

FILED

JAN 26 2007

Terri A. Lorenzon, Director
Environmental Quality Council

January 26, 2007
Mr. Mark Gordon, Chairman
Wyoming Environmental Quality Council
122 W. 25th St.
Herschler Bldg., Rm. 1714
Cheyenne, WY 82002
Fax- 307-777-6134

RE: Citizen Petition for Rulemaking-Powder River Basin Resource Council et al-
Revised Version – WQD Chapter 2.

Mr. Gordon:

My name is Rick Boyce. I was born and raised in Wyoming as were my parents and grandparents. I have lived in Gillette for the past 16 years. I am currently working as a service supervisor for Consolidated Oil Well Services LLC in Gillette. I am writing to you today to voice my opinion against the Citizen Petition for Rulemaking- Powder River Basin Resource Council et al – WQD chapter 2. If this rule passes, my wife, two month old son, and I will be without a steady stable source of income and I will be forced to take a lesser paying job or move to another area away from family and friends- both of which will definitely have a negative impact my family's way of life. I like my job and the money I make by doing good, honest, hard work here in the town of Gillette where I graduated high school and want to continue living.

This proposed rule has the potential to severely limit the production of coal bed methane or halt it completely. You are already aware that to extract the gas from the ground, water must be removed. This water is used and appreciated by the majority of ranchers and landowners. It is clean enough to be used for irrigation and for livestock and wildlife watering. This takes the "need for water" burden off our ranchers that was present before CBM development in our very dry climate. This discharge water, when put into streams and other watersheds, has allowed riverbeds that have been dry for years to once again flow with water. Water is the basis of all life, so the assumption of more water more life is easily drawn. More water to drink, more grasses to eat and a general increase in all flora and fauna native to our area as well as a number of migratory birds.

I understand that the DEQ has looked at the petition and has concluded that as it is written will prohibit most if not all CBM produced water discharges by holding it to extreme standards that none of the other traditional water discharges are held to. This prejudice against CBM water leads me to believe that there is another agenda against the CBM industry and this water proposition is the easiest veiled way to bring our industry as we know it in the Powder River Basin to an abrupt end. This end to our booming industry would have extensive catastrophic impacts at the city, county, and state levels. The impact to our economy would be devastating.

I am still trying to comprehend how is it possible to hold water discharges to a higher level than we deem appropriate and safe for human consumption. The majority of

surface water is detrimental to humans if consumed, but wildlife and livestock can drink from them exclusively with no negative effects. Grasses and trees grow and thrive from this surface water which in many cases has many more and more highly concentrated constituents than this CBM discharge water.

I do understand that some ranchers and landowners do have a problem with this discharge water. We need to do some testing to see if CBM discharge water is the cause of these complaints. If this water is negatively affecting their livelihood there are ways of solving these problems of the few without harming the majority with an umbrella rule. I suspect that these ranchers who are complaining are using the CBM industry as a scapegoat for problems they have incurred which are not at all related to our industry.

There is no precedence for this kind of rule. If CBM discharged water is held to a much higher standard than any other waters, the rule will not stand up. It will cause irreparable damage to our industry and waste the valuable time and money of our state committees and commissions before being inevitably repealed for being arbitrary and capricious.

This industry has created many jobs and boosted our economy significantly in all levels. This rule would devastate our industry. We should not hold one source of discharge water to different and higher standards than other traditional sources. The complaints of the few should not negatively affect the majority who use this water and find it very beneficial. This type of an umbrella rule will hurt many more than it may help. More research should be done on Wyoming soils before deciding what is best for all.

Thank you for your time and consideration

Rick Boyce