



June 16, 2026

Gwen Ricco
Office of Legal Services
Texas Commission on Environmental Quality
P.O. Box 13087, MC 205
Austin, Texas 78711-3087

Re: Support for Proposed Amendments to 30 TAC Chapter 309 Concerning Land
Application of Produced Water Treated for Beneficial Use

Dear Chairwoman and Commissioners:

The Texas Alliance of Energy Producers (TAEP) appreciates the opportunity to submit comments in support of the proposed amendments to 30 Texas Administrative Code Chapter 309 regarding the land application of produced water treated for beneficial use.

The Alliance represents independent oil and natural gas producers and service companies operating throughout Texas. The Alliance has a combined membership of more than 2,500 members. It is the largest state independent oil and gas association in the nation. Our members are responsible for developing the energy resources that fuel the state's economy while continually seeking innovative approaches to environmental stewardship and resource management.

The Alliance supports the proposed rulemaking as a thoughtful implementation of Senate Bill 1145 and the Legislature's direction to establish a regulatory framework under the Texas Commission on Environmental Quality (TCEQ) for permitting the beneficial use of treated produced water. The proposed amendments provide an important foundation for advancing water reuse opportunities while maintaining appropriate environmental protections and regulatory oversight.

Texas continues to face significant water challenges driven by population growth, economic expansion, and recurring drought conditions. Developing additional sources of water through innovation and technology will be essential to meeting future water needs. The beneficial reuse of treated produced water has the potential to become an important

Texas Alliance of Energy Producers
1000 West Ave.
Austin, TX 78701

component of Texas' broader water management strategy, particularly in regions where water supplies are increasingly constrained.

The Alliance supports the proposed amendments because they:

- Provide regulatory certainty regarding TCEQ's authority and permitting requirements for land application projects involving treated produced water;
- Establish a clear and transparent permitting pathway for entities seeking to develop beneficial reuse projects;
- Maintain appropriate environmental safeguards designed to protect public health and the waters of the state;
- Encourage continued investment in treatment technologies and water management innovations; and
- Advance legislative objectives intended to facilitate the responsible evaluation of produced water reuse opportunities in Texas.

Regulatory certainty is particularly important for independent producers and technology developers seeking to invest in emerging water treatment and reuse projects. Clear permitting standards will help encourage innovation while ensuring that all projects undergo rigorous environmental review and oversight.

For these reasons, the Texas Alliance of Energy Producers respectfully supports adoption of the proposed amendments to 30 TAC Chapter 309.

Thank you for your consideration of these comments and for your work implementing the Legislature's vision for the responsible beneficial use of treated produced water. We look forward to continuing to work with TCEQ on issues affecting Texas energy producers and the state's long-term water future.

Sincerely,

Karr Ingham

6/16/2026

Karr Ingham
President
Texas Alliance of Energy Producers