



September 13, 2009

Mr. Clinton Dworshak
Division of Oil, Gas and Mining
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Sent via fax: 801-359-3940

Re: Proposal for wastewater injection at Westwater Farms

Dear Mr. Dworshak,

Please accept this letter of public comment from Living Rivers, Center for Biological Diversity, and Grand Canyon Trust concerning the proposal to inject wastewater, from regional oil and gas drilling operations, at Westwater Farms in Grand County, Utah.

Considering that approximately 2.5 billion gallons of fluid could be injected into this bedrock over a period of eleven years, and that the Colorado River is only 5 to 6 miles away from the proposed injection site, we consider that operations from this facility could render harm to endangered species and to the drinking water supplies of downstream users.

The operations of this facility, as proposed, will likely threaten the water quality of the Colorado River over time through seepage from direct pressure and fracturing in the host bedrock.

For example, the consultant to Westwater Farms, Dr. Wayne Downs, expressed concern in his report to Grand County that the Entrada sandstone could transport wastewater to the Colorado River. His report also confirms that some water is currently discharging from the Entrada Sandstone into the Colorado River. The source of this discharge to the Colorado River is unknown.

The potential risk to this vital source of water in arid lands is too great, and for this reason we strongly suggest that this permit be denied.

Additionally, the Colorado River is managed by state, federal, and international agencies for the benefit of 30 million people and the recovery of endangered and threatened species.

We ask that you make an assessment of all the potential cumulative impacts from this facility and consult directly with the Utah Division of Water Rights, the Utah Radiation Control Board, and the Utah Division of Wildlife Resources. The analysis should also include the cumulative impacts from existing and proposed wastewater facilities in Grand County, including sections currently managed by State Institutional Trust Lands Administration.

Furthermore, it would be appropriate to consult with the Salinity Control Forum, US Geological Survey, US Fish and Wildlife Service, Bureau of Land Management, National Park Service, Bureau of Indian Affairs, and various water purveyors such as the Southern Nevada Water Authority, the Metropolitan Water District and the Central Arizona Project.

Considering the damage that similar operations have caused to drinking water supplies in Wyoming, we view this issue to be a serious matter that requires a rigorous analysis with all the identified stakeholders and for the expertise they can provide toward protecting our water resources.

If we can provide any assistance to you, please do not hesitate to contact us.

Sincerely yours,

John Weisheit
Living Rivers, Conservation Director
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Moab, UT 84532
435-259-1063

Robin Silver
Center for Biological Diversity, Co-Founder & Board Member

Laura Kamala
Grand Canyon Trust, Utah Program Director

Cc via email:
Kristine Killoy, Grand County Planner
Mark Wright, Grand County Engineer
Jean Binyon, Chair of Grand County Planning and Zoning
Grand County Council