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Terri A. Lorenzon, Director
Environmental Quality Council

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WATER QUALITY DIVISION
WYOMING

To the EQC, Water Quality Division:

I am taking this opportunity to write you on behalf of landowners, agricultural producers, and wildlife in relation to coalbed methane water discharge.

Studies have clearly demonstrated that CBM discharge water can be of such poor quality that it can impair soil permeability for years. I would maintain that the State of Wyoming has no business allowing the dumping of fossil aquifer waters onto the surface anyway. CBM water should be re-injected into the formation from which it came. In the long term this water resource in place is of far greater value to the state of Wyoming than the coalbed methane resource that is being extracted now, at such cost to the environment and to landowners.

However, if you are going to continue to allow the surface discharge of this water, then at least you should require operators to clean it up to the point where it does no further harm to the environment. Right now from what I've read and also seen, some of this water might as well be poison.

This water should be brought up to the quality of irrigation water, with an SAR that does not exceed 5, and an EC of no more than 1300. Your draft limits are too high, and could potentially cause irreversible changes in soil structure, making the riparian zones into which CBM water is discharged less productive for forage for livestock and wildlife. The plants able to survive in this polluted water will be different than the vegetation there now, and who knows if anything will grow there at all once the wells are done with, and the discharge water gone. Adequate protections need to be in place today in order to safeguard the existing resource. I am also against the idea of creating a whole new category of "Effluent Dependent" drainages. I recognize that there are already many such situations in existing oil fields, but my concern is that this designation will permit even lower water quality standards for effluent discharged into these drainages (which were once Rainfall Dependent) EQC should require one and only one high standard for industrial water discharges, and then stick by it.

I also disagree with the plan to protect only riparian areas that are 20 acres or larger. I own property where the riparian (most productive) zone of my 160 acres is way less than 20 acres, and yet it provides livestock

grazing, cover and water for deer and elk and moose, and vital habitat for songbirds. Not to mention shade, water table protection, firewood, and even a home for a few small fish. My beautiful cottonwood bottomlands would not be considered worthy of protection in your current proposal.

This brings me to my final point: The burden of proof should not fall on the landowner. Industry should always be the one required to prove that they will not harm existing resources, or that they will adequately mitigate if surface damage is unavoidable. Industry should be required to post a bond as insurance to landowners that their private property will in fact be respected, and restored to usefulness. State agencies should also have this assurance in place, that there will be adequate funds for remediating whatever kind of damage occurs on public or split-estate lands.

Thank you for engaging in this process of revising outdated rules. But I would like to reiterate my first point---CBM water should be reinjected, not discharged. Then we wouldn't have to deal with this damage to our watercourses after the fact.

Sincerely,

Linda Raynolds

A handwritten signature in cursive script, appearing to read "Linda Raynolds".

2/9/07