## JIM'S WATER SERVICE, INC COALBED METHANE DIVISION

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February 14, 2007

Mr. Mark Gordon, Chairman
Wyoming Environmental Quality Council
122 W. 25<sup>th</sup> Street
Herschler Building, Room 1714
Cheyenne, Wyoming 82002
Fax: 307-777-6134

FILED

FEB 1 4 2007

Terri A. Lorenzon, Director Environmental Quality Council

Re:

Proposed Rule / Policy Chapter 1 Section 20 (Appendix H)

FACSIMILE CORRESPONDENCE
HARD COPY TO FOLLOW VIA UNITED STATES POSTAL SERVICE
CERTIFIED MAIL RETURN RECEIPT REQUESTED

Dear Mr. Gordon:

Jims Water Service, Inc is a Wyoming Corporation that has done business in this state as operator, owner/operator in the CBM / Oil and Gas Industry as well as construction, and water hauling among numerous other entities for over 30 years. Currently we have pulling units, roustabout crews, pipeline crews, drilling rigs, OTR and Local trucking, Water Enhancement (FRAC) tanks and rentals, rental properties (commercial, industrial and residential) averaging 50 – 75 plus employees utilizing 100-150 local and state vendors over the 2006 year with a work area covering all of the Powder River Basin and greater. It is our opinion and history that we as a corporation have made a major impact throughout our journey in the Industry through the good years and the bad, Boom or Bust, you might say. JWS has weathered monumental changes in rules and regulations over the years, and we are still in operation. This doesn't hold true for a monumental amount of other small companies. We have seen them come in fast and go out just as quickly for various reasons. After 30 plus years, we as a corporation, our employees, contractors, sub-contractors nor our vendors want to see this happen to us.

After extensive review and meditation, Jims Water Service, Inc adamantly opposes the Department of Environmental Quality's proposed rule changes for Chapter 1 Section 20, more specifically your Agricultural Use Protection further known as Appendix H. Any rulemaking that reduces or eliminates the ability for coalbed methane production water to be discharged due to such stringent criteria, eliminates the beneficial use of such production water and therefore results in eliminating the economic feasibility and possibility of methane production! Production water is a constant and reliable source of water needed by ranchers, landowners, livestock, wildlife, aquatic life as well as the use for agriculture and this is in addition to waters in reservoirs, streams, lakes and rivers.

Water management plans and plans of development have been implemented and continue to be required, regulated and monitored for specific reasons and results. These results of which JWS and other operators have achieved and exceeded.

Thank you for the opportunity to comment on the proposed rule changes. Please note our opposition.

Respectfully,

Julia Brown, CBM Division Jims Water Service, Inc

JWS/jb