

Environmental Quality Council
Herschler Building, Room 1714
122 West 25th Street
Cheyenne, WY 82002

FILED

JAN 18 2007

**Terri A. Lorenzon, Director
Environmental Quality Council**

January 15, 2007

TO: Wyoming Environmental Quality Council
RE: Powder River Basin Resource Council petition for rulemaking

The current water management system for coalbed methane (CBM) discharges, administered primarily by Wyoming's Department of Environmental Quality (DEQ), must be amended to address water disposal practices from CBM development that are causing erosion, damaged soils and killed vegetation, and flooding of ephemeral drainages crucial for livestock production.

Greater restrictions must be imposed on the volume of water that can be discharged from CBM wells, particularly when the practice is being allowed in the name of beneficial use.


Only quantities of water that will actually be used for beneficial purposes should be allowed to be discharged from CBM wells—with the exception of landowners who have specifically requested the water, and where the water poses no environmental risk to downstream landowners.

The DEQ has the legal authority to address this issue, which is causing these serious environmental problems in the Powder River Basin, and which will only be exacerbated as the development proceeds.

I appreciate the council's steadfast work on this increasingly serious issue, and your recognition that water, as it is described in the statute, must be managed judiciously for the benefit of all Wyoming citizens.

Thank you for the opportunity to comment.

Sincerely,



Gillian Malone