

Tim Ulrich

Water Reuse Regulation

In the Southwest US, the lack of fresh water, will likely result in the end of life as we now know it. It's a sad coincidence that the yearly volume of produced water in the Permian Basin would completely fill Lake Nighthorse, here, in the Four Corners area from bottom to top. What makes it sad is the volume of produced water from coalbed gas production in the San Juan Basin would have dwarfed the annual volume of produced water from the Permian Basin oil reservoir over these many years - all that litigation over Nighthorse Reservoir, meanwhile everyone involved in the San Juan Basin gas fields deep well injected trillions of gallons of our most valuable resource. I'm sickened by my failure to take action on this front. But, in fairness, who the hell am I? What was I supposed to do? Okay, I'll tell you who I am, if you're interested - I know for a fact coalbed methane production water is relatively easy to treat to NPDES surface discharge standards using even early 90's water treatment technology ♦ I did it with a company called RMI Environmental, Inc. for several years on a shoestring budget from 1992 to 1996. US EPA Region 8 should have records of the reams of Quarterly NPDES Permitting Reports (literally, a stack of forms at least 2 ft high) that I signed. NMED should also have records, as should the Southern Ute Tribal Environmental Entity. I know this because I operated the field treatment sites and authorized the compliance testing.

So, here we are in 2023. What happened? I gave you my excuse. I'm just some nobody and I simply failed. What's your excuse? Were you too busy pandering to big oil and gas entities? Were you rolling up every time a tribe or some environmental group pitched a fit? Why are you still talking about this? Every one of your constituents needs water. It seems like supporting this legislation would be covered the first day of Politics 101. I don't think it's productive to soapbox anybody or any group, but every year we could create another lake Nighthorse, or maybe save Elephant Butte Reservoir, with Permian Basin produced water alone. And every year we fail to do so, puts us that much closer to the collapse of our quality of life. What I want to know is are we going to squander this opportunity as well again? We continue to do nothing at all of our peril.

Every deep well injected gallon of water is lost or is it? Have we looked into recovering produced water from select deep disposal reservoirs? Perhaps, flowing back the trillions of gallons previously injected might be possible given that the SWD wells were often shutdown as the result of hitting injection pressure limits. Just an idea, since I don't know how difficult this might be because I don't know what the well abandonment procedures were. How about all the water Intel disposed in Rio Rancho? I know I'm crying over disposed water ♦ why aren't you?

Once again, technically there is no reason not to recover and reuse produced water for agricultural processes. Effective produced water treatment technologies have existed for decades. Fears concerning frac and other production chemicals somehow poisoning us are greatly exaggerated, it's actually bullshit, especially in a world where 99% of us

are already part plastic ♦ I know this because when DuPont tried to find people for a study with blood untainted by PFAS, the only untainted blood they could find was blood saved from Korean War recruits. So, "Give me a break!" That ship sailed long ago. Decades old membrane treatment technologies are 100% effective in removing heavy metals, viruses and large organic molecules like PFAS. Treated produced water in many ways would be superior to many of our surface waters. I've been dealing with unforeseen consequences "chicken littles" my entire adult life. They have power in virtually every facet of American life driving up the cost of doing business or anything for that matter by raising all kinds of unfounded objections. They are self-serving alarmists who prey on people's fear and ignorance. Please don't give legitimacy to the contempt they obviously have for those of us who simply support scientifically sound, reasonable progress. If some environmental, or any other, group wants to make the case in court we shouldn't use any and all available water resources that don't further deplete our precious surface water and our even more precious freshwater aquifers here in the middle of the freakin desert, by all means encourage them to do so. Oh yeah, seriously, enough with pandering to your donor class benefactors in the oil and gas industries ♦ show a little courage and serve your constituents for a change. If they want a drilling permit, make them provide some significant percentage of future revenue to produced water recovery projects. You know, I really do struggle to understand the many difficulties they encounter and the terrible tax and regulatory burdens they endure as they suck us dry and report record profits. Once again, all we're asking is you show a little courage and serve your constituents for a change.

Do the right thing before it's too late, if it isn't already.