



Steve Gilbert  
Northern Plains Resource Council  
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Steve,

The Montana Chapter of the American Fisheries Society (MCAFS) has reviewed the Northern Plains Resource Councils (NPRC) "Doin' It Right" blueprint for coalbed methane development in Montana. We are in strong support of the initiative. The American Fisheries Society, organized in 1870, is the oldest professional society in North America dealing with the natural resources. The MCAFS was chartered in 1967, and our nearly 200 members include fish biologists, limnologists, fisheries managers, stream ecologists and anglers. We are seriously concerned about potential impacts of Coal Bed Methane to the ground and surface waters of Montana.

In light of the fact that almost no data has been gathered to document pre-development conditions for many prairie streams in the areas of proposed development and because we are aware of potentially serious impacts of the sodium bicarbonate waters that will be discharged into our streams to aquatic resources, AFS must support careful and responsible development if it has to occur at all.

Our foremost concern is the impact of groundwater discharged into streams or other surface waters on fish and aquatic life. 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 that 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.

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

NPRCs comprehensive and common sense approach to responsible coal bed methane development in its "Doing it Right" initiative is highly commendable, and is the right thing for the developers and government officials to do to minimize the impacts of any development on others who rely on Montana's waters for their livelihood and recreational values.

Sincerely,

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