



March 11, 2026

Via email to lphillippi@endeavor-re.com

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

RE: Remaining Requirements for Production Authorization Application Submitted by OP III ATX Ledgestone II, LP for Citizen House 290 Well No. 1 (District Well ID 58492OP1)

Dear Luke Phillippi:

District staff has reviewed the Production Authorization Application submitted by OP III ATX Ledgestone II, LP ("Applicant") seeking an Operating Permit to produce up to 2,810,000 gallons (8.62 acre-feet) annually from a single well completed in the Lower Trinity Aquifer for Non-agricultural Irrigation Use. Staff has also reviewed the materials submitted in response to the District's January 29, 2026 letter regarding outstanding application requirements.

Under District Rule 3.4(A), an application must include all required information and the appropriate application fee in order to be considered administratively complete. Based on staff review, the following items remain outstanding or require clarification:

1. **Rule 3.4(A)** requires applications for Operating Permit to include sufficient documentation showing 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.

The Application includes irrigation demand estimates to support the requested permit volume. However, the property upon which the well is located and where groundwater produced from the well will be used is located within the service area of the West Travis County Public Utility Agency (PUA). To satisfy this requirement, please submit documentation demonstrating that the PUA is unable to provide water service to the intended use.

2. **Rule 3.4(A)(5)(a)** requires applications for Operating Permit to include the well owner's name, mailing address, physical address, phone number, email address, a contact person (if different from the well owner), and the same information for the well operator (if different from the well owner).

The Application includes contact information for Luke Phillippi, an officer of OP III ATX Ledgestone II, LP, which owns the property on which the well is located. However, the Application does not confirm whether OP III ATX Ledgestone II, LP is the well owner or whether the well owner and well operator are the same entity. To satisfy this requirement, confirm whether OP III

ATX Ledgestone II, LP is both the well owner and well operator. If either the well owner or operator is a different entity, provide the required contact information for each as described above.

3. **Rule 3.4(A)(5)(d)** requires applications for Operating Permit to include a water conservation plan and a drought contingency plan.

Applicant submitted a User Conservation Plan (UCP) using District forms (Revised Application PDF pp. 24-34), with required signature and the appropriate subsection initialed for the proposed groundwater use type(s). However, the letter prepared by James Poole Irrigation Consultants, titled “Conservation Plan Checklist – Irrigation Water Use, Endeavor 290, Austin, Texas”, which was included in the original application (Original Application PDF p. 34) was not included in the Revised Application. To satisfy this requirement, please include this letter in the Revised Application.

4. **Rule 3.4(A)(5)(j)** requires corporations, partnerships, or other business forms to submit a list of all principal owners and their contact information.

Applicant submitted a “Certificate of Resolution and Incumbancy Certificate of OP III ATX Ledgestone II, LP” (Revised Application PDF pp. 170-171), which confirms the Applicant owns the property on which the well is located and identifies seventeen officers. However, contact information has only been provided for Luke Phillippi, who is listed as one of the officers. To satisfy this requirement, please provide contact information for all principal owners.

5. **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)) and is acceptable to the District.

Applicant provided a revised hydrogeologic report including estimated impacts of combined production from the three OP III ATX wells (Citizen House 290 Well No. 1 (the subject of this application), Citizen House Ledgestone Well No. 1, and Ledgestone Townhomes Well No. 1), including:

- A summary table showing projected drawdown resulting from combined pumping (Table 7 on p. 36 of the Revised Hydrogeologic Report; Revised Application PDF p. 96);
- Maps showing projected drawdown at 1 week, 1 year, and 7 years of combined pumping (Figures 22-24 on pp. 36-37 of the Revised Hydrogeologic Report; Revised Application PDF pp. 96-97); and
- A geologic cross section showing estimated drawdown at 7 years resulting from combined pumping (Figure 25 on p. 39 of the Revised Hydrogeologic Report; Revised Application PDF p. 99).

To be acceptable to the District, the report must be revised to include:

- Additional maps showing estimated drawdown at 1 week, 1 year, and 7 years of combined pumping, zoomed to show properties and wells within ½ mile of the Applicant’s property boundaries, with wells likely completed in the Lower Trinity Aquifer clearly distinguished from wells completed in overlying aquifers; and

- An additional geologic cross section with the same lateral extent as the maps described above, showing estimated drawdown at 7 years resulting from combined pumping, with existing neighboring Lower Trinity wells projected onto the section to more clearly illustrate potential impacts to nearby wells.
6. **Rule 3.4(B)** – No application for a non-exempt well requesting an annual pumpage volume of more than 1,000,000 gallons will be administratively complete until the applicant has provided proof to the District that notice of the application has been mailed to all persons who own property located within a ¼-mile radius of the proposed well site by certified mail, return receipt requested. The District will provide the type of information that must be contained in the notice that the applicant must mail to adjoining property owners.

Applicant submitted an excel file listing public water suppliers and persons who own property located within ¼ mile of the well site, with separate links for each mailed notice. To satisfy this requirement, please provide PDF copies of the mailed notices demonstrating that notice of the application was sent by certified mail, return receipt requested, to all required recipients.

7. **Rule 3.4 C (8)** requires the applicant to provide the District with a time-stamped photograph(s) of the face plate of the meter showing its identification number and current reading.

Applicant provided a time-stamped photograph of the meter face plate, however, the meter serial number is not legible. To satisfy this requirement, please submit a new time-stamped photograph that clearly shows the meter identification number and current reading.

Please submit the above requested information within 180 days of the date of this letter. If the required information is not received by this deadline, the application will expire. Once all required information has been received and the requirements described above have been satisfied, the application will be deemed administratively complete, and the District will issue a letter confirming this status with further instructions regarding the permitting process.

If you have any questions or need clarification regarding the requested information, please contact my office at (512) 276-2875 or at generalmanager@swtcgcd.org.

Sincerely,



Lane Cockrell
General Manager/Hydrogeologist
Southwestern Travis County GCD

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