May 7, 2025

Carmen E. Flores Dumont
L'Atelier D'Formulation Inc.
P.O. Box 371535
Cayey, Puerto Rico 00737

RE: Request for Additional Information, Produced Water Pilot Project Notice of Intent, L'Atelier D'Formulation Inc.

Dear Carmen E. Flores Dumont,

The New Mexico Environment Department (NMED) received your Notice of Intent (NOI) for a produced water pilot project on March 19, 2025. L'Atelier D'Formulation Inc. intends to conduct a produced water pilot project in New Mexico; however, the NOI does not include a specific or sufficient plan.

NMED has reviewed the submitted NOI in accordance with the New Mexico Water Quality Control Commission Regulations (20.6.2 NMAC). To complete our evaluation, we request the following additional information:

1. Item #3: Provide a clear response regarding the research focus, as requested in Item #3 of the NOI form.
2. Item #4: Clarify the proposed use of the treated produced water, as indicated in Item #4.
3. Item #5: Based on your testing plan, specify whether the proposed technology will be tested inside or outside of an oil and gas field.
4. Item #6: NMED does not select research sites for applicants. Please provide the physical location of the research site, including the size and boundaries, as required in Item #6.
5. Item #7: Submit an aerial map clearly showing the location of your proposed testing system.
6. Item #8: Identify any regulatory, governmental, or non-governmental agencies (including municipalities or counties) that have authority over your proposed testing location, as identified in Items #4, #5, and #6.
7. Item #9: Describe how the testing site will be clearly identified with signage. This should include the type, content, and placement of signs to ensure public awareness and site safety.
8. Item #10: Provide details on how the testing site will be secured, including any measures to restrict access, the use of barriers or surveillance, and any training provided to personnel to maintain site safety and security.
9. Item #11: Provide a list of adjacent landowners and confirmation that they have been notified of the proposed pilot project.

10. Item #12: List the source(s) of the produced water including basin of origin. Describe how the produced water will be transported to and from the site including origin and disposal locations and onsite storage safety precautionary methods.
11. Item #13: Provide a disposal and decommissioning plan for all expected byproducts, waste materials, and any potentially contaminated items. The plan should include how equipment, soils, vegetation, and piping will be handled and disposed of, along with the expected disposal locations for each.
12. Item #14: Describe the expected contaminants in the untreated produced water and the treated produced water (e.g. contaminants being studied, known contaminants, known additives). Include estimated concentrations if known, and copies of laboratory analyses of untreated and treated produced water.
13. Item #15: Provide a detailed and clear description of all components involved in produced water processing, treatment, storage, secondary containment, and produced water system. Include sizes, a site layout map, closed loop processing plans, and specifications.
14. Item #16: Describe your disposal plan for all produced water, including treated produced water, permeate, and brine concentrate, specifying how and where these will be disposed of into a Salt Water Disposal (SWD) well.
15. Item #17: Please describe your final closure plan for the site following completion of the pilot project. This should include site cleanup, equipment removal, waste disposal, and land restoration.
16. Items #18 and #19: Provide responses to these items if your project involves the use of groundwater.
17. Submission: Please incorporate all updated information into a single PDF document and submit a newly notarized version of the NOI.

The NOI must include all necessary information as outlined in 20.6.2.1201 NMAC. For your reference, information about all active or completed produced water pilot projects in New Mexico can be found at https://www.env.nm.gov/new-mexico-produced-water/pilot-projects/.

Please submit the requested information within 30 days of the date of this letter, by June 17, 2024. NMED appreciates your cooperation. If you have any questions, you may contact Jason Herman, Program manager at 575-649-3871 or by email at Jason.herman@env.nm.gov.

Sincerely,

Justin Ball

Digitally signed by Justin Ball
Date: 2025.05.07 12:00:16 -06'00'

Justin D. Ball
Ground Water Quality Bureau Chief

Cc: Jonas Armstrong, Director, Water Protection Division, NMED
Danielle Gilliam, Tribal Liaison (Acting), NMED
Andrew Knight, Assistant General Counsel, NMED
Justin Ball, Chief, Ground Water Quality Bureau, NMED

Jason Herman, Program Manager, GWQB PPS, NMED
Susan Lucas Kamat, Program Manager, SWQB PSRS, NMED
Gerasimos Razatos, Acting Director, Oil Conservation Division, EMNRD
Jim Griswold, Special Projects Manager, OCD, EMNRD
Patricia Sullivan, Director, Office of Strategic Initiatives, NMPWRC, NMSU
Mike Hightower, Program Director, NMPWRC, NMSU