



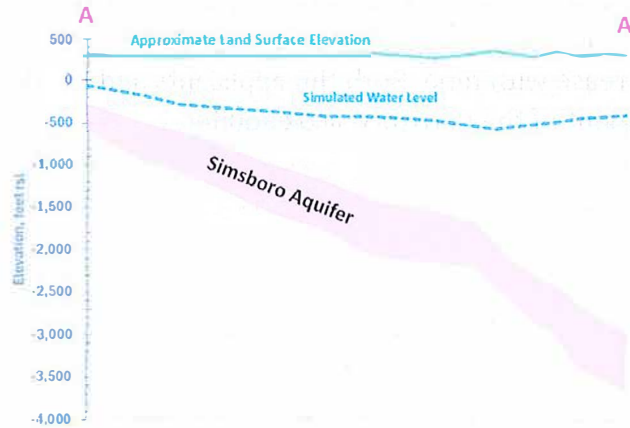
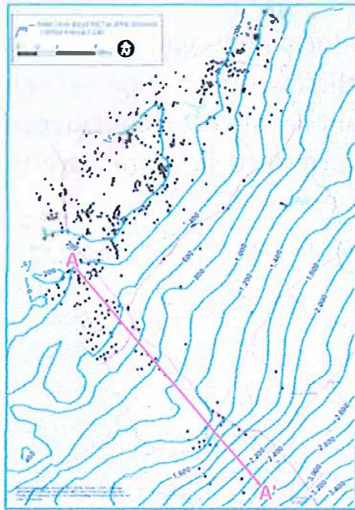
SIMSBORO AQUIFER WATER DEFENSE FUND

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The Simsboro Aquifer Water Defense Fund has reviewed the presentation materials for the proposed transport permits and offers the following recommendations to the Brazos Valley GCD board of directors. SAWDF urges the board to take their time to consider these permits, request additional information, and consider phasing the permits based on monitoring results and joint planning with Groundwater Management Area 12 [GMA-12].

The district’s consulting hydrologists, AGS have provided a comprehensive technical review of the permits. SAWDF urges to board to consider a few factors that the AGS review reveals:

1. The remaining available drawdown in the northern half of the Simsboro will be significantly reduced and set on a declining trajectory. [See slides 9 & 10 in AGS presentation]



S-19G3_100K

Available Drawdown Remaining (ft)	200	400	600	800	1,000	1,200	1,400	Average
% of Total Available Drawdown (2020 Simsboro head)	55%	59%	66%	74%	78%	80%	72%	69%

S-19G3_75K

Available Drawdown Remaining (ft)	200	400	600	800	1,000	1,200	1,400	Average
% of Total Available Drawdown (2020 Simsboro head)	62%	70%	74%	79%	89%	84%	84%	78%

S-19G3_50K

Available Drawdown Remaining (ft)	200	400	600	800	1,000	1,200	1,400	Average
% of Total Available Drawdown (2020 Simsboro head)	62%	77%	84%	86%	89%	91%	89%	83%

Simsboro Aquifer Water Defense Fund [SAWDF] a non-profit dedicated to protecting groundwater rights and the Carrizo-Wilcox Aquifer.

www.simsboroaquiferwaterdefensefund.org

2. The predicted average drawdown for all three scenarios will significantly exceed the district's Desired Future Condition [DFCs] in the Wilcox group, i.e. Calvert Bluff, Simsboro, and Hooper formations. The average drawdown in the Simsboro formation will exceed the DFC by approximately double the current management goal. [See slides 11 & 12 in AGS presentation] The DFCs are a product of a joint planning process that may or may not result in dramatically deeper DFCs. A prudent approach is to go slow and go shallow and use the districts well monitoring system to verify predicted outcomes.
3. The district's review did not include a "water budget" using the results from the various Groundwater Availability Model [GAM] runs; S-19G3_100K, S-19G3_75K, and S-19G3_50K. A water budget models the percentage of different groundwater sources that are "captured" in the different pumping scenarios. The Carrizo-Wilcox formations interact with the surface waters in the outcrop areas and with adjoining formations, as well. A typical water budget for the Carrizo-Wilcox may reveal that up to 50% of the water produced from pumping comes from capturing recharge that would normally flow into surface water features, such as river, creeks, seeps and springs. Up to an additional 20% may be captured from adjoining formations, leaving only 30% of production to come from "storage" in the target aquifer.

For these reasons, SAWDF urges the board to take the time necessary to produce and review the water budgets and discuss possible impacts within the district. The applicants and the district have done their due diligence. Private property rights are protected, and it is a sure bet that the applicants return on investment [ROI] will only increase with time. Both the applicants and the district can afford to go slow and carefully monitor development of the Carrizo-Wilcox aquifer.