

Trinity Exploration, LLP

January 29, 2007

FILED

JAN 29 2007

Mr. Mark Gordon
Chairman
Wyoming Environmental Quality Council
122 West 25th Street
Herschler Bldg., Room 1714
Cheyenne, WY 82002

Terri A. Lorenzon, Director
Environmental Quality Council

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

Dear Mr. Gordon:

Trinity Exploration, LLP's (Trinity) is a locally owned and operated drilling company. As Trinity's General Manager, I have over 35 years of experience in the oil and gas industry, both domestic and overseas markets. Our focus is on expanding Trinity's capabilities to provide a turnkey operation featuring fast/mobile rigs that minimize environmental impacts.

Near-term our goal is meeting the immediate needs for drilling and exploration of CBM wells in the Powder River Basin, the state and surrounding areas. Long term, Trinity will be a company that reaches beyond today's needs by providing larger, deeper depth-capacity mobile drilling rigs that will be required for future CBM exploration and production.

In providing this equipment to the industry, Trinity has invested approximately \$4M in capital. We currently employ 17 people with an average annual payroll of \$1.4M. The projected growth of Trinity over the next three years is estimated at approximately \$24M in capital investment with an average annual payroll of \$8.4M.

Trinity opposes any rulemaking that reduces or eliminates the ability for CBM produced water to be discharged and thus beneficially used. As a landowner, who is also involved in the agricultural business arena, I have become dependent on CBM produced water for livestock watering and irrigation of hay fields. Therefore, not only would Trinity suffer business revenue and growth opportunities, but my family's ranch would suffer due to a lack of adequate water supply.

It is my understanding that DEQ has looked at the petition and that as it is written it will have the effect of prohibiting most, if not all CBM produced water discharges. I strongly oppose the setting of standards for water discharges for CBM produced waters that are more restrictive than for other discharges. This rule would be arbitrary if adopted as proposed.

P.O. Box 1688 – Gillette, Wyoming 82717
Phone: 307.682.1153
Fax: 307.682.2745

I understand that problems with some individuals and ranches do exist through the mismanagement of CBM produced water. I also realize that some of these problems are due to an uncooperative attitude toward their neighbors as well as CBM operators. However, changing water quality rules will not correct those problems. There are many options to resolve individual conflicts that have not been pursued by the petitioners.

To secure a strong financial future for the state of Wyoming and its residents, the DEQ should respond to the needs of the majority and not heed the voice of the very vocal minority.

Sincerely,



Dennis Geiss
Owner / General Manager

DB/bfc