



United States Department of the Interior

BUREAU OF RECLAMATION
Great Plains Region
Wyoming Area Office
P.O. Box 1630
Mills, WY 82644-1630



IN REPLY REFER TO:

WY-4300
2.1.4.17

APR 24 2019

Mr. Jason Thomas
Water Quality Division
Wyoming Department of Environmental Quality
200 West 17th Street
Cheyenne, WY 82002

Subject: Comments on Draft Permit Number WY0002062 to Aethon Energy Operating, LLC

Dear Mr. Thomas:

The Bureau of Reclamation Wyoming Area Office (WYAO) is taking the opportunity to comment on Draft Permit Number WY0002062 (Permit) to Aethon Energy Operating, LLC.

The Wyoming Department of Environmental Quality (WDEQ) indicates that the Permit would increase the maximum allowable discharge volume of produced water into Alkali Creek, which flows into Badwater Creek and then into Reclamation-owned Boysen Reservoir. Furthermore, there is explanation that there will be no measurable effect on water quality below Boysen Dam, and that antidegradation monitoring and reviews would provide a level of protection to the receiving waters, including the reservoir, that are consistent with the antidegradation provisions of surface water quality standards.

As the WDEQ is responsible for enforcing water quality standards in the State of Wyoming, Reclamation relies on the WDEQ for ensuring these standards are met. Reclamation has no jurisdiction related to the water quality that enters Boysen Reservoir. We want to make sure WDEQ knows how important Boysen Reservoir water quality is to Reclamation irrigation water contractors downstream of the reservoir, as well as to the other irrigation water users, recreationists, and fishery at and below the reservoir.

Therefore, Reclamation provides four comments. We ask that the WDEQ: 1) Ensures the evaluation to support the conclusion of no negative effects to water quality and issuance of the Permit is sound. 2) Continually monitors to ensure that the hypothesis is correct and that there are no negative effects to water quality. 3) Take immediate corrective action if negative effects are found. 4) Take enforcement action to correct any violations of the Permit.

We thank the WDEQ for the opportunity to comment and the important job performed to protect water quality at Boysen Reservoir. Should you need any clarification on our comment, please contact Laura Schwieger at 307-261-5664.

Sincerely,



Carlie A. Ronca
Area Manager

cc: John Snyder, President
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