

February 14, 2007

Wyoming Environmental Quality Council
122 W. 25th St.
Herschler Bldg., Room 1714
Cheyenne, WY. 82002

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Terri A. Lorenzon, Director
Environmental Quality Council

Dear Mr. Gordon,

My name is Jim Nies; I work for Yates Petroleum as a drilling superintendent in charge of hiring rigs and contractors to oversee and perform various services that are needed for the completion of these wells.

I am concerned about the Chapter 1, Section 20 rulomaking changes that are being presented to the EQC. I feel this will affect agriculture waters as it exists, will restrict future water management for CBM development and the beneficial wildlife uses.

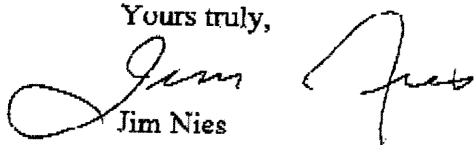
I believe it is overkill to design reservoirs to contain the 50 year/ 24 hour storm event. The financial burden to build a reservoir to contain such an event would soon destroy the bottom line of any CBM Operator no matter privately held or publicly traded. The amount of surface disturbance related to containing the 50 year/ 24 hour storm event in most cases would not be allowed by the BLM on Federal Projects. The private landowners would not want a reservoir that is capable of holding 12 acre feet of water to only have 1 acre feet of water in it. Not to mention the threat of West Nile that would lurking in a reservoir with such little water in it.

Treating produced water with technology that is available today is cost prohibitive, as the minute the treated water is put in contact with the soil it quickly becomes laden with salts from the soil and would once again not meet end of pipe testing.

In conclusion, please consider all aspects of the proposed rule changes before making the tough decisions that face you and your fellow council members.

Thank you for allowing me to comment on this issue

Yours truly,


Jim Nies