

Phyllis Roseberry

I have submitted comments previously, but attended the public meeting in Thermopolis and gained additional information. Therefore, I'm submitting more comments.

We have lived on the Gooseberry Creek outside of Worland and Thermopolis for about 40 years. We have fished, swum and camped at Boysen for many years. The water quality of Boysen Reservoir and the Wind River are very important to us.

The DEQ has a legal responsibility to protect our water. You must look at all alternatives to reach that goal including actions that may reach outside of your agency. Thus, a major consequence of your permit issuing decision must be considered. This is the CUMULATIVE impacts to the water quality. These cumulative impacts should be the point of reference for issuing the permit not the individual discharge from the Aethon field.

Also, the baseline water quality from which to gauge impacts from the current permit request should be from the most pristine historical water quality. You have not utilized the historic water quality measurements from the USGS at their Dubois, below Boysen Dam and Basin measurement stations. You have used the most impacted time water quality contamination as your baseline for permit application impacts. That is unacceptable from a drinking water, recreational and wildlife uses for this water.

Two alternatives must be considered when analyzing this permit application. These alternatives have not been analyzed to date. One is to treat ALL the produced water from this field not just some of it and assuming dilution will take care of the rest. You should require the permittee to build sufficient treatment plants to treat all the produced water with no assumption of dilution to solve the contamination problem. Another alternative is to reinject the produced water back into the ground level from which it came. This alternative would result in NO contamination of surface water. The DEQ person at the Thermopolis meeting indicated this alternative must be permitted by the State Oil and Gas commission. So what about State level coordination between agencies? The answer provided in Thermopolis was very bureaucratic. Because this action must be permitted by another State agency, it is infeasible? Really?! The State agencies cannot coordinate their actions for the welfare of its citizens? Is the Governor aware of this bureaucratic snafu??

This permitting process is not thorough, rigorous or consistent with the DEQs responsibility to The Clean Water Act or the citizens of Wyoming. The rationale presented in Thermopolis appeared to be to allow Aethon to be permitted for the maximum allowable contamination within questionable baseline and cumulative effects standards.

Also, there is a false dichotomy between jobs, the economy and water pollution for all citizens to endure. This field can be developed, there can be jobs but the permittee may have to take reasonable steps (more produced water treatment plants or reinjection) to protect the water quality for everyone. If it costs the company more \$ so be it. The DEQs job is not to facilitate the bottom line profit maximization for the operator, it is charged to protect the water quality for the citizens of Wyoming.