

**RESOLUTION OF THE BOARD OF DIRECTORS OF THE
CONSOLIDATED WATER SUPPLY CORPORATION REGARDING
GROUNDWATER WITHDRAWAL APPLICATIONS BY REDTOWN
RANCH HOLDINGS LLC AND PINE BLISS LLC.**

WHEREAS, The Consolidated Water Supply Corporation ("Consolidated") is a member-owned, nonprofit utility providing water service to over 16,800 rural residents in Houston, Anderson, and Walker Counties, Texas; and

WHEREAS, Consolidated operates active public water supply wells in Houston County that draw from the Carrizo-Wilcox Aquifer and purchases surface water from Houston County WCID No. 1 to meet growing demand across its multi-county service area; and

WHEREAS, Consolidated maintains a Certificate of Convenience and Necessity (CCN) for service territories, including portions directly adjacent to or overlapping with the Redtown Ranch project area; and

WHEREAS, Redtown Ranch Holdings LLC and Pine Bliss LLC have filed groundwater withdrawal applications with the Neches and Trinity Valleys Groundwater Conservation District (NTVGCD) requesting authority to withdraw a combined 48,972 acre-feet per year, or approximately 15.96 billion gallons annually, from the Carrizo-Wilcox and Queen City aquifers; and

WHEREAS, the applications reference approximately 54 wells:

1. 21 wells in Anderson County (Redtown Ranch LLC, under NTVGCD jurisdiction),
2. 22 wells in Henderson County (Pine Bliss LLC, under NTVGCD jurisdiction), and
3. 11 wells in Houston County (outside of formal NTVGCD jurisdiction but clearly within the same project footprint and aquifer system), and

WHEREAS, the stated purpose of the groundwater withdrawal is "for all beneficial purposes," which lacks specificity and fails to comply with Texas Water Code and NTVGCD rules requiring applicants to disclose the intended use, point of use, and transport infrastructure in sufficient detail to allow for meaningful evaluation of hydrologic impact; and

WHEREAS, the total requested withdrawal volume vastly exceeds the modeled available groundwater (MAG) for Anderson County under the District's management plan (27,024 acre-feet per year), and approaches the entire MAG for the three-county District combined (49,488 acre-feet per year), thereby threatening the ability of the District to maintain its Desired Future Conditions (DFC) as adopted under Chapter 36 of the Texas Water Code and established by Groundwater Management Area 11; and

WHEREAS, Consolidated is explicitly recognized as a Water User Group (WUG) and stakeholder in the NTVGCD's Management Plan, and relies upon long-term groundwater availability from the

Carrizo-Wilcox to sustain critical public infrastructure and reliable service to existing members; and

WHEREAS, several hundred private well owners also rely on domestic and agricultural wells throughout the area, many of whom are Consolidated members that supplement or wholly depend upon groundwater for their needs; and

WHEREAS, excessive drawdown from the proposed well field development could interfere with Consolidated's existing wells or damage nearby domestic wells, creating a foreseeable public health burden and emergency service obligation for Consolidated that would not exist but for these applications; and

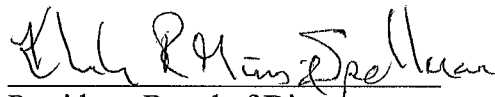
WHEREAS, the applicants' membership in the Consolidated system and development within its certificated service area gives rise to governance, planning, and infrastructure considerations that cannot be decoupled from this project's hydrologic and regulatory context; and

WHEREAS, source water protection, aquifer recharge, and watershed dynamics are of high concern to Consolidated, especially where the scale and ambiguity of proposed withdrawals may jeopardize sustainable supply and water quality for decades to come;

NOW, THEREFORE, BE IT RESOLVED THAT:

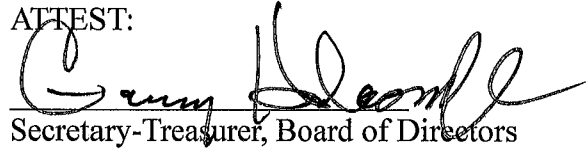
1. The Consolidated Water Supply Corporation formally requests a contested case hearing on the applications submitted by Redtown Ranch Holdings LLC and Pine Bliss LLC and to be granted standing as a party in opposition to the applications as an adversely affected party under Chapter 36 of the Texas Water Code;
2. The Board finds that the referenced applications:
 1. Fail to adequately define the purpose and destination of use;
 2. Present cumulative withdrawal volumes inconsistent with MAG and DFC preservation requirements;
 3. Fragment project scope by omitting meaningful analysis of all 54 referenced wells across three counties;
 4. Pose direct operational, financial, and environmental risks to existing Consolidated members, particularly those near the project area or served by infrastructure dependent on stable aquifer drawdown and quality;
3. The General Manager of The Consolidated Water Supply Corporation is hereby authorized and directed to contest these applications on behalf of the Corporation, including submission of written comment, appearance at administrative hearings, engagement of legal or technical experts, and coordination with public officials and other affected parties;
4. The Board commits to further evaluating legislative or regulatory safeguards needed to protect rural water systems and ensure that private development does not overwhelm the public's long-term access to groundwater.

PASSED AND ADOPTED this 3rd day of June 2025.



President, Board of Directors
The Consolidated Water Supply Corporation

ATTEST:



Secretary-Treasurer, Board of Directors