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Terri A. Lorenzon, Director
Environmental Quality Council

Dear members of the Wyoming Environmental Quality Council,

My son Eric Barlow and I own and operate a ranch in NE Wyoming . The ranch has been in our family for 85 years and consists of 18,000 privately owned acres of mixed grass rangeland on which we run 350 head of cattle and 150 sheep. The ranch is a cow and calf operation that relies on native grass. The subirrigated meadows along Dead Horse Creek which is an ephemeral drainage provide a substantial portion of the feed for our cattle and sheep. We do not buy hay.

For three months (March to June 2003) CBM produced water flowed across our property. The water originated from 2 in-channel CBM reservoirs located upstream of our ranch. This CBM water was unsuitable for irrigation. Laboratory analyses revealed a sodium adsorption ration (SAR) of 8.62 and an electrical conductivity (EC) of 3,720. These measurements certainly exceeded the irrigation limits set by the Wyoming Department of Environmental Quality; namely SAR of 6 and EC of 2,000.

Our ranching operations are based upon the ephemeral nature of Dead Horse Creek. Prior to CBM development, the creek flowed only during spring thaw and thunderstorm events. During spring 2003, however, upstream CBM development altered the natural flow regime in Dead Horse Creek. On our ranch the creek bottoms became saturated with low quality CBM water. After the water dropped, many acres of our bottomland meadows were covered with white salt and some of the native vegetations were dead. I have attached several photographs taken on April 10, 2004, a year after this flooding occurred. The photos depict the salt deposits and dead vegetation that I described above.

In summer 2004, despite the extreme drought, many of the creek's potholes filled-up with CBM reservoir water that had resurfaced from shallow aquifers. Analyses of this pothole water showed that SAR values ranged from 11.5 to 32 and EC values range from 7,240 to 16,740.

In September 2005, during a National Pollutant Discharge Elimination System(NPDES) permit renewal process, the Wyoming DEQ rewarded the CBM operator for his non-compliance with the original water quality limits by increasing the SAR limits from 6 to 21 and the EC limit from 2,000 to 3,300.

I would urge you to adopt the proposed Appendix I to Chapter 2 of the Water Quality rules in order to ensure protection of soil, vegetation, wildlife, livestock and the downstream landowners and their existing uses of the land, and to prevent the damage being caused by the DEQ's failure to regulate CBM discharges.

Thank you for providing the opportunity to comment.

