



MORMON
ENVIRONMENTAL
STEWARDSHIP
ALLIANCE

PO Box 526082
Salt Lake City, UT 84152-6082

MormonStewards.net

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Utah Board of Oil, Gas & Mining
LaVonne Garrison, Chair

Utah Division of Oil, Gas & Mining
Mick Thomas, Director

Attn: Natasha Ballif
Utah Division of Oil, Gas & Mining
natashaballif@utah.gov

Comments Regarding Proposed Performance Bonds Rule 649-13

The Mormon Environmental Stewardship Alliance is a nonprofit, faith-based advocacy organization that is working to bring together people, particularly from our faith community, from all walks of life and all political persuasions, to find common ground in caring for our home, our Earth, and all life it sustains.

Our movement was born in 2012, and today our organization represents thousands of members and supporters, predominantly in Utah and the Western U.S., but stretching across North America and around the globe. We primarily educate and advocate to our elected leaders and civil servants, a large number of which in the Western U.S. share our faith or represent large communities and constituencies who are members of our faith.

Our mission is to encourage policies and actions as societies that support environmental stewardship and conservation, which is among the core doctrines, beliefs and values of The Church of Jesus Christ of Latter-day Saints. Our mission and movement are inspired by messages from Church leaders:

Former President Russell M. Nelson gave a talk in April 2000, which includes the following statement that has served as a primary inspiration for our efforts: “As beneficiaries of the divine Creation, what shall we do? We should care for the earth, be wise stewards over it, and preserve it for future generations. And we are to love and care for one another.”

President Dallin H. Oaks, the new leader and President of The Church of Jesus Christ of Latter-day Saints gave a commencement address at BYU Hawaii in 2017, where he said: "These are challenging times, filled with big worries: wars and rumors of wars, possible epidemics of infectious diseases, droughts, floods, and global warming. Seacoast cities are

concerned with the rising level of the ocean, which will bring ocean tides to their doorsteps or over their thresholds. Global warming is also affecting agriculture and wildlife. We are even challenged by the politics of conflict and the uncertainties sponsored by the aggressive new presidential administration in the world's most powerful nation."

While I don't believe this is an formal policy on matters like climate change and environmental degradation, it's impossible to ignore the increasing voices coming from faith leaders of major religions across the globe, asking to individuals and societies to increase our awareness of and responsibility toward caring for the earth and for each other.

With that introduction and background, we wish to provide written comments, in addition to our brief testimony at the December 2025 Board Meeting. I attended and had intended to comment at the March Board Meeting Public Hearing, but due to time constraints, was unable to stay until my scheduled comment opportunity. I am therefore providing these written comments on behalf of our organization.

We are grateful for the work of the Division staff, board members, and other contributors to update the bonding rule for operators of oil and gas wells operating within the state of Utah. We see two primary benefits for updating this rule — first, protecting our land, air and water from the unintended impacts of leaking, orphaned wells, and second, limiting the exposure of Utah taxpayers from the potential liabilities of capping and cleaning up harmful pollutants of abandoned wells. Principles of self-reliance and stewardship of resources apply to industries and businesses, in addition to individuals, where the economic benefit is primarily received by the industries and operate such wells. The current proposal is an important step forward to benefit the people of Utah and the ecological systems that sustain all life.

As I listened carefully to the comments provided at the December and March public comments by various stakeholders, I was drawn especially to the detailed analysis provided by professionals at the Environmental Defense Fund, which we discussed with the leaders of our organization following both Board meetings.

In deliberating and adopting the final rule language and provisions, the Mormon Environmental Stewardship Alliance urges you to consider including temporarily abandoned or shut-in wells in the "At-Risk Well" calculations. Operators will be required to plug these wells at some point in the future, and excluding the greater risks from these wells only increases the risk to Utah taxpayers.

We also strongly urge you to update some confusing aspects the "At-Risk Well Ratio" calculation formula. As the formula was presented and discussed at the March Public Hearing, it was our understanding that in the current draft, an operator only includes in the calculation their "At-Risk Wells" that are on state lands, but is able to include their combined wells on State, Federal and Tribal lands in the "Total Well Count." We believe that such a calculation formula

will preclude the state from accurately capturing operator risk and the potential liability to Utah taxpayers. The multiple case studies presented by the Environmental Defense Fund illustrated how many or most operators would be exempted from the liability of “At Risk Wells,” which places that risk and possible burden on the environment and on the people of Utah. This seems to contradict the intent of the updated rule.

Current laws governing the oil and gas extractive industry state that the risks and liabilities associated with industries should be carried by those who benefit the most from the extraction and use of these natural resources. Clarifying this language and formula of these calculations for consistency with the intent will provide some modest assurance that our ecological systems will not be harmed, and Utah taxpayers will not be left with the burden of remediation should an operator default on their obligations.

We urge you to move quickly to finalize and adopt the rule, and would appreciate your serious consideration of these clarifications and modifications to insure the rule is fair, balanced, and justifiable to the people of Utah that you represent on the Board.

Gratefully and Respectfully,

A handwritten signature in black ink, appearing to read 'Soren Simonsen', with a stylized flourish extending to the right.

Soren Simonsen
Chair Pro Tem, Board Member and Financial Officer