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Terri A. Lorenzon, Director
Environmental Quality Council

January 26, 2006

Wyoming Environmental Quality Council
Mr. Mark Gordon, Chairman
122 W. 25th Street
Herschler Building, Rm 1714
Cheyenne, WY 82002

RE: Citizen Petition for Rulemaking – Powder River Basin Resource Council et al – Proposed Revised Version – WQD Chapter 2

Dear Mr. Gordon:

The Powder River Basin Resource Council (PRBRC) has proposed a petition to change Wyoming water quality rules to the Environmental Quality Council. This petition is aimed at produced water from coalbed methane wells and may impact traditional produced waters. This letter is a formal response against the proposed petition. I have put substantial analysis into determining the negative impacts of this petition. It is my understanding that the WYDEQ has looked at the petition and that as written it will have the effect of prohibiting most if not all CBM produced water discharges. By changing WQD, Chapter 2, EQC would not be protecting existing use of CBM water by ranchers, livestock and wildlife. I oppose rulemaking that reduces or eliminates the ability for coalbed produced water to be discharged and beneficially used. Finally, I oppose setting standards for water discharge for coalbed produced waters that are more restrictive than for any other discharges. I understand that problems with some individuals may exist; however, changing water quality rules is not a fix for those solutions. The Attorney General's office has repeatedly cautioned against this petition. The EQC would be wise to heed their attorney's advice. This rule will be struck down as arbitrary and capricious.

Thank you for giving me the opportunity to comment on this important issue. Please contact me at my email address: bwillson@marathonoil.com if you have any questions regarding this letter.

Sincerely,



Beverly Willson, Engineering Tech

Marathon Oil Company

cc: Governor; State Legislative Body