

Please accept this formal written comment given on behalf of Clean Water Action's thousands of members in Texas. Clean Water Action's mission is to protect our environment, health, economic well-being and community quality of life.

We request that TCEQ NOT PROCEED with the current approach to using 30 TAC Chapters 210 and 309 for rulemaking and regulating treatment of oil and gas wastewater. This is not a similar enough wastewater product to slot into the existing rules, regulations, policies, or technical standards. We request a separate set of regulation and rulemaking for this oil and gas "produced water" wastewater product before it can be disposed of on land or further integrated into existing water systems.

Additionally, once treatment technologies and regulations are set for this wastewater product, please answer: what will be required for disposal of the sludge or any waste product removed from the wastewater?

We request that TCEQ extend the public comment period and increase public engagement opportunities to at least 5 regionally-dispersed in-person and virtual combined hearings to provide for a more thorough engagement process.

Thank you for the opportunity to give feedback,
Becky Smith

Becky Smith
Texas Director
Clean Water Action/Clean Water Fund
617.314.2347 (mobile)