17 June 2019

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Water Quality Division

Jason Thomas Wyoming DEQ, Water Quality Division 200 West 17th Street Cheyenne, WY 82002

Dear Mr. Thomas:

I am writing about the proposal to allow Texas-based Aethon Energy Company to dump up to 8.27 million gallons per day of fracking wastewater from its Moneta Divide oil and gas field into streams that flow into Boysen Reservoir and the Wind and Bighorn rivers. I am a retired professor who has studied and taught about water quality in Wyoming, and am co-author of the Wyoming Water Atlas first published in 1990. I am familiar with the general issue and the specific area under question. I write to you not as a professor (I am retired), but as a former citizen of the State of Wyoming.

I strongly urge the Wyoming DEQ to consider safer alternatives for the disposal of polluted water from the Moneta Divide oil and gas field. This oil and gas field has already impacted Alkali and Badwater creeks with water containing high TDS concentrations. Boysen Reservoir is used for swimming and boating, fishing, municipal drinking water, and irrigation agriculture. The Wind River (about Boysen) and the Bighorn River (below Boysen) are Class 1 rivers...blue ribbon trout streams. What are the costs to fisheries, agriculture, and the drinking water at Thermopolis? As you know, the DEQ has rules to prohibit the degradation of water quality in Class 1 surface water. However, the proposed wastewater discharge would cause such degradation to occur. Please perform the necessary analysis to document the negative social and economic costs.

Respectfully submitted,

Dr. Richard A. Marston

University Distinguished Professor Emeritus

President 2005-06, Association of American Geographers

Co-Editor-in-Chief Emeritus, Geomorphology

Fellow in AAAS, AAG, AGS, GSA, The Explorer's Club, Royal Geographical Society

448 Seville Ave.

Newport Beach, CA 92661