

Doug White

Submitted Electronically Via TCEQ's Online Public Comments System
<https://tceq.commentinput.com/?id=bB4ec365S>

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

Re: Comments of NGL Water Solutions Permian, LLC on Rule Project No. 2026-006-309-OW,
Land Application of Produced Water; Proposed Revisions to 30 TAC Chapters 210 and 309

Dear Ms. Ricco:

NGL Water Solutions Permian, LLC ("NGL") appreciates the opportunity to submit these comments on the Texas Commission on Environmental Quality's proposed revisions to 30 TAC Chapters 210 and 309 relating to the land application of produced water treated for beneficial use. NGL supports TCEQ's effort to implement Senate Bill 1145 and to establish a clear, protective, and workable permitting path for treated produced water. Texas needs new additional water supplies, and treated produced water can be part of that solution when it is treated, managed, permitted, and monitored under clear protective standards.

I. NGL supports TCEQ's effort to establish a clear and protective path for treated produced water reuse.

A clear TCEQ permitting program for land application of produced water treated for beneficial use is an important first step in helping Texas evaluate, permit, and safely use a new water source that has historically been managed primarily as a waste stream.

NGL encourages TCEQ to implement the rules in a manner that is protective, timely, and practical. However, at the same time, NGL requests that the TCEQ carefully review the proposed revisions to ensure that changes do not inadvertently imply that any long-standing requirements related to domestic wastewater treatment plants that both discharge and land apply treated domestic wastewater, such as plans and specification reviews, would be applicable to industrial or produced water treatment systems. SB 1145 only applies to land application of treated produced water. The permitting program should protect surface water and groundwater while also allowing responsible operators to invest in treatment, monitoring, and beneficial use projects that can reduce pressure on existing water supplies. NGL requests that the TCEQ vet all revisions to Chapter 309 closely prior to their promulgation to ensure that the revisions only apply to land application of treated produced water. The revisions should have no unintended consequences that add requirements for direct dischargers of treated produced water, direct dischargers of primarily industrial wastewater or wastewater treatment facilities that treat primarily industrial wastewater and that land apply the treated wastewater.

II. NGL looks forward to continued stakeholder engagement as the treated produced water program develops.

NGL recognizes that this rulemaking is an initial step in implementing SB 1145. As TCEQ begins implementing the Chapter 210 and Chapter 309 revisions, NGL encourages continued engagement with operators, landowners, agricultural interests, industrial users, technical experts, and other stakeholders.

NGL believes TCEQ can play an important role in helping Texas safely convert treated produced

water into a useful new water resource. NGL looks forward to working with TCEQ and other stakeholders on future guidance, permitting implementation, and any additional rulemaking that may be needed to support responsible, protective, and beneficial reuse of treated produced water.



June 16, 2026

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Re: Comments of NGL Water Solutions Permian, LLC on Rule Project No. 2026-006-309-OW, Land Application of Produced Water; Proposed Revisions to 30 TAC Chapters 210 and 309

Dear Ms. Ricco:

NGL Water Solutions Permian, LLC ("NGL") appreciates the opportunity to submit these comments on the Texas Commission on Environmental Quality's proposed revisions to 30 TAC Chapters 210 and 309 relating to the land application of produced water treated for beneficial use.

NGL supports TCEQ's effort to implement Senate Bill 1145 and to establish a clear, protective, and workable permitting path for treated produced water. Texas needs new additional water supplies, and treated produced water can be part of that solution when it is treated, managed, permitted, and monitored under clear protective standards.

I. NGL supports TCEQ's effort to establish a clear and protective path for treated produced water reuse.

A clear TCEQ permitting program for land application of produced water treated for beneficial use is an important first step in helping Texas evaluate, permit, and safely use a new water source that has historically been managed primarily as a waste stream.

NGL encourages TCEQ to implement the rules in a manner that is protective, timely, and practical. However, at the same time, NGL requests that the TCEQ carefully review the proposed revisions to ensure that changes do not inadvertently imply that any long-standing requirements related to domestic wastewater treatment plants that both discharge and land apply treated domestic wastewater, such as plans and specification reviews, would be applicable to industrial or produced water treatment systems. SB 1145 only applies to land application of treated produced water. The permitting program should protect surface water and groundwater while also allowing responsible operators to invest in treatment, monitoring, and beneficial use projects that can reduce pressure on existing water supplies. NGL is generally supportive of the proposed changes to Chapter 210. NGL requests that the TCEQ vet all revisions to Chapter 309 closely prior to their promulgation to ensure that the revisions only apply to land application of treated produced water. The revisions should have no unintended consequences that add requirements for direct dischargers of treated produced water, direct dischargers of primarily industrial wastewater or

wastewater treatment facilities that treat primarily industrial wastewater and that land apply the treated wastewater.

II. NGL looks forward to continued stakeholder engagement as the treated produced water program develops.

NGL recognizes that this rulemaking is an initial step in implementing SB 1145. As TCEQ begins implementing the Chapter 210 and Chapter 309 revisions, NGL encourages continued engagement with operators, landowners, agricultural interests, industrial users, technical experts, and other stakeholders.

NGL believes TCEQ can play an important role in helping Texas safely convert treated produced water into a useful new water resource. NGL looks forward to working with TCEQ and other stakeholders on future guidance, permitting implementation, and any additional rulemaking that may be needed to support responsible, protective, and beneficial reuse of treated produced water.

Respectfully submitted,

NGL Water Solutions Permian, LLC

By: 

Doug White
Executive Vice President, Water
NGL Water Solutions Permian, LLC