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January 28, 2007

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Mr. Mark Gordon, Chairman  
Wyoming Environmental Quality Council  
122 W. 25<sup>th</sup> St.  
Herschler Bldg., room 1714  
Cheyenne, WY 82002

Terri A. Lorenzon, Director  
Environmental Quality Council

RE: Citizen Petition for Rulemaking – Powder River Basin Resource Council et al

Dear Mr. Gordon:

My name is Paul Wages. I grew up in Montana and graduated from Montana Tech with a degree in Petroleum Engineering. Ten years of my career has been spent in Wyoming, first in the Rock Springs area and now in the Gillette area with the coal bed methane industry. Only four years of my career, utilizing my professional degree, has been spent working in my home state because the job opportunities do not exist there like they do in Wyoming.

In 2000, I return to my home state so I could finish raising my children through high school amongst their family. I was able to land a job with the BLM in Great Falls for less than half of my industry salary but achieved my personal objective of seeing my children attend and graduate from high school among our family and friends. In 2005, I received a call from a former business acquaintance and was asked to consider a position in Gillette with their company, which I accepted. I am convinced that I would not have been given this opportunity to work again in Wyoming if it had not been for the rapid growth of the CBM industry in the Powder River Basin.

I oppose the Citizen Petition for Rulemaking – Powder River Basin Resource Council et al – WQD Chapter 2 for a number of reasons:

- I do not believe the more stringent regulations in the proposal are necessary to protect the land, wildlife habitat, wildlife or domestic ranching operations. I believe the DEQ has the wherewithal in the existing regulations to effectively managing the industry.
- More stringent regulations would have the immediate affect of slowing down the development. **It is the pace of the development that created the job opportunity I now enjoy and allows me to fund my children's college education.**
- As the CBM development centers on the acreage associated with the Big George, more and more Federal Minerals are involved. The Federal Government, through the BLM has already imposed significant wildlife timing stipulations to our operations that effectively shut down many of our activities from late in the year for Bald Eagle roosting criteria until mid-year with nesting and breeding activities associated with raptures and sage grouse. The service industry is going to be severely impacted by these stipulations in 2007 unlike previous years because so much of the development is now on Federal acreage. The social/economic effects

will be drastic. More stringent regulations for surface discharge of CBM water will compound these effects.

- I am discouraged that a small group of vocal opponents to CBM development can impact the industry so much. There are too many landowners in the basin that welcome the CBM development and the beneficial uses associated with the water whose testimony appears to be unheard.
- The coal development in the Northern portion of the basin is not as good as that in the center. These proposed regulations will significantly increase the operating costs for the development of CBM and will make portions of the basin uneconomic. Undeveloped minerals mean no gas production and no royalty payments to the Fee, State and Federal mineral owners.

In summary, I have enjoyed good employment in Wyoming because of the business friendly regulatory environment that exists here. I know too well how unnecessarily stringent regulations have discourage business development in the State of Montana. You have only to look across the border to the lackluster Montana CBM development to recognize how damaging these types of initiatives can be for the industry and the associated employment opportunities.

Thank you for the opportunity to comment on this important issue. Please contact me if you have any questions at 307-685-5735.

Sincerely,



Paul Wages