

From: BLM_WY_Casper_WYMail
Sent: Thursday, January 05, 2012 2:41 PM
To: Robinson, Michael D; Durham, Christopher C
Subject: FW: Microbial Conversion

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From: Marilyn Ham [mailto:in_wyoming@yahoo.com]
Sent: Thursday, January 05, 2012 2:40 PM
To: BLM_WY_Casper_WYMail
Subject: Microbial Conversion

Experimenting with the public safety, health, and holdings, should be carefully researched before implementing any of these highly questionable efforts. Shouldn't a "test well" be done and assessed with public results before jumping into the use of this technology. Also --

1. The microbial conversion of coal to gas is an experimental, highly uncertain, and unproven technology that should require an Environmental Impact Statement.

2. The impacts to the aquifer from the injection of chemicals and so called "nutrients" to enhance the microbial activity includes the injection of several salts and acids. The BLM should assess water quality impacts in depth, as it seems unlikely that dissolved solids such as sodium could be consumed by microbial action. More likely, many of these dissolved solids - especially salts - would become waste products that would redissolve in the water. BLM must both analyze these impacts and provide prevention and mitigation measures to protect the aquifers and domestic and livestock water wells. What are the by products of the microbial consumption of the chemicals and the coal?

3. BLM should analyze the risk of methane releases into water wells.

4. BLM should analyze and disclose the rights of landowners under this permitting process and require surface owner consent for the process.

5. The BLM should clearly analyze the impacts to the coal, why the coal is not being leased for this process and clearly describe the method to compensate the public for the impacts to the coal resources.

6. The BLM must disclose and analyze the marginal economics of this process and the risk.

7. BLM should consider and analyze an alternative that requires bonding to cover the full cost of reclamation and any impacts to water wells since the process is experimental and unknown.

8. Please analyze and describe the water management since the scoping document describes both

surface discharge and no surface discharge.

Sincerely, Marilyn R. Ham