alaska.gov

RE: 20 AAC 25.025

Dear Commission members,

As a 41-year resident of Alaska, I am writing regarding proposed regulatory changes that would increase the bond amount a private operator must file in the event it abandons a well, as well as establish, for the operator, a multi-tiered bonding schedule for multiple wells.

The proposed changes are more than reasonable. Indeed, per your agency's mission—"to protect the public interest in exploration and development ... (etc.)"—perhaps the bond amounts should be larger. Considering that the cost to the state of 26 abandoned wells in the North Slope alone, according to BLM, could total \$100 million, the minimum bond requirement the Commission should consider should start at \$4 million for 1-2 wells and increase accordingly.

Expecting the State of Alaska to cover the costs of well clean up is like expecting a homeowner to remove trees, slash and garbage left over by a hired landscaping contractor. As you know, there are thousands of wells in our state, many that are and will be abandoned or "orphaned". Leaking wells could create a legacy of toxic pollution harmful to the environment and people, requiring, at this point, exorbitant amounts of state funding for clean-up and remediation (if that is even possible at these sites).

Needless to say—though, weirdly, it *must* be said—you need to also consider the impacts of climate change. To keep planetary warming under 2 degrees celsius, the target set by the Paris Climate Agreement, significant changes will have to be made in the way we manage oil production. Wells will inevitably have to be abandoned and methane prevented from leaking. We will have to begin keeping oil in the ground to prevent catastrophic climate crisis.

While you may see your duty as protecting the financial interests of the oil industry, you are also bound by a mandate to protect the **public interest** of the people of Alaska. I am one of the those people, one of a tiny few who even know about this public hearing. Please have the courage to support this reasonable regulatory change.

Sincerely,

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