



January 29, 2001

Subject: Coalbed Methane Development Plan  
Mary Bloom, Project Leader  
Bureau of Land Management  
111 Garryowen Road  
Miles City, MT 59301

Dear Ms. Bloom:

The Montana Chapter of the American Fisheries Society is very concerned about coalbed methane development in eastern Montana and would like to see several important issues addressed in the planning process and any development proposals. Our 150+ membership includes fish biologists, limnologists, fisheries managers, stream ecologists and anglers, some of who work in the Tongue and Powder River basins.

First and foremost is our concern about the impacts on fish and aquatic life of groundwater discharged into streams or other surface waters. These direct discharges have been found to be highly saline and may contain a variety of toxic substances, not to mention the significant depletion of underground aquifers which support late season streamflows in this semi-arid region. In some locations, the discharges themselves can cause erosion, siltation and stream channel damage by disrupting natural water flows. All of these effects need to be adequately addressed in the development plan.

At minimum, wastewater treatment methods need to be fully discussed in order to ensure that discharged water does not threaten aquatic organisms. The option of reinjecting groundwater into wells should be fully explored as a way to minimize adverse effects on all resources. And finally, the plan should address the potential for cumulative effects of multiple wells being developed in one river basin.

Thank you for the opportunity to comment on this important planning action. Please keep us informed of the progress of this development plan.

Sincerely,

Michael Enk

President, Montana Chapter AFS  
PO Box 1408  
Great Falls, MT 59403

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