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Gillette, WY 82718
February 14, 2007

F I L E D

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Mr. Mark Gordon, Chairman
Wyoming Environmental Quality Council
122 West 25th St.
Herschler Building, Room 1714
Cheyenne, WY 82002

Terri A. Lorenzon, Director
Environmental Quality Council

Re: Citizen Petition for Rulemaking – Powder River Basin Resource Council

Dear Mr. Gordon:

Unless it is your intent to prohibit the surface discharge of CBM water I believe the EQC has no choice but to deny the PRBRC's Citizen Petition for Rulemaking.

You've heard all of the testimony and read the letters from Mr. Cora and his crew at the WYDEQ and, possibly, even a few letters from a pro-CBM law firm or two. Out of all of this information we have heard recently, it appears to me that even the current WYDEQ rules are suspect given (1) the effluent limits from the Water Quality Division were based *not* on tolerances of native Wyoming plants, but on tolerances of plants grown in California soils, or (2) basing reservoir containment volumes on 50 year events where there is absolutely no basis for that. It is clear to me that no one knows the true and correct answers of the cumulative effects of water discharges, CBM or otherwise. To compensate for our collective lack of knowledge, someone picks a number and then makes it 30% more conservative just to cover their unknowns. My hope is that common sense will prevail and I encourage you and the EQC to use your common sense and keep Wyoming moving forward.

Very truly yours,



Larry A. Johnson

(Fourth generation Wyoming native; graduate of the University of Wyoming; worked in the Wyoming oil and gas industry over 32 years.)

cc: Mr. Dirienzo, WYDEQ WQD