

November 20, 2008



Sandra Squire, Executive Secretary
WV Public Service Commission
201 Brooks Street
Charleston, WV 25323

RE: PSC Case No. 08-1521-E-C, Longview Power LLC

The Dunkard Creek Watershed Association provides this reply and update in Case 08-1521-E-C. The information before the WV Public Service Commission in this Case to date is in many aspects incorrect, misleading, and/or incomplete.

Our letter of October 13, posted to the PSC internet web site on October 15, called for a "perpetual treatment trust fund" in West Virginia similar to that being negotiated in Pennsylvania by Longview and their affiliated companies in order to deal with the wastewater from the power plant and from the mining operations interrelated to it.

The response to that letter states as follows: "None of these parties have petitioned the Commission for intervenor status in this proceeding, and Longview believes that both Ms. Wiley and Mr. Jamison are members of the Born Intervenors. Further, pursuant to the Commission's Rules of Practice and Procedure Article 150-4-4.4 any corporation or limited liability corporation seeking party status is required to be represented by an attorney." This assumption is incorrect.

Neither the Dunkard Creek Watershed Association as a not-for profit organization nor Betty Wiley, its President as an individual, are part of the Born Intervenors. Further, we have submitted information in this Case for use of the Public Service Commission based upon the value of this information on its face, in the public interest, unlike Longview. We have no funds for an attorney but stand willing to participate further in the Case should the Public Service Commission deem it useful.

It is therefore requested that the WV Public Service Commission accept our submissions for their relevance, for their timeliness in a changing environment, and in the public interest.

At this time, we submit the presentation of the WV Water Research Institute to the Public Meeting on "TDS in the Monongahela River" held at the Morgantown Airport on Friday, November 14, 2008. See the Attachment of some eleven (11) pages. This presentation is documented and available to the public at the following Internet site:

http://www.uppermon.org/Marcellus_Shale/Mon%20River%20PaDEP%20Monitoring.pdf

This presentation is entitled "High TDS in the Monongahela River – Analysis of Chemical Data" by Paul Ziemkiewicz, PhD, Director, West Virginia Water Research Institute, West Virginia University Morgantown, WV. This presentation revealed that sulfate compounds are the primary source of the high Total Dissolved Solids (TDS) that are polluting the Monongahela River. A major share of this pollution is coming from West Virginia and is associated with coal mine wastewater. Coordinated releases of treated mine water are needed to reduce this problem to a manageable condition, as presented in the last page (number eleven).

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Therefore, action by all State agencies having some connection to this problem is needed to reduce the scale of the current high level of pollution and to avoid the recurrence of this extreme situation in the future. The current planning and changes of plans by Longview are directly relevant to this prevailing situation.

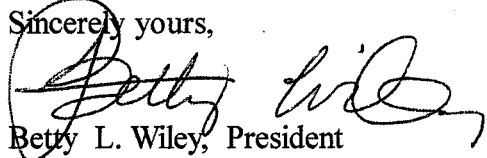
Impacts have already been made upon the water supplies for over 350,000 people in the Monongahela River valley, upon the quench water for the Clairton Coke Works (the largest coke plant operations in the world) located just downstream of Elizabeth (PA), and the Hatfield Ferry coal fired power plant cooling towers within view of the Longview site.

The Morgantown Municipal Water Works has experienced high TDS values of the order of 380 ppm, where it is recognized that these dissolved solids will lead to deposits in water lines and faucets, deposits in containers and vessels used for transferring or using this water, and increased sulfates in the diets of the local citizens.

It is clear that a coordinated effort among State agencies is needed to plan a realistic approach to the future of the Monongahela River valley including consideration for all of the impacts of the power plants therein. Failure to deal with these problems is going to result in further, accelerated deterioration of living standards in this very stable and prosperous area, and eventually have a detrimental effect on the economy.

Only the PSC can mitigate the damage. We urge the PSC to do so.

Sincerely yours,



Betty L. Wiley, President
Dunkard Creek Watershed Assn., Inc.
373 Dunkard Avenue
Morgantown, WV 26501

Attachment: "High TDS in the Monongahela River"

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High TDS in the Monongahela River Analysis of Chemical Data

Paul Ziemkiewicz, PhD

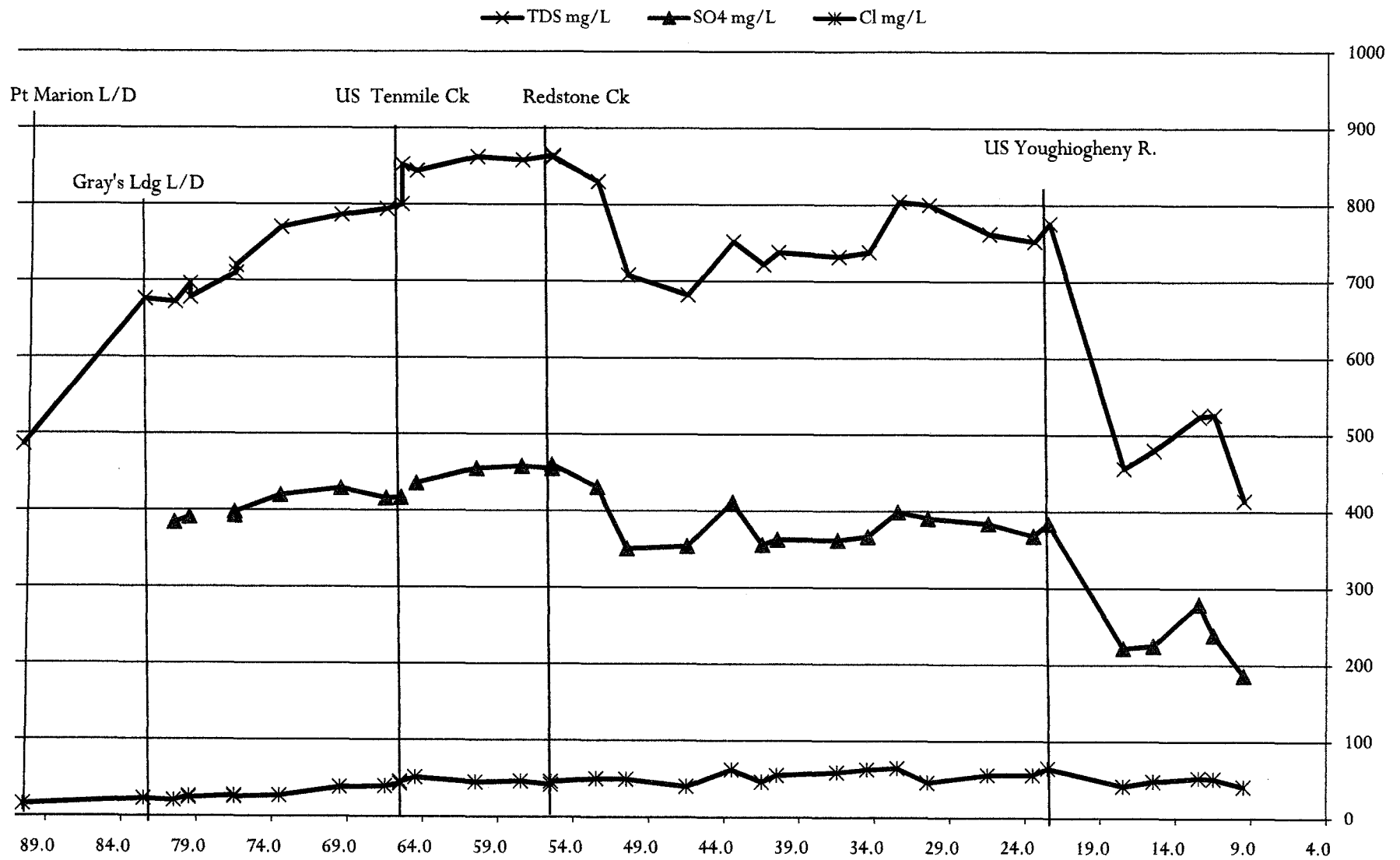
Director, West Virginia Water Research Institute

West Virginia University

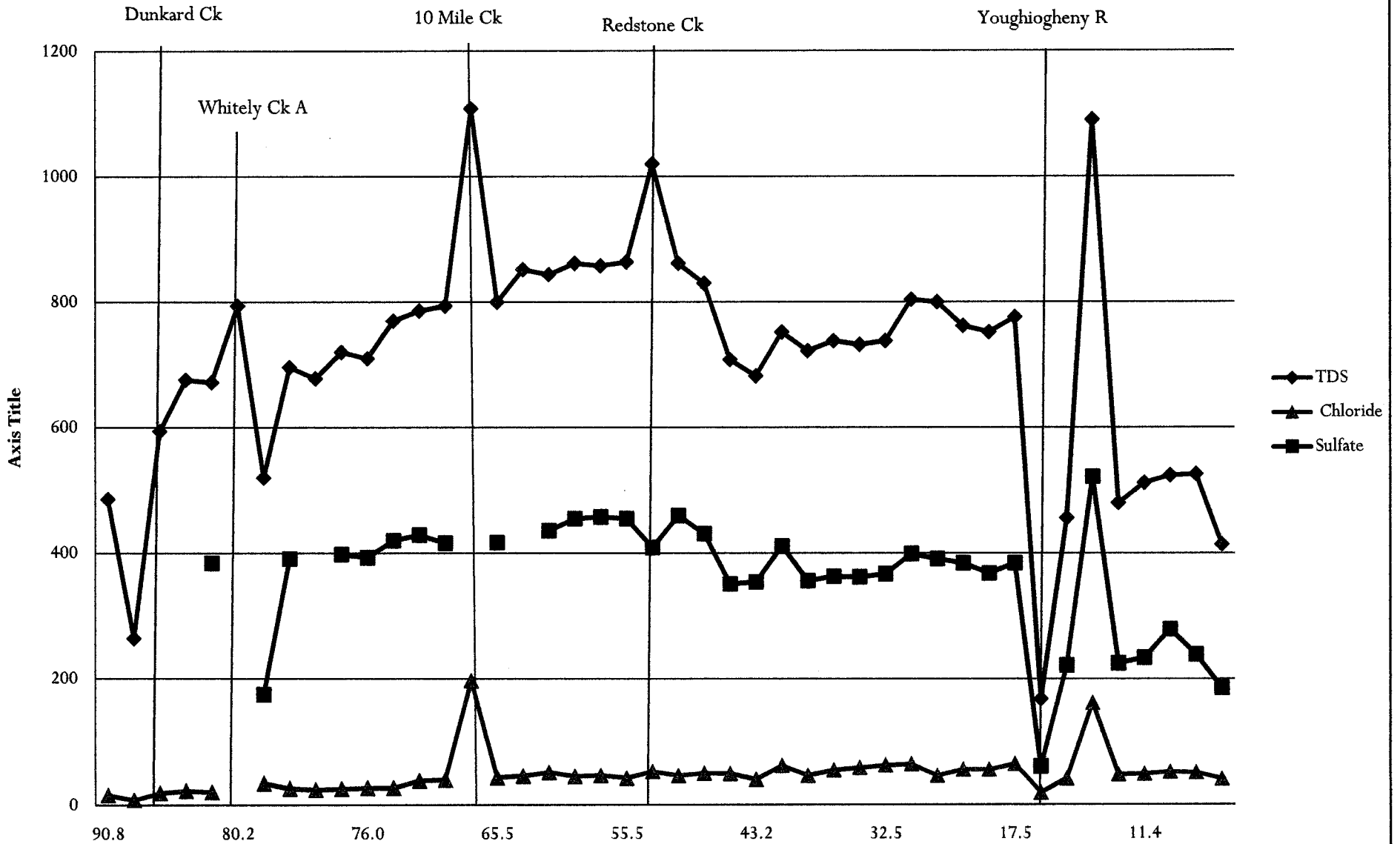
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Water Research Institute

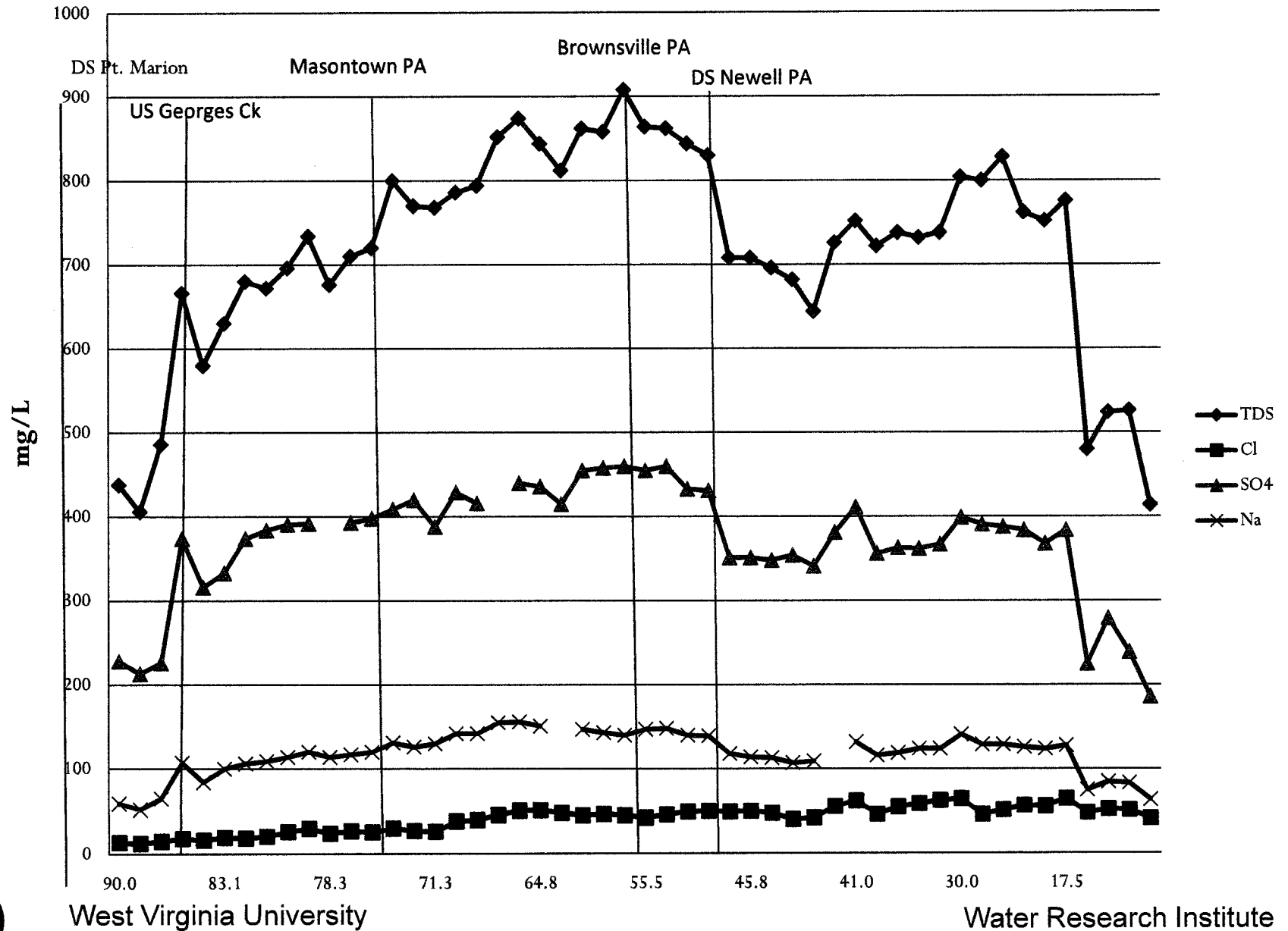
Monongahela River Only. PaDEP sampling A: Oct 08



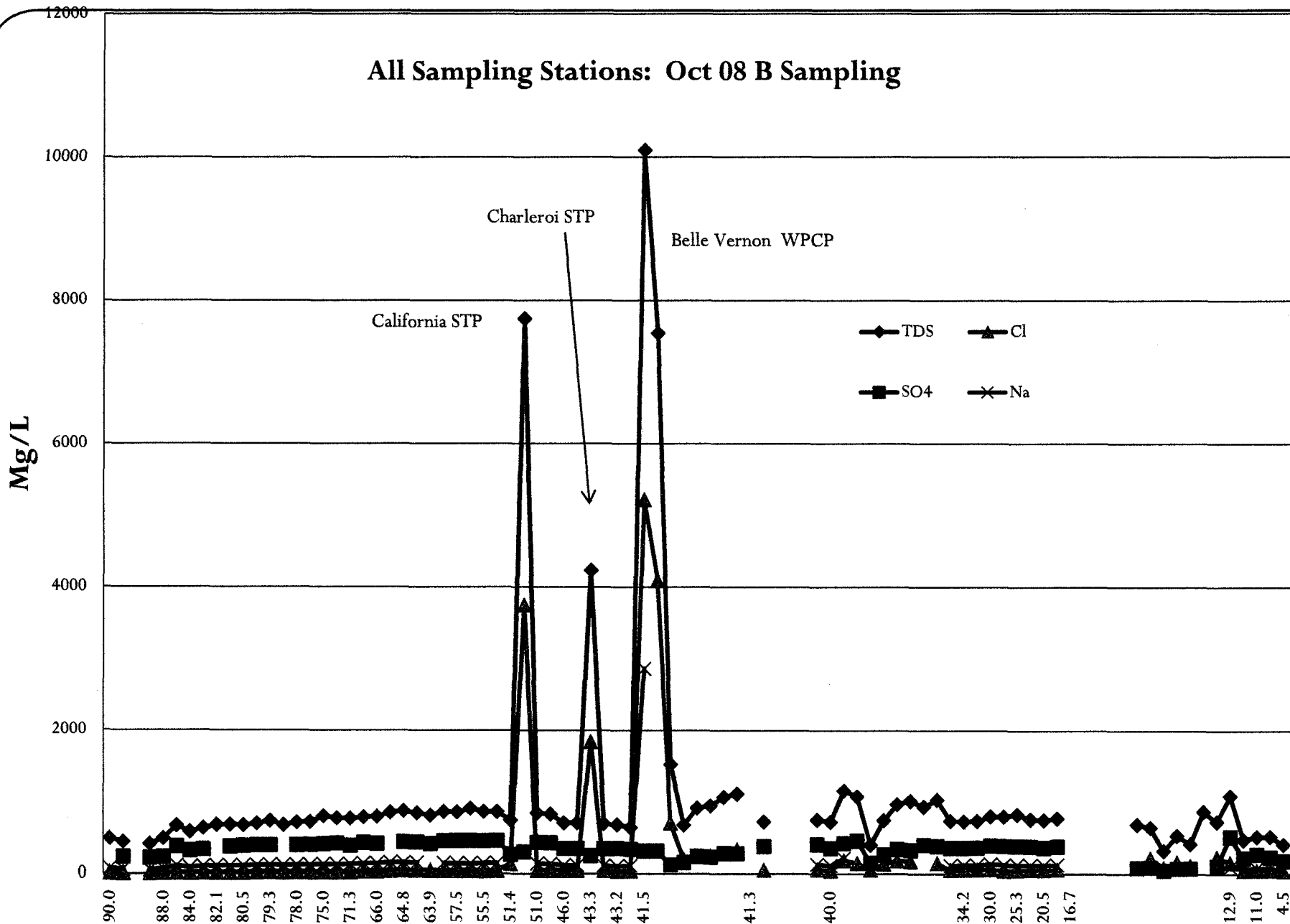
PaDEP Monongahela R. and Tributaries A Sampling



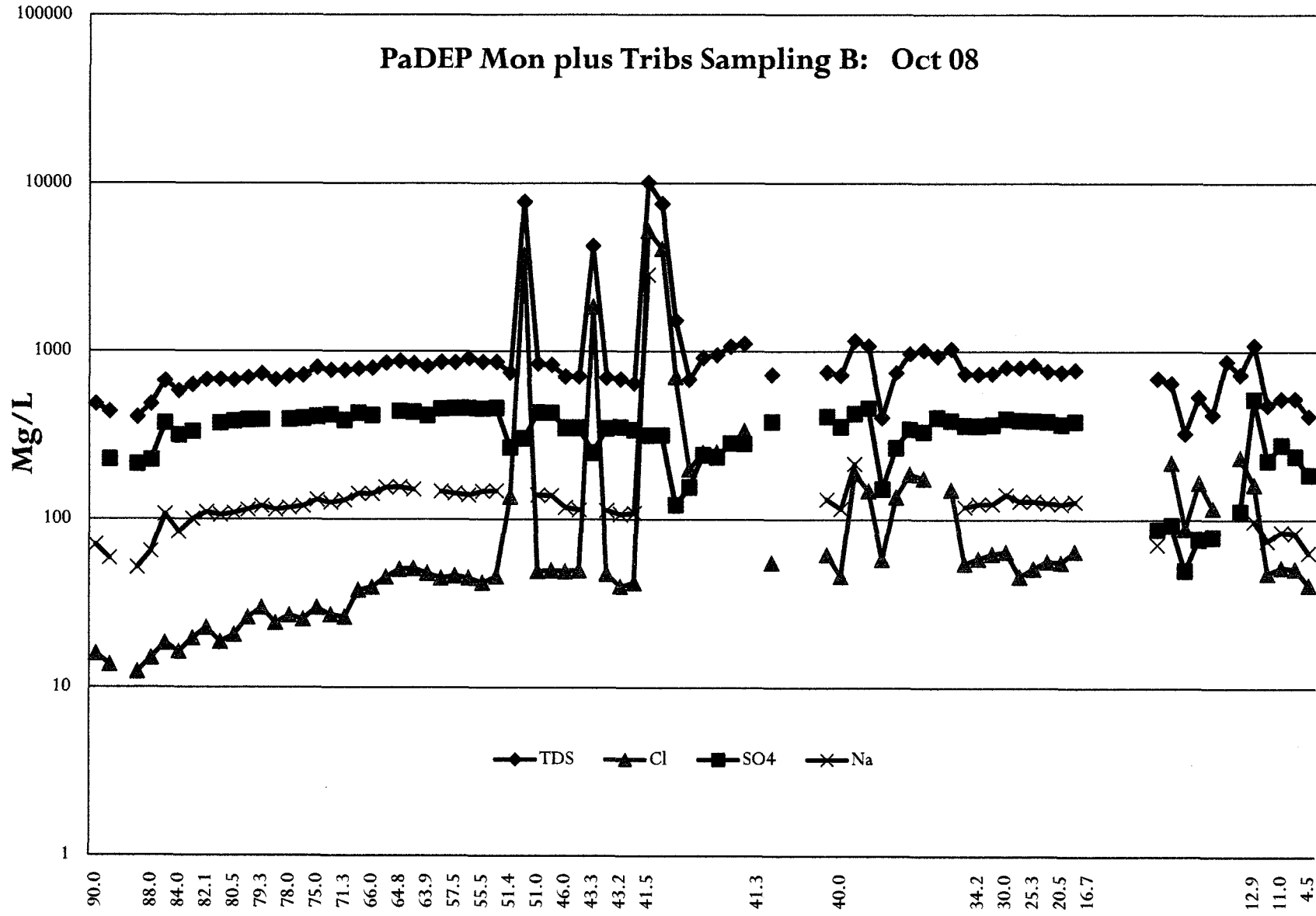
Monongahela River Sampling B: Oct 08



All Sampling Stations: Oct 08 B Sampling



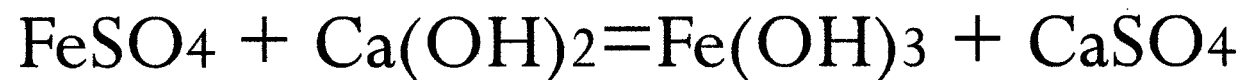
PaDEP Mon plus Tribs Sampling B: Oct 08



Chemical Signatures:

There appear to be two types of water

- CaSO_4 : Treated Mine Drainage



- NaCl : Brine

Contributions to TDS

Averages of stations reporting all ions

	mg/L	% TDS
TDS	981	100%
SO₄	371	38%
Na	192	20%
Cl	189	19%
Ca	84	9%
Mg	24	2%
Total	860	88%

River vs. STP outfalls

Proportion of TDS

	Cl	SO₄	Na	Ca	Mg	Total
River	6%	52%	16%	10%	3%	87%
STPs	34%	20%	23%	7%	2%	87%

Water Use Implications: Perspective

Estimated Marcellus Frac Water Demand:

WV-2008

If 1,200 wells developed:	gal/well	gpm	cfs
1,200	2,500,000	5708	12.7

Recommendations: Managing TDS in the Mon Things that can be done in the near term

- Develop relationship between flow and TDS/other ions
- Management tools:
 - Dilution?
 - Coordinate release of treated
 - mine water
 - Frac water
 - With higher river flows