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1509 Coburn Ave.  
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Jason Thomas  
Wyoming DEQ Water Quality Division  
200 W. 17<sup>th</sup> St.  
Cheyenne, WY 82002

June 14, 2019

Re: Comment letter – Aethon Energy Operating LLC – WYPDES Permit WY0002062

Dear Mr. Thomas:

I am a resident of Worland, but work in Thermopolis. I have reviewed the Water Quality Compliance Analysis prepared by ERM for the Discharge Permit for Aethon's Moneta Divide proposal, and wish to make the following comments:

1. **The Water Quality Compliance Analysis fails to adequately address the Class 1 waters between the Dam and the Town of Thermopolis.** These provide potable water for Thermopolis and its environs, support a viable sport fishery, and are used to irrigate agricultural crops.
2. **In approving this Discharge Permit, DEQ would be violating its own Anti-degradation Policy.** As I read it, that Policy states that no permitting shall occur upstream of any Class 1 waters unless the discharge itself meets Class 1 standards.
3. **Future releases from Boysen Dam are likely to contain concentrated amounts of sedimentation, chlorides, heavy metals, and other contaminants.** The Water Quality Compliance Analysis assumes that all mixing would occur in Badwater Bay, then suddenly be homogenous throughout the entire reservoir. It ignores the effects of stratification, a known factor in Boysen Reservoir, which can prevent thorough mixing.
4. **The Water Quality Compliance Analysis fails to take into consideration all other discharges into Boysen.** A true assessment of cumulative impacts to water quality in Boysen must first quantify all inputs. These include Wind River, the "grandfathered" discharges from Frenchie Draw, and all EPA-permitted discharges from the Wind River Reservation.
5. **Elevated salinity would be detrimental to downstream fisheries, domestic water, and agriculture.** Irrigators below the dam are already contending with

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high chloride concentrations, and this project would force DEQ to raise the upper limits of allowed levels of salinity in Boysen. That would be unacceptable.

6. **Irreparable damage would be inflicted upon the sauger breeding area in Badwater Bay.** I understand this is Wyoming's last native population of sauger, and that they range from Badwater Bay upstream into the Wind River Range. It must be noted that Boysen Reservoir's fisheries are already heavily impacted, and that

In Conclusion, the Moneta Divide project could be a "win" for all Wyoming residents – if its production water is either treated to Class 1 standards and piped to Boysen, as was proposed by Encana five years ago, or injected into a suitable aquifer. The proposed method of discharging produced water – untreated, and into Boysen via streambeds – is irresponsible, and unacceptable. From where I sit, it sure appears DEQ is not doing its job.

Thank you for the opportunity to comment.

Sincerely,



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