

February 17, 2020

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

Subject: Moneta-Divide Gas Field, Permit No. WY0002062, Revised Draft Permit

Dear Mr. Thomas:

My name is Sandy Luers and I have lived and worked in Fremont County most of my life. I married a Fremont County native and we love the great outdoors that is an important part of Fremont County. We hunt, fish, camp and basically enjoy the freedom of exploring the open uninhabited lands that our county provides. We have chosen to live here because of these attributes and the ability to have employment that provides a modest, adequate living. Of course we wish to see our natural environment and its abundant wildlife sustained where possible and become even more robust. The modest employment that we and many of our Riverton neighbors enjoy hinges on that availability of employment largely made possible through wise development of our states abundant resources.

I personally believe that DEQ's revised discharge permitting of the proposed Moneta Divide opposes both of my major reasons for living here, a healthy natural environment and sustainable employment making it possible for us to live here. Because of that, I oppose the revised second draft, but do support the initial draft proposal WYPDES permit No. WY0002062. If the State of Wyoming is to make best use of the resources it has, I find no defensible reason why this permit should be allowed to thwart development of this resource. The following are reasons for my decision:

1. I question whether DEQ has the actual field gathered information to render its decision in its present form.
2. In the public information presented I find no in-field data measuring what quantity of the produced flow, if any, would traverse the 40 mile long reach of Badwater Creek from the proposed field and actually reach Boysen Reservoir, much less the Wind River's Class 1 waters below the dam which I personally relish fishing.
3. I prefer that in-stream measurements be made following USGS protocol to determine the stream's annual hydrograph.
4. I believe that the DEQ could take a much more defensible position of setting limits on actual measured flow reaching Boysen, both in quantity and quality, at a designated gauging station, situated perhaps at Badwater's crossing of Highway 26.
5. Should produced water be shown to reach Boysen and not meet reasonable standards, the proposed field could then be required to reduce flow to acceptable levels based on actual flow data as opposed to speculative computer models.

In the DEQ Summary of Public Comments, I find the WDEQ Response on page 1 frankly dismissive of the public comments, some which were noted at the Riverton public meeting held at CWC.

While it is not scientifically defensible data, in my 65 years of living here I have never seen free flowing water in Badwater Creek, except during the spring runoff period and occasional thunderstorms events. Finally, I question Badwater Creek being classified as a Class 2 stream. It does not meet the criteria set out in the Table on page ii of DEQ's June 21, 2001 Surface Water Classification List. I don't know how fish could survive in the creek near or downstream of the Frenchie Draw Field since it is dry much of the year.

I have full confidence that the gas industry can and will follow appropriate technology to provide adequate safeguards to the natural environment which we all enjoy. Denying the proposed permit harms rather than helps our state's ability to maintain both its natural environment and its human environment. Please approve the initial draft of the proposed discharge permit so that we can enjoy continued employment, benefits brought by the resulting tax revenues and an enhanced natural environment.

Sincerely,

Sandy K Luers