

**Proposed Revisions to Water Quality Rules and Regulations, Class VI Injection Wells
and Facilities, Underground Injection Control Program**

Analysis of Comments Received before December 16, 2020



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Commenter:

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Comments and Responses

General

Kim Brown: “ I feel that new rules should not be allowed without deleting old rules that may be contradictory or overlapping to new rules.”

Department Response: As part of our standard rulemaking process, the Water Quality Division (Division) collaborates with and seeks the advice of the Attorney General’s Office to ensure the proposed revisions do not exceed the Division’s statutory authority, and to ensure the rules do not conflict with the Wyoming Statutes. Additionally, the Division is required to consult with the Wyoming Oil and Gas Conservation Commission and the State Geologist when promulgating rules for carbon sequestration, which ensures that the proposed rules do not inadvertently overlap or conflict with the authority of these other departments.

Repealing rules and creating new chapters can be cumbersome for the regulated community and our federal partners, so Water Quality Division does not fully repeal chapters without careful consideration. The revision to Chapter 24 would not improve the efficiency of using the chapter and the revisions do not meet other repeal scenarios outlined by the Wyoming Secretary of State, Rules on Rules for State Agencies, Chapter 1, Section 3.

The revisions to the regulations for Class VI Injection Wells and Facilities, Underground Injection Control Program, will remain in Chapter 24 as proposed.