

August 26, 2008

Dennis Boal, Chairman  
Environmental Quality Council  
122 West 25th Street  
Herschler Building, Room 1714  
Cheyenne, WY 82002

Re: *EQC Docket No. 08-3101, Water Quality Division, Chapter 1, Section 20*

Dear Chairman Boal:

The Coalbed Natural Gas Alliance (CBNGA) wishes to re-submit the enclosed comments to the Environmental Quality Council (EQC) regarding the Department of Environmental Quality (DEQ), Water Quality Division's proposed revisions to Chapter 1, including Appendix H and the associated Agricultural Use Protection Policy. The Coalbed Natural Gas Alliance is an organization of about 600 energy providers, businesses, ranchers, farmers and individuals in Montana and Wyoming who support responsible energy development.

Formed in 2001 as a cooperative effort to bring together the many parties involved in natural gas development, the objective of the Alliance is to grow the economy of the region through responsible development of coalbed natural gas while maintaining the region's values and sense of place. One way we do this is by providing accurate information and education about coalbed natural gas development in the region. Operating companies, mineral right owners, interested individuals and those calling the land home have all come together and worked collaboratively towards this common goal.

During previous rulemaking proceedings concerning Chapter 1, Section 20, the EQC, DEQ, and the Waste and Water Advisory Board (WWAB) heard from several counties, local planning organizations, and wildlife organizations regarding positive impacts from oil and gas development and produced water discharges. As an organization whose goal is to inform, communicate and educate, CBNGA believes it is important all members of the Council hear from the local governments and nonprofit organizations that would be impacted by reductions in produced water discharges. We understand there has been significant turnover on the council since this issue was last heard. Therefore, enclosed with this letter is a copy of some of the comments and testimony previously submitted by counties in the Powder River Basin and Big Horn Basin, as well as conservation districts, economic development organizations, and wildlife working groups. We trust the council will take the time to review these comments from our local leaders regarding the impacts on their communities if produced water discharges are curtailed.

Thank you for your consideration of these comments and please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Monica M. Deromedi". The signature is written in a cursive style with a large initial 'M'.

Monica M. Deromedi  
Director

cc: David Waterstreet, DEQ/Water Quality Division, 122 West 25th Street, Herschler Building - 4W, Cheyenne, WY 82002