



Upper Green River Alliance
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March 2, 2026

The Honorable Scott J. Cameron
Acting Commissioner
Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006

Re: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft EIS

Dear Acting Commissioner Cameron:

Thank you for the opportunity to contribute to dialogue about the future of the Colorado River and its upstream tributaries, including the Green River, as presented in the *Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft EIS*.

The Upper Green River Alliance fully supports the *Maximum Operational Flexibility Alternative (Cooperative Conservation Alternative)*, and would like to suggest additional opportunities, mitigation strategies, and water conservation practices that can enhance the *Cooperative Conservation Alternative*.

The Bureau of Reclamation intends that the new guidelines extend for approximately 20 years. However, given that the previous guidelines have not sufficiently protected the resources dependent on the Colorado River, and with the exceptionally dry winter of 2025-2026 exacerbating an already long-term drought, we believe that the interim guidelines should extend for only five years. The situation is that dire.

The amount of “produced” water withdrawn from natural gas fields (water produced with the gas, also called “by-product water”) within the Colorado River Basin increases with gas field development. The [Wyoming Oil and Gas Conservation Commission](#) reports that, between 2000 and 2025, the Pinedale Anticline gas field alone withdrew ~47,648 acre-feet of produced water.

If produced water is reinjected deep underground, the Wyoming State Engineer's Office does not limit the amount of this type of groundwater withdrawal. Beneficial use of this groundwater has tremendous, unrealized potential.

New advances in water reclamation are boosting scarce water supplies in the Intermountain West and throughout the world. For example, the \$50-million-dollar Confluence Park Water Reclamation Facility in Washington County, Utah will have the capacity to treat 1.5 million gallons of wastewater per day.

In addition, Wyoming has developed a 5-year voluntary pilot water conservation program for the Upper Green River Basin, enabling water users with valid water rights to receive financial compensation for reducing consumptive use.

In order to provide greater water conservation and efficiency practices, we suggest the following:

- Determine whether a reduction in groundwater withdrawals for oil and gas production may help to satisfy any portion of Wyoming's interstate compact obligations.
- Incentivize creation of produced water reclamation facilities to realize the potential, beneficial use of millions of gallons of groundwater;
- Require broader use of recycled, produced water for drilling and hydraulic fracturing in natural gas fields;
- Incentivize a voluntary pilot water conservation program similar to Wyoming's effort in the Green River Basin that would reduce consumptive use of groundwater by the oil and gas industry;
- Determine whether produced water withdrawn from groundwater sources for oil and gas production results in loss or impairment of surface waters and groundwater;
- Because the State of Wyoming does not limit the amount of unpermitted, produced water withdrawn if its use is not beneficial, establish a limit on the amount of produced water that can be withdrawn for oil and gas production, based on information about geology, hydrogeology, precipitation, aquifer sensitivity, aquifer recharge, and groundwater modeling.

We look forward to continued opportunities for additional coordination and collaboration. Again, thank you.

/s/

Linda F Baker
Executive Director