

VISTA RIDGE

VISTA RIDGE LLC 11010 Coachlight Street, Suite 202, San Antonio 78216 Phone: (512) 718-9298

October 29, 2021

Post Oak Savannah Groundwater Conservation District (POSGCD)
c/o Gary Westbrook
310 East Avenue C
Milano, Texas 76556

Dear Mr. Westbrook,

We are in receipt of the correspondence from The Knight Law Firm informing Vista Ridge LLC of non-compliance as described in the letter on October 20, 2021. This response letter will also address the points made by INTERA in their October 18, 2021 correspondence.

Table 2 provided by INTERA shows that the Vista Ridge system is within compliance of instantaneous pumping rates 95% of the time. In addition, there are no monthly or annual permit pumpage exceedances.

The three Simsboro wells that make up for 65% of the alleged exceedances during the November 21, 2020 to February 9, 2021 time-frame are now properly programmed and are not exceeding instantaneous pumping limits.

Over the period from April 15, 2021 to September 30, 2021, 3% of the alleged exceedances occurred. In response to the QA/QC protocols using a continuous 24 hour period, EPCOR submitted a revised protocol on October 12, 2021 requesting the following language change in the protocol that would eliminate these last 3% of exceedances: *"The Carrizo Wilcox wells are not equipped with Variable Frequency Drives (VFD) and require manual adjustment of pump flow. The instantaneous pumping rate for these wells will be over a 48-hour interval in order to accommodate for this field deployment to adjust the pump."*

The final statement in Dr. Young's letter summarize the operation of the Vista Ridge system. "There have been no exceedances." As a matter of interest, this occurred during the highest summer production months.

Therefore, Vista Ridge is appealing the penalties assessed. No permit holder's water rights or water supplies were impacted. All instantaneous exceedances only impact other Vista Ridge rights and no adjacent landowners or permit amounts were in violation. Vista Ridge requests a meeting to discuss the decision of POSGCD. Please do not hesitate to contact me with any questions or concerns.

Respectfully,

Stefan Schuster

Stefan Schuster, P.G.
Director of Operations, EPCOR, Vista Ridge Operator