

January 9, 2007

Environmental Quality Council  
Lerschler Building, Room 1714  
222 West 25<sup>th</sup> Street  
Cheyenne, WY 82002

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Terri A. Lorenzon, Director  
Environmental Quality Council

Dear Sirs/Ms.:

I wish to comment on proposed rules to address the unique problems and environmental impacts caused by C.B.M. discharge water, as per a citizen petition filed by the Powder River Basin Resource Council. In general, there is definitely a need for implementing rules to address the C.B.M. discharge water problem. I recommend that you take action to adopt this new rule, which seeks to address the problems being caused by C.B.M. discharge water.

Over the past several years, the discharge of C.B.M. water in the Powder River Basin into ephemeral drainages has destroyed native vegetation and replaced it with vegetation neither wildlife or livestock will eat, and resulted in water that livestock cannot safely drink. The C.B.M. discharge water has also killed hundreds of cottonwood trees and is loading these drainages with salts causing irreversible damage to the area's soils. Therefore, I support the citizen petition's proposal to add a specific Appendix I to Chapter 2 of the Water Quality rules that will address C.B.M. produced water discharges. Specifically, the rule change would direct the DEQ to move away from its restrictive view that regulation is only at the end-of-pipe, and require it to look at the impacts downstream, where too much of the damage is occurring. It would also impose effluent limits more reasonably ex-



tion (barium, TDS/EC, and sulfates). I ask that you implement this rule change to ensure protection of soil, vegetation, wildlife, livestock, aquatic life and the downstream landowners and their existing uses of the land, and to prevent damage being caused by DEQ's failure to regulate CBM discharges.

I remain, seeking to protect the Powder River Basin from the CBM discharge water's ill-effects,

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