



**Barton Springs
Edwards Aquifer**
CONSERVATION DISTRICT

September 30, 2015

Sent via certified mail and email

Wet Rock Groundwater Services, LLC
317 Ranch Rd 620 South, Suite 203
Austin, TX 78734

**RE: Staff Review of a Temporary Permit Application submitted by Needmore Water LLC ,
for authorization to produce groundwater from the Middle Trinity Aquifer.**

Dear Mr. Kaveh Khorzad:

This letter is to inform you that District staff is currently reviewing the Temporary Permit application submitted by Needmore Water LLC on 9/18/15. In our initial review of the submitted application the District has determined that additional clarification and information are needed. The District requests this additional information in order to gain a better understanding of the application request and expedite the review within limited processing timeframes. Further, the requested information will facilitate determining whether the existing well in operation prior to 6/19/15 is being operated consistent with the authorization sought in the permit.

Please provide the requested information to address the following application requirements:

3-1.55.2 (A)(1) - A detailed statement of the nature and purpose of the existing uses.

On the application form, you indicated “agricultural irrigation” and “general irrigation” as the current uses types for of the well. The descriptive statement submitted with the application does not provide enough information or description of the agricultural and/or general irrigation operations. This information is integral to the characterization of the primary use type and verification of beneficial use.

The District requests that the applicant provide a written statement and associated supporting documentation that expands upon the statement of use provided in the application. The written statement should address the following:

- Provide a description of the existing agricultural and/or general irrigation uses supplied by the well in operation prior to 6/19/15.

- Provide a detailed description of the vegetation currently receiving irrigation from this well and other relevant related information (e.g. cultivated crops, native vegetation, recreation areas, landscaping, etc.).
- Provide clarification on whether the request is primarily used for agricultural irrigation or general irrigation or a combination of irrigation use types. If both, provide an estimate of the proportions of general versus agricultural irrigation demand.
- Provide a detailed description of the existing irrigation system(s) used to convey and distribute produced groundwater from the well(s) to the irrigated area including maps, diagrams, schematics, or other relevant supporting documentation describing the irrigation equipment and infrastructure.

3-1.55.2 (A)(8) - A description of the location of the proposed receiving area for the water to be produced.

- Please confirm that the location shown on the receiving area map is the only existing receiving area for the produced water from well (D).
- If applicable, please provide a description and a map that depicts all locations of the existing receiving area for the produced water from well (D).
- Please provide the approximate irrigated area (acres, sq ft) for each area.

3-1.55.2 (A)(2) – The requested annual permit volume not to exceed maximum production capacity and supporting documentation.

With the limited information provided in the application, the requested volume, which is assumed to represent maximum production capacity, does not appear to be practically feasible. Several factors contribute to this conclusion including: the relatively short well testing data (<24 hrs), completion of the well limiting pump size, and a pumping level that did not reach a steady-state for the pumping rate of 430 gpm prior to cessation of the test. Accordingly, we would like to request the following information:

- Please confirm that 887 acre/ft/year requested is based on the “maximum production capacity” of the well as defined by statute. Or provide an alternate basis if the requested volume is not being requested as the “maximum production capacity”.
- Please confirm that the well is constructed as the final completion for permanent production.
- Please provide the pump model and specifications for:
 1. the pump which was used to conduct the well test on November 14, 2012;
 2. the pump that is currently installed in the well; and
 3. the increased capacity pump that could be installed in the well as it is currently completed, which was used to derive the pumping rate for the requested permit volume.

- Please provide the intended run time of the well (pumping duration) on an annual basis and the intended pumping rate (gpm) for that intended pumping duration.

3-1.55.2 (A)(9) – Other facts and considerations. Given the time-sensitive nature of the review and this information request, the District also requests access to the property for a site visit of the well and associated irrigation/conveyance system in order to expedite this permit review within limited processing timeframes. We believe this will be the most efficient and effective way to better understand the requested authorization.

Please note that the deadline to complete the application review and issue a Temporary Permit is **10/19/15**. In order to timely process this application within these limited timeframes, we request that you provide the above requested information by **10/7/15**. The District very much appreciates your cooperation in assisting staff in this application review in order to provide a smooth and expeditious transition into a permit.

Please contact us as soon as possible to schedule the site visit. Please also feel free to contact us if you have any further questions or need clarification regarding the requested information. You may contact my office by phone at 512/282-8441 or by e-mail at jdupnik@bseacd.org

Sincerely,



John T. Dupnik, P.G.
General Manager

cc:

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