

Public Comment of Meta Midstream LLC

Gwen Ricco, MC 205

Office of Legal Services

Texas Commission on Environmental Quality

P.O. Box 13087, Austin, Texas 78711-3087

Re: Rule Project No. 2026-006-309-OW — Support for Proposed Amendments to 30 TAC §210.54 (Land Application of Produced Water), with Recommendations on Verification and Monitoring

Dear Ms. Ricco:

Meta Midstream LLC, a Houston-based energy infrastructure company focused on water midstream and measurement systems in the Eagle Ford and Eaglebine regions of South Texas, writes in support of the proposed amendments adding produced water regulated under 40 CFR Part 435, and centralized waste treatment facilities under Part 437, to the exceptions in §210.54(a)(5). In an average year, Texas oil and gas operations bring several barrels of water to the surface for every barrel of oil. Treating that water for beneficial use rather than permanently disposing of it is one of the most practical contributions our industry can make to a water-stressed state. Nowhere is that truer than in the South Texas counties of the Eagle Ford where agriculture, ranching, and energy share the same land and the same aquifers. The proposed amendments, implementing Senate Bill 1145, are a sound first step toward that future and we support their adoption.

A beneficial reuse program will succeed only if it earns and keeps the trust of rural landowners and communities and we believe trust in this context is earned through verified measurement. Produced water quality varies significantly across formations, wells, and time; public confidence in land application will rise or fall on the integrity of the data behind each authorization. As the Commission develops the implementing framework as well as including the forthcoming standards under House Bill 49 and the updated memorandum of understanding with the Railroad Commission under §7.117, we respectfully encourage the Commission to consider:

1. Continuous, instrument-based monitoring of key indicator parameters (such as flow, conductivity, and pH) with calibrated, verifiable instrumentation, rather than reliance on periodic grab sampling alone;
2. Electronic, tamper-evident recordkeeping and reporting that creates an audit-ready trail from treatment through land application, available to the Commission and meaningful to the public; and
3. Performance-based, technology-neutral standards that allow treatment innovation while holding every provider, both producer-owned and commercial alike, to the same verified water-quality outcome, through permitting that remains workable for the modular, distributed treatment facilities suited to South Texas geography.

Texas has the opportunity to set the national benchmark for trustworthy produced water reuse. Rules that are both protective and practical as well as anchored in measurement that anyone can verify. These standards will protect soil and groundwater, give rural communities

confidence, reward responsible operators, and let **beneficial reuse** grow from pilot projects into genuine water supply.

We support adoption of the proposed amendments and look forward to participating in the subsequent rulemakings.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Andrews', with a stylized flourish at the end.

Ronnie Andrews

Manager, Meta Midstream LLC

Houston, Texas

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