



October 11, 2013

Wyoming Oil and Gas Conservation Commission
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Dear Supervisor Black,

Please accept these comments from the Wyoming Outdoor Council and Environmental Defense Fund. The Wyoming Outdoor Council is Wyoming's oldest environmental advocacy organization. In much of our work, we advocate for policies that provide for Wyoming's energy development coupled with the necessary consideration and protection of public health and our state's inimitable and irreplaceable land and water resources. EDF's mission is to preserve the natural systems on which all life depends. Guided by science and economics, we find practical and lasting solutions to the most serious environmental problems.

As stated in our previous comments on the draft rule, we are very pleased to see the Commission moving forward with a state groundwater testing rule. We would also like to thank the Commission for taking into consideration our earlier suggestions during the informal public comment period.

It is clear that this rule can provide the state, industry, and Wyoming residents important information about baseline groundwater quality and monitoring data as oil and gas development proceeds. With its adoption, this rule will further establish Wyoming as a leader on management of oil and gas operations and the protection of water resources. We commend the work that has been done in this effort and, while we do feel some improvements are needed, we offer our strong support for the general approach outlined in the rule.

On the whole, we agree that the rule would create a strong, scientifically-valid groundwater testing program. The Wyoming draft rule's statewide applicability, use of a radial approach without an artificial cap on the number of wells tested, ability to rely on the experienced

