



Quality Services, Inc.

3459 Jet Drive, Rapid City, South Dakota 57703-4760

Archeology-Paleontology-History-GIS-Training

qservices@qwest.net

<http://www.quality-services.info>

Phone: 605-388-5309

Fax: 605-388-5319

Cell: 605-209-0265

January 27, 2007

FILED

JAN 29 2007

Terri A. Lorenzon, Director
Environmental Quality Council

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

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

Dear Mr. Gordon:

Our opinion is that the above request to change water quality standards for coal bed methane discharges should be denied for the following reasons –

1. The proposed rule places more stringent requirements on discharge waters than there is for drinking water and this makes no sense at all. No discharge requirements should be more strict than standards for drinking water.
2. There should not be stricter discharge standards for any one type of similar discharge than another. CBM producers should not be treated more severely than other oil and gas producers, or more severely than agricultural or industrial production facilities.
3. Implementation of this rule would severely hurt the economy in the Powder River Basin. Our firm has employed up to 20 people working in Campbell County and these proposed rules can result in our work being reduced to the point that most of our people working there could lose their jobs due to severe lack of work for them.
4. The potential harm to the Campbell County economy would at least as severe as the last three economic down turns there dating back to the early 1980s. The entire Powder River Basin would lose thousands of jobs, local governments and the State of Wyoming would lose millions of dollars in royalties and taxes, and land values would plummet. Many personal bankruptcies would occur and Wyoming would quickly see it's this area's population move out of state for employment elsewhere.
5. There is no reason to implement stricter discharge standards here than in any other part of the State of Wyoming, or more strict than in adjacent states.
6. This petition for rulemaking is proposed by only a few people but will seriously and adversely effect the entire population of the State of Wyoming and adjacent areas.

Thank you for your consideration in the matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance Rom". The signature is fluid and cursive, with a large initial "L" and a long, sweeping underline.

Lance Rom
President