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June 16, 2025

Directors of the Neches & Trinity Valleys Groundwater Conservation District
501 Devereaux St.
Jacksonville, Texas 75766

Re: Contest to Applications by:

Redtown Ranch Holdings LLC to drill 21 wells in Anderson County; 5 wells in the Carrizo Sand (3,700 GPM/5,965.40 AF per year), 8 wells in the Upper Wilcox (9,800 GPM/15,800.25 AF per year, and 8 wells in the Middle Wilcox (7,050 GPM/11,366.50 AF per year

and

Pine Bliss, LLC to drill 22 wells in Henderson County; 11 wells in the Queen City (combined 3,475 GPM/5,506.64 AF per year) and 11 wells in the Carrizo/Reklaw/Wilcox (6,350 GPM/10,237.91 AF per year)

Dear Sirs:

The Consolidated Water Supply Corporation (“CWSC”) is a member-owned, member-controlled non-profit water supply corporation existing under Texas Water Code, chapter 67. CWSC owns land located in Anderson County and Houston County; provides retail water utility service within Anderson County, Houston County, and Walker County; and owns and operates public water supply wells producing water from the Carrizo Wilcox Aquifer in order to satisfy its statutory obligations to its members. CWSC is considered a “political subdivision” under Texas Water Code, Chapter 36 per the definition of the term in Section 36.001(15).

As a landowner, retail water utility, water producer, and a political subdivision, CWSC holds a justiciable interest related to legal right, duty, privilege, power, or economic interest that is within the GCD’s regulatory authority and affected by the permit applications. As a person adversely affected by the applicants’ activities should the District approve the applications, CWSC contests the above-referenced applications. CWSC requests that the District conduct, or cause to be conducted, contested case hearings on the above-referenced applications. CWSC requests to be designated as an affected party to the hearings on the above-referenced applications. CWSC may be contacted through its attorneys listed in this letter.

MAINTAINING A TRADITION OF TEXAS VALUES SINCE 1962

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4208/12 #351919.5B

I. CWSC is an Affected Party.

Pursuant to Chapter 36 of the Texas Water Code and Rule 1.1(a) of the NTVGCD's Rules, CWSC hereby formally requests to be recognized as an affected party in any proceedings. Redtown Ranch Holdings LLC and Pine Bliss LLC (collectively, "Applicant Parties") groundwater withdrawal application permits directly and substantively impacts CWSC on the following basis applying affected party status to CWSC:

1. CWSC owns real property within the NTVGCD's jurisdiction:
 - a) property R829770 on FM 322, further described as A0010 BOX, JOHN A BLOCK 1093 TRACT 12A, 0.229 ACRES. This tract of land is located 3.82 miles from the nearest well proposed to be drilled by Applicant Redtown Ranch and 3.37 miles from Redtown Ranch's property line. Evidence may show that the elevation of water within the Carrizo-Wilcox Aquifer at this location will be reduced by the cone of depression from Applicants' wells, if allowed to be drilled and groundwater produced at the proposed volumes stated in the applications.
 - b) property R21502 on FM 319, further described A0308 GOSSETT, JOHN BLOCK 1005 TRACT 6, 0.057 ACRES. This tract of land is located 5.97 miles from the nearest well proposed to be drilled by Applicant Redtown Ranch and 5.54 miles from Redtown Ranch's property line. Evidence may show that the elevation of water within the Carrizo-Wilcox Aquifer at this location will be reduced by the cone of depression from Applicants' wells, if allowed to be drilled and groundwater produced at the proposed volumes stated in the applications.
2. CWSC provides essential public water service to 5,610 retail connections in Houston, Anderson, and Walker counties, including schools, volunteer fire departments, industrial facilities, ranches, and underserved rural populations. Additionally, CWSC is an active participant in the TXWARN mutual aid network, offering emergency water response beyond its service boundaries—including recent emergency assistance in Trinity County.
3. CWSC will be directly injured and impacted by the increased risk of contamination to the water supply from natural elements or bad acts if these permit applications are approved. Due to the magnitude of wells proposed for drilling in the applications without identifying any need or use of this volume of water, the Applicant Parties are multiplying the risk of contamination. The permit applications cite 43 wells collectively and reference 17 additional wells collectively in their maps located within the Queen City Sands, Carrizo/Reklaw Formation, Wilcox Group, Carrizo Sand, Middle and Upper Wilcox, which is the same water supply CWSC utilizes. This heightened risk of contamination to CWSC's water supply poses a serious threat of injury and impact to CWSC and the general public it services.

4. CWSC is a designated Water User Group (WUG) in the NTVGCD Management Plan, and therefore directly implicated in the NTVGCD's obligation to preserve the underlying aquifer conditions and achieve the established Desired Future Conditions (DFC).

- a) See Appendix A.2 *Projected Total Water Demands* on page 17.
- b) See Appendix A.3 *Projected Surface Water Supplies* on page 20.
- c) See Appendix A.5 *Projected Water Needs Within the District* on page 23.

5. CWSC owns and operates 12 groundwater production wells, listed below.

Name	State Well No.	TCEQ Source ID	Latitude DD	Longitude DD	Aquifer	Well Depth
Plant I		G1130033A	31.5204390	-95.5752130	Carrizo-Wilcox	827
Plant B	3829802	G1130033B	31.507778	-95.4561111	Carrizo-Wilcox	877
Plant C	3829607	G1130033C	31.5465940	-95.3950110	Carrizo-Wilcox	695
Plant D	3830502	G1130033D	31.569844	-95.3187194	Carrizo-Wilcox	686
Plant F	3838705	G1130033E	31.399289	-95.3640417	Carrizo-Wilcox	1173
Plant G		G1130033F	31.4324100	-95.1811130	Sparta	465
Plant H		G1130033G	31.3272220	-95.3563880	Sparta	752
Plant O	3836702	G1130033H	31.4083340	-95.5947220	Carrizo-Wilcox	851
Plant U	3844505	G1130033I	31.292967	-95.5617694	Carrizo-Wilcox	1322
Plant Z		G1130033J	31.0878980	-95.5344560	Sparta	1324
Alpha		G1130031A	31.4083330	-95.4583330	Carrizo-Wilcox	1109
Beta		G1130033K	31.4622220	-95.5941660	Carrizo-Wilcox	820

Nine of CWSC's wells are located within the Carrizo-Wilcox Aquifer, with two wells being within 7 miles of the Applicant Parties' property subject to the proposed permits and another being less than 9 miles from the Applicant Parties' proposed project area. These three wells are pivotal in supplying drinking water to approximately 1,255 residential, commercial and agricultural members in Houston and Anderson Counties.

6. CWSC's 12 groundwater wells are located within Groundwater Management Area 11, which is the planning authority that established the 155-foot DFC drawdown goal for the Carrizo-Wilcox Aquifer in Anderson County. Therefore, as a groundwater participant within the Groundwater Management Area 11, CWSC's interests directly align with the regional efforts to maintain compliance with the DFC. The Applicant Parties' proposed permits are contrary to the intent and goal established by the DFC and threaten to undermine the regional efforts to protect the Carrizo-Wilcox Aquifer's water supply, which directly affects CWSC and its customers.

7. The Applicant Parties' prior engagement with CWSC, specifically soliciting a proposal to sell groundwater further illustrates CWSC's relevance and the stake it holds in the proposed permit project. CWSC maintains infrastructure on the Applicant Parties' property, including a meter, valves and piping. Due in part to the proximity of CWSC's infrastructure to the property, representatives of the Applicant Parties, Conservation Equity Management, previously approached CWSC soliciting a proposal to sell groundwater to CWSC. The proposal offered a 15-year term to purchase groundwater, with ownership of the well infrastructure transferring to CWSC at the end of the term. CWSC declined this offer, but the history between the Parties displays a direct intent of the Applicant Parties' desire to undermine CWSC's water supply.
8. Considering these factors together, it's clear that CWSC is a qualified, materially impacted party with substantial interest in the outcome of this proceeding. We respectfully request that CWSC be granted affected party status and the opportunity to participate fully in any contested case hearing as CWSC anticipates specific damages if the proposed applications are approved as submitted. Specifically, these damages include:
 - Reduced groundwater availability in CWSC's existing production wells due to drawdown or shifting gradients resulting from excessive pumping near the Applicant Parties' Proposed Wells.
 - Risk of contamination through natural elements or bad acts due to the amount of wells the Applicant Parties intend on drilling.
 - Elevated pumping costs and energy usage if water levels decline significantly, requiring deeper pumps and straining pump equipment and unnecessary increased costs to CWSC customers.
 - Potential aquifer interference leading to degraded water quality or increased maintenance from sand, turbidity, or mineral changes.
 - Risk of land subsidence induced by over-pumping, which may result in structural damage to CWSC's well casings and distribution infrastructure, as well as permanent loss of aquifer storage capacity.
 - An increase in emergency service requests from private well owners in the immediate vicinity of the Applicant Parties' project area due to excessive drawdown or subsidence resulting in private well deficiencies or structural collapse.
 - Surface water impacts affecting reservoir inflows to Houston County Reservoir, which shares a hydrologic connection to the affected aquifer system and supports CWSC partners and approximately 661 CWSC meters.
 - Disruption to CWSC's emergency mutual aid operations due to regional groundwater depletion, threatening the reliability of disaster response across counties.

II. CWSC offers the following technical and administrative deficiencies with the Applicant Parties Groundwater Application Permits.

1. Exceedance of the Modeled Available Groundwater and Impairment of the DFC

The Anderson County application requests 33,132 acre-feet per year (AFY) exceeding the Modeled Available Groundwater (MAG) of 27,024 AFY by over 22%. Without consideration to the total volume of exempt and permitted groundwater, this requested annual production volume violates and undermines the NTVGCD's adopted Management Plan, which states that permits must be representative of the MAG. Under Texas Water Code Section 36.1132, a district must manage total permitted production to achieve the DFC and a district shall issue permits up to the point that volume of exempt and permitted groundwater production will achieve an applicable DFC under section 36.108. In addition, subsection (d)(4) states that the district shall consider whether "the proposed use of water is consistent with the district's approved management plan." It's evident from the vast volume requested in these permits that the Applicant Parties' use will be inconsistent with NTVGCD's approved Management Plan and will undermine its goal, which will directly impact CWSC.

- a. See NTVGCD Management Plan Appendix A.8 Modeled Available Groundwater Based on the DFCs of GMA-11 on page 52.

2. **Failure to Specify Use Types and Volumes by Use Type**

The Applicant Parties permit applications are administratively incomplete as it specifies "for all beneficial purposes," which is contrary to Texas Water Code Section 36.113 which requires "a statement of the nature and purpose of the proposed use and the amount of water to be used for each purpose." In addition, the lack of specificity broadens Redtown Ranch Holdings LLC business purposes which was stated as "own and operate ranchland," as provided in their 2022 Application for Registration of a Foreign LLC with the Texas Secretary of State, and is contrary to this purpose because ownership and operation of ranchland does not warrant this volume of water. The Applicant Parties failure to specify is contrary to NTVGCD's rules, which requires that each use type and its associated volume be specifically defined as "domestic, municipal, industrial, agricultural, or irrigation use." The permits use of "for all beneficial purposes" fails to meet the intent of Texas Water Code and NTVGCD's rules by disallowing a thorough consideration and review of the permits and the permits consistency with the Management Plan. This failure to specify use types with even a scintilla of the permits proposed uses is a clear attempt to undermine a thorough and meaningful impact analysis raising concerns of speculative and potential wasteful uses, which both are grounds for denial of the permit applications.

Further, if the proposed use is for all beneficial purposes, then the use will include municipal purposes subjecting it to NTVGCD's Rule 5.4(e) regarding issuance of permits for non-exempt wells, which is another reason for the applications being administratively incomplete since it fails to include notice of any application to the Texas Commission on Environmental Quality to obtain or modify a Certificate of Convenience and Necessity to provide water or wastewater service with water obtained for municipal purposes pursuant to the requested permits.

3. **Fragmentation of Project Scope**

The applications arbitrarily divide the project into two entities across three counties by omitting cumulative analysis of impacts from the full referenced 60-well network and potentially evading environmental review standards and regional planning coordination.

The cited wells in the Applicant Parties Redtown Ranch Holdings LLC notice of application include:

Well ID	Latitude	Longitude	GPM	AF/yr.
L2-1/CZ-1	31° 31' 10.054" N	95° 41' 30.815" W	750	1,209.20
CZ-2	31° 32' 51.705" N	95° 42' 49.965" W	650	1,047.98
CZ-3	31° 31' 3.339" N	95° 43' 15.243" W	950	1,531.66
CZ-4	31° 32' 42.580" N	95° 43' 48.169" W	600	967.36
SE-5/CZ-5	31° 31' 26.771" N	95° 44' 2.731" W	750	1,209.20
UWLX-1	31° 31' 11.226" N	95° 41' 30.537" W	1,400	2,257.18
UWLX-2	31° 32' 53.159" N	95° 42' 48.626" W	1,400	2,257.18
UWLX-3	31° 31' 1.610" N	95° 43' 14.956" W	1,000	1,612.27
UWLX-4	31° 32' 43.746" N	95° 43' 46.215" W	1,200	1,934.72
UWLX-5	31° 31' 25.086" N	95° 44' 1.795" W	1,000	1,612.27
UWLX-10	31° 31' 49.224" N	95° 42' 0.512" W	1,300	2,095.95
UWLX-11	31° 31' 54.091" N	95° 43' 13.570" W	1,200	1,934.72
UWLX-12	31° 32' 0.146" N	95° 44' 51.493" W	1,300	2,095.95
MWLX-1	31° 31' 10.325" N	95° 41' 29.366" W	900	1,451.04
MWLX-2	31° 32' 51.460" N	95° 42' 47.676" W	900	1,451.04
MWLX-3	31° 31' 2.255" N	95° 43' 17.019" W	800	1,289.82
MWLX-4	31° 32' 44.426" N	95° 43' 48.072" W	900	1,451.04
MWLX-5	31° 31' 25.248" N	95° 44' 3.815" W	900	1,451.04
MWLX-10	31° 31' 49.429" N	95° 41' 58.141" W	900	1,451.04
MWLX-11	31° 31' 55.164" N	95° 43' 15.226" W	800	1,289.82
CZ-6	not provided	not provided	not provided	not provided
CZ-7	not provided	not provided	not provided	not provided
CZ-8	not provided	not provided	not provided	not provided
MWLX-6	not provided	not provided	not provided	not provided
MWLX-7	not provided	not provided	not provided	not provided
MWLX-8	not provided	not provided	not provided	not provided
MWLX-9	not provided	not provided	not provided	not provided
UWLX-6	not provided	not provided	not provided	not provided
UWLX-7	not provided	not provided	not provided	not provided
UWLX-8	not provided	not provided	not provided	not provided
UWLX-9	not provided	not provided	not provided	not provided

The cited wells in the Applicant Parties Pine Bliss LLC notice of application include:

Well ID	Latitude	Longitude	GPM	AF/yr.
QC-1	32° 8' 41.673" N	95° 33' 3.523" W	225	362.76
QC-2	32° 7' 46.717" N	95° 31' 17.220" W	225	362.76
QC-3	32° 8' 43.245" N	95° 31' 38.167" W	300	483.68
QC-4	32° 9' 39.017" N	95° 31' 50.855" W	425	685.21
QC-5	32° 10' 5.498" N	95° 31' 51.588" W	500	806.13
QC-6	32° 10' 20.949" N	95° 31' 22.682" W	625	1007.67
QC-7	32° 8' 20.361" N	95° 32' 46.421" W	200	322.45
QC-8	32° 8' 42.588" N	95° 34' 0.365" W	200	322.45
QC-9	32° 8' 45.307" N	95° 32' 25.315" W	225	362.76
QC-10	32° 9' 12.618" N	95° 31' 50.111" W	325	523.99
QC-11	32° 7' 59.058" N	95° 32' 4.010" W	225	362.76
WLX-1	32° 8' 40.989" N	95° 33' 2.165" W	500	806.13
WLX-2	32° 7' 47.961" N	95° 31' 17.125" W	475	765.83
WLX-3	32° 8' 41.972" N	95° 31' 37.305" W	650	1047.98
WLX-4	32° 9' 35.152" N	95° 31' 50.577" W	650	1047.98
WLX-5	32° 10' 4.123" N	95° 31' 51.494" W	700	1128.59
WLX-6	32° 10' 19.624" N	95° 31' 21.927" W	900	1451.04
WLX-7	32° 8' 20.254" N	95° 32' 44.601" W	450	725.52
WLX-8	32° 8' 42.311" N	95° 34' 2.862" W	600	967.36
WLX-11	32° 7' 57.618" N	95° 32' 4.569" W	450	725.52
WLX-12	32° 8' 7.471" N	95° 33' 26.189" W	475	765.83
WLX-13	32° 7' 38.732" N	95° 32' 49.050" W	500	806.13
CZ-1	not provided	not provided	not provided	not provided
CZ-2	not provided	not provided	not provided	not provided
CZ-3	not provided	not provided	not provided	not provided
CZ-4	not provided	not provided	not provided	not provided
CZ-5	not provided	not provided	not provided	not provided
CZ-6	not provided	not provided	not provided	not provided

4. **Lack of a Transfer Permit**

The Applicant Parties have not obtained an export or transfer permit as required by NTVGCD rules *prior* to the construction of wells for the purpose of transporting groundwater outside of the NTVGCD's jurisdiction. The annual proposed production volumes requested and the applicant's public statements aiming to address a "...water supply source crisis..." clearly indicates the Applicant Parties intent to supply the demand to consumers outside of the NTVGCD's jurisdiction. Specifically, Agenda Item 6 of the NTVGCD's May 2024 meeting minutes references the discussion of a "...possible request for permits for significant amounts of water, including *drilling and transportation...*" (*emphasis added*). The minutes suggest the

NTVGCD's awareness of the applicant's transfer intent, and pursuant to NTVGCD's rules, any proposed transfer of groundwater across NTVGCD's boundaries requires a separate permit that is subject to evaluation based on impacts to the aquifer, compliance with the DFC, and other relevant criteria. Specifically, Rule 14(b), states that "a groundwater transfer permit shall be obtained prior to commencing construction of wells or other facilities." Therefore, the omission of the required transfer permit with the applications renders them incomplete and procedurally deficient. This omission also raises concerns of a potentially calculated delayed transfer permit after the approval of the permits, which would further evidence the Applicant Parties clear intent to undermine the Texas Water Code and NTVGCD's efforts to conserve the aquifer and the Management Plan.

Further, since a transfer permit was not obtained, the application lacks critical information which is essential for a complete and informed assessment and should raise serious concerns of potential waste of the water considering the volume the Applicant Parties are seeking. NTVGD's Rules requires data demonstrating the availability of water both within the District and in the proposed receiving area for the duration of the requested supply period¹, an evaluation of alternative water sources available to the applicant², an analysis of the feasibility and practicability of using those alternative supplies³, a signed contract between the applicant and end user⁴, and additional information that informs the assessment.

5. Hydrologic and Watershed Impacts Ignored

The Applicant Parties have ignored impacts to the hydrology and watersheds within the area through the failure to accompany the applications with credible analysis of these potential impacts, and therefore have violated NTVGCD Rule 5.4(k) requiring impacts of use, including "...area of influence, draw down, recovery time, and other pertinent information..." and "...hydrogeologic information addressing and specifically related to the proposed water pumpage levels at the proposed pumpage site intended for the proposed well or for the proposed transporting of water outside the District." The proposed Applicant Parties' wells lie adjacent to the Trinity River and upstream of the Houston County Reservoir watershed. The proposed volume and associated required pumping of this magnitude increases the risk of reduced baseflows, contamination, impairment to watershed inflows, and alteration of critical surface water-groundwater interactions, and provides another reason for the denial of these permits.

¹ See NTVGCD Rule 14(d)(9) requiring "data showing the availability of water in the District *and in the proposed receiving area* during the period for which water supply is requested."

² *Id.* at (10) regarding "alternate sources of supply that might be utilized by the applicant..."

³ *Id.* at (12)(II) requiring a "technical description of the facilities to be used for transportation of water."

⁴ *Id.* at (13) requiring if the water is to be used by someone other than the applicant "...a signed contract between the applicant and the user or users."

6. **Ambiguous and Incomplete Permit Boundaries**

Several proposed wells cited in the Redtown Ranch Holdings LLC Notice of Application lie just outside NTVGCD jurisdiction in Houston County but are geologically and operationally connected to the same aquifer. Although these 11 additional wells may be jurisdictionally exempt from permitting, NTVGCD has a vested interest and duty to consider the impact of the applied volumes within its jurisdiction and the estimated amount of pumping that is exempt from permitting.⁵

7. **Map Deficiencies**

Pursuant to NTVGCD Rule 5.4(d), the Applicant Parties committed another violation by failing to include a map from the appraisal district indicating the location of each proposed well, the subject property, and adjacent owner's physical addresses and mailing addresses.

The Applicant Parties also submitted inaccurate setback distances in an apparent attempt to avoid triggering notice requirements for wells located within 0.25 miles (1,320 feet) of property boundaries. For example, proposed well MWLX-10 is reported as being 1,437 feet from the nearest property line; however, geospatial measurements based on the Applicant's own coordinates place the well approximately 1,147 feet from the nearest boundary. Similarly, proposed well UWLX-10 is reported as being 1,437 feet from the nearest property line, but map-based measurements show it is only 963 feet away. Additional discrepancies include well CZ-1, reported at 1,510 feet but measured at approximately 1,223 feet; MWLX-1, reported at 1,510 feet but measured at 1,251 feet; and UWLX-1, reported at 1,510 feet but measured at 1,340 feet. These material inaccuracies directly affect compliance with NTVGCD Rule 5.6(1), which mandates mailed notice to landowners with property boundaries located within one-quarter mile of any proposed well. Accordingly, affected property owners in the area should have received written notice of the applications.

8. **Other Technical and Operational Concerns**

- a. Groundwater levels in the Carrizo Aquifer unit have declined through time at most Texas Water Development Board (TWDB) hydrograph locations, reflecting long-term regional drawdown trends.⁶

⁵ See NTVGCD Management Plan Section H.

⁶ See the TWDB *Conceptual Model Report: Groundwater Availability Model for Northern Portion of the Queen City, Sparta, and Carrizo-Wilcox Aquifers*, Figure 4-38 and Figure 4-39.

- b. Large groundwater level declines have occurred specifically in Anderson County, sections of the Carrizo Aquifer relevant to the proposed permit area. These declines signal sustained aquifer stress and reduced availability for other users who rely on the same resource, including CWSC.
 - a. See the TWDB *Conceptual Model Report: Groundwater Availability Model for Northern Portion of the Queen City, Sparta, and Carrizo-Wilcox Aquifers*, Figure 4-39. An excerpt from that image is below.



- c. The area is also recognized by TWDB as being at a moderate risk of subsidence, even without considering the scale of groundwater withdrawal requested by the Applicant Parties.⁷ Accelerated drawdown, particularly in consolidated formations like the Carrizo, raises the risk of irreversible aquifer compaction, land surface deformation, and damage to buried utility infrastructure, such as CWSC pipelines.

9. **Deficiency and Ambiguity in Application Raise Potential Threats to Infrastructure and Water Systems**

The Applicant Parties' failure to specify critical information in the applications raises serious concerns of potential threats to the areas' infrastructure and water systems that the Texas Legislature has aimed to prevent. The Applicant Parties are formed under a complex entity structure with various Limited Partnerships, and absent discovery and transparency, it is uncertain as to whether these entities are straw men for foreign ownership interests.

Recently, the Texas Legislature passed Senate Bill 17, which addresses increasing concerns of foreign entities owning land with infrastructure and aims to restrict foreign entities from owning or leasing land with infrastructure in Texas. The bill enacts

⁷ See *Identification of the Vulnerability of the Major and Minor Aquifers of Texas to Subsidence with Regard to Groundwater Pumping* - TWDB Contract Number 1648302062

Subchapter H of the Texas Property Code to take effect on September 1, 2025.⁸ Without a thorough review for clarity and brevity of the Applicant Parties' ownership, specific use, and customers for this project, concerns are heightened about potential threats to CWSC and its customers from foreign ownership that the Texas Legislature's recent actions are aimed to prevent. CWSC maintains infrastructure on and near the Property in question and cannot sit idly by in the face of such a possibility. A permit for this volume of water by a private landowner needs to be thoroughly investigated for conservation, reasonable use, and threats to infrastructure and water systems within the area.

III. Relief Requested:

1. A contested case hearing;
2. That CWSC be granted full party status in any contested case hearing;
3. That the District deny or condition any permit not fully compliant with MAG/DFC obligations under §36.1132;
4. That the application be deemed administratively incomplete pending clear specification of use types, end users, consolidated hydrologic impact analysis;
5. That NTVGCD's impact assessment include all proposed wells referenced in the application documents and communications, including those wells located in Houston County.
6. That any permit, if issued, be strictly conditioned for:
 - o volume limitations,
 - o periodic review and curtailment authority,
 - o measurable conservation requirements, and
 - o immediate revocation for noncompliance.

CWSC urges NTVGCD to act in accordance with the Texas Water Code, regional groundwater planning goals, the Management Plan, the District Rules and the public interest in maintaining aquifer integrity and conservation. CWSC stands ready to provide further documentation and participate in all hearings or stakeholder processes, including providing testimony under penalty of perjury.

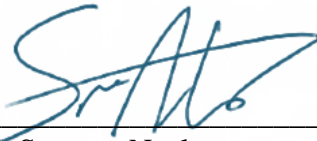
(Signature page follows.)

⁸ See Texas Property Code Subchapter H Purchase or Acquisition of Real Property By Certain Foreign Individuals or Entities.

Respectfully submitted,

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SUPPLY CORPORATION

Cc: Amber Stelly, General Manager

Via Email: general.manager@consolidatedwsc.com

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