



March 18, 2026

via email: lphillippi@endeavor-re.com

Luke Phillippi
Endeavor Real Estate Group
500 W. 5th Street, Ste. 700
Austin, TX 78701

RE: Administrative Completeness Determination – Production Authorization Application
OP III ATX Ledgestone I, LP – Citizen House Ledgestone Well No. 1 (District Well ID
58492OP2)

Dear Luke Phillippi:

The purpose of this letter is to notify you that the Production Authorization Application submitted by OP III ATX Ledgestone I, LP (Applicant) to the Southwestern Travis County Groundwater Conservation District (District) has been determined to be administratively complete. The application requests an Operating Permit authorizing production of up to 2,980,000 gallons (9.145 acre-feet) per year from the Lower Trinity Aquifer for non-agricultural irrigation use.

Under District rules, an application must include all required information and the applicable application fee to be considered administratively complete.

The District considered the following materials in making this determination:

1. Application for Well Production Authorization, received July 10, 2025 (“**Application**”);
2. Application fee (\$750.00), Check no. 1043, dated July 2, 2025;
3. Irrigation Demand Worksheet with accompanying documentation, received June 7, 2024, to satisfy requirements related to corresponding Well Drilling Authorization Application (“**Supplement No. 1**”);
4. Pump Installation Certification, received May 7, 2025, to satisfy requirements related to corresponding Well Drilling Authorization Application (“**Supplement No. 2**”);
5. Aquifer testing data (excel format), received January 30, 2026 (“**Supplement No. 3**”);
6. Notice documentation, including links to certified mail records, received January 30, 2026 (“**Supplement No. 4**”);
7. Revised Application for Well Production Authorization, received February 11, 2026 (“**Revised Application**”); and
8. Correspondence titled “Remaining Requirements for Production Authorization Application Submitted by OP III ATX Ledgestone I, LP for Citizen House Ledgestone Well No. 1 (District Well ID 58492OP2)”, received March 13, 2025 (“**Supplement No. 5**”).

This list is not exhaustive but reflects the principal materials supporting the determination of administrative completeness. The record demonstrates that the application satisfies the requirements of Rule 3.4, as summarized below.

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.

The Applicant submitted the required application form (Revised Application, pgs. 5-9) and 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 water produced from the well will be used to irrigate approximately 158,400 square feet (3.64 acres) of turfgrass and 43,600 square feet (1.00 acres) of landscape beds (Revised Application, pgs. 21, 68). The Irrigation Demand Worksheet indicates a total property area of 36.175 acres, including approximately 3.64 acres (158,400 square feet) of turfgrass, 1.00 acres (43,600 square feet) of landscape beds, and 9.15 acres of impervious cover (Supplement No. 1, pg. 31). Irrigated areas are shown on site maps (Application, pgs. 19, 68). The requested volume is based on irrigation calculations prepared by the Applicant's landscape architect with input from District staff (Revised Application, pgs. 21, 68). Documentation also indicates that the West Travis County Public Utility Agency (PUA), whose service area includes the property on which the well is located, did not approve water service for the intended use (Supplement No. 5, pgs. 3-4).

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."

The Applicant submitted a hydrogeologic report with appendices (Revised Application, pgs. 58-166), aquifer test data (Supplement No. 3), and additional analysis of pumping impacts (Supplement No. 5, pgs. 11-16). Together, these materials generally meet the requirements for a Tier 2 aquifer test and hydrogeologic report under District rules.

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.

Required contact information is provided (Revised Application, pg. 4). The Applicant is identified as both well owner and operator (Supplement No. 5, pg. 1).

5. Rule 3.4(A)(5)(a) requires a copy of the real estate deed evidencing land ownership.

A Special Warranty Deed documenting ownership is included (Revised Application, pgs. 10-15).

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;

The requested annual production volume is 2,980,000 gallons (9.145 acre-feet) to irrigate approximately 158,400 square feet (3.64 acres) of turfgrass and 43,600 square feet (1.00 acres) of landscape beds (Revised Application, pgs. 21, 68). Additional information regarding total irrigated areas, upon which the requested permit volume is based, is provided in the Irrigation Demand Worksheet and accompanying documentation (Supplement No. 1, pgs. 31-46).¹

- b. the maximum rate of withdrawal;

The stated maximum production rate is 35 gallons per minute (Revised Application, pgs. 21, 69).

- c. the approximate average monthly distribution of the requested annual withdrawal amount (provided in Revised Application, pgs. 21, 69);

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

The stated place of use is 9021 W. U.S. Hwy 290, Austin, Texas 78736 (Revised Application, pg. 4), more particularly described by the Special Warranty Deed (Revised Application, pgs. 10-15).

- e. The purpose of use;

The stated purpose of use is on-site landscape irrigation (non-agricultural) (Revised Application, pgs. 21, 68).

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

The stated location of the well is Latitude 30° 13' 43.76" N and Longitude 97° 55' 26.29" W (Revised Application, pgs. 17, 66).

- 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;

The application confirms that water from the well will not be used to supply water to any pond, lake, reservoir, or other surface impoundment (Revised Application, pgs. 21, 69).

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

¹ The District's Board of Directors 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.

The application confirms that water from the well will be used solely on-site (Revised Application, pg. 22) and that it will not be leased, resold, transferred or transported to other users (Revised Application, pg. 68).

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).

The application describes a single production well with no interconnections. The locations of two neighboring wells owned by the Applicant (“Citizen House 290 Well No. 1” and “Ledgestone Townhomes Well, No. 1”), which are the subject of separate applications, are shown (Revised Application, pg. 78). Neither well is connected to Citizen House Ledgestone Well No. 1 or to each other.

8. Rule 3.4(A)(5)(d) requires a water conservation plan (provided in Revised Application, pgs. 24-34, with additional information provided on pages 35-37).
9. Rule 3.4(A)(5)(d) requires a drought contingency plan (provided in Revised Application, pgs. 38-56).
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 1,000 feet of the proposed well location on any tract:

- Existing or proposed domestic buildings;
- All water wells, including those abandoned, deteriorated, or not currently in service;
- Septic tanks and septic disposal areas;
- Driveways;
- Barns and feedlots;
- Ponds, creeks, rivers, and intermittent streams;
- Property lines;
- Power lines; and
- Any other known or suspected potential sources of pollution.

The Applicant submitted a property survey (Application, pg. 17) and a site plan (Application, pg. 19), which generally meet the requirements described above.

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 Revised Application, pg. 71).
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.

The Applicant submitted a well diagram (Revised Application, pg. 81) and State of Texas Well Report (Revised Application, pgs. 112-114) describing well construction. The application

states that water from the well will be pumped into an adjacent 10,000-gallon ground storage tank and distributed to the irrigation system via booster pumps or a pressure tank (Revised Application, pgs. 21, 69).

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.

The application states that the well is equipped with a submersible pump capable of producing up to 35 gallons per minute, depending on aquifer conditions and total dynamic head (Revised Application, pgs. 21, 69). The Pump Installation Certification (Supplement No. 2) confirms the pump make and model (Goulds 35GS75), horsepower (7.5), depth setting (840 feet below top of casing), and maximum pumping capacity (35 gallons per minute).

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.

The Applicant provided a State of Texas Well Report (Revised Application, pgs. 112-114) and geophysical log (Application, pg. 120).

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.

The Applicant provided a list of officers and corresponding contact information (Supplement No. 5, pgs. 5-10).

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.

Not applicable; the application does not contemplate a public water supply well.

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)).

The Applicant submitted a hydrogeologic report with appendices (Revised Application, pgs. 58-166), aquifer test data (Supplement No. 3), and additional analysis of pumping impacts (Supplement No. 5, pgs. 11-16). Together, these materials generally meet the requirements for a Tier 2 aquifer test and hydrogeologic report under District rules.

18. Rule 3.4(A)(5)(n) requires water chemistry data for the conductivity, or total dissolved solids, for the well's groundwater (provided in Revised Application, pgs. 91, 150).

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.

March 18, 2026

The Applicant provided documentation of certified mail notice to neighboring property owners and water suppliers (Supplement No. 5, pgs. 17-55).

A determination of administrative completeness is a determination by the District's General Manager that the application contains the information required by District rules to proceed to a public hearing before the District's Board of Directors, or that any such requirements have been waived. This determination does not constitute approval of the application, nor a guarantee that the District's Board of Directors will approve the application. This determination does not indicate 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 requested permit and withdrawal amount is reasonable.

In accordance with Rule 6.6, the District will call and hold a public hearing on the application within 60 days of the date of this letter. Notice of the hearing will be provided in compliance with the Texas Open Meetings Act and District rules and will include required application information. At least 10 days prior to the hearing, the Applicant must publish notice in a newspaper of general circulation in Travis County (e.g., the Austin American Statesman) in a format acceptable to the District. The District will confirm the information that must be included in the notice and can provide a notice template upon request. Additional notice and hearing procedures are set forth in 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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