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**FILED**

JAN 29 2007

Terri A. Lorenzon, Director  
Environmental Quality Council

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

January 26, 2007

Dear Sir,

My name is Gary L. Ritterhouse. I am the operations manager for Moser Engine Service, Inc. in Casper Wyoming. It has been brought to my attention that a Citizen Petition for Rulemaking has been filed by the Powder River Basin Resource Council to modify Chapter 2 of the Wyoming Water Quality Rules and Regulations.

I feel that all industries, including farming and ranching, need to be environmentally conscious in their operations. I understand from time to time, problems with some individuals might exist; however changing water quality rules is not a fix or solution for these issues. There are many options available for conflict resolutions that are not being pursued by the petitioners.

It is my understanding that the Wyoming DEQ has looked at the petition and as it is written, it will have the effect of prohibiting most, if not all CBM produced water discharges. I feel that the Rule change would be arbitrary if adopted as proposed and I strongly oppose setting standards for water discharge for coal bed produced waters that are far more restrictive than are set for other similar discharges (livestock wells, irrigation wells, mines etc.) I feel that by changing the Rule, most if not all ranchers, livestock and wildlife currently using and benefiting from CBM water will suffer damage, along with the tens of thousands of families working in the CBM industry as well as the cities, counties and state that they live in.

Over 70% of Moser Engine Service's revenues are derived from various parts of the CBM industry. If the Petitioners are successful in getting the Rule changed, Moser Engine Service would be severely impacted by the immediate loss of CBM related business. This translates to hundreds of thousands of dollars per year in lost sales tax revenue to the state and counties affected and a reduction of over 80% of our work force. We would have approx. 16 families with high paying jobs laid off from our work force alone. Multiply this by the thousands of other small businesses and larger companies doing business in the CBM sector and you will have massive unemployment, loss of real

estate value (taxes), and financial ruin for many individuals and businesses directly and indirectly involved in the CBM industry.

Other ramifications resulting from the Petitioner Rule Change would be Regulation carry over to other industries with similar discharge issues, impacting them and their employees. There would be major revenue losses to the state and affected counties created from mineral severance taxes, sales taxes and real estate taxes. Wyoming has been through several boom and bust cycles over the years and I don't think the good people of this great state would like to see another bust cycle such as occurred in the 1980's, especially one created by a small handful of disgruntled people (all of whom have cashed checks given them by the CBM industry).

It is my knowledge that the Wyoming Attorney General's Office has repeatedly cautioned against this Petition and the Rule it proposes, and that the EQC should weigh heavily in considering the impact and hardships this rule change would create. This Rule Change Petition should be struck down as arbitrary and capricious. It is definitely not in the best interest of the citizens of Wyoming.

I thank you for the opportunity to voice my strong opposition to these Petitioners.

Sincerely,

A handwritten signature in cursive script that reads "Gary L. Ritterhouse". The signature is written in black ink and is positioned above the typed name.

Gary L. Ritterhouse  
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