

July 3, 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:

Thank you for the time you spent with our staff discussing the draft Aethon Energy Operating Permit as well as hosting the public open houses.

We understand that the proposed Aethon permit is good for five years and after five years it will be reevaluated for renewal. The model used to prepare the draft permit is based on the worst case scenario for build out and that the Wyoming Department of Environmental Quality (WYDEQ) feels that full energy build-out is unlikely in the five years of the permit coverage. Currently, WYDEQ believes that surface water quality standards will be met. As part of the permit process Aethon did substantial modeling. We are aware that there may be modeling efforts offered during the public comment period and we are confident that WYDEQ will review all public comment.

Wyoming State Parks and Cultural Resources (SPCR) has no jurisdiction related to the water quality that enters the Boysen Reservoir. However, SPCR encourages Wyoming residents and tourists to visit the reservoir and park facilities to enjoy water recreation activities. It is our goal to work with federal and state partners to ensure park and reservoir visitors have a safe visit.

With that understanding, we still have concerns that the expected permit impacts are based upon modeling. Modeling is a great way to predict future impacts, however, there is a possibility this modeling could have missed something. With the amount and quality of water that could potentially reach the Boysen Reservoir it is our hope that this permit is approached with caution and substantial oversight. Both the reservoir and watershed could be impacted if the model is incorrect.

State Parks and Cultural Resources primary concern is that appropriate monitoring would be required in the draft Aethon permit. We recommend that if the permit is approved, sufficient monitoring is in place to address any incorrect assumptions and needed changes to the permit are addressed quickly.

A robust monitoring schedule related to water quality, watershed integrity, and fishery impacts is critical to assure that the model and assumptions are indeed correct that there are no negative effects on water quality. An adaptive monitoring plan should be considered in the final permit so that immediate corrective action can be taken if negative effects are found and addressed.

Mark Gordon | Governor
Darin J. Westby, P.E. | Director
Domenic Bravo | Administrator

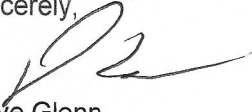


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Although WYDEQ does not believe that the permitted discharge will affect algae blooms, we do not want to take our eye off the algae bloom problem either. There are often unintended and unexpected consequences that could occur with the additional discharge.

We are available to discuss any issues that come up that may affect Boysen State Park recreation opportunities.

Sincerely,



Dave Glenn
Deputy Administrator
Wyoming State Parks and Historic Sites

Mark Gordon | Governor
Darin J. Westby, P.E. | Director
Domenic Bravo | Administrator



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