



July 3, 2025

Honorable Members of the Water Quality Control Commission

Re: Case No. WQCC 25-34

On behalf of the members of the Greater Albuquerque Chamber of Commerce, we write in support of amending rules relative to the use of produced water in our state to include applications beneficial to economic development. We also urge moving the meeting to Jal, New Mexico, in the heart of oil and gas production country, to fully examine this issue and receive the maximum amount of scientific and expert information.

It seems very clear that when the Legislature enacted the Produced Water Act in 2019, that produced water use should extend beyond applications just in the oil and gas industry. The law states that the WQCC "shall adopt regulations to be administered by the department of environment for the discharge, handling, transport, storage, recycling or treatment for the disposition of treated produced water, **including disposition in road construction maintenance, roadway ice or dust control or other construction, or in the application of treated produced water to land, for activities unrelated to the exploration, drilling, production, treatment or refinement of oil or gas.**"

The current regulations, for whatever reason, failed to provide economic development uses and this oversight should be corrected. To fail to act will result in the loss of this resource to other states or to reinjection - putting more stress on fresh water usage that otherwise can be avoided. There is widespread support for making good use of our produced and brackish water resources.

As we all know, the availability of water is a crucial component of quality of life in our state, the foundation of which is a robust economy that provides good paying jobs. In too great a number, our young people are leaving our state seeking better opportunities elsewhere. Very often when discussing potential business location or expansion opportunities, one of the top concerns expressed is the availability of water. We can only stretch the use of current water supplies so far, especially if prolonged drought occurs. It only makes sense to bolster our supplies by use of produced and brackish water for economic development purposes.

We believe the bottom line for most New Mexicans is to create a robust future economy. And the investment in oil and gas and economic development projects in New Mexico is needed to reach that goal.

We sincerely appreciate your consideration of our views and urge amendment of the current regulations to fully enact the intent of the Legislature.

Peter Lorenz
Chair of the Board
Greater Albuquerque Chamber of Commerce

Terri Cole
President and CEO
Greater Albuquerque Chamber of Commerce