Carin CK
EFR MH
To: Bert Garcia

Mr. Robert A. Bennett, State Director
Bureau of Land Management
Wyoming State Office
5253 Yellowstone Road
Cheyenne, WY 82009

Mr. Robert E. Roberts,
Regional Administrator
EPA Region 8
1595 Wynkoop Street
Denver, CO 80202

Randy Eresman
President & Chief Executive Officer
EnCana Oil & Gas Inc
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Calgary, AB T2P 2S5

Larry Nichols
Chairman & Chief Executive Officer
Devon Energy Corporation
20 North Broadway
Oklahoma City, OK 73102-8260

RECEIVED
JUL 17 2008
USEPA RA'S OFFICE
RE-08-000-9540-EPR

July 15, 2008

Re: Request for Human Health Impact Assessment.

Dear Sirs:

As oil and gas development increases in Fremont County, so does concern for human health. The undersigned citizens are especially concerned as neither the Final Environmental Impact Statement for the Wind River Gas Field Development Project, Fremont County, Wyoming, December 2004, nor the Draft Environmental Impact Statement, Bureau of Indian Affairs, Wind River Agency, Riverton Dome Coal Bed Natural Gas and Conventional Gas Development Project, September 2007, fully address the potential human health consequences of on-going and proposed natural gas development activities in Fremont County.

What makes concern even greater are the known impacts to groundwater and private drinking water wells in the Pavillion/Muddy Ridge gas field area, where approximately 400 people live. Along with huge dust problems from traffic on access roads, and diesel exhaust from vehicles and engines used to power machinery at oil and gas facilities, folks living as close as 200 feet from gas wells also fear their health is being impacted by the hazardous air pollutants such as polycyclic aromatic hydrocarbons (PAHs), nitrogen oxides (NOx), and volatile organic compounds (VOCs) emitted by oil and gas operations. These compounds are known to cause serious health problems, yet none of these emissions are being captured through green completions. In addition to the dense oil and gas development in the Pavillion area, 346 CBM and conventional gas wells are proposed in the Riverton Dome Coal Bed Natural Gas and Conventional Gas Development Project. This proposed exploration and development will substantially elevate further risks to human health in Fremont County. It is critical that management decisions include full assessment of impacts to human health in Fremont County in order to provide protection to all citizens living in close proximity to exploration and development. Health Impacts Assessments are designed to assess and address those impacts.

It is our understanding that in 2007 the U.S. Interior Department's Mineral Management Service completed a public health impact assessment of impacts from oil and gas

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activities in Alaska. Also, the International Petroleum Industry Environmental Conservation Association has produced, A *Guide to Health Impact Assessments In the Oil and Gas Industry*, recognizing appropriate responsibility for human health in energy development regions, and Shell Oil Company requires health impact assessments "prior to all new projects and major facility development, as well as prior to the significant modification or abandonment of existing facilities." As exploration and development increases in Fremont County, our citizens must have the protection that these assessments provide.

We strongly recommend that the HIA protocol utilized by the World Health Organization and U.S. Centers for Disease Control be adhered to, in order to assure comprehensive and thorough human health impact analysis. With reference to legal interests, such analysis should fulfill the broader human health analysis and disclosure requirements of the National Environmental Protection Act and Community Right to Know Act.

We look forward to working with you to develop a comprehensive health impact assessment.

Thank You,

Signature	Title or Affiliation
[signature]	Land Owner & School nurse
Judith M Bryant	Land Owner & School nurse
[signature]	Mayor of Pavillion
Signature [signature]	Title or Affiliation CHIROPRACTOR, NATUROPATH
Signature Ralph E Hopkins	Title or Affiliation RALPH E. HOPKINS, MD
Signature [signature]	Title or Affiliation FREMONT COUNTY TREASURER
Jolenely Catron	Executive Director Wind River Alliance
[signature]	Chair: Pavillion Area Concerned Citizens and local landowner

Cc: Governor Dave Freudenthal
State Capitol Building
200 West 24th Street
Cheyenne, WY 82002

Mr. John Corra, Director
Wyoming DEQ122
West 25th Street
Herschler Building
Cheyenne, WY 82002

Mr. Ramon A. Nation
Bureau of Indian Affairs
Wind River Agency
P.O. Box 158
Fort Washakie, WY 82514

Mr. Andrew Dannenberg,
Associate Director for Science
Centers for Disease Control
Mail Stop F60
Chamblee, GA 30341

Dr. Brent D. Sherard, Director
Wyoming Department of Health
401 Hathaway Building
Cheyenne, WY 82002

Randall B. Luthi, Director
Minerals Revenue Management
United States Department of the Interior
P. O. Box 25165
Denver, CO 80225

EPAPAV0054327

Fremont County Public Health

Healthy People In Healthy Communities

June 17, 2008

Mr. John Fenton, Chair
Pavillion Area Concerned Citizens
202 Indian Ridge Road
Pavillion, WY 82523

Dear John,

This letter represents the support of Fremont County Public Health to endorse your request for completion of a WHO/CDC Health Impact Assessment for the Pavillion and Riverton Dome Coal Bed and Natural Gas Development projects.

Essential services of Public Health Departments are to;

- Monitor health issues and understand health issues facing the Community
- Protect people from health problems and health hazards
- Give people information they need to make healthy choices
- Engage the Community to identify and solve health problems
- Develop Public Health policies and plans
- Enforce Public Health laws and regulations
- Help people receive health services
- Maintain a competent Public Health workforce
- Evaluate and improve programs and interventions
- Contribute and apply the evidence base of Public Health

The Public Health model of Practice is to begin with the assessment stage of the scientific method of inquiry. To help to identify any existing or potential health issues impact, this agency requests that this assessment be completed and the results be shared with those agencies who are required to provide assistance.

Sincerely,

Martha E Stensaas

Martha E. Stensaas, RN , County Manager

Lander Office
450 North 2nd, Room 350
Lander WY 82520
(307)332-1073 Fax: (307)332-1064
Outlying Areas 800-967-2297, Ext 1073

Riverton Office
322 North 8th West, Upper Floor
Riverton WY 82501
(307)856-6979 Fax: (307)856-6850
Outlying Areas 800-967-2297 Ext 3620

In addition to the formal request for a Human Health Impact Assessment, we've included the following statement of concern signed by 93 residents of the area. While this statement doesn't contain a request for action on your part, it most certainly--and accurately--reflects the sentiments of people most directly affected by the increasing oil and gas development activity in their neighborhood. Please include this statement in your files, because it demonstrates the level of local concern regarding the situation that confronts local residents now and in the future. Thank you.

For decades, wells on the Meeks and Locker ranches near Pavillion had reliably delivered clean, clear water for their homes, stock tanks and gardens. But that ended in early 2005, shortly after EnCana Oil & Gas USA took over development of the surrounding gas fields.

Almost immediately, water in the Meeks home began to stink. It left ugly stains in the sinks and tubs. Louis Meeks and his family stopped drinking it. At the Locker home, the water ran gray, coating hoses and fittings in a greasy black slime.

Common sense and everyday experience would lead most of us to conclude that there's a cause and an effect on those Pavillion-area ranches. But most of us don't work for a multinational oil and gas conglomerate—or, for that matter, for the Wyoming Department of Environmental Quality.

With all the crafty calculation of an O.J. Simpson defense lawyer, EnCana's "geology consultant" found all kinds of other explanations for the degradation of the groundwater the Meeks and Locker families used to rely on. On contract to the developer, Anthony Gorody pointed his finger at the families' neighbors—and the families themselves. Those folks had used pesticides on their pastures, he mused accusingly. And what about those household septic systems?

As for tests Meeks himself had paid for, Gorody concluded with no apparent basis that the findings were tainted. Glycol—an ingredient in the fluids oil and gas companies use to break up underground rock to release their precious gas—had been found in the samples Meeks sent in, Gorody conceded. But, he added, it must have come from someplace else. It was probably due, he finally decided, to sloppy scientists and technicians who had introduced it in the lab.

And the state's environmental bureaucrats? Paralyzed by doubt, boxed in by rules and regulations the oil and gas industry has helped them write, they appeared to accept the self-serving questions Gorody and other industry apologists raised. Problems clearly plagued the Meeks and Locker water supplies, some of them agreed, but it was way too early to pin those problems on any definite cause.

In the meantime, though, they've allowed EnCana to put its so-called "voluntary remediation program" on hold—just as that program was beginning to produce solid findings of contamination.

In other words, it's all business as usual in Wyoming, with oil and gas calling the shots while landowners and residents are left to worry about their property, their ranch productivity and their health.

We've all been down this road, too many times before. It's time we found another route.

For starters, we can acknowledge that oil and gas development is here to stay. The industry is vital to the state, and to the nation. Wyoming depends on the revenue this activity produces, and consumers across the country need the energy it supplies.

But that simply can't be the end of this discussion. People and their property, and the health of both, are too important to be treated as an afterthought when developers sink their drills into the land.

If we agree that oil and gas development is going to continue, we also have to agree to hear and respect the concerns of ordinary people who live in the areas under development. They

shouldn't be expected to give up their rights to use their property, to make a living on it or to drink their water without fearing for their lives.

How would this work in practice? It really shouldn't be too hard.

To begin with, the oil and gas industry—as well as the state officials who are supposed to regulate it—could agree to actually listen and offer a meaningful response when landowners raise red flags about the impacts of development. As things stand now, residents' concerns are too often dismissed or even ridiculed, and landowners are forced to make their cases on their own, at their own expense.

Next, the industry's routine assurances that it is already heavily regulated, and that therefore nothing bad can possibly happen, must be closely and skeptically reviewed. Frustrated landowners in the Powder River Basin have already learned how inadequate those regulations can be, and they successfully made their case to the state's Environmental Quality Council. Despite Gov. Dave Freudenthal's tortured reasoning in blocking it, their effort stands as a reasonable citizen-led response to an under-regulated industry.

Finally, we have to learn to look beyond the legalistic and scientific smokescreens industry mouthpieces pump out whenever ordinary people—people like Louis Meeks and his neighbors—bring us clear evidence of dangerous impacts from oil and gas development.

We, our neighbors, friends, and fellow citizens want to support efforts to preserve the quality of our water and soil.