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Department of Environmental Quality

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Water Quality Division

June 18, 2019

Jason Thomas,
DEQ/WQD,
200 West 17th Street, Cheyenne, WY 82002

Jason,

The following questions are in regard to the Moneta Divide Project. These are my concerns raised from the meeting in May as well as information that I read in the permit renewal.

Questions for DEQ and the BLM on the Moneta Divide oil project

1. The City Thermopolis relies on the Big Horn River for a majority of our potable water. What is the immediate and long range potential for contamination of this water source?
2. Has there been a baseline study on the impact and water quality of the Wind and Big Horn Rivers downstream of the Boysen Reservoir? If so when was the study done?
3. I know that there are other areas of the reservoir where waste water is permitted to enter the reservoir, oil field as well as agriculture. Has there been a testing or studies of the water quality for the entire area of the reservoir?
4. Can the discharge water be collected in evaporation ponds and allowed to evaporate rather than letting the water flow into Boysen Reservoir?
5. Does the Wyoming Game and Fish have any concerns on how the discharge from the Moneta Divide Project may affect the fish populations in Boysen Reservoir and the downstream fisheries below the Boysen Dam, in the Wind and the Big Horn rivers.
6. How would the Moneta Divide Project affect surface water and ground water resources?
7. Why can't the waste water be pumped back into the ground where it came from?
8. Will the Wyoming Department of Environmental Quality do regular water quality checks at the area where the bad water creek enters Boysen Reservoir, several areas in bad water bay and at the Boysen Dam, as well as downstream in the Wind river and the Big Horn river. How often will the testing be done?

9. As water levels change in the reservoir, raising and lowering the water level to anticipate spring runoff and drought conditions, leaving large portions of bad water bay dry will the waste material be left behind?
10. When water level comes back up will the accumulated materials become toxic to that area of the lake and possibly spreading to other areas of the reservoir?
11. Will the DEQ and the BLM continue to monitor the discharged water that flows down Bad Water creek before it enters Boysen and then several locations around Bad Water Bay?
12. It concerns me that a major source of drinking water is being used to dump oil field waste. Why is it okay to use our water sources as dumping grounds for waste? Once the water source becomes polluted we will lose that valuable resource for ever.
13. In 2017 the Moneta Divide project did an environmental impact statement. In November of that year Aethon said that current production (820 wells) is being constrained because only a limited amount of wastewater can be discharged onto the surface. The company has a water treatment plant that can process 25,000 barrels, are the restrictions going to apply to the upwards of a trillion gallons of wastewater that may be produced by the drilling of the additional wells? (4250)
14. Bottom line, if this is a renewal of an existing permit why are the requirements for the renewal seem to be less restrictive than they are for the original permit. Water purification, erosion etc.?

Thank you for your time.



Mike Chimenti

Thermopolis Mayor