



TAKE ACTION

Tell the BLM: No Discharge to Surface Waters!

BACKGROUND

The BLM has prepared a draft Environmental Impact Statement for the Moneta Divide Project — a proposal to drill up to 4,100 more wells in the central Wyoming oil and gas field (see the draft EIS [here](#)). We've identified many serious flaws in the BLM's environmental analysis — regarding wildlife habitat, air quality, and especially water quality. The draft EIS reveals that the scale of Aethon's proposed development — 4,100 wells — requires managing a massive volume of produced water associated with the targeted oil and gas formations without proper assurances of protecting existing clean water resources.

For more background and analysis of the Moneta Divide Project and the proposed wastewater discharge plan, read this [Wyoming Outdoor Council blog post](#).

POINTS TO CONSIDER MAKING IN YOUR COMMENTS TO THE BLM

No discharge to surface waters. Dumping contaminated produced water into Alkali and Badwater creeks is irresponsible and environmentally damaging. The draft EIS should be revised to include analysis of a “no discharge to surface waters” alternative. There are many options besides surface disposal, including deep-well injection, evaporation ponds, recycling and reuse, and advanced treatment technologies. By law, all reasonable alternatives must be studied.

Analyze and disclose full environmental impacts of wastewater discharge. The draft EIS does not evaluate the environmental impacts of Aethon Energy's proposed wastewater discharge permit pending at Wyoming DEQ — which would allow up to 8.27 million gallons per day of untreated and/or partially treated produced water to be disposed of in Alkali and Badwater creeks. This is a significant omission that the BLM must correct in a revised draft EIS.

Analyze and disclose full environmental impacts to downstream waters and uses. The draft EIS does not evaluate water quality impacts to Boysen Reservoir or to downstream water uses. The BLM must evaluate the impacts from the potential introduction into Boysen Reservoir of harmful chemicals used in hydraulic fracturing. These chemicals are contained in flowback water (a component of produced water) and may not be fully removed from the waste stream.

HOW TO SUBMIT COMMENTS

BLM's comment portal (preferred method): [Click this link to the BLM's online comment portal.](#)

By email: BLM_WY_LD_Moneta_Divide_EIS@blm.gov

By U.S. Mail: *Moneta Divide Project Manager, BLM Lander Field Office, 1335 Main Street, Lander, WY 82520*