

## Commission Shift

Commission Shift formally requests a 30-day extension of the comment period.



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Laredo, TX 78040

VIA Email to: [fax4808@tceq.texas.gov](mailto:fax4808@tceq.texas.gov)  
June 8, 2026

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

RE: Comments on Land Application of Produced Water - RPN 2026-006-309-OW

Dear Ms. Rico,

Commission Shift is currently assessing the proposed Rule Project Number 2026-006-309-OW. We have significant concerns that these regulations may not sufficiently safeguard agricultural resources or public health. The potential daily land application of millions of barrels of produced water requires exceptionally rigorous and comprehensive standards to prevent the accumulation of toxic substances in soil and water.

Since these rules involve technologies not yet proven at scale and concern chemicals with unknown exposure risks, the current 30-day window is insufficient for a thorough public evaluation. Consequently, we formally request a 30-day extension of the comment period to allow time to prepare detailed feedback.

Furthermore, we request that additional in-person hearings be conducted in the Eagle Ford, Permian Basin, and East Texas communities most vulnerable to the impacts of treated water land application.

Sincerely,

A handwritten signature in black ink that reads "Virginia E. Palacios". The signature is fluid and cursive, with the first name being the most prominent.

Virginia Palacios  
Executive Director