

TO DEQ 307/777-6134

FILED

January 29, 2007

JAN 29 2007

Re: Proposed rule changes by the PRBRC.

Terri A. Lorenzon, Director  
Environmental Quality Council

To Whom It May Concern:

Thank you for the chance to respond as you consider a petition for rule changes in regard to the definition of water and its contents as a pollutant. Please accept these comments from a layman with regard to the science, but also as an astute observer who has years in this area and in the CBM field.

With the initiation of CBM drilling in 1998 we also saw the beginning of a drought (could any problems that might exist be related to this more than anything else). During these last 7 or 8 years I have marveled at the increase in wildlife in the areas where CBM fields are developed and the produced water is collected in reservoirs, in spite of the drought. As we develop these fields one of the most requested items during surface contract discussions is the provision of water taps and reservoirs for agricultural uses. While my experience carries no statistical weight, it is interesting to me that I have never talked to a land owner that is opposed to CBM development except those who do not own the mineral rights or those in the dual estate situation who don't share in the development proceeds. I hope that we don't let pseudo scientific definitions be used as a club to beat on us in the name of environmental protection if the real issue is anti-development.

I do have a stake in the continued development of the CBM resource. I consult for pipeline companies in the development of gathering fields and compression stations. As Gillette has also seen a shortage in housing as this area grows, I am developing a subdivision that targets workers in search of affordable housing. Gillette is a wonderful place and is growing responsibly. Both the city and the county have learned from the booms and busts of the past and are regulating current growth in a good way.

I hope that the proposed rule changes will be rejected in that they are more restrictive than even the rules for drinking water in our community. Although I'm no scientist, I can't help but recognize that something is going terribly wrong when water that I drink every day would be considered a pollutant under the new rules. This is water that will be used to water livestock and wildlife as well as irrigate crops.

Please accept these comments against the adoption of the proposed rule changes.

Sincerely,



Randal P. Pope  
905 Clarion Dr.  
Gillette, WY 82718  
307/680-3840