

TCEQ DOCKET NO. 2025-0017-MIS

PETITION FOR INQUIRY	§	
FILED BY COCKRELL	§	BEFORE THE TEXAS
INVESTMENT PARTNERS, L.P.	§	COMMISSION ON
SEEKING A REVIEW OF THE	§	ENVIRONMENTAL QUALITY
MIDDLE PECOS GROUNDWATER	§	
CONSERVATION DISTRICT	§	

**GROUNDWATER MANAGEMENT AREA 3 AND REEVES COUNTY GCD'S
CERTIFIED RESPONSE TO COCKRELL INVESTMENT
PARTNERS' PETITION FOR INQUIRY**

My name is Greg Perrin, and I am the General Manager of the Reeves County Groundwater Conservation District (Reeves County GCD). In addition to submitting this response on behalf of Reeves County GCD, I have been authorized by the Administrator of Groundwater Management Area 3 (GMA 3) to provide this joint response on behalf of the districts within GMA 3. GMA 3 consists of two districts: Reeves County GCD and Middle Pecos Groundwater Conservation District (Middle Pecos GCD). This joint response is filed under TCEQ Rule 293.23(f).

I have served as the General Manager of Reeves County GCD since 2018 and have worked on groundwater planning in GMA 3 to set DFCs (Desired Future Conditions) with Middle Pecos GCD. Because GMA 3 consists solely of Reeves County GCD and Middle Pecos GCD as its two designated members, I have worked closely with Middle Pecos GCD over the years. We share the same consultant for work at GMA 3, Dr. Bill Hutchison, and regularly collaborate to manage the Edwards-Trinity and Pecos Valley major aquifers, as well as the Captain Reef, Dockum, and Rustler minor aquifers. I understand the DFCs we aim to achieve, and I support Middle Pecos GCD's rules, which I know to be strong and backed by sound science. In my professional opinion and in the opinion of Dr. Hutchison with whom I rely, Middle Pecos GCD's rules are designed to achieve the DFCs we have developed together to protect groundwater in GMA 3.

Middle Pecos GCD has an active and well-funded well-monitoring program that plays a key role in ensuring proper groundwater management. It has also provided significant support to Reeves County GCD and the broader GMA 3 area by investing millions of dollars over the years into studying the aquifers and strengthening regional groundwater management. This kind of cooperation is essential, and Middle Pecos GCD has been a valuable partner in our shared efforts.

I have read the petition, and it appears that the Petition for Inquiry process is being used in this instance to address an on-going dispute regarding a permit issued by Middle Pecos GCD rather than addressing management planning or district rules.

Reeves County GCD stands firmly with Middle Pecos GCD. Reeves County GCD respectfully requests that the Texas Commission on Environmental Quality deny the request to initiate a review process based on this petition and dismiss the petition.

I have coordinated with the designated representatives of Middle Pecos GCD, which serves as the administrator of GMA 3, and I submit this response on behalf of Reeves County GCD and GMA 3 as an Authorized Representative of GMA 3. I certify that this is my sworn statement below.

For the reasons stated above, TCEQ should dismiss this petition so that the districts can focus on their critical work of protecting the water resources of West Texas.

Sincerely,

Reeves County GCD and the Districts of GMA 3

by: 

Greg Perrin, General Manager of Reeves
County GCD and Authorized Representative
of GMA 3

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TCEQ Docket No. 2025-0017-MIS

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**Groundwater Conservation Districts
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3:**

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