

ONLY FACTS....

Facts for Today's Hearing =  
The Permits Approved by the District

- I rely only on the Facts for my Conclusions.
- Although I believe my Conclusions are correct
  - input is always invited.

# Amendments Application

## **Amendment 2: Increase Total Annual Simsboro Well Field Production**

The Vista Ridge Operating Permit currently authorizes production of 35,993 acre-feet per year (ac-ft/yr) from its 12 permitted wells in the Simsboro Formation and 15,000 ac-ft/yr from the wells permitted in the Carrizo Formation, for a total permitted annual production of 50,993 acre-feet. Through Amendment 2, Vista Ridge requests that the Simsboro production be increased by 4,842 ac-ft/yr for a total Simsboro withdrawal of 40,835 ac-ft/yr. No change is requested for any of the permitted Carrizo wells.

Vista Ridge, LLC Drilling and Operating Permit, Exhibit A

Site	Latitude	Longitude	Formation	Max GPM	Permit Status
CW-1	30.44211	-96.81383	Carrizo	1200	Relocation requested
CW-2	30.43564	-96.80366	Carrizo	1200	Originally permitted location
CW-3	30.42930	-96.80682	Carrizo	1200	Relocation requested
CW-4	30.43169	-96.81623	Carrizo	1200	Originally permitted location
CW-5	30.43101	-96.82404	Carrizo	1200	Relocation requested
CW-6	30.42843	-96.83313	Carrizo	1200	Relocation requested
CW-7	30.41497	-96.81718	Carrizo	1200	Relocation requested
CW-8	30.42325	-96.81969	Carrizo	1200	Originally permitted location
CW-9	30.42184	-96.81010	Carrizo	975	Relocation requested
CW-10	30.41916	-96.80507	Carrizo	750	Originally permitted location
CW-11	30.41392	-96.79280	Carrizo	750	Originally permitted location
CW-12	30.41116	-96.79682	Carrizo	750	Originally permitted location
CW-13	30.44583	-96.76865	Carrizo	1200	Originally permitted location
CW-14	30.40421	-96.77860	Carrizo	750	Originally permitted location
CW-15	30.41001	-96.78026	Carrizo	750	Originally permitted location
CW-16	30.40794	-96.77606	Carrizo	750	Originally permitted location
CW-17	30.41709	-96.77139	Carrizo	750	Originally permitted location
CW-18	30.42121	-96.77545	Carrizo	975	Originally permitted location
CW-19	30.41838	-96.76680	Carrizo	750	Originally permitted location
CW-20	30.43605	-96.76393	Carrizo	1200	Originally permitted location
CW-21	30.43899	-96.77173	Carrizo	1200	Originally permitted location
PW-9	30.44189	-96.81334	Simsboro	3000	Relocation requested
PW-10	30.43638	-96.80358	Simsboro	3000	Originally permitted location
PW-11	30.42851	-96.80668	Simsboro	3000	Originally permitted location
PW-12	30.42220	-96.81065	Simsboro	2617	Relocation requested
PW-13	30.42394	-96.82004	Simsboro	2685	Originally permitted location
PW-14	30.41469	-96.81752	Simsboro	2500	Relocation requested
PW-15	30.42798	-96.83298	Simsboro	3000	Relocation requested
PW-16	30.43054	-96.82385	Simsboro	2412	Relocation requested
PW-17	30.43181	-96.81635	Simsboro	3000	Originally permitted location
PW-18	30.41998	-96.77520	Simsboro	3000	Originally permitted location
PW-19	30.41001	-96.77979	Simsboro	3000	Originally permitted location
PW-20	30.41145	-96.79644	Simsboro	1800	Originally permitted location

Was Vista Ridge using the MAX GPM to determine the maximum amount of Simsboro that could be pumped?

Maximum annual production based on MAX GPM:

- Simsboro = 53,044 ac-ft/y
- Carrizo = 34,196 ac-ft/y

Requested Simsboro Amount = 40,835 ac-ft/y

# Current Permit

The Wells are registered with the District and the State of Texas. The Wells are approved for production in the aggregate as a Well System. The Permittee is authorized to drill and operate the Wells at the locations and maximum GPM production set forth in Exhibit "A", and the maximum annual production of the Well System shall not exceed 50,993 acre feet per year.

Groundwater Conservation District ("District"), for the purpose of producing water for Municipal Use. The name, location, maximum annual production and maximum gallons of production permitted per minute for each of the thirty-three wells is listed in Exhibit "A". The individual wells listed in Exhibit "A" are referred to herein as the "Well" or "Wells" and the thirty-three Wells are collectively referred to as the "Well System". This Amended Permit is conditioned upon and subject to



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OFFICIAL LETTER OF COMPLAINT

Central Texas Aquifers Coalition - bluegold@centurylink.net

TO: Board of Directors, Post Oak Savannah Groundwater Conservation District

FROM: Central Texas Aquifers Coalition Based in Milam County: *Calvin Whiteley, Donald Schuerman, Mike Kornegay, Ralph Dizzine, Curtis Chubb*

DATE: 20 August 2018

4. In Paragraph 1 of the Permit, it is stated that the "maximum annual production" is provided for each well identified in Exhibit A.

- There is no "maximum annual production" provided for any of the 33 wells in Exhibit A.

Action Requested:

*We respectfully request:*

- A written response from the President of the Post Oak Savannah Groundwater Conservation District Board of Directors; and
- A discussion of both this Letter of Complaint and the Directors' responses to the errors outlined below during an open session at a regular Board Meeting.



# My conclusions based on the Facts:

- Vista Ridge's request to change the Simsboro pumping amount is not required - the current Permit already allows Vista Ridge to pump more Simsboro than requested in their amendment application.
- Vista Ridge does not request that the maximum Well Field pumping amount be amended.
- Today's hearing should be cancelled and rescheduled after the numerous mistakes on the Permits are corrected.