

January 27, 2007

Mr. Mark Gordon  
Chairman  
Wyoming Environmental Quality Council  
122 W. 25<sup>th</sup> St.  
Herschler Bldg., Rm 1714  
Cheyenne, WY 82002

**FILED**

JAN 29 2007

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,

My name is Kaila Jones, and I am an Environmental Specialist/Economist for a water resources consulting firm in Gillette, Wyoming. I graduated with a Master's degree in Agricultural Economics/Environment and Natural Resources from the University of Wyoming. My husband is a compressor operator on the large coal bed methane (CBM) gathering pipelines. We are the parents of two young girls, ages 2 and 1, and are outdoor enthusiasts who very much respect and enjoy our environment. We are the typical family who works hard in the CBM industry to make a good, honest living. We are also adamantly against the proposed rulemaking to change Chapter 2 of Wyoming Water Quality Rules and Regulations.

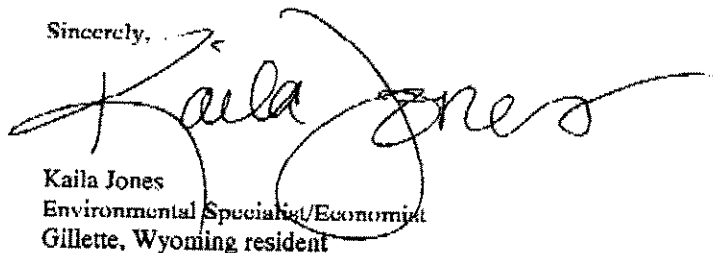
The effect of the rule, as the Wyoming Department of Environmental Quality has noted, would be to prohibit most, if not all CBM produced water discharges. It is concerning that the proposed rule would asymmetrically impose stricter water regulations on CBM produced discharges versus water from conventional oil/gas extraction and coal mining. CBM water quality in the Powder River Basin is far superior to the typical water resulting from conventional oil/gas extraction. The water pumped from coal prior to open pit mining is identical to CBM water. So, why the distinction in the proposed rule? The proposed changes are ripe to be struck down as being arbitrary and capricious, as our Attorney General's office has repeatedly cautioned.

As an Economist, I can say the result of adopting this rule would unequivocally be the collapse of Northeastern Wyoming's economy and the livelihoods of thousands of families. People just like me and my husband would lose their jobs. The housing market and property values would crumple. Families like mine would be stuck with mortgages well above the market value of their property, which would drive us and many others into foreclosure and/or bankruptcy. Additionally, the state would lose millions of royalty dollars that support Wyoming's infrastructure, schools, and social programs. Moreover, the nation's market for natural gas would take an intense hit at a time when the United States needs the CBM production. The economic effects of the proposed rule would be severe in Northeastern Wyoming, but felt all over the state and country.

In my line of work, I have never seen evidence that demonstrates the severe environmental degradation the petitioners claim occurs due to CBM produced waters. Instead of protecting the environment, imposing this rule would eliminate water that, in my experience, many landowners use beneficially in their agricultural and livestock production. It would also remove water that promotes our wonderful wildlife populations, eliminate all the financial benefits to the state and its citizens, and cause economic fallout for thousands of families in Northeastern Wyoming.

My family would appreciate if the EQC would vote down the proposed rule to change Wyoming Water Quality Rules and Regulations Chapter 2. Thank you for the opportunity to comment, and thank you for your time.

Sincerely,



Kaila Jones  
Environmental Specialist/Economist  
Gillette, Wyoming resident