

Thomas Davenport

I support and believe it is the duty of the Wyoming Department of Environmental Quality to approve the initial draft of the Aethon (Moneta Divide) Proposed Discharge Permit and manage the discharge within acceptable limits for the benefit of Wyoming citizens

Thomas Davenport
118 Valley Circle
Riverton, WY 82501

February 11, 2020

Jason Thomas, WYPDES Permitting Supervisor
WDEQ – Water Quality
200 West 17th Street
Cheyenne, WY 82002

Re: WYPDES Permit No. WY0002062, Comments to Revised Draft Permit

Dear Mr. Thomas:

Being a long time resident of Wyoming, graduate of the University of Wyoming in Engineering, having businesses in Fremont, Natrona and Carbon counties I am extremely aware of how permitting affects business. I do **NOT** support the **revised second** draft issued 1/17/2020, which does not increase TDS load limits effectively preventing Aethon from expanding its operations at Moneta Divide. The initial draft, which I supported, issued in March of 2019, allowed for an increase in Total Dissolved Solids (TDS) load limits and protected the environment.

Seemingly innocent reports on the permit are grossly misleading, as in the Wyoming Tribune Eagle:

March 28, 2019 - Millions of gallons of tainted water carrying thousands of tons of oilfield pollutants could flow into Boysen Reservoir and the Wind River each month under a proposed Wyoming Department of Environmental Quality permit...

Here the author has done his best to paint a picture of poisonous, oil laden water flowing down pristine virgin creeks, choking off all life until it reaches the reservoir to wreak its' havoc there. A total misrepresentation of the situation that is dealing with TDS as salts/alkali, which are all too common throughout the surface formations that dominate the Wind River Valley, not oilfield pollutants! The early pioneers named these creeks Alkali, Badwater and Poison Creek for a reason, not to mention the latter runs through Alkali Flats. This gives a historic record to the existence of alkali in surface runoff water. Research on the Wind River, at Riverton, yields an average of 1650ppm TDS so changing requirements in the Revised Draft Permit to 260mg/L, which is equal to 260ppm, does not take into account this initial turbidity of the host river or any other area steam, **ridiculous!** It does not account the benefits of this water for game and livestock in the area, that the water would not reach Boysen in most months, that any extra flow would diluting the coliform and hard mineral concentrations in the Big Horn River North of Thermopolis and benefits from dilution of existing nitrates, phosphates, other farm/ranch wastes flowing into Boysen from other sources. All waters in Boysen would be of good irrigation/stock quality for surrounding lands and downstream users.

I believe it is the duty of the Wyoming Department of Environmental Quality to approve the initial draft of the Aethon (Moneta Divide) Proposed Discharge Permit and manage the discharge within acceptable limits for the benefit of Wyoming citizens.

Sincerely,

Thomas Davenport