

Richard Gard

Please consider the following as our general comments as it pertains to Revised Draft Permit WY0002062.

Historic beneficial use of this produced water from the applicant has been utilized for more than sixty years and represents existing background conditions. WDEQ should not forget or disregard the fact that the conditions have been in existence for an extensive amount of time. In doing so, the WDEQ significantly impacts the existing activity of the applicant company. This impact further serves to negatively affect the economy of the State and the surrounding region by essentially "moving the target" for the applicant with absolutely no benefit to the applicant over the already existing conditions of the permit. This seems punitive in nature.

The revised draft permit does significant harm beyond the damage done to the existing operations of the applicant. The changes proposed further serve to illustrate to all potential extraction businesses that the State of Wyoming is not only "closed for business" but also will actively take any opportunity to hinder extraction activity within our State. These activities are at the core of our economy and continue to provide our State the means to function effectively.

Furthermore, we have seen almost no assistance from the State and its individual agencies (few exceptions) towards finding solutions. We have seen stall tactics and an overall disinterest in assisting the applicant towards acceptable solutions. This is very evident in the additional requirements proposed within the draft permit. It is not suggested that we disregard health and safety of new activity but it does not seem that participating agencies have appropriately worked to find a workable way forward to all.