



# CURELAW, P.C.

Attorneys and Counselors at Law

April 20, 2021

*Hand-delivered*

Greg Lanning, P.E., State Engineer  
Wyoming State Engineer's Office  
122 West 25th Street  
Herschler Building, 2nd Floor West  
Cheyenne, WY 82002

Todd Parfitt, Director  
Wyoming Department of Environmental Quality  
200 West 17th Street  
Cheyenne, WY 82002



Re: Letter from Crank Legal Group dated April 9, 2021

Dear Mr. Lanning and Mr. Parfitt,

The City of Laramie asked that I reach out to both of you in response to the letter you received from Mr. Crank on April 9, 2021. Representatives of the City and I would be happy to meet with you and your respective staff and counsel to discuss this matter, if either of you have any concerns with the 41T3 Well drilling project. While we are certain that the City complied with all laws, including the rules and regulations of your respective agencies, and it successfully completed your review processes, we could absolutely meet with you in person to go over the project in detail.

Accusing the City of providing "faulty or fraudulent information" to your agencies is libelous and absurd. The April 9<sup>th</sup> letter mischaracterizes the intent, history, and purpose of the 41T3 Well drilling project. There is also no validity to the allegation that the permits "failed to comply with Wyoming law." I believe it goes without saying that Permit No. U.W. 207285 provides that the well shall be completed in the Casper Formation "to a depth adequate to allow for the maximum development and beneficial use of ground water in the source of supply."

It has been no secret to the University of Wyoming that the City intends to use this new well to serve expansion on the north side of Laramie. Securing water for this area is crucial for the impending housing development, which will undoubtedly include the University's faculty and staff. The City also offered to partner with the University to develop the new well so that it could serve the dual purpose of watering the Jacoby Golf Course. Since the University was not interested in that option, you would think it would be pleased that the well will be drilled on City property instead of UW's land.

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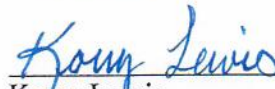
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State Engineer Greg Lanning, P.E.  
Director Todd Parfitt  
April 20, 2021  
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The City has been very upfront with its intentions for the 41T3 Well and its concerns related to the University's new wells. As stated by the Wyoming Supreme Court over a century ago, "in the matter of acquiring and holding the right to the use of water for the benefit of the whole public," a municipality "acts as the agent of the state in exercising, within the provisions of its charter and the statutory law, governmental functions and powers, and as already stated the securing of water sufficient not alone for its present but such as may be necessary for its future inhabitants." *Holt v. City of Cheyenne*, 137 P. 876, 881 (Wyo. 1914).

Thank you for your time and consideration. Please let me know if you have any questions and if I could be of assistance is setting up a meeting.

Respectfully,

  
Korry Lewis  
[kLewis@curelaw.com](mailto:kLewis@curelaw.com)

cc: Lisa Lindemann, Administrator, Ground Water Division (*hand-delivered*)  
Brian Pugsley, Superintendent, Water Division 1 (*via email*)  
Christopher Brown, Senior Assistant Attorney General (*via email*)  
Matt VanWormer, Supervising Assistant Attorney General (*via email*)  
Beth Callaway, Policy Staff, Governor's Office (*via email*)  
Tara Evans, General Counsel, University of Wyoming (*via email*)  
Patrick Crank, Crank Legal Group (*via email*)



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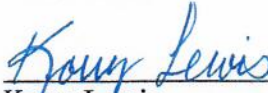
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Korry Lewis  
[kLewis@curelaw.com](mailto:kLewis@curelaw.com)

cc: Lisa Lindemann, Administrator, Ground Water Division (*hand-delivered*)  
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