

PRARIANA FARMS

PO Box 209

Clearmont, Wyoming 82835

307.758-4391

307.751-4011

Rec'd
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Environmental Quality Council
122 West 25th Street
Herschler Building, Room 1714
Cheyenne, Wyoming 82002

January 15, 2007

Dear Environmental Quality Council:

Since I will be unable to attend your hearing January 17th in Cheyenne, I would like to submit this letter stating my strong support for the CBM-water-related rulemaking petition you will be considering at that hearing.

First, let me express my thanks and admiration to you council members, who have recognized a problem and agreed to try to fix it, despite strong resistance from DEQ and the Governor. We native Wyomingites are indeed fortunate to have such a group to turn to.

Many landowners are concerned about the effect of poor quality water on their bottomland meadows, and about the blanket determination by the State Engineer that pumping of any water by a CBM company is a beneficial use, whether or not gas is produced and regardless of the quantities involved. It is clear to us that the more water of any quality pumped the greater the damage to soil and crops. Landowners experiencing the true effect of uncontrolled water quantity have cattle with hoof rot, interrupted grazing land, boggy bottomland, natural forage killed, wildlife habitat destroyed, cottonwood trees dead.

We are only 5% into Coal Bed Methane development in our Clear Creek Valley. There will be millions of gallons pumped out of Wyoming aquifers over the next 10 to 15 years. Much of this water will be put into containment ponds and allowed to evaporate. This is not a beneficial use of the water. All of the cattle and wildlife in Wyoming cannot use the amount of water projected to be pumped out of coal seams. Most of the water will evaporate, infiltrate, or flow down drainages and out of state.

Low quality (high EC/SAR) water allowed to flow across fields will destroy natural vegetation important to our cattle, and in many cases render the land unproductive for decades after the CBM boom is long past. Water of moderate quality will leech salts from our soil types, and become dangerously low quality water destined to pollute our meadows, fields and Clear Creek itself.

After the water is pumped out and no longer available for wildlife or livestock or other aquatic life what will remain? Will ranchers and fishermen and wildlife and waterfowl enjoy the dry ponds with salt bottoms and changed forage? What will our landscape look like as we cover it with poor quality water?

There has to be a better way. Industry acknowledge that these problems exist, but claim that the problems the petition before you attempts to address are rare and minimal. If that is the case, they should be easy to solve with proper rulemaking that leads to progressive engineering and environmental practices. We have great confidence that the Council can come up with solutions that allow surface owners to use produced water, but do not allow industry to dictate the terms of that use to the detriment of overlying or downstream owners.

Industry should not be allowed to externalize their costs and leave the citizens of Wyoming to pick up the tab. This petition is a first step in addressing the water management problem created by coal bed methane development. We urge you to consider the considerable impacts to land, cattle, crops and citizens that are and will occur with unrestrained water development.

Thank you,



Carol LeResche
PO Box 209
Clearmont, Wyoming 82835
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