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Environmental Quality Council
Herschler Building, Room 1714
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FILED

JAN 16 2007

Terri A. Lorenzon, Director
Environmental Quality Council

RE: Citizen Petition to address CBM water discharges

Ladies and Gentlemen:

We are ranchers in the northern part of the Powder River Basin in Wyoming. Our ranch is fully developed for coal bed methane gas production. The excessive discharge of water which characterizes coal bed methane development is a serious concern for us and our neighbors. This water is a waste of one of Wyoming's most valuable natural resources. The discharged water that is not fully contained causes immeasurable damage to our grass and forage which may never be fully reclaimed. Our neighbors down stream are damaged even worse than we, when unnatural amounts of water, often laden with sodium and other salts, settles onto hay meadows or bottomland and destroys the base upon which their operation depends.

Another issue that we would like to bring to your attention is the discharge of water from wells which have produced little or no gas at all, yet the company continues to pump, apparently to dewater the gas field so other wells can produce. Nobody ever seems to talk about this practice, but it is very wide spread in this area. On a school section that we lease, we would guess that at least half of the wells there were essentially unproductive, yet continued to pump out water for two or more years. We don't believe that the rules were ever designed to allow this sort of waste. The excess water is of no beneficial use to either the rancher or the gas producer (except to dewater the larger area). We realize this excessive discharge is not a focus of the rule making that you have agreed to consider. We bring it to your attention to help you realize that the effluents that damage downstream lands may be from wells that are not even producing economical amounts of gas. If the gas companies were required to contain their produced water or dispose of it in a more responsible manner, perhaps they would think twice about continuing the discharge of water from unproductive wells, wasting the ground water of the state of Wyoming, and damaging the soils and vegetation in ways that may never be able to be reclaimed.

The costs of disposing the water from CBM wells should be on the shoulders of the energy companies that benefit financially from the operation. These companies have instead put this burden onto the landowners who are permanently damaged by the discharges of water. Please consider our petition for a change in rules.

Thank you so much for the very difficult job that you do in overseeing the operations of the Wyoming Department of Environmental Quality. The decisions that you make are very complex and we are impressed with the thoughtfulness and professionalism that you demonstrate in doing your very important job.

Sincerely yours,

Robert and Nancy Sorenson

Nancy Sorenson
Robert J. Sorenson