



February 20, 2025

via email: AMcCleary@smcprep.org and AMcCleary@sgs-austin.org

Audra McCleary
Archangel Catholic School of Austin
3000 Barton Creek Blvd.
Austin, TX 78735

RE: Administrative Completeness Review of Production Authorization Application Submitted by Archangel Catholic School of Austin for Authorization to Produce Groundwater from the Lower Trinity Aquifer for Non-agricultural Irrigation Use

Dear Audra McCleary:

The purpose of this letter is to notify you that the Production Authorization Application submitted to the Southwestern Travis County Groundwater Conservation District ("District") by Archangel Catholic School of Austin ("Applicant") has been deemed administratively complete. The Application seeks an Operating Permit to produce up to 9,850,000 gallons (30.23 acre-feet) annually from the Lower Trinity Aquifer for Non-agricultural Irrigation Use.

For an application to be considered administratively complete under District Rules, it must include all information required by District Rule 3.4(A) and be accompanied by the appropriate permit application fee.

The District is in receipt of the following correspondence and materials supporting a determination of administrative completeness:

1. Application for Well Production Authorization, submitted October 28, 2024 ("**Application**");
2. Check no. 57324 from St. Gabriel's Catholic School, in amount equal to \$750.00, dated October 17, 2024.
3. Completed Irrigation Demand Worksheet and accompanying map, submitted December 7, 2023 to satisfy requirements related to corresponding Well Drilling Authorization Application ("**Supplement No. 1**");
4. Aquifer testing data for pumping and observation well (excel format) and revised figure from hydrogeological report (Figure 10), submitted November 1, 2024 ("**Supplement No. 2**");
5. AQTESOLV files, submitted November 5, 2024 ("**Supplement No. 3**");
6. Correspondence entitled "User Conservation Plan Checklist Responses" and accompanying equipment list, submitted February 6, 2025 ("**Supplement No. 4**") and
7. Digital copies of Shipment Confirmation Acceptance Notice and mailing labels for sending application notices via USPS Certified Mail to neighboring property owners and water suppliers, submitted February 6, 2025 ("**Supplement No. 5**").

Please note this list is not a comprehensive list of all correspondence and documentation filed to support the Application but together compose the record containing the requisite information for administrative completeness. The enumerated list below identifies each of the requirements contained in the District's Rules, which must be met before an application is deemed administratively complete and includes

references to the applicable rule and page numbers of the appropriate filings where information is located in the record documents filed with the District.

1. Rule 3.4(A)(1)-(2) requires an application to be filed using the District's form accompanied by the appropriate permit application fee.

You have filed an application using the District's form (Application pgs. 1-5) and provided the requisite application fee of \$750.00.

2. Rule 3.4(A)(3) requires an application to provide sufficient documentation to show the applicant will have a real, non-speculative need of the requested quantity of groundwater within one year following the date of issuance of the Operating Permit.

The Application states that the well is intended to replace an existing irrigation well that was decommissioned and plugged due to casing deterioration and an obstruction (pgs. 93 and 135). The Application states that water produced from the well will be used for landscape irrigation of common areas and athletic fields on the Archangel campus (pgs. 93 and 135). A completed Irrigation Demand Worksheet was submitted stating the total area of the property as 81.35 acres, total estimated impervious cover as 21.7 acres, total area of sports fields to be irrigated as 5.79 acres (overseeded turfgrass), total area of non-playing areas to be irrigated as 2.3 acres (turfgrass), total area of landscaping beds to be irrigated as 4.48 acres, and total area of water features/ponds/pools to be maintained as none (Supplement No. 1). A map showing property boundaries, irrigated areas (12.57 acres), and impervious areas (21.69 acres) was submitted with the irrigation worksheet (Supplement No. 1). The Application states that the requested volume is "based on projections by Archangel staff who has knowledge of historic use and landscaping professionals" (pg. 93). Additional information regarding projected demand and pumping rates is provided on pages 135 and 136 of the Application.

3. Rule 3.4(A)(4) requires conducting and reporting to the District the results of an aquifer test that conforms to the District's "Guidelines for Aquifer Testing and Hydrogeological Reports."

You provided a Hydrogeologic Report (Application pgs. 128-368), including Appendices A-D, and accompanying aquifer-testing data in digital format (Supplements No. 2 and 3), which generally meet the criteria for a Tier 2 Aquifer Test and Hydrogeologic Report contemplated by District Rule 3.4(A)(4).

4. Rule 3.4(A)(5)(a) requires the well owner's name, mailing address, physical address, phone number, email address, a contact person, and the same information for the well operator (provided in Application on pgs. 1 and 48).
5. Rule 3.4(A)(5)(a) requires a copy of the real estate deed evidencing land ownership.

You provided a Merger Agreement dated November 11, 2022, including Exhibits A-C (Application pgs. 7-72); a Special Warranty Deed dated October 16, 1997, including Exhibits A and B (Application pgs. 73- 81); and a Warranty Deed dated April 20, 1984 (Application pgs. 82-86) demonstrating current landownership by Archangel Catholic School of Austin.

6. Rule 3.4(A)(5)(b) requires documentation stating the following:

- a. annual groundwater withdrawal amount requested along with documentation asserting the Applicant's justification that the requested amount is reasonable for the requested purpose of use;

You have requested authorization to produce up to 9,850,000 gallons (30.22 acre-feet) per year for landscape irrigation (Application pg. 2) and state that the requested volume is based on projections by Archangel staff with knowledge of historic use and landscaping professionals (Application pg. 93). Additional information regarding projected irrigation demand, upon which the requested permit volume is based, is provided on pages 135 and 136 of the Application.¹

- b. the maximum rate of withdrawal;

You state the anticipated rate of withdrawal is 30 gallons per minute (Application pgs. 93 and 136).

- c. the approximate average monthly distribution of the requested annual withdrawal amount (provided in Application on pg. 94);

- d. the place of use, described by physical address, metes and bounds, or legal description;

You state place of use is the campus of Archangel Catholic School of Austin, located at 3000 Barton Creek Blvd., Austin, Texas, 78735 (Application pg. 1), property more particularly described by the Special Warranty Deed (Application pgs. 73-81) and Warranty Deed (Application pgs. 82-86) included with your application.

- e. The purpose of use;

You state the purpose of use is landscape irrigation (non-agricultural) of common areas and athletic fields on the Archangel campus (Application pg. 93).

- f. the location or proposed location of the well or wells;

You state that the well is located within the Archangel property boundary at Latitude 30.290714 N and Longitude 97.874045 W (Application pg. 93).

- g. whether the proposed purpose of the use of water from the well is wholly or partly to provide water to a pond, lake, or reservoir to enhance the appearance of the landscape;

¹ The District's Board will determine whether the requested authorization is reasonable for the requested purpose of use in accordance with the District's rules and applicable state law.

You state that the water from the well will not be used for surface impoundments, and surface impoundments will not be utilized for the storage of produced water prior to its use for landscape irrigation. (Application pg. 93).

- h. whether and what portion of the requested withdrawal amount will be exported, and how that exported amount will be measured;

You state that water from the well will be used on-site for landscape irrigation. (Application pg. 96) – the Application does not contemplate groundwater export.

- 7. Rule 3.4(A)(5)(c) requires documentation identifying the total number and location of all wells and an interconnection diagram showing estimated well production contributions and meter location(s).

Your application contemplates a single production well without interconnections or well production contributions from other wells.

- 8. Rule 3.4(A)(5)(d) requires a water conservation plan (provided in Application on pgs. 98-108 with additional information provided in Supplement No. 4).
- 9. Rule 3.4(A)(5)(d) requires a drought contingency plan (provided in Application on pgs. 109-127).
- 10. Rule 3.4(A)(5)(e) requires a property plat, survey, or map of the parcel, to scale and with north arrow, showing the location of the proposed well and that includes the following features within 1000 feet of the proposed well location on any tract:
 - a. Existing or proposed domestic buildings;
 - b. All water wells, including those abandoned, deteriorated, or not currently in service;
 - c. Septic tanks and septic disposal areas;
 - d. Driveways;
 - e. Barns and feedlots;
 - f. Ponds, creeks, rivers, and intermittent streams;
 - g. Property lines;
 - h. Power lines; and
 - i. Any other known or suspected potential sources of pollution.

You provided a “Well Location Map” that shows the locations of the proposed irrigation well and the plugged Existing Well, property boundaries, and satellite imagery of the property and surrounding areas, which generally meets the requirements described above (Application pg. 91).

- 11. Rule 3.4(A)(5)(f) requires a surface geology map and topographic map of the property where the proposed well is located and extending 1,000 feet into adjacent properties (provided in Application on pg. 173).
- 12. Rule 3.4(A)(5)(g) requires drawings and physical descriptions depicting and describing well construction design, facility layout, existing or proposed pipelines, chlorination system, water softeners, storage tanks, boost pumps, and any other well related equipment.

You provided a well diagram (Application pg. 174) and State of Texas Well Report Tracking #675038 (Application pgs. 186-188), which describe well construction. You state that water from the well will be piped into three existing 9,000-gallon storage tanks which feed the existing irrigation system (Application pgs. 93 and 135).

13. Rule 3.4(A)(5)(h) requires documentation on installed or proposed pump horsepower, pumping capabilities at installed depth, or other production-related pump information.

You state that a permanent pump has not been installed yet, but the anticipated rate of withdrawal is 30 gallons per minute with approximately 700 ft of head, which will require a 7.5-horsepower submersible pump set at approximately 720 ft (Application pg. 93).

14. Rule 3.4(A)(5)(i) requires State of Texas Well Report and a Geophysical Well Log for each well and test borehole drilled (provided in Application on pgs. 186-189).
15. Rule 3.4(A)(5)(j) requires a list of all principal owners and their contact information for any corporations, partnerships, and other business forms.

You provided a list of Board of Trustees on page 48 of the Application.

16. Rule 3.4(A)(5)(k) requires applications contemplating public water supply wells to provide copies of the Texas Commission on Environmental Quality approval letter for each well and the certificate of convenience and necessity for the water supply system from the Public Utility Commission of Texas, and any other relevant documentation related to public water supply wells.

The application does not contemplate public water supply wells, and you state that the Applicant is not a Public Water Supply Provider (Application pg. 94).

17. Rule 3.4(A)(5)(m) requires a hydrogeological testing report that conforms to the appropriate tier of testing under the District's "Guidelines for Aquifer Testing and Hydrogeological Reports" (*see* Rule 3.4(A)(4)).

You provided a Hydrogeologic Report (Application pgs. 128-368), including Appendices A-D, and accompanying aquifer-testing data in digital format (Supplements No. 2 and 3), which generally meet the criteria for a Tier 2 Aquifer Test and Hydrogeologic Report contemplated by District Rule 3.4(A)(4).

18. Rule 3.4(A)(5)(n) requires water chemistry data for the conductivity, or total dissolved solids, for the wells' groundwater (provided in Application on pgs. 202-213).
19. Rule 3.4(B) requires proof of notice mailed to all persons who own property located within ¼-mile radius of the proposed well site.

You provided digital copies of the Shipment Confirmation Acceptance Notice and mailing labels for sending application notices via USPS Certified Mail to neighboring property owners and water suppliers within ¼ mile (Supplement No. 5).

A determination of administrative completeness is a determination by the District's General Manager that the Applicant has either provided the information required by rule in order to set the permit application for public hearing before the District's Board of Directors or has been granted a waiver for any such requisite information. A determination of administrative completeness is not an approval of the Application, nor a guarantee that the District's Board of Directors will approve the Application. This determination is not an indication that the Application's substance justifies a permit or has met the minimum requirements set forth by the District's rules and the laws of the State of Texas to justify the Application's request and shall not be construed as a determination that the Application's proposed permit and withdrawal amount is reasonable.

Within 60 days of the date of this letter, the District will schedule and hold a public hearing to consider the Application, and will issue notice not later than 10 days in advance of the date of the hearing. The District will coordinate with you to ensure you are available on the date of the hearing. At least 10 days prior to the scheduled public hearing, Applicants must publish notice in a format acceptable to the District in a newspaper of general circulation in Travis County (typically the Austin American Statesman) in accordance with District Rule 6.6(C). The District will provide the type of information that must be contained in the notice and can provide a notice template upon request. Additional information regarding District permitting actions and related notice requirements is provided in District Rule 6.6.

Please feel free to contact me if you have any questions.

Sincerely,



Lane Cockrell
General Manager/Hydrogeologist
Southwestern Travis County GCD

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