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Dear Mr. Gordon:

I am providing comments based on a petition that was proposed to the Environmental Quality Council (EQC) by the Powder River Basin Resource Council (PRBRC) concerning effluent limits put on CBM discharged water. There are many proposals in the petition that I strongly oppose and I am stating in summary those items. It seems that that PRBRC has not put a lot of thought or good science into their proposals. I am employed by a consulting firm that works directly with CBM operators, Wyoming Department of Environmental Quality (WYDEQ), and landowners that have CBM leases on their lands. In my experience of dealing with CBM operators and landowners through the process of creating Plans of Development, I have seen that most, if not all landowners involved, welcome the additional water and storage that CBM discharges create. The following points describe the potentially damaging thought processes that the PRBRC has proposed to the EQC.

Terri A. Lorenzon, Director  
Environmental Quality Council

1. The PRBRC proposes that "no discharge water may cause the release of any chemical or chemical compound". Show me a body of water in the state of Wyoming that contains no naturally occurring chemicals or chemical compounds received from typical run-off water. This proposal would effectively shut down nearly all of the CBM operations in the Powder River Basin. The petition proposes ridiculous limits on constituents such as barium to be one tenth of the drinking water standard. Again, how could this replicate naturally occurring bodies of water in an arid region such as Wyoming? The petition also proposes limitations that are not found in other realms of the oil and gas industry.
2. All items that the PRBRC proposes would have a dramatic effect (not in a good way) on private and government employment as well as local and state economies. There is a huge employment base revolving around CBM development that would be critically affected if policies reflecting the PRBRC's proposal were implemented. I believe that this would hurt all parties involved: BLM, WYDEQ, CBM operators, private consultants that mitigate the processes to discharge water, and local communities that have felt a positive impact from the influx of families that have moved to the area to work in the industry.
3. The PRBRC fails to realize that most of the CBM discharged water is used and welcomed by landowners for irrigation and stock-watering. This is considered beneficial use of this water. As everyone in the state knows, Wyoming has been experiencing a long-standing drought that appears to have no end. Who knows what the future holds for many landowners that have been relying on water from CBM discharges if CBM operators are no longer able to discharge to the surface. Similarly, wildlife populations that would normally be hard pressed to exist in some parts of the Powder River Basin have increased due to reservoirs that contain CBM discharged water.

That being said, I feel that the PRBRC doesn't seem to care about the outcome or subsequent events that would transpire if the CBM industry had to follow unreasonable discharge regulations based on unfounded science. There is hard scientific evidence that has been collected for nearly a decade that shows that with intelligent care, forethought, and sound science we can discharge CBM water on the surface and still minimize effects to our soils and waterways and benefit everyone involved. It would be unconscionable to let a group of people that refuse to stop and look at the facts, bring an industry to its knees that has brought so much to the state of Wyoming.

I thank you and the Council for the opportunity to comment on a situation that may affect myself and others in a very personal way.  
We can all WIN!!

Beau J. Bergstrom  
CBM Associates, Inc.  
500 W. Lott St.  
Buffalo, WY 82834