

April 8, 2020

Mr. Gary Westbrook , General Manager Post Oak Savannah Groundwater Conservation District 310 E. Avenue C Milano, TX 76556

## RE: Application to Amend Vista Ridge Drilling and Operating Permit No. POS-D&O/A&M-001d ("Operating Permit") and Transport Permit No. POS-T-0001d("Transport Permit")

Dear Gary:

The purpose of this letter is to comment on letter from Mr. Paul Terrill to POSGCD dated April 8, 2020. In his letter, Mr. Terrill provided evidence to retain the current maximum permitted instantaneous production rate of Well Nos. 10, 11, and 17, which are currently authorized by the District at a maximum instantaneous production rate of 3000 gpm.

Among the evidence provided in his letter are results from an analytical model that show the difference in drawdows in the Simsboro aquifer between an assumed reduction in pumping for Well Nos 10, 11, and 17 and the currently authorized rate of 3,000 gpm. Mr. Terrill states that there is very little measurable drawdown in the well field between the two modeling scenarios. Mr. Terrill also states that there is no measurable drawdown ( < 1 foot) difference in the nearest non-Vista Ridge Simsboro Well.

The modeling results and conclusions provided by Mr. Terrill are consistent with modeling results generated by INTERA. Based on our review of the technical evaluation presented by Mr. Terrill, INTERA does not have evidence or reason for why the District should not grant Vista Ridge a good cause exception as provided in Rule 4.2.1 from POSGCD spacing requirements in Rule 4.1.2 for Wells 10, 11, and 17.

Sincerely,

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Steven Young, PG PE Principal Geoscientist