

4101 N. Garner Lake Rd.
Gillette, WY 82716
January 28, 2007

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Terri A. Lorenzon, Director
Environmental Quality Council

Mr. Mark Gordon, Chairman
Wyoming Environmental Quality Control
122 W. 25th St.
Herschler Building, Room 1714
Cheyenne, WY 82002

Dear Mr. Gordon,

This letter is to state my opposition to the *Citizen Petition for Rulemaking – Powder River Basin Resource Council et al – WQD chapter 2*. It is my understanding that DEQ has looked at this petition and, as it is written, it would have the effect of prohibiting most, if not all, CBM produced water discharges. This would in effect shut down coal bed methane production in Wyoming, which would have a disastrous effect on the economy of our city, our county, and our state. The solution to the problems of a few landowners should not adversely affect the economic benefits of CBM for the entire state.

I vigorously oppose this petition. I grew up on a ranch in Campbell County...a ranch where my grandfather homesteaded. I have worked for years as a steward of the land. I now own a trucking business and the great majority of our work is done in the methane fields. If the CBM activity were to shut down, my business would in all likelihood shut down also.

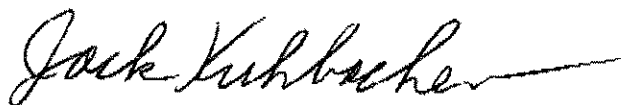
The standards set forth in the petition are unreasonable, especially since methane water is held to a much higher standard than oil well discharge water and coal mine discharge water....not to mention setting a higher standard than for drinking water for humans! The Wyoming Attorney General's office has cautioned against this petition, and if CBM water is held to a stricter standard than other discharged water, the rule will be struck down as arbitrary and capricious.

As I truck to sites in Campbell and Johnson Counties, it is easy to see the beneficial results of use of CBM discharge water. Cattle are fat and healthy; calves weigh more; sage grouse, deer, antelope, birds – all wildlife thrive because there is plentiful water. There are trees and fields on ground where once was only sparse vegetation. Most landowners I speak with appreciate and value the water that CBM development has provided.

Thank you for your consideration of my opinion in this matter. And remember:

No water, no gas.
No gas, no revenue.

Sincerely,



Jack Kuhbacher
Kuhbacher Trucking, Inc.
4101 N. Garner Lake Rd.
Gillette, WY 82716
307-680-1814