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Terri A. Lorenzon, Director
Environmental Quality Council

DEQ/Water Quality Division
Herschler Building-4W, 122 W. 25th Street
Cheyenne, WY 82002
Attention: Bill DiRienzo

February 12, 2007

RE: Changes to Chapter 1 of the Water Quality Rules and Regulations

Dear Environmental Quality Council,

Thank you for allowing us to comment on the DEQs proposed changes to Chapter 1 of the Water Quality Rules and Regulations. We urge you to reject the proposed changes and place stronger protections on CBM discharges. We ask that you include default limits for CBM discharges that do not exceed an EC of 1,300 and SR of 5. These standards would help ensure protection of soils, grazing lands, and irrigated lands. We also believe it is wrong to force CBM discharge water on landowners who do not want it. We also ask that the EQC include protection for all ephemeral drainages and bottomlands regardless of their size, not only for areas adjacent to stream channels that are 20 acres or larger in size as proposed in the present draft. Please require discharge water to meet irrigation water quality at the point of use, not just at the end of pipe discharge. Industry must prove they won't harm existing uses. As the developing industry, it is their responsibility and must be one of the costs of doing business. The landowner should not have the burden of proof fall on their shoulders.

We would also like to comment on the new "Effluent Dependent" water category being proposed by the DEQ. Effluent discharges should not be categorized as an environmental benefit. Any and all discharges which allow more pollution and damages into our water ways and ephemeral drainages are not environmental benefits. The state of Wyoming should be strengthening rules and laws to protect our water and water ways.

Oil and Gas development has brought revenue to Wyoming, created jobs, and made profits for private companies. These valuable additions to our economy should be protected, but NOT at the expense of our water, air, human environment, and natural environment. It is time for the oil and gas industry to adhere to regulations that protect our state as well as their profits. A good start will be stronger rules and regulations to protect our water and waterways. Please reject the new category of "Effluent Dependent Waters" as proposed by the WDEQ.

Sincerely,



Deborah K. Thomas



Dick L. Bilodeau