



January 24, 2014

The Honorable Matt Mead
Chairman, Wyoming Oil & Gas Conservation Commission
State Capitol Building
200 W. 24th St.
Cheyenne, WY 82002

Grant Black
Supervisor, Wyoming Oil & Gas Conservation Commission
2211 King Blvd.
Casper, WY 82602

RE: Citizen Rulemaking Petition

Dear Governor Mead and Supervisor Black,

Thank you for your interest in addressing deficiencies in Wyoming's oil and gas regulatory framework. We are encouraged by your desire to undertake a comprehensive revision of the agency's regulations, and about the other rulemaking initiatives you plan to carry out in the near future.

It is within this context that we ask you again to consider the rulemaking petition our organization and others submitted last May. The petition addresses three areas of particular interest to our organizations and our land and mineral owner members: (1) increasing setbacks from homes and other facilities; (2) reducing flaring associated with oil drilling; and (3) addressing spills and other incidents related to oil and gas development.

We drafted and organized the petition on behalf of citizens across the state from Pinedale to Pavillion, Cheyenne, Clark and Douglas, where landowners are being impacted by increasing oil and gas development. It was also supported by responsible government groups such as the Equality State Policy Center.

Given the high level of leasing, permitting, and drilling activity throughout Eastern Wyoming, the reasons for our petition are even more pressing than they were six months ago. An additional 5,000 wells are on the horizon in Converse County, over 3,000 wells in Campbell and Johnson Counties, and perhaps thousands more in Southeast Wyoming and around the state. In order to get out in front of this new development, we encourage the agency to consider our petition on an expedited basis. We believe that the rationale and language for the regulatory changes is fully developed and ready for public notice and comment. The Commission has a statutory duty to consider the petition "as soon as practicable." W.S. § 16-3-103.

Alternatively, we encourage you to adopt portions of the petition, especially the increased setback provisions, as emergency rules to ensure that the new requirements will apply to wells in

the process of being permitted. If the Commission does not act soon, a new generation of thousands of wells will be permitted under the outdated setback rules, threatening public health, property values, and the quality of life of Wyoming citizens. Increasing the setbacks for homes and businesses is an easy solution that must occur before development further encroaches.

In addition to the topics already addressed in our rulemaking petition, we would like to encourage the Commission to revise its bonding and reclamation regulations. It seems likely that this is already on your priority list, and we are pleased if that is so. The problem of orphaned wells will only increase in the future and the best way to address it is through proactive initiatives such as those we have suggested.

Thank you again for your leadership and commitment. We would appreciate a prompt response to this correspondence, and we look forward to working with you to better serve the people of Wyoming.

Sincerely,



Gillian Malone
Chair, Powder River Basin Resource Council

cc: Commissioners Hill, Drean, Williams, and Doelger