

Matt Stefanich

According to the WDEQ water quality website, the Division "works to keep Wyoming's water clean by monitoring and protecting surface- and groundwater in the state." I ask the WDEQ perform its due diligence and deny this permit. This proposed draft permit is inadequate and does not follow established law, policy and regulations of the Clean Water Act, the Wyoming Environmental Quality Act, and the Department's own rules and regulations implementing those laws.

Please consider and incorporate the Bergman and Meyer (2019) Memorandum (found in the Wyoming Outdoor Council comments to this draft permit) as an expert and objective guide on the inadequacies of Aethon Energy's analyses. The WDEQ may also use this memorandum to bolster its own requirements to provide a more current, accurate and meaningful evaluation of this permit to ensure WDEQ's core responsibilities. Review of existing data demonstrates multiple and major deficiencies, as well as a lack of knowledge on reasonably expected negative ecological impacts, both hydrological and biological, related to this wastewater discharge proposal.

As the agency responsible for maintaining Wyoming's environmental quality, and given inadequate analyses, reasonably expected negative (and potentially illegal) impacts, as well as unknown impacts, there is no way to legitimately approve this permit. Given the best available science regarding issuance of this draft permit, the WDEQ cannot be reasonably sure existing law, policy and regulations can be adhered to and State water lawfully protected.

Thank you for the opportunity to comment.

Matt Stefanich