



October 25, 2023

Wet Rock Groundwater Services, LLC
317 RR 620 S., Suite 303
Lakeway, TX 78746
via email: k.khorzad@wetrocksgs.com

RE: Administrative Completeness Review of Production Authorization Applications

Dear Mr. Kaveh Khorzad:

This letter is to inform you that as of October 25, 2023, the applications submitted by JPD Backyard Finance LLC for authorization to produce groundwater from two Lower Trinity Aquifer wells are still administratively incomplete. Based on review of submitted application materials, the District has determined that the following items have not been satisfied:

- **3.4(A)(3) – The applicant must provide sufficient documentation to the District to show that 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.**

3.4(A)(5)(b) – The annual groundwater withdrawal amount requested along with documentation justifying that amount as reasonable for the requested purpose of use, the maximum rate of withdrawal, the approximate, average monthly distribution of the requested annual withdrawal amount, the place of use (described by physical address, metes and bounds, or legal description), the purpose of use, and the location or proposed location of the well or wells (described by physical address or latitude and longitude). The application must state if the proposed purpose of 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.

The District acknowledges that the applicant has completed the Irrigation Demand Worksheet requested by the District on September 20, 2023 (submitted as “Attachment B” in your letter dated September 27, 2023). Other submitted application materials include information relating to the combined requested annual groundwater withdrawal amount, the anticipated maximum rate of withdrawal for each well, the monthly distribution of the combined requested annual withdrawal amount, the place of use, the purpose of use, and the locations of wells.

However, the applicant has not provided sufficient documentation demonstrating a real, non-speculative need for the requested groundwater volume, nor is there sufficient documentation justifying that volume as reasonable for the requested purpose of use. To satisfy this requirement, the applicant must provide additional details relating to the projected demand for the proposed use(s) and describe how the requested groundwater

volume (3,700,492 gallons) was determined. Submitted information should address relevant factors such as:

- Projected annual irrigation demand for the proposed landscape areas that will be irrigated using groundwater from the wells, and basis for such.
 - Projected demand must be consistent with established water requirements for the proposed vegetation types and total area to be irrigated using groundwater.
- Projected portion of total annual irrigation demand that will be met using water sources other than groundwater (e.g., precipitation, rainfall collection) and basis for such.
- Projected evaporative loss from detention pond B.
 - In the application, you state that “The proposed water wells shall only serve to maintain constant level of 941 feet Mean Sea Level (177,407 cf) in Pond B...” (pg. 29 of submitted application).
- Other factors as needed.

Please provide the above requested information within 180 days of the date of this letter. Once all information has been received and the requirements described above have been satisfied, the application will be deemed administratively complete and a letter indicating such will be provided with further instructions. If you have any questions or need clarification regarding the requested information, please feel free to contact my office by phone at 512-276-2875 or by e-mail at generalmanager@swtcgcd.org.

Sincerely,



Lane Cockrell
SWTCGCD General Manager/Hydrogeologist

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