

October 7, 2022

Rules Coordinator
Railroad Commission of Texas
Office of General Counsel
P.O. Drawer 12967
Austin, Texas 78711-2967

Re: Proposed Amendments to §3.65, relating to Critical Designation of Natural Gas Infrastructure

Mr. Chairman and Commissioners:

NGL Water Solutions, LLC appreciates the opportunity to submit comments on the Railroad Commission of Texas's proposed amendments to 16 Texas Administrative Code §3.65, related to Critical Designation of Natural Gas Infrastructure.

NGL is one the largest oil and gas waste-water solutions providers in the Permian Basin, moving 1.5 million barrels, and climbing, of water through its system daily. NGL has and continues to take proactive measures to ensure its system is prepared to continue operating through myriad climactic events, including winter storms like Uri. NGL supports the Commission's efforts to update the rule to incorporate lessons learned over the last year and recognizes the importance of this process.

Upon review of relevant materials, it is NGL's position that an opportunity exists to strengthen the Commission's understanding of saltwater disposal wells and associated systems and the potential impacts of severe winter storms on such systems. More specifically, we request an opportunity to engage with the Commission to discuss the methods NGL employs to effectively mitigate the impacts of severe winter storms on salt water disposal wells and systems.

Due in large part to the nature of the product NGL manages—highly-saline produced water—and the robustness of our interconnected pipe and wells, NGL's system and method of operation have proven to be effective mitigants against the effects of severe winter storms like Uri.

Our system receives a constant flow of highly-saline produced water and has the ability to loop water through the extensive pipeline and disposal well system, as necessary, to eliminate opportunity for the product to ever reach a freezing temperature. It is our position that incorporating certain of these methods into the Commission's *Weatherization Guidance Document – Gas Supply Chain Facilities and Pipeline Facilities* will help strengthen the Commission and industry's preparedness for sever winter storm events.

NGL appreciates the Commission's consideration of and looks forward to continued engagement on this matter.

Sincerely,

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