

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.

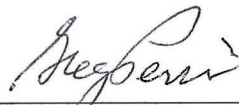
Reeves County GCD stands firmly with Middle Pecos GCD. Reeves County GCD respectfully requests that the Texas Commission on Environmental Quality deny the request to initiate a review process based on this petition and dismiss the petition.

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


CERTIFICATION

STATE OF TEXAS
COUNTY OF REEVES

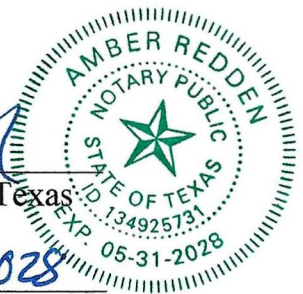
§
§

BEFORE ME, the undersigned Notary Public, on this day personally appeared Greg Perrin, who, being by me duly sworn on oath deposed and said that he is the General Manager of Reeves County Groundwater Conservation District and the Authorized Representative for the groundwater districts in Groundwater Management Area 3, and that every factual statement in this response is within his personal knowledge and is true and correct.

SUBSCRIBED AND SWORN TO BEFORE ME on the 30 day of January 2025, to certify which witness my hand and official seal.


Notary Public in and for the State of Texas

My commission expires: 5/31/2028



CERTIFICATE OF SERVICE

I certify that on January 31, 2025, the foregoing document was electronically filed with the TCEQ Chief Clerk, and copies were served to all parties on the official Mailing List in accordance with TCEQ rules and TCEQ's official notice of January 6, 2025.



Greg Perrin

Mailing List
Middle Pecos Groundwater Conservation District
TCEQ Docket No. 2025-0017-MIS

Ryan Reed
Pulman, Cappuccio & Pullen, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
210/222-9494 FAX 210/892-1610
rreed@pulmanlaw.com

Michael Gershon
Lloyd Gosselink
816 Congress Ave., Suite 1900
Austin, Texas 78701
512/322-5800
mgershon@lglawfirm.com

**Groundwater Conservation Districts
within Groundwater Management Area
7:**

Ty Edwards
Middle Pecos Groundwater Conservation
District
P.O. Box 1644
Fort Stockton, Texas 79735
mpgcd@mpgcd.org

Janae Wells
Coke County Underground
Water Conservation District
P.O. Box 1110
Robert Lee, Texas 76945
ccuwcd@wcc.net
Slate Williams

Crockett County Groundwater Conservation
District
201 11th Street
P.O. Box 1458
Ozona, Texas 76943
crockettcountygcd@gmail.com

Rhetta Hector
Glasscock Groundwater Conservation
District
P.O. Box 208
Garden City, Texas 79739
glasscockgroundwater@yahoo.com

David Huie
Hickory Underground Water Conservation
District No. 1
P.O. Box 1214
Brady, Texas 76825
hickoryuwcd@yahoo.com

Paul Tybor
Hill Country Underground Water
Conservation District
508 South Washington St.
Fredericksburg, Texas 78624
ptybor@gmail.com

Diana Thomas
Irion County Water Conservation District
P.O. Box 10
Mertzon, Texas 76941
icwcd@verizon.net

Meredith Allen
Kimble County Groundwater Conservation
District
P.O. Box 31
Junction, Texas 76849
kimblecountygcd@gmail.com

Genell Hobbs
Kinney County Groundwater Conservation
District
P.O. Box 369
Brackettville, Texas 78832
kinneyh2o@att.net

Leon Braden
Lipan-Kickapoo Water Conservation
District
8934 Loop 570
Wall, Texas 76957
lkwcd@frontier.com

Sarah Kouba
Lone Wolf Groundwater Conservation
District
139 W 2nd St.
Colorado City, Texas 79512
skouba@lonestargcd.org

Meredith Allen
Menard County Underground Water District
P.O. Box 1215
Menard, Texas 76859
manager@menardcountywd.org

Jon Cartwright
Plateau Underground Water Conservation
and Supply District
P.O. Box 324
203 SW Main St.
Eldorado, Texas 76936
jonc@plateauwcds.com

Joel Pigg
Real-Edwards Conservation and
Reclamation District
P.O. Box 1208
Leakey, Texas 78873
manager@recrd.org

Jonna "JJ" Weatherby
Santa Rita Underground Water Conservation
District
P.O. Box 849
Big Lake Texas 76932
srwcdist@verizon.net

Diana Thomas
Sterling County Underground Water
Conservation District
P.O. Box 873
Sterling City, Texas 76951
scuwcd@verizon.net

Meridith Allen
Sutton County Underground Water
Conservation District
301 S. Crockett Ave.
Sonora, Texas 76950
manager@suttoncountywcd.org

Debbie Deaton
Terrell County Groundwater Conservation
District
P.O. Box 927
Sanderson, Texas 79848
debbiedeaton@hotmail.com

Vic Hilderbrans
Uvalde County Underground Water
Conservation District
200 E. Nopal, Suite 203
Uvalde, Texas 78801
ucuwcd@sbcglobal.net

Dale Adams
Wes-Tex Groundwater Conservation
District
100 East Third Street, Suite 305B
Sweetwater, Texas 79556
dale.adams@co.nolan.tx.us

Roland Ruiz
Edwards Aquifer Authority
900 E. Quincy
San Antonio, Texas 78215
rruiz@edwardsaquifer.org

**Groundwater Conservation Districts
within Groundwater Management Area
3:**

Greg Perrin
Reeves County Groundwater
Conservation District
119 South Cedar St.
Pecos, Texas 79772
info@reevescountygcd.org

For the Executive Director:

Todd Galiga
TCEQ Environmental Law Division MC
173
P.O. Box 13087
Austin, Texas 78711-3087
512/239-0600 FAX 512/239-0606
Todd.Galiga@tceq.texas.gov

Justin Taak
TCEQ Water Supply Division MC 152
P.O. Box 13087
Austin, Texas 78711-3087
512/239-4691 FAX 512/239-2214
Justin.Taack@tceq.texas.gov

For the Office of Public Interest Counsel:

Garrett Arthur
Eli Martinez
TCEQ Office of Public Interest Counsel MC
103
P.O. Box 13087
Austin, Texas 78711-3087
512/239-6363 FAX 512/239-6377
Garrett.arthur@tceq.texas.gov
Eli.martinez@tceq.texas.gov

For the Office of Chief Clerk:

Docket Clerk
TCEQ Office of Chief Clerk MC 105
P.O. Box 13087
Austin, Texas 78711-3087
512/239-3300 FAX 512/239-3311
<https://www.tceq.texas.gov/goto/eFilings>

For the Office of External Relations:

Ryan Vise
TCEQ External Relations Division MC 118
P.O. Box 13087
Austin, Texas 78711-3087
512/239-0010 FAX 512/239-5000
pep@tceq.texas.gov

**For the Office of Alternative Dispute
Resolution:**

Kyle Lucas
TCEQ Alternative Dispute Resolution MC
222
P.O. Box 13087
Austin, Texas 78711-3087
512/239-0687 FAX 512-239-4015
Kyle.lucas@tceq.texas.gov