

Ruth Shepherd

RE: Moneta Divide oil and gas field pollutant discharge permit - WYPDES Permit Number WY0002062 (Aethon Energy).

The time is ripe for Wyoming's environmental, regulating agencies (e.g., DEQ) to begin making decisions that are the best for the State, and not just the company applying for the permit. We really only have one long-term asset in this State, and that is our natural resource environment, which is dependent upon our water resources. Any decision that DEQ takes must include analysis of chemical pollution discharges into what are sediment loaded but, otherwise, pretty clean waters in the State. If DEQ permits what is expedient in the short-term, without recognizing that the consequences of chemical water pollution are with us for the long haul, there is a disservice to the State of Wyoming's economic future. At some point there will have to be a massive reverse osmosis cleanup of the Boysen Reservoir and the Wind River. Why set us up for that outcome?

The Laramie Rivers Conservation District (LRCD) just completed the work on a brownfield clean up of the old Yttrium Plant. According to the DEQ field representative that we worked with, it is doubtful that siting a building and shop on this land would be feasible without a huge cost to bring in back-fill to cap the contaminated site because of the high water table. This is an old industrial site, but I presumed that the State DEQ uses better science and regulation before permitting chemical discharges into Wyoming's aquifers and exposed water bodies in the current era.

DEQ is going to have to implement sound science before permitting chemical discharges into Wyoming's water bodies. It was not acceptable in the 1920s-1940s when the Yttrium plant and later Standard Oil discharged chemical pollutants into the aquifer draining into the Laramie River. It flies in the face of logic that, in today's permitting process, the State would allow the chemical discharge proposed in the Moneta Divide O&G field into Boysen Reservoir.

Consider the economics of the proposed decision. LRCD spent a little over \$500,000 in local, State and Federal funds to clean up two and a half acres of contaminated soil overlaying the aquifer. Run the numbers; what would it take future generations in funding costs to clean up two and a half acre feet of water/sediment in the Boysen Reservoir? Maybe it is time for Wyoming to leverage the O&G companies to provide funding for a toxic waste disposal facility. Or the State negotiates on behalf of O&G companies for more efficient distribution to the existing facilities in the Western U.S. Simply permitting chemical discharge into the State's water bodies is not the path that Wyoming should be taking based on our uninformed practices in the past. Please consider the present uses of Boysen Reservoir, as well as the future cost of chemical contamination into our most valuable resource, WATER!

Thank you for taking time to read and register my comments on the Moneta Divide O&G field.

Cordially,
Ruth Shepherd