

## **Coal Bed Methane Ponds**

*By: Jim Rogers, RCD Board Vice-Chairman*

The ponds that will be created in the development of CBM are going to create a dilemma in the State of Montana. The ponds may or may not need to have a beneficial water right to be built. A benefit of having these ponds is that at least there is a chance of having the aquifer recharged, as opposed to letting the water be wasted into a stream and not being used in any manner by the State of Montana. Water held in these ponds may also have a certain amount of beneficial use to wildlife, especially if the water is treated before being discharged into the pond. However, the CBM ponds may pose a risk to the environment. If the CBM water infiltrates to the soil, does it leave its salts in the soil? If the CBM water infiltrates to the groundwater or surface water, does it impact that water?

These ponds will have some value during the life of CBM production, which will be approximately 20 years. A question of the Rosebud CD is that after the CBM play, when there is no longer water to keep the ponds full, what happens to the pond site? There is the possibility that producers will be able to keep a water right and a CBM well producing water for some of these ponds. Some of them will have no more water put in them and they will become dry. These dry pond sites may have a layer of salt or sodium lying on the surface that could cause damage if allowed to be blown about or to be washed out in some weather event that could flush them into watersheds. According to the DNRC, ponds that have not been used for beneficial use for 10 years would have to be breeched. If these ponds are not reclaimed they could cause damage to our soil resource in the associated watersheds.

How many ponds in the Rosebud CD? From the EIS (4-6) it appears to be a minimum of 200 ponds at 5 acres in size, or 1000 acres of pond site in Rosebud CD. Although the State Department of Environmental Quality and the Montana Board of Oil and Gas Conservation require reclamation of these ponds with their permits, there is going to be a significant amount of time that passes until the ponds may be abandoned. Because of the length of time after the CBM play, it seems that it may be hard to say who is responsible for the reclamation of these abandoned ponds. It is for this reason that the Rosebud CD would like to see that all CBM ponds have a reclamation bond put in place to cover the expense of restoring these sites to their original

condition. If this process is put in place before construction of the ponds, there is a chance that site location as well as construction method may enhance this reclamation effort.