

Vivek Gani

Hello, I have some concerns regarding Rule Project number 2026-006-309-OW in relation to implementing Texas Senate Bill No. 1145. At the minimum, I would like to request an extension of the comment period by 30-60 days in order for the public to have more time to understand what this bill really entails regarding the land application of Produced Water (PW).

At the moment I'm left with more questions around what are the byproducts of the water "that has been treated for beneficial use" and what happens to them. What exactly are the methodologies around testing treated PW? Will the proposed treatment processes reliably remove contaminants such as Heavy Metals (e.g. Arsenic & Barium), Radioactive materials, Per- and polyfluoroalkyl substances (i.e. PFAS), Volatile Organic Compounds, and any other chemicals that could be toxic to humans or animals directly or when integrated into food production systems? What exactly are the standards around the filtration of PW?

Additionally, how is there transparency around monitoring the results long-term in areas applied with treated PW? And are there geographic limits around where this will be applied when considering the proximity to homestead wells, public/private groundwater wells. I'm concerned about the current rules that allow PW to be within 100 feet of creeks, 150 feet of private wells, and 500 feet of public wells - particularly on sensitive karst ecosystems where it wasn't until around the 1990's where through dye tracing studies we learned that water can travel much faster underground in other areas much faster than we have previously thought.

Thank you for considering this comment and again request more time for the comment period,
Vivek Gani