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Terri A. Lorenzon, Director
Environmental Quality Council

Mr. Mark Gordon, Chairman
Wyoming Environmental Quality Council
122 W. 25th Street
Herschler Building, Rm 1714
Cheyenne, WY 82002

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

Dear Mr. Gordon:

I am writing to you to voice my opposition of the Citizen Petition for Rulemaking – Powder River Basin Resource Council et al – WQD Chapter 2. I have been a resident of Gillette, Wyoming since 2003 and have worked in the management of coal-bed methane water most of that time. While that may not be a long time in comparison to many who live in this area, I do understand landowner concerns about other industries that can impact their way of life as I grew up on a farm/ranch in North Dakota. I feel that the petition before the council could be very detrimental to the economy of Wyoming and especially to Campbell County.

As I understand it, the proposed petition would prohibit most if not all CBM discharges, which in turn would make coalbed methane an uneconomic resource in this area. Companies that provide jobs to residents, money to non-profit organizations, water to the many ranchers that do utilize and appreciate it, and help fuel the local economy in general would move to other parts of the country where the regulatory agencies are not so strict. Thousands of people in Wyoming would be either directly or indirectly impacted by the loss of a valuable industry.

Regarding the proposed water quality limit changes, why would CBM water be required to contain less than or equal to 200 ppb, especially when the current standards (1800 ppb) set forth in WYPDES permits are below drinking water standards (2000 ppb)? In addition, why would this rule change only apply to CBM water when water discharged from a different type of well would have a different set of standards?

If CBM companies were able to stay in the Powder River Basin and operate economically with the proposed rule changes, treatment plants would be needed to meet these standards. While treatment plants are a good way to get very high quality water, the disturbance area caused by the number of plants that would be needed would take away

from land that could be utilized by the surface owner. I have seen the livestock and wildlife that congregate around the CBM reservoirs and I have seen the fields that have been irrigated by CBM water. I have also talked with landowners and seen their excitement at the prospect of having water for their hay crops so that they can provide feed for their livestock instead of paying high prices for out of state hay during these dry years. Many companies do use the water for irrigation and this is a very effective way to beneficially use the produced water. In the petition, they refer to it as land application, but the term "managed irrigation" is really more accurate. Regular soil samples and soil amendments are used as they are needed to effectively manage the irrigation system.

I feel very strongly that the water produced by the CBM industry is a valuable asset and when landowners work cooperatively with the industry it has a very positive outcome. CBM companies are constantly looking for alternative water disposal methods that meet everyone's needs, but the solutions are not always something that can be implemented quickly under the various regulatory agencies to which the industry must comply with.

I urge you to take more than the petition of the Powder River Basin Resource Council and ten landowners into consideration. There are hundreds of landowners in the Powder River Basin and their voices should also be heard. There are so many more factors involved here and so many more people that could be affected in a negative way by this petition. While the concerns of the petitioners are important and should not be discarded, there are other ways that their needs could be met. The majority of CBM companies that I know of do their best to work with all parties involved to address their concerns.

In closing, I just want to thank you and the other EQC members for your time and consideration in this very important matter.

Thank you,



Krystal K. Price