

attn: Kim Mc Gee.

**FILED**

**JAN 26 2007**

**REGARDING PRODUCED CBM WATER**

Terri A. Lorenzon, Director  
Environmental Quality Council

Dear EQC Council:

Thank you for addressing the question of CBM water.

While I'm not from the Powder River Basin, I have been concerned about these produced waters from the beginning of this type of gas production.

- (1) Much of this CBM water changes the soil structure over time with its salts.
- (2) CBM Water Flows cause erosion and destruction of native plant species.
- (3) CBM water is changing the Powder River ecosystem.
- (4) CBM water affects hay meadow and grazing land productivity.
- (5) CBM water provides a breeding grounds for mosquitoes and the transmission of disease. I'm concerned about the potential of impacts of West Nile Disease, especially to sage-grouse.

While I support reinjection, I think the water eventually should be reinjected into the coal aquifers from which it was removed when possible. It is likely that this will produce more gas over time and could be one of the few ways gas production is sustainable.

Reinjection is not a panacea for these waters. In the Atlantic Rim project, reinjection is occurring into deeper formations where the water is of poorer quality just to get rid of it and not violate the Colorado River Compact. Thus this water is forever lost to beneficial use of any kind.

Therefore, one option is to treat these waters, when it isn't possible to reinject them into the coal aquifers, and then "pipe" them, to cities or reservoirs like Alcova, rather than simply discharge them on the surface.

Rather than have "custody" battles over who decides what happens to this water, I would like to see the best minds make an intelligent determination of best management practices. To simply assume that this water is beneficial, somewhere, somehow, is highly irresponsible.

I firmly support the EQC finding solutions that will "prevent, reduce and eliminate pollution." I think that is your responsibility.

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