

# 5L DRILLING, LLC

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PO Box 626 ~ 1302 Arlyn Court, Suite B ~ Gillette, WY 82717-0626  
 Phone (307) 682-0240 ~ Fax (307) 682-7261  
 Pete Luthy Cell (307) 660-5040 ~ Barb Luthy Cell (307) 299-8148

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 - 307-777-6134

**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

Mr. Gordon,

First, allow me to introduce myself and my company. My name is Pete Luthy and my wife is Barb Luthy. We are both residents of Gillette, Wyoming and are the principals of 5L Drilling, LLC. In October 2005, we purchased the Skytop Brewster Drilling Rig and the related equipment used in the drilling operation. The investment was significant and required us to use all resources available to us, including borrowing money from family. 5L Drilling, LLC focuses its drilling services on coalbed methane wells that are 1000' to 3400' in depth. We strive to provide reliable well-maintained equipment, and a professional, safe and drug free work environment. Last year, we infused into the local and state economy over \$400,000 in payroll, employee benefits and payroll taxes and over \$12,000 in sales taxes paid on purchases of parts and supplies. All of this would be lost if we were not able to remain in business.

It has come to my attention that the above referenced petition has been submitted and has the potential to eliminate coal bed methane drilling. I am opposed to the Citizen Petition for Rulemaking - Powder River Basin Resource Council et al - Revised Version - WQD Chapter 2. I oppose rulemaking that reduces or eliminates the ability for coalbed produced water to be discharged and thus beneficially used. I have seen or heard about ranchers in Campbell County, and in other areas of the state, that have come to rely on CBM and oil well discharged water to water their livestock and irrigate their fields.

It is my understanding that DEQ has looked at the petition and that as it is written it will have the effect of prohibiting most, if not all CBM produced water discharges. I do not feel that any specific industry should be held to a different set of standards. This petition would set stricter standards for CBM discharged water than for other discharges. I understand that problems with some individuals might exist, however, changing water quality rules is not a fix for those solutions. There are many options available for conflict resolution that are not being pursued by the petitioners.

The individual petitioners listed represent approximately 50,000 acres which is .1% of the 62.6 million acres in Wyoming. I oppose changing rules to suit the few, but could ultimately adversely affect so many.

Thank you for the opportunity to comment on this petition. Please feel free to contact me if you have any questions (307) 660-5040

Sincerely,



Pete Luthy  
 Managing Member  
 5L Drilling, LLC