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JAN 26 2007

Mr. Gordon,

Terri A. Lorenzon, Director  
Environmental Quality Council

Thank you for the opportunity to comment on the Citizen Petition for Rulemaking- Powder River Basin Resource Council et al-WQD chapter 2.

My name is Frank Vogel and my wife and children's names are Michelle, Brady, and Quincy Vogel. My wife and I are Wyoming natives of Fremont and Sweetwater Counties.

I am the Regional Manager for Consolidated Oil Well Services, with operations in Gillette and Worland. I have fifteen employees in the state. Of these fifteen employees, twelve of them are also Wyoming natives. We have an average salary per employee of sixty thousand dollars and our annual in state expenses are two million three hundred thousand dollars, on average per year, over the last seven years. In simple terms, our small operation generates three million two hundred seven thousand dollars for the state economy annually.

I oppose the Citizen Petition for Rulemaking-Powder River Basin Resource Council et al-WQD chapter 2 for the following Reasons.

- 1) I do not agree with setting standards for water discharge for combed produced waters that are more restrictive than for other discharges. While I do understand the need to protect our waterways, I do not agree that we are doing any harm by discharging water into them that is cleaner than my own household drinking water. This combed water is fresh water, drinking water for man and wildlife no matter how you look at it. It is my understanding of the petition as it is written that it will have the effect of prohibiting most, if not all CBM produced water discharge.
- 2) I oppose rulemaking that reduces or eliminates the ability for coal bed produced water to be discharged and thus beneficially used. Populations of wildlife have thrived on these water sources. ALL ranchers have benefited from these water sources as drinking water for their cattle, particularly in the last several drought years. Other ranchers outside the PRB are seeking relief for losses incurred due to the lack of water. Waterfowl populations have increased ten fold in the PRB according to research from Ducks Unlimited and Delta Waterfowl.
- 3) I do not agree with the petition from the standpoint that the CBM industry is making every reasonable to "do the right thing." Everyone in the industry relies on making good on its promise to be conscioce of the environment. Today's production companies dedicate large sums of money to their environmental departments. Extraordinary efforts are being made to continue responsible stewardship of the lands. Yes, the efforts being put forth are for monetary gain, but the people of Wyoming are gaining wealth right along with industry. This petition proposes to discount the wealth of thousands of Wyoming folks and industry personnel for the benefit of the minority. The petitioners got their money

out of the industry and now want us out. This isn't about fresh water as much as it is about sour grapes.

In closing, I would like to thank you again for your time, and urge The Environmental Quality Council to consider the afore mentioned points that are important to my family and I.

Regards,



Frank Vogel  
Region Manager, Consolidated Oil Well Services  
Fourth Generation Wyoming Native