



**BOGM – Bonding | April 23, 2025**

# Key Concerns

- Disconnect between goal and result – unintended consequences in conflict with Division's statute
- Definition of “at risk wells”
- Risk of double bonding
- Change of operator – “controlling interest”
- Significant administrative burden
- Suggest 20% of at risk wells covered by the blanket bond
- Additional definitions and drafting details needed

