

# Rockin'

*production services, inc.*

**FILED**

JAN 29 2007

Terri A. Lorenzon, Director  
Environmental Quality Council

January 29, 2007

Mr. Mark Gordon, Chairman  
Wyoming Environmental Quality Council  
122 W. 25<sup>th</sup> St.  
Herschler Bldg, Room 1714  
Cheyenne, WY 82002

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

Dear Mr. Gordon,

My name is Sherri Schiller and I would like to introduce our company to you. We are a small business, out of Gillette, Wyoming, that provides oil field services to oil and gas companies. Specifically, we provide pipelining and roustabout services for the coal bed methane (CBM) industry. It has come to our attention that the PRBR Council is considering changing the rule in regards to prohibiting most, if not all coal bed methane discharges to the surface.

We strongly oppose the setting of standards for water discharge for CBM produced waters that are more restrictive than for other discharges. The setting of this rule would be an arbitrary one if adopted as proposed. This rulemaking cannot stand up, if CBM water is held to a stricter standard than other discharged water.

We are aware and understand that problems may exist with some individuals, however, the solution to this problem does not lie with changing the water quality rules. Many other options are available that are not currently being pursued by the petitioners.

We oppose rulemaking that reduces or eliminates the ability for CBM produced water to be discharged and thus beneficially used. As a company on the front lines in this industry, we have seen first-hand the benefits of CBM discharged water to ranchers, livestock and wildlife. We are aware of many ranchers who want and are reliant upon this water for their livestock and pastures. We believe it is accurate to say that there are many more ranchers in favor of the CBM discharged water, than those who are opposed.

The abundant livestock of ranchers and the wildlife of Wyoming is respected and appreciated by the people who live and work in this great state. Companies such as ours take great pride in making sure that the land is restored to its natural state so that the livestock and wildlife continue to flourish. We work extensively with a CBM discharged water purification system to ensure the quality of water meets the highest standards possible. *(See enclosed photo of system in its working state).*

By changing this rule, the EQC would not be protecting the existing use of CBM water by ranchers, livestock and wildlife. Ranchers will suffer greatly, if this rule is passed.

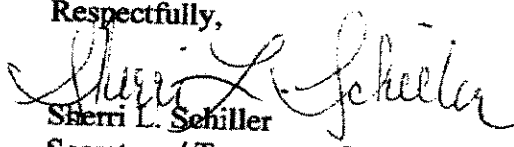
We would like, respectfully, to remind you of the financial ramifications this rulemaking would have on a large number of individuals. This includes, but is not limited to the livelihoods of our company that consists of five officers and their families, as well as our 25 employees and their families, other subcontracting companies providing the same services, as well as the numerous individuals employed by the oil and gas industry. *(See enclosed photo of some of our employees).*

This would also put a significant financial burden on the north central portion of the State of Wyoming, as well as the entire state should gas production be reduced and/or possibly eliminated. This could potentially impact the entire nation with regards to providing a viable source of energy.

Also, we would like to remind the EQC that the Attorney General's office has repeatedly cautioned against this petition and the rule it proposes. We feel it would be in the best interest of the EQC to heed their attorney's advice.

We thank you for the opportunity to comment on this petition issue. Should you require additional information or have questions, please don't hesitate to contact either of the gentlemen below at 307-686-8123.

Respectfully,



Sherri L. Schiller  
Secretary / Treasurer, Owner

Roland Schiller  
Vice President, Owner

Brian Ogden  
Supervisor



