

**NORTHLAND  
INDUSTRIAL  
SPECIALTIES L.L.C.**

**FILED**

JAN 29 2007

Terri A. Lorenzon, Director  
Environmental Quality Council

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January 29, 2007

Mr. Mark Gordon, Chairman  
Wyoming Environmental Quality Council  
122 W. 25<sup>th</sup> St.  
Herschler Bldg., Room 1714  
Cheyenne, WY 82002  
Fax: 307-777-5973

RE: Powder River Basin Resource Council Citizen Petition for Rulemaking on WQD Ch. 2

To: The Chairman of the WEQC,

We, the members of Northland Industrial Specialties, LLC a welding/fabrication and field construction/services Company are writing to express our opposition in regards to the Powder River Basin Resource Councils' Citizen Petition for Rulemaking on WQD Chapter 2.

Our company has served the Powder River Basin area for over 10 years in various aspects of the industries that have supported the Wyoming economy. We pride ourselves on being a local representative and supporter of our local economy as well as a diplomat to Wyoming's development in all respects of the word.

Our company currently employs 28 Campbell County residents that range in ages of 18 - 61 years. We are capable of providing health care benefits as well as competitive wages due to our success in the industries served, thus providing viable benefits to our state and local entities.

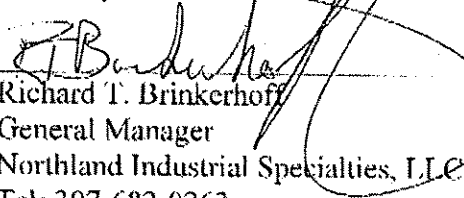
It our understanding that the DEQ has reviewed the proposed petition and that as it is written will have the effect of prohibiting most, if not all CBM produced water discharge. It is also our understanding that the Attorney General's office has repeatedly cautioned against the petition and the rule that is proposed. We would oppose setting standards on water discharge for coalbed produced waters that are more restrictive than for other industry discharges. We also feel that this ruling would be arbitrary as it is proposed.

Should the PRBRC Citizen Petition for Rulemaking pass, our work load and revenue would diminish by 90%, which would result in 20 plus lost jobs. It is mind boggling as to the negative economic impact this rulemaking could have. There are numerous benefits in which our community receives from CBM industries.

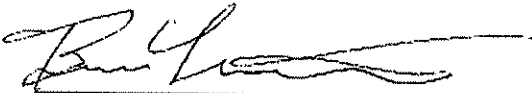
While it is understood that there have been isolated problems with some land owners/ranchers, there is a vast majority that have benefited from the use of the CBM discharged water for irrigation, livestock and wildlife drinking water in locations that had little or none due to current weather conditions.

In summary we oppose the petition to stop discharge of CBM produced water and the negative impact on the economy locally and statewide. We thank you for the opportunity to comment on the ruling and respectfully ask that our comments be submitted into the records.

Sincerely,



Richard T. Brinkerhoff  
General Manager  
Northland Industrial Specialties, LLC  
Tel: 307-682-0263  
Fax: 307-682-0977



Brian M. Norstegaard  
Field Construction Supervisor / Owner  
Northland Industrial Specialties, LLC

Cc: NIS, LLC Owners  
NPS, LLC  
Ridge Runners Investments, LLC