

Mr. Mark Gordon, Chairman
Wyoming Environmental Quality Council
122 West 25th Street
Herschler Building, Room 1714
Cheyenne, Wyoming 82002

January 27, 2007

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Terri A. Lorenzon, Director
Wyoming Environmental Quality Council

RE: Opposition to Citizen Petition for Rulemaking – Powder River Resources Council et al –WQD Chapter 2

Dear Mr. Gordon:

For the record, I would like to state my position in opposition of this petition.

I believe that I have some qualifications in regards to understanding the petition, the CBM industry, water management in the production of CBM and stewardship of the land.

I personally know the Barlow's (Eric and his mother Bernadette) and they are fine people that are genuinely concerned about their property that has been in the family for four generations. Like the Barlows, my grandfather homesteaded in the Yellowstone River valley of Eastern Montana at the turn of the century 100 years ago. Like Gillette, that area is in the middle of an energy boom. I have watched my family and advised them on land easements, minerals leases and production issues on their lands in an environmentally sensible way.

I was the first in my family to go to college. I received a Bachelor of Science degree in Electrical Engineering from Montana State University in 1974. I was hired out of school by Schlumberger Well Services and worked for them in various positions for 25 years before I retired. During that time I was a resident of Wyoming on three different occasions (1976-78 in Gillette) (1979 – 1980 in Evanston) and (1982-85 in Casper). For 33 years I have primarily worked as a Petroleum Engineer in the oil and gas fields of Montana, Wyoming and California. I am currently a resident of the State of Alaska but as you see have many ties to the states of Montana and Wyoming.

In 2005, Marathon Oil Company located here in Gillette lured me out of retirement to help them produce CBM gas and the associated water in an environmentally responsible manner. I believe that Marathon is at the forefront of water management from the CBM production using approved disposal methods that are environmentally responsible. Through Marathon, I am working with the Barlow's to develop their BLM and fee mineral leases underlying the Barlow's property by using 5C5 Underground Injection Wells. We are poised to begin this project and I believe that we can achieve a balance between Marathons' development and environmental stewardship of the Barlow's land.

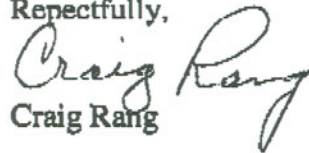
The existing rules of the DEQ appear to be more than adequate to protect surface owners and allow mineral owners to develop their resources in their current format. If the petition is adopted it would eliminate this industry and unfairly protect a small minority

of surface owners presenting this petition. There is a larger percentage of surface owners that benefit from this industry and would be hurt both physically (lack of water during our drought) and financially if the petition is adopted.

Environmental stewardship is vital to me as a person that I carry over to my job with Marathon Oil Company. I personally own property located on the Kenai National Wildlife Refuge near Soldotna, Alaska. The Kenai River is world famous for its salmon stocks and sizes that are not matched anywhere else in the world. Unless we are good stewards of the environment, these can be lost forever and must be protected.

Thank you for allowing my input.

Respectfully,


Craig Rang