



**Oil & Gas
Accountability
Project**

A program of EARTHWORKS

July 27, 2007

Ms. Kathy Brown, Sr. Environmental Analyst
Solid and Hazardous Waste Division
Wyoming Department of Environmental Quality
510 Meadowview Dr.
Lander, WY 82520

Offices:

Main (Durango):
P.O. Box 1102
Durango, CO 81302
970-259-3353 (p)
970-259-7514 (f)

Bozeman:
P.O. Box 7193
Bozeman, MT 59771
406-587-4473 (p)
406-587-3385 (f)

Washington, D.C.:
1612 K St., NW
Suite 808
Washington, D.C. 20006
202-887-1872 (p)
202-887-1875 (f)

Website:
www.ogap.org

Via Fax and Regular Mail: (307) 352-7726

Re: Remedial Investigation Work Plan – July 2, 2007 Amended Draft

Dear Ms. Brown,

The Oil & Gas Accountability Project (OGAP) is a signatory to the Clark Resource Council's comments dated July 27, 2007 on the above two documents. OGAP is also submitting the following additional comments regarding the July 2, 2007 Remedial Investigation Work Plan.

Comments

In order to successfully remediate the aftermath of the Crosby 25-3 blowout, Windsor and the State of Wyoming must employ a broad approach to identifying, monitoring, and analyzing impacts from the blowout that effect Clark's groundwater, public health and natural resources. Fully identifying and disclosing to the public the complete chemical make-up and reactions of the products used in the production and "killing" of the Crosby 25-3 well is critical to this process.

Identification and Monitoring of Impacts

As referenced in the Clark Resource Council and OGAP's separate comments, an Energy Lab representative stated at the WyDEQ Public Meeting on July 10, 2007 that certain chemical compounds, such as gluteraldehyde, essentially "can not" be detected in groundwater. OGAP wishes to address this point more fully. Page 24 of the Remedial Investigation Work Plan outlines more precisely that the detection of gluteraldehyde is actually possible; it would, however, simply require a custom designed laboratory process, sophisticated laboratory equipment, and the repetition of that process at a second laboratory.

According to the attached chemical analysis of Aldacide ® G by The Endocrine Disruption Exchange, the known health effects associated with glutaraldehyde include: damage to the respiratory, reproductive, immune and gastrointestinal systems; damage to skin and sense organs; and glutaraldehyde is a developmental,

neuro, kidney and wildlife toxicant. Glutaraldehyde is also a mutagen. OGAP has also attached a reference list that details professional literature addressing the known health affects associated with glutaraldehyde.

Given the documented information regarding glutaraldehyde's health effects, OGAP urges Windsor and the State to implement the extra steps necessary to monitor for glutaraldehyde and to disclose this information to the public.

OGAP also reiterates here that it would be prudent to include in the groundwater monitoring and remediation program a public health monitoring program to identify potential health concerns and detect any health problems for Line Creek residents.

Full Disclosure of Product Composition and Chemical Reactivity

Additionally, while the Remedial Investigation Work Plan lists products associated with the Crosby 25-3 blowout, the complete chemical composition is often not available for each product. Thus, the State, citizens and residents can not know how each chemical of concern is combining with other materials present, nor how each chemical is behaving in current soil and groundwater conditions.

The complete chemical make-up of the products listed on page 23, and for those products used in the "killing" of the well, should be located and disclosed to the public such that the State, affected citizens, and the public have an adequate picture of the contamination in the Clark community.

Thank you for the opportunity to comment on this issue.

Sincerely,

Jennifer Goldman
Public Health & Toxics Campaign Director

Encl./ Products Used in Wyoming 7-24-07, Pages 1 & 9, TEDX, Inc.
References for Glutaraldehyde