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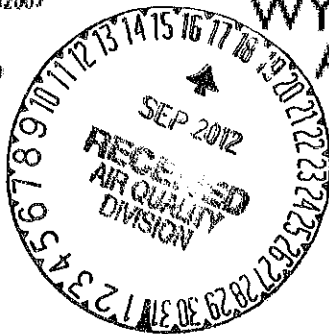


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September 17, 2012

FILED

Sep 20, 2012

Jim Ruby, Executive Secretary
Environmental Quality Council

Mr. Steven A. Dietrich
Wyoming Department of Environmental Quality
Air Quality Administrator
122 W. 25th Street
Cheyenne, WY 82002

Re: Department of Environmental Quality Rules to Regulate Green House Gases

Dear Mr. Dietrich:

The Wyoming Mining Association (WMA) offers the following comments on the above referenced rules to regulate green house gases (GHG).

WMA is a statewide association representing companies that produce bentonite, coal, trona, uranium and rare earth minerals in Wyoming. Many of WMA's members are required to obtain Title V Operating permits or PSD permits and so rules regulating GHG are very important to them.

In general WMA is in support of the proposed rules. WMA was very involved in the legislation passed in 2012 to allow the Department of Environmental Quality (DEQ) to initiate the rule making process and we have been involved in the draft legislation being considered by the Joint Minerals Committee to allow the rules to be submitted to EPA once adopted. WMA recommends that the Environmental Quality Council (EQC) adopt the rules as written.

WMA is concerned about the possibility of some future administration imposing fees on the GHG. There is nothing in the rules that preclude the DEQ from imposing fees at some future date. WMA understands that the DEQ has publicly indicated that there are no plans to include GHG's in the collection of fees, but there is nothing in writing stating that position. WMA recommends that a statement be included in the Statement of Reasons that DEQ does not plan on collecting fees on GHG's to run the Air Quality Division Title V Operating Permit program.

Thank you for considering these comments.

Sincerely,
WYOMING MINING ASSOCIATION

A handwritten signature in cursive script that reads 'Marion Loomis'.

Marion Loomis
Executive Director