



January 6, 2021

Transmitted via email: [jennifer.fullam@state.nm.us](mailto:jennifer.fullam@state.nm.us)

Ms. Jennifer Fullam,  
Water Quality Standards Coordinator  
Surface Water Quality Bureau  
New Mexico Environment Department  
PO Box 5469  
Santa Fe, NM 87502-5469

Re: Supplemental Letter - Public Comment on NMED's proposed amendments to the State's Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC).

Ms. Fullam:

The Environmental Defense Fund (EDF) appreciates the opportunity to submit this supplemental comment for your consideration in the Triennial Review process.

EDF has read the comprehensive comments submitted by Amigos Bravos and a coalition of other environmental groups. In line with our own comments submitted on December 6, 2020, we would like to emphasize our agreement with section I(H) regarding the importance of addressing constituents of concern in produced water, specifically the below recommendation:

*Recommendation: Identify constituents found in produced water for which there is available data for inclusion in 20.6.4.900 NMAC during the current Triennial Review. In addition, start now to develop numeric criteria for the close to 200 constituents common in produced water for which we currently do not have a standard.*

Beyond produced water, the comments raise a number of other important points and EDF respectfully encourages NMED to seriously consider recommendations made by experts at Amigos Bravos and other signatories.

Sincerely,

Nichole Saunders  
Senior Attorney  
Environmental Defense Fund