

BEFORE THE WYOMING ENVIRONMENTAL QUALITY COUNCIL

Wyoming Outdoor Council and)
Powder River Basin Resource)
Council,)
)
Petitioners,)
)
vs.)
)
Wyoming Department of)
Environmental Quality, Water)
Quality Division,)
)
Respondent.)

Department of Environmental Quality,
Water Quality Division General Permit
for Off-Channel Containment Units to
Store Water Produced by Coal-Bed-
Methane Extraction

Docket No. _____

FILED
MAR 06 2011
Terri A. Lorenzen, Director
Environmental Quality Council

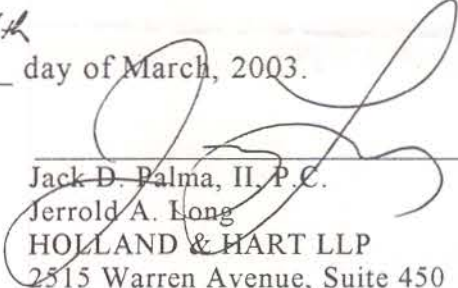
**PETROLEUM ASSOCIATION OF WYOMING
MOTION TO INTERVENE**

The Petroleum Association of Wyoming (“PAW”) moves to intervene in the above captioned matter pending before the Wyoming Environmental Quality Council. PAW is an organization of over 250 members whose purpose is to promote the exploration, production, transportation, refining, marketing and conservation of crude oil and natural gas in Wyoming. See www.pawyo.org for background on PAW. The members of PAW represent every segment of the petroleum industry including both operators and non-operating interests. PAW members include the full spectrum of companies involved in oil-and-gas production—major international oil-and-gas companies, large and small independent producers, and pipeline and transportation companies. PAW members account for approximately ninety percent of the natural gas and two-thirds of the crude oil produced in Wyoming. PAW represents a cross-section of the oil-and-gas industry, with a diversity of membership and interests including land access, environmental compliance, drilling and exploration activities, production, processing, transportation operations, and taxation and legislation.

At issue in this appeal is a General Permit issued by the Department of Environmental Quality, Water Quality Division, authorizing the discharge of water produced by coal-bed-methane ("CBM") extraction into off-channel containment units. Many PAW members currently develop methane from coal seams that produce water, and more PAW members are likely to develop methane from similar formations in the future. The General Permit at issue provides a cost-effective and environmentally sensitive means to manage this produced water. Without the general permit, PAW members would be required to obtain individual discharge permits – at greater cost and delay – to discharge water produced by their CBM operations. Consequently, the outcome of this appeal directly affects PAW members and the interests PAW seeks to protect. PAW's participation in this appeal would ensure adequate representation of all interests potentially affected by the Council's decision.

PAW requests leave to intervene in this appeal and to be heard in any hearings that may be held regarding the merits of this appeal. Counsel for PAW has discussed this motion with counsel for the Wyoming Outdoor Council and the Department of Environmental Quality, Water Quality Division, and neither party expresses opposition to PAW's motion to intervene.

Respectfully submitted this 4th day of March, 2003.



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ATTORNEYS FOR INTERVENOR PETROLEUM
ASSOCIATION OF WYOMING

CERTIFICATE OF SERVICE

I hereby certify that on March ⁴4, 2003, I served the foregoing **Petroleum Association of Wyoming's Motion to Intervene** as follows:

Two copies were directed to and served upon the Chairman of the Environmental Quality Council, Herschler Building, Cheyenne, WY 82002, by certified mail, return receipt requested.

Two copies were directed to and served upon Dennis Hemmer, Director of the Department of Environmental Quality, Herschler Building, Cheyenne, WY 82002, by certified mail, return receipt requested.

In addition, copies were mailed to the following:

Steve Jones
Wyoming Outdoor Council
262 Lincoln St.
Lander, WY 82520

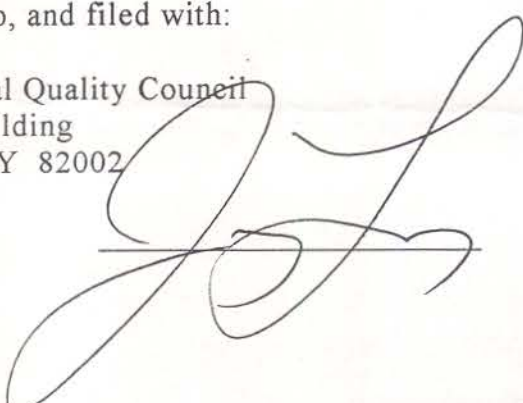
Gary Beach
Administrator, Water Quality Division
Herschler Bldg.
Cheyenne WY 82002

Magdelene Allely
Assistant Attorney General
Wyoming Attorney General's Office
123 Capitol Avenue
Cheyenne, WY 82002

A copy was also hand delivered to, and filed with:

Environmental Quality Council
Herschler Building
Cheyenne, WY 82002

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A large, stylized handwritten signature in black ink, appearing to be the initials 'JH' or similar, written over a horizontal line.