

Rio Grande Foundation
P.O. Box 40336
Albuquerque, NM 87196

October 15, 2025

Via Email

To:
Chair and Members
New Mexico Water Quality Control Commission
New Mexico Environment Department
1190 St. Francis Drive, Suite N4050
Santa Fe, NM 87505

Re: WQCC No. 25-34 – Proposed Amendments to 20.6.8 NMAC (Ground and Surface Water Protection – Supplemental Requirements for Reuse of Treated Produced Water)

Dear Chair and Members of the Commission,

I am writing on behalf of the Rio Grande Foundation. We are an economic policy research organization also known as a “think tank.” We understand the critical importance of increasing New Mexico’s water supplies both to boost economic growth in the state and to fulfill compact obligations. I appreciate this opportunity to express our support for the Commission’s work to establish clear, responsible, and transparent rules for the reuse of treated produced water in New Mexico.

We recognize that this Commission understands the technical aspects of produced water and the scale of the issue before you. What we wish to emphasize is the broader policy opportunity and economic imperative before the state.

New Mexico faces one of the most persistent water challenges in the nation. Fresh water is limited, drought cycles continue, and communities are under increasing strain. The question is not whether we should act — but whether we will act wisely and with balance. Treated produced water reuse provides a meaningful, regulated path forward that benefits both the environment and the economy.

The reuse of produced water under rigorous oversight can:

- Ease pressure on existing freshwater supplies, helping rural communities, municipalities, and agriculture maintain reliability.
- Create a new economic sector built around innovation, infrastructure, and water treatment — driving high-quality jobs in science, construction, and monitoring.
- Improve environmental outcomes by reducing injection volumes, lowering trucking miles, and encouraging local reuse where appropriate.

- Build resilience as drought, population growth, and regulatory obligations tighten demands on limited resources.

This opportunity is not theoretical. Texas and other western states have already begun building projects that treat and reuse produced water. Each time we send our water across the border for treatment or disposal, we lose both a potential resource and the chance to create local employment and investment.

The Rio Grande Foundation supports strong safeguards and public transparency, but we also believe New Mexico must not allow fear or political posturing to block progress. The responsible path forward lies in regulation, not restriction — setting high standards and enforcing them through data, science, and accountability.

Finally, we urge the Commission to hold public hearings in the regions where these activities occur. Communities in the Permian Basin and San Juan Basin deserve the opportunity to participate directly in these discussions. Too often, decisions are made from afar in Santa Fe, while the people who live with the consequences are left unheard.

New Mexico's strength has always been its ability to adapt — to find pragmatic solutions grounded in stewardship and common sense. Reuse of treated produced water is not an experiment; it's an evolution toward sustainability.

Thank you for your leadership and for continuing this vital conversation.

Sincerely,
Paul J. Gessing
President
Rio Grande Foundation