



August 1, 2024

Tony Haag Strongbox Water Solutions LLC 8060 CR 725N Brownsburg, Indiana 46112

RE: Request for Additional Information, Produced Water Pilot Project Notice of Intent, Strongbox Water Solutions LLC

Dear Tony Haag:

The New Mexico Environment Department (NMED) received a Notice of Intent (NOI) for a produced water pilot project from you on July 11, 2024, to be conducted at the Brackish Groundwater National Desalination Research Facility (BGNDRF) in Alamogordo. The NOI proposes to treat produced water using a mobile flash evaporation system that vaporizes excess water from industrial wastewater, leachate, and produced water. Strongbox Water Solutions LLC intends for this project to determine the amount of usable water that can be collected from the vapor.

NMED has reviewed the above referenced NOI in accordance with the New Mexico Water Quality Control Commission Regulations (20.6.2 NMAC). The NOI did not include sufficient information and the following is necessary for NMED to complete its evaluation:

- 1. Provide a copy of the BGNDRF Guidelines or reproduce the guidelines for signage and security as identified in questions 9 and 10 of the NOI form.
- 2. Provide a list of the sources of produced water, describe in detail the plan to transport produced water to and from the site and onsite storage safety methods as identified in question 12 of the NOI form.
- 3. Provide the disposal plan for the expected by-products, waste products and other potentially contaminated materials as identified in question 13 of the NOI form.
- 4. Provide a listing of the expected contaminants and their concentrations in the untreated and treated produced water as identified in question 14 of the NOI form.
- Describe in detail all components of the produced water processing, treatment, storage, as illustrated on the drawing attached to the NMED NOI, and labeled as "Strongbox Solutions/ BGNDRF Vapor Reclaim Testing Arrangement" and as identified in question 15 of the NOI form.
- 6. Provide a description of the disposal plan for all produced water, treated produced water, secondary waste streams, permeate, or brine, as identified in question 16 of the NOI form.

Please submit the requested information within 30 days of the date of this letter, by September 1, 2024. NMED appreciates your cooperation. If you have any questions, you may contact me at (505) 660-7567 or by email at Kathleen.Murphy@env.nm.gov.

Sincerely,

Kathleen Murphy

Produced Water Project Manager New Mexico Environment Department Ground Water Quality Bureau Pollution Prevention Section Harold Runnels Building 1190 St. Francis Drive, P.O. BOX 5469 Santa Fe, NM 87502-5469 (505)-660-7567

Cc: John Rhoderick, Director, Water Protection Division, NMED

Kathryn Becker, Tribal Liaison, NMED

Andrew Knight, Assistant General Counsel, NMED

Justin Ball, Chief, Ground Water Quality Bureau, NMED

Jason Herman, Program Manager, Ground Water Quality Bureau, Pollution Prevention Section, NMED

Susan Lucas Kamat, Program Manager, Surface Water Quality Bureau, NMED

Gerasimos Razatos, Acting Director, Oil Conservation Division, EMNRD

Jim Griswold, Special Projects Manager, Oil Conservation Division, EMNRD

Patricia Sullivan, Director, Office of Strategic Initiatives, New Mexico Produced Water Research Consortium, NMSU

Mike Hightower, Program Director, New Mexico Produced Water Research Consortium, NMSU