



## Meeteetse Conservation District

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1-18-07  
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January 15, 2007

Wyoming Environmental Quality Council  
Herschler Building  
122 W. 25th St., Rm. 1714  
Cheyenne, WY 82002.

Re: Petition for Rulemaking, filed by the Powder River Basin Resource Council

Esteemed Council:

The Meeteetse Conservation District Board of Supervisors (MCD), representing the citizens that elected it\*, hereby again registers its opposition to the cited action and summarily reiterates its comments presented at the hearing that you convened in Basin, Wyoming on November 2, 2006, and that;

**This petition should be killed immediately following the January, 2007 hearing.**

**This petition is an unwise attempt to create a statewide rule in response to a local situation.**

The petitioners' own exhibits and the comments that the Petitioners have solicited in its support clearly document that local soil/water interaction, not statewide conditions control whether or not damage from discharged water occurs or may occur.

From the *Notice of Proposed Rulemaking Before The Environmental Quality Council*  
By the *Environmental Quality Council*, <http://deq.state.wy.us/eqc/Docket/05-3102>

“A new Appendix I will contain requirements applicable to produced water discharges from CBM with more stringent limits on discharges that cause, or have the potential to cause, unacceptable water quality, and would limit the pollution caused by such discharges. Appendix I would also contain more stringent limits for sulfates, TDS/SC, and barium. This rule revision is being proposed to provide for regulation of the unique environmental issues presented by CBM produced waters...”

Yet, The Petitioners' own exhibits show that proposed limits on certain constituents are unrealistically low. (Example, this excerpt from Exhibit 19: “Sulfate imparts a bitter taste to the water, but animals can acclimate to it... ..levels up to 1500 ppm produce slight effects on livestock and levels of 1500 to 2500 produce temporary diarrhea.”)

**It is absurd to consider regulating discharge from a source labeled “Coal Bed Natural Gas”, Coal Bed Methane”, or “CBM” any differently than discharge from a source labeled “traditional oil and gas facilities”.**

In the Big Horn Basin, water quality that would be unsuitable for discharge under the proposed Appendix I is currently being discharged by industry and is being used by agriculture.

**This discharged water is so valuable that agricultural producers file with the State Engineer’s Office in order to obtain adjudicated water rights on the discharged water.**

Respectfully submitted for the Meeteetse Conservation District Board of Supervisors,



Steve Jones  
Resource Management Coordinator  
Meeteetse Conservation District

\* FROM: W.S. § 11-16-103 Legislative declarations and policy

(a) It is hereby declared that the farm and grazing lands of Wyoming are among the basic assets of the state; that improper land use practices cause and contribute to serious erosion of these lands by wind and water; that among the consequences which would result from such conditions are the deterioration of soil and its fertility and the silting and sedimentation of stream channels, reservoirs, dams and ditches; that to conserve soil, and soil and water resources, and prevent and control soil erosion, it is necessary that land use practices contributing to soil erosion be discouraged and that appropriate soil conserving land use practices be adopted.

(b) It is hereby declared to be the policy of the legislature to provide for the conservation of the soil, and soil and water resources of this state, and for the control and prevention of soil erosion and for flood prevention for the conservation, development, utilization, and disposal of water, and hereby to stabilize ranching and farming operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health, safety and general welfare of the people of this state.

The above, being the charge and direction of the Wyoming Legislature for all Conservation Districts within the State of Wyoming, the MCD Board of Supervisors’ responsibility to the cooperators of the District is measurable and accountable by the actions the MCD takes to accomplish the direction given by the Wyoming Legislature. The District Board of Supervisors, an elected body, and a local government, is the local guide to the management of lands within the jurisdiction of the MCD and is accountable to the citizens of the District.