

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



Garrett T. Arthur, *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 22, 2025

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

RE: **IN THE MATTER OF THE RESTATED PETITION FOR INQUIRY
REGARDING THE MIDDLE PECOS GROUNDWATER
CONSERVATION DISTRICT
TCEQ DOCKET NO. 2025-0373-MIS**

Dear Ms. Gharis:

Enclosed for filing is the Office of Public Interest Counsel's Response to the Restated Petition for Inquiry in the above-entitled matter.

Sincerely,

A handwritten signature in black ink that reads "Josiah Mercer".

Josiah T. Mercer, Attorney
Assistant Public Interest Counsel

cc: Mailing List

TCEQ DOCKET NO. 2025-0373-MIS

PETITION FOR INQUIRY	§	BEFORE THE TEXAS COMMISSION
REGARDING THE	§	
MIDDLE PECOS GROUNDWATER	§	
CONSERVATION DISTRICT	§	ON ENVIRONMENTAL QUALITY

**OFFICE OF PUBLIC INTEREST COUNSEL'S
RESPONSE TO THE RESTATED PETITION FOR INQUIRY**

The Office of Public Interest Counsel (OPIC) of the Texas Commission on Environmental Quality (Commission or TCEQ) files this Response to the Restated Petition for Inquiry Regarding the Middle Pecos Groundwater Conservation District in the above-referenced matter and respectfully shows the following:

I. INTRODUCTION

On December 23, 2024, Cockrell Investment Partners, L.P. (Cockrell or Petitioner), filed a petition¹ requesting the Commission inquire into the activities of the Middle Pecos Groundwater Conservation District (Middle Pecos or the District). On March 4, 2025, Cockrell withdrew and restated their petition (the Petition) to address certification compliance issues raised in response to the original petition. The District is a single county conservation and reclamation district created by Senate Bill 1911, Acts of the 76th Legislature, Regular Session, 1999 (pursuant to the provisions of Article XVI, Section 59 of the Texas Constitution and Chapter 36 of the Texas Water Code). The District is located

¹ The original petition was assigned TCEQ docket number 2025-0017-MIS.

entirely in Pecos County and is a member of GMA (Groundwater Management Area) 3 and 7.

The Petition provides three reasons for the Commission to act: (1) the District has failed to adopt rules; (2) the rules adopted by the District will not achieve the Desired Future Conditions (DFCs); and (3) the groundwater in the management area is not adequately protected by the District's rules. The Commission received timely responses from several interested parties including the District. The Commission may dismiss the Petition if it finds that the evidence is not adequate to show that any of the conditions alleged in the Petition exist, otherwise it may select a review panel to conduct an inquiry and prepare a report.²

After review of the restated Petition and the District's response, OPIC finds that the evidence proffered by Petitioner is not sufficient to show that: the District has failed to adopt rules, that the rules adopted will not achieve the DFCs, or that the groundwater in the management area is not adequately protected by the rules adopted by the District. Accordingly, OPIC recommends denial of the Petition, dispensing with the need for further inquiry.

II. APPLICABLE LAW

Section 59, Article XVI of the Texas Constitution authorizes the creation of conservation and reclamation districts to conserve and develop the natural resources of the state and vests the Legislature with authority to pass laws as may be appropriate for such purposes. The Legislature enacted Chapter 36 of the

² See Texas Water Code (TWC) § 36.3011(c).

Texas Water Code to provide for the management of groundwater through the creation of groundwater conservation districts (GCD), “[i]n order to provide for the conservation, preservation, protection, recharging, and prevention of waste of groundwater, and of groundwater reservoirs or their subdivisions, and to control subsidence caused by withdrawal of water from those groundwater reservoirs or their subdivisions, consistent with the objectives of Section 59, Article XVI, Texas Constitution...”³ Additionally, “[g]roundwater conservation districts created as provided by this chapter are the state's preferred method of groundwater management. . .through rules developed, adopted, and promulgated by a district in accordance with the provisions of this chapter.”⁴ Chapter 36 goes on to, among other things, delineate the powers and duties of GCDs.

Petition for Inquiry

Texas Water Code § 36.3011(b) provides that an affected person may file a petition with the Commission to inquire into the activities of a GCD if it fails to satisfy or implement the various requirements of Chapter 36. Section 36.3011(b) provides that an affected person may file a petition if one of nine conditions exist:

- (1) a district fails to submit its management plan to the executive administrator;
- (2) a district fails to participate in the joint planning process under Section 36.108;
- (3) a district fails to adopt rules;
- (4) a district fails to adopt the applicable desired future conditions adopted by the management area at a joint meeting;

³ TWC § 36.0015(b).

⁴ *Id.*

- (5) a district fails to update its management plan before the second anniversary of the adoption of desired future conditions by the management area;
- (6) a district fails to update its rules to implement the applicable desired future conditions before the first anniversary of the date it updated its management plan with the adopted desired future conditions;
- (7) the rules adopted by a district are not designed to achieve the adopted desired future conditions;
- (8) the groundwater in the management area is not adequately protected by the rules adopted by a district; or
- (9) the groundwater in the management area is not adequately protected due to the failure of a district to enforce substantial compliance with its rules.⁵

Commission rules require that the petition include supporting documentation for each of the individual reasons the affected person identifies that demonstrates Commission inquiry is necessary.⁶ Furthermore, the petition must include a certified statement from the affected person that describes why the petitioner believes that a Commission inquiry is necessary.⁷ The petitioner must provide a copy of the filed petition to all GCDs within and adjacent to the GMA within five days of the date the petition was filed and must within 21 days file evidence that a copy of the petition was mailed to all GCDs within and adjacent to the GMA.⁸

Only an “affected person” may file a petition with the Commission.⁹ In this context, an “affected person” is defined as:

- (1) an owner of land in the management area;
- (2) a GCD or subsidence district in or adjacent to the management area;

⁵ TWC § 36.3011(b).

⁶ 30 Texas Administrative Code (TAC) § 293.23(c).

⁷ 30 TAC § 293.23(d).

⁸ 30 TAC § 293.23(e).

⁹ TWC § 36.3011(b).

- (3) a regional water planning group with a water management strategy in the management area;
- (4) a person who holds or is applying for a permit from a district in the management area;
- (5) a person with a legally defined interest in groundwater in the management area; or
- (6) any other person defined as affected by commission rule.¹⁰

Responses to and Review of Petition for Inquiry

Any GCD that is within and adjacent to the GMA that is the subject matter of the petition may file a response to the validity of the specific claims raised in the petition.¹¹ The responding entity must file its response with the chief clerk of the Commission within 35 days of the date that the petition is filed and must also on the same day serve the petitioner, the executive director, the public interest counsel, and any other GCD in and adjacent to the GMA.¹²

The Commission must review the petition and any timely filed responses, no sooner than 35 days, but not later than 90 days after the date the petition was filed.¹³ The Commission must either: (1) dismiss the petition if it finds that the evidence is not adequate to show that any of the conditions alleged in the petition exist; or (2) select a review panel.¹⁴ TCEQ rules likewise provide that the Commission may dismiss the petition if it finds that the evidence required by 30 TAC § 293.23(c) or (d) is not sufficient to show one or more of the conditions listed in 30 TAC § 293.23(b)(1)–(9) exist.¹⁵

¹⁰ TWC § 36.3011(a).

¹¹ 30 TAC § 293.23(f).

¹² *Id.*

¹³ 30 TAC § 293.23(g).

¹⁴ TWC § 36.3011(c).

¹⁵ 30 TAC § 293.23(g).

If a review panel is selected, the Commission must appoint a five-member panel to conduct any public hearings ordered by the Commission, review the petition and relevant evidence, and consider and adopt a report to be submitted to the Commission.¹⁶ The review panel's report must be submitted to the Executive Director no later than 120 days after the review panel was appointed.¹⁷ The Executive Director or the Commission must take action to implement any or all of the review panel's recommendations if a cause contained in 30 TAC § 293.23(b)(1)–(9) applies.¹⁸ Procedures for Commission review and action regarding GCD noncompliance with the requirements of Chapter 36 of the Texas Water Code are found in 30 TAC § 293.22(b)–(h). Authorized actions include initiation of a noncompliance review and facilitation of a compliance agreement by the Executive Director.

III. DISCUSSION

Petitioner provides three reasons for the Commission to act: (1) the District has failed to adopt rules that apply to all permitholders; (2) the rules adopted by the District will not effectuate the Management Plan or achieve Desired Future Conditions; and (3) the groundwater management area is not adequately protected by the District's rules. As a threshold matter, OPIC finds that Petitioner, as an owner of land in the management area, is an affected person.¹⁹ Further,

¹⁶ TWC § 36.3011(g), (h); 30 TAC § 293.23(g).

¹⁷ 30 TAC § 293.23(h).

¹⁸ 30 TAC § 293.23(i).

¹⁹ See TWC § 36.3011(a)(2).

OPIC finds that Petitioner has satisfied the certification and notice requirements contained in 30 TAC § 293.23(d), (e).²⁰

Allegations of Petitioner

Petitioner claims that the District has failed to adopt substantive, Edwards-Trinity Aquifer related rules that apply to all permitholders. They argue that the District has abandoned its rulemaking responsibility in place of special permit conditions that come from a 2017 settlement agreement between the District, Fort Stockton Holdings, L.P. (FSH), and Republic Water Company of Texas, LLC (Republic). Petitioner argues that this settlement agreement allowed for the export of 28,500 acre-feet of groundwater from the District without proper abatement mechanisms. Petitioner claims that by dealing with FSH's and Republic's applications in this way, the District intentionally eliminated Petitioner's rights as an affected groundwater permitholder. Since this settlement, Petitioner argues, the District has failed to adopt rules to adequately protect the aquifers it is charged with conserving in favor of honoring the settlement.

Petitioner opines that by allowing FSH to export 25,500 acre-feet of groundwater and also use nearly 20,000 acre-feet for their agricultural operations, the District allows FSH to potentially drawdown the aquifers to dangerously low levels. They claim that the District cutback thresholds allow pumping as long as the aquifer recharges to levels set in FSH's permit conditions—levels that they claim are dramatically lower than average water

²⁰ See page 12 of the Petition.

levels. Petitioner claims to have done an in-depth technical review and found serious issues with the District's rules. It provides limited data to show that the currently permitted level of consumption and export could significantly lower the aquifer over time.

Petitioner points out that it has engaged in substantial litigation in an attempt to protect its interests, which it claims have been affected by the District's settlement agreement. Lawsuits include challenges to the settlement agreement, challenges to the renewal of FSH's export permit, and suits seeking declaratory and injunctive relief to prevent improper review of the renewal of the export permit. There are several active lawsuits, some currently awaiting Texas Supreme Court review and some pending at the district court level.

Petitioner also repeatedly petitioned the District to change its rules to be more protective. This included filing three petitions for rulemaking between September 2023 and August 2024 pursuant to TWC § 36.1025. Petitioner suggested that the District adopt rules for a year-round pumping threshold, create a mitigation fund with export fees revenue, and define unreasonable impacts to the aquifer as it relates to achievement of DFCs. All of these rulemaking petitions were denied by the District.

Petitioner argues that these facts show that the District is failing to adopt rules to achieve its management plan, failing to ensure achievement of DFCs, and failing to ensure its rules protect the aquifers. Petitioner claims that this is not responsible conservation and management, and that the lack of effective and specific rules to protect the aquifers merits Commission inquiry.

Response of District

In its response brief, the District denies Cockrell's allegations. The District claims that they have adopted rules that satisfy all TCEQ requirements. The District characterizes this Petition as the latest attempt by Petitioner to oppose FSH's groundwater export permit. They also claim that Cockrell misrepresents and omits several key facts in their Petition.

As support for its position, the District shows that the Court of Appeals found that the FSH export permit was properly amended.²¹ It also argues that the settlement agreement was the District's victory over FSH's attempts to litigate itself into a much larger and less stringent export permit.²² The District claims that it only entered into the settlement after seeking input from other litigants and the public. It points out that Cockrell attended the town-hall meetings on the subject, but did not offer comment.²³ The District rejects the Petition's argument that it has excluded Cockrell from District processes—presenting evidence that they made time for public deliberation on the FSH permit and Cockrell did not engage during this process.²⁴ According to the District, the public deliberation and the subsequent related lawsuits, are the avenues in which Cockrell should seek legal remedies against FSH's permit and the related settlement agreement.

The District presents evidence of extensive District rules. The District's essential rules were adopted in 2000 under Mr. Honaker—who was the District

²¹ See *Cockrell Inv. Partners, L.P. v. Middle Pecos Groundwater Conservation Dist., et al.*, 677 S.W.3d 727, 733 (Tex. App.—El Paso 2023), pet. pending.

²² *Id.* See also District Exh. 14.

²³ See District Exh. 10. Minutes of this meeting are [linked](#) in District response.

²⁴ *Id.*

Board President and Cockrell's pecan farm's chief executive at the time.²⁵ Since then, the rules have been amended several times to carry out the District's management plan and achieve DFCs.²⁶ Middle Pecos presents evidence of how the rules are implemented by its staff and updated by ongoing expert consultation. The District also presents a section-by-section review of some of their rules in their response brief—including rules related to production limitations, permitting, enforcement, and DFCs.

The District's first DFCs for GMAs 3 and 7 were adopted in 2010, also during the tenure of Mr. Honaker. Included in the District's response to comments during the DFC adoption process was an analysis and simulation of the impact of FSH's export project on the DFCs. The District claims that this data and its experts' opinions show that there is substantial groundwater supply in the aquifer and no trend toward any impairment of the DFCs.²⁷ Despite Cockrell's claims, they say, the District has analyzed extensive pumping and water-level data dating back to the 1950s—revealing that FSH's permit conditions could be less conservative and would still allow for water levels to rebound every year.²⁸ District rules also provide for an annual analysis of groundwater levels and allow the District to limit permits as may be necessary.²⁹ It is for these reasons that the

²⁵ See District Exh. 3. See also District Exh. 5.

²⁶ See District Exh. 26.

²⁷ See District Exh. 29.

²⁸ *Id.* at 59, 91.

²⁹ See District Exh. 26, Rule 10.3(a).

District denied Cockrell's petitions for rulemaking—claiming that the existing rules are sufficiently protective of local groundwater.³⁰

The District also provides evidence that, as required by the settlement agreement, new modeling for aquifer level thresholds based on the effect of the FSH permit is being conducted. This updated model is expected to be completed by the end of 2025.³¹ The District argues that this new model is not required to meet the accountability standards but is evidence that the District is responsibly evaluating and managing water levels to achieve DFCs and protect local groundwater supply.

OPIC Analysis

Under TWC § 36.1132, “[a] district, to the extent possible, shall issue permits up to the point that the total volume of exempt and permitted groundwater production will achieve an applicable desired future condition under Section 36.108.” Furthermore,

“in issuing permits, the district shall manage total groundwater production on a long-term basis to achieve an applicable desired future condition and consider: (1) the modeled available groundwater determined by the executive administrator [of the Texas Water Development Board]; (2) the executive administrator's estimate of the current and projected amount of groundwater produced under exemptions granted by district rules and Section 36.117; (3) the amount of groundwater authorized under permits previously issued by the district; (4) a reasonable estimate of the amount of groundwater that is actually produced under permits issued by the district; and (5) yearly precipitation and production patterns.”³²

³⁰ See District Exh. 34. See also District Exh. 36.

³¹ See District Exh. 21. See also District Exh. 22, Item VIII.

³² TWC § 36.1132(b).

Additionally, the District's DFCs must "provide a balance between the highest practicable level of groundwater production and the conservation, preservation, protection, recharging, and prevention of waste of groundwater and control of subsidence in the management area."³³

OPIC notes that the District's management plan, as approved by the Texas Water Development Board, considers all of these statutory factors.³⁴ To help guide the DFCs, it requires that four different groundwater availability models be compared annually to those from the TWDB.³⁵ The management plan also requires routine monitoring of groundwater elevations in 11 disparate wells.³⁶ Furthermore, District rules provide for aquifer-based production limits that allow for groundwater production to be capped to prevent substantial lowering of groundwater levels.³⁷ These limits are set annually based on scientific data—which includes groundwater availability models, actual groundwater measurements in the monitoring wells, and annual recharge estimates.³⁸ The District presents convincing evidence that these limits are consistent with the DFCs.³⁹

Petitioner is essentially arguing that the District is failing to protect groundwater levels and achieve DFCs because of their preferential treatment of FSH's export permit. They opine that the District is abandoning its responsibility

³³ TWC § 36.108(d-2).

³⁴ See District Exh. 27 at 17.

³⁵ *Id.*

³⁶ *Id.* at 11.

³⁷ *Id.* at 12. See also District Exh. 26, Rule 10.3(c), (d).

³⁸ See Rule 10.3(a).

³⁹ See District Exh. 32 at 7.

to protect local groundwater supply and the interests of other local groundwater users. However, none of the data provided by Petitioner clearly shows that the current permit conditions are affecting or will affect groundwater levels in the area.⁴⁰ Petitioner does provide data to show that if FSH and all other groundwater users use their maximum allotment, this *may, over time*, lower the aquifer.⁴¹ However, this data only shows that, if all permit holders pump at the maximum allowable levels without cutbacks, it is *possible* that groundwater levels will drop and DFCs will not be achieved *over 50 years*.⁴²

Despite evidence to the contrary—discussed in several of the responses to the original petition—the restated Petition still claims that District rules and the FSH permit do not provide cutback thresholds to prevent this potential drawdown of the aquifer. However, as we have seen, the District provides evidence that its rules provide adequate groundwater level monitoring and modeling and would demand pumping cutbacks before groundwater levels drop substantially. Even the settlement agreement that is the focus of the Petitioner’s argument includes language specifying that FSH’s export permit is subject to limitation by aquifer-level triggers.⁴³ FSH’s export permit also clearly states that it can be capped by the same district rules that apply to all other permits overseen by the District.⁴⁴ Any potential production limits imposed by the

⁴⁰ See Petition Exh. 4. See also Petition Exh. 5.

⁴¹ *Emphasis added.* See Petition Exh. 5. See also Petition Exh. 6.

⁴² *Emphasis added.*

⁴³ See Petition Exh. 2, FSH Column, Paragraph 3.

⁴⁴ See Petition Exh. 3, Special Permit Condition 6. See also District Exh. 22, Rule 10.3.

District would therefore apply to FSH's export permit and its historic and existing use permit.

The District has also provided evidence that it is currently working on a new model that will provide further assurance that the FSH export permit will not lead to the lowering of groundwater levels.⁴⁵ The District claims that this model will be implemented by the end of 2025. Additionally, the Petition is opposed by all other parties that submitted filings in this or the original matter—Pecos County, districts in GMA 3, districts in GMA 7, Kimble County Groundwater Conservation District, Menard County Underground Water District, Sutton County Underground Water Conservation District, Reeves County GCD,⁴⁶ Pecos County Water Control and Improvement District No. 1, The West Texas Water Partnership, FSH, and the City of Fort Stockton. Some, but not all, of these parties benefit from FSH's export permit.

Petitioner claims that, in its original response, OPIC simply accepted the District's argument as true, without analyzing the existing rules and underlying data. However, it is the Petitioner that must provide supporting documentation for each of the reasons they identify as needing commission inquiry under TWC § 36.3011(b).⁴⁷ The restated Petition provides no new evidence showing that any of the conditions listed under TWC § 36.3011(b) exist. Conversely, the District

⁴⁵ See District Exh. 21.

⁴⁶ The Commission received a joint response from Kimble County Groundwater Conservation District, Menard County Underground Water District, Sutton County Underground Water Conservation District and the districts within GMA 7; and a joint response from Reeves County GCD and the districts within GMA 3.

⁴⁷ See 30 TAC § 293.23(c).

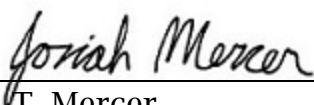
has presented evidence that its rules have been properly adopted and demand drawdown-triggered pumping cutbacks of FSH and all other water users to properly achieve DFCs and protect groundwater levels.

IV. CONCLUSION

Therefore, for the reasons discussed above, OPIC concludes that the District has properly adopted rules—and that these rules provide adequate protections for groundwater levels and will properly ensure DFCs are met. Consequently, OPIC finds that the Petitioner has not provided evidence sufficient to show that any items contained in TWC § 36.3011(b)(1)-(9) exist. As such, OPIC respectfully recommends that the Commission dismiss the instant Petition under TWC § 36.011(g).

Respectfully submitted,

Garrett T. Arthur
Public Interest Counsel

By: 
Josiah T. Mercer
Assistant Public Interest Counsel
State Bar No. 24131506
P.O. Box 13087, MC 103
Austin, Texas 78711-3087
(512) 239-0579

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2025, the Office of Public Interest Counsel's Response to the Restated Petition for Inquiry Regarding the Middle Pecos Groundwater Conservation District was filed with the Chief Clerk of the TCEQ and a copy was served on all persons listed on the attached mailing list via electronic mail, and/or by deposit in the U.S. Mail.



Josiah T. Mercer

Mailing List
Middle Pecos Groundwater Conservation District
TCEQ Docket No. 2025-0373-MIS

Ryan Reed
Pulman, Cappuccio & Pullen, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
210/222-9494 FAX 210/892-1610
reed@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
Paul Babb
Hill Country Underground Water
Conservation District
508 South Washington St.
Fredericksburg, Texas 78624
ptybor@gmail.com
pbabb@hcuwcd.org

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

Sue Young
Lone Wolf Groundwater
Conservation District
139 W 2nd St.
Colorado City, Texas 79512
sueyoung@lwgcd.org
Meredith Allen
Menard County Underground Water District
P.O. Box 1215
Menard, Texas 76859
manager@menardcountyuwd.org

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

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

**Groundwater Conservation Districts adjacent
to Groundwater Management Area 7:**

Dicky Wallace, President
Kathy Nelson
Garza County Underground Water
Conservation District
Garza County Courthouse, 2nd Floor
300 West Main
Post, Texas 79356
kathy.nelson@co.garza.tx.us

Angela Lance
Permian Basin Underground Water
Conservation District
P.O. Box 1314
Stanton, Texas 79782
permianbasin@pbuwcd.com

Robbyn Hill
Brewster County Groundwater
Conservation District
P.O. Box 465
Alpine, Texas 79831
bcgwcd@gmail.com

Haley Davis
Culberson County Groundwater
Conservation District
P.O. Box 1295
1300 West Broadway Blvd
Van Horn, Texas 79855
generalmanager@ccgwcd.com

Janet Adams
Jeff Davis County Underground Water
Conservation District
P.O. Box 1203
Fort Davis, Texas 79734
janet@fdwsc.com

Belynda Rains
Clear Fork Groundwater Conservation District
105 N Lyon St., Suite C
Roby, Texas 79543
clearforkgcd@gmail.com

Mitchell Sodek
Central Texas Groundwater
Conservation District
P.O. Box 870
225 S. Pierce
Burnet, Texas 78611
sodek@centraltexasgcd.org

Saratoga Underground Water
Conservation District
P.O. Box 168
Lampasas, Texas 76550
saratogauwcd@gmail.com

David Mauk
Bandera County River Authority and
Groundwater District
440 FM 3240
P.O. Box 177
Bandera, Texas 78003
dmauk@bcragd.org

Micah Voulgaris
Cow Creek Groundwater Conservation District
P.O. Box 1557
Boerne, Texas 78006
manager@ccgcd.org

Gene Williams
Headwaters Groundwater Conservation District
125 Lehmann Drive, Suite 202
Kerrville, Texas 78028-6059
gene@hgcd.org

David Caldwell
Medina County Groundwater
Conservation District
1607 Avenue K
Hondo, Texas 78861
gmmcgcd@att.net

**Groundwater Conservation Districts
Adjacent to Groundwater Management Area
3:**

Janet Adams
Jeff Davis County Underground Water
Conservation District
P.O. Box 1203
Fort Davis, Texas 79734
janet@fdwsc.com

**Additional Entity Submitters from Previous
Petition:**

Billy Gonzales, General Manager
Pecos County WCID No.1
Pcwcid1@gmail.com

Joe Shuster, County Judge
County of Pecos
judge@co.pecos.tx.us

Frank Rodriuez, City Manager
City of Fort Stockton
frrodriguez@cityfs.net

Meridith Allen
opmanager@suttoncountyuwcd.org

Adam Friedman
qsmith@msmtx.com

Edmond R. McCarthy, Jr.
Edmond R. McCarthy, III.
ed@ermlawfirm.com
eddie@ermlawfirm.com

For the Executive Director:

Todd Galiga
Bradford Eckhart
Kayla Murray
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
Bradford.Eckhart@tceq.texas.gov
Kayla.Murray@tceq.texas.gov

Justin Taack
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
Josiah T. Mercer
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
Josiah.Mercer@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