

From: [Davidson, Florene, EMNRD](#)
To: [Salvidrez, Marlene, EMNRD](#)
Subject: FW: [EXT] re: OCD "produced water" rules
Date: Wednesday, July 29, 2020 10:24:26 AM
Attachments: [2020-7-29 letter OCD Produced Water.pdf](#)
[ATT00001.htm](#)

Case 21281. The attachment needs to be scanned, also.

From: Rebecca Sobel <rsobel@wildearthguardians.org>
Sent: Wednesday, July 29, 2020 9:59 AM
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>; Sandoval, Adrienne, EMNRD <Adrienne.Sandoval@state.nm.us>; jkessler@slo.state.nm.us; thomas.engler@nmt.edu
Subject: [EXT] re: OCD "produced water" rules

Dear Division Director Sandoval, Commissioner Kessler, Commissioner Engler,

I hope this email finds you well.

Please find attached a letter signed by a coalition of 42 tribal government representatives, groups, and businesses representing Indigenous and minority voices across New Mexico, Texas, Colorado and Arizona, who represent more than two million members that are deeply concerned with the Oil Conservation Commissions' upcoming "produced water" rule promulgation. Groups are concerned these rules fail to put peoples' health first and are requesting the Commission put the brakes on plans to adopt new rules governing the use of toxic radioactive oil and gas waste, known as "produced water."

Absent thorough and independent scientific analysis proving "produced water" is safe, we are requesting the Commission halt any rulemaking related to "produced water." If the July 30 rulemaking continues as planned, we request the Oil Conservation Commission protect public health, the environment, and fresh water resources by promulgating rules that prohibit the use of fresh water for fracking; expressly forbid the discharge or dumping of "produced water;" and require that as "produced water" is transported or used, it is regulated as a toxic and hazardous waste that is inherently dangerous and handled and disposed of accordingly.

We look forward to your response and supporting robust engagement on the management of oil and gas waste.

Thank you,

Rebecca Sobel