

TCEQ DOCKET No. 2025-0917-MIS

PETITION FOR INQUIRY OF BLANCO-	§	BEFORE THE
PEDERNALES GROUNDWATER	§	TEXAS COMMISSION
CONSERVATION DISTRICT	§	ON
SUBMITTED BY THE CITY OF	§	ENVIRONMENTAL QUALITY
JOHNSON CITY, TEXAS	§	

EXECUTIVE DIRECTOR’S RESPONSE TO PETITION FOR INQUIRY & BLANCO-PEDERNALES GROUNDWATER CONSERVATION DISTRICT’S RESPONSE

I. INTRODUCTION

The Executive Director (ED) of the Texas Commission on Environmental Quality (TCEQ or Commission) files this Response to the Petition for Inquiry of Blanco-Pedernales Groundwater Conservation District (Blanco-Pedernales or District) filed by the City of Johnson City, Texas (City or Petitioner). This Response also addresses the District’s Response to the Petition for Inquiry in this filing.

Under Title 30, TEXAS ADMINISTRATIVE CODE (TAC) § 293.23(g), the Commission may either dismiss the Petition or appoint a review panel to conduct the inquiry and submit a report.

The ED respectfully recommends that the Commission dismiss the Petition for Inquiry.

II. PROCEDURAL BACKGROUND

On June 13, 2025, Petitioner filed a Petition for Inquiry of Blanco-Pedernales Groundwater Conservation District (Petition or PFI) with the Commission.

30 TAC § 293.23(d) requires the Petitioner to file a certified statement describing why the Petitioner believes that a commission inquiry is necessary. Petitioner included a certified statement.¹

30 TAC § 293.23(e) requires the Petitioner to provide a copy of the Petition to all groundwater conservation districts (GCDs) within and adjacent to the groundwater management area (GMA) within five days of filing the Petition. Blanco-Pedernales is a member of GMA 9. 30 TAC § 293.23(e) also requires that the Petitioner provide evidence, within 21 days of filing the Petition, that copies were timely provided to those GCDs. On June 13, 2025, within the 21 days required by 30 TAC § 293.23(e), the Petitioner provided evidence that the Petition had been provided to the following GCDs: Cow Creek Groundwater Conservation District, Bandera County River Authority & Groundwater District, Comal Trinity Groundwater Conservation District, Hays Trinity Groundwater Conservation District, Headwaters Groundwater Conservation District, Medina County Groundwater Conservation District, Southwestern Travis County Groundwater Conservation District, Trinity Glen Rose Groundwater Conservation District, Edwards Aquifer Authority, Uvalde County Underground Water Conservation

¹ PFI at page 12.

District, Real-Edwards Conservation and Reclamation District, Kimble County Groundwater Conservation District, Hill Country Underground Water Conservation District, Hickory Underground Water Conservation District, Central Texas Groundwater Conservation District, Barton Springs / Edwards Aquifer Conservation District.

According to the affidavit attached to the PFI, the Petitioner served a true and correct copy of the Petition for Inquiry to all GCDs within and adjacent to GMA 9, as well as additional interested parties. The GCDs that were provided a copy included all GCDs within and adjacent to GMA 9 as required by 30 TAC § 293.23(e).

Blanco-Pedernales and all GCDs within and adjacent to GMA 9 are affected persons.² On June 19, 2025, the Office of General Counsel mailed a letter providing information on how to file a response on the validity of the specific claims raised in the Petition to all persons listed in the Petition's mailing list, which includes all GCDs within and adjacent to GMA 9. The 35-day deadline to file a response to the Petition was on July 18, 2025, and **only Blanco-Pedernales responded by that date.**

III. GROUNDWATER LAW

A. Groundwater Conservation Districts

The Texas legislature recognizes that a landowner, along with his lessees, heirs, and assigns, owns the groundwater below the surface of the landowner's land as real property.³ GCDs are the state's preferred method of groundwater management in order to protect property rights, balance the conservation and development of groundwater to meet the needs of this state, and use the best available science in the conservation and development of groundwater.⁴ GCDs shall meet at least annually to conduct joint planning and review management plans, accomplishments, and new or amended Desired Future Conditions (DFCs).⁵ A GMA is an area designated and delineated by the Texas Water Development Board (TWDB) under Chapter 35 of the Water Code as "an area suitable for management of groundwater resources."⁶ GMAs may include one or multiple GCDs. GCDs shall consider groundwater availability models and other data or information for the GMA and shall propose DFCs for adoption for the relevant aquifers within the GMA.⁷ DFCs are a quantitative description of the desired condition of the groundwater resources in a GMA at one or more specified future times.⁸

The GCDs in a GMA must adopt DFCs by considering several criteria, including uses or conditions within a GMA, water supply needs in the State Water Plan, hydrological conditions, environmental impacts, subsidence, ownership rights, socioeconomic impacts reasonably expected to occur, and the feasibility of achieving the DFC.⁹ The DFCs must also 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. However, DFCs may provide for the reasonable long-term management of

² TWC § 36.3011(a)(2); *see also* 30 TAC § 293.23(a)(2).

³ TWC § 36.002(a)-(b).

⁴ TWC § 36.0015(b).

⁵ TWC § 36.108(c).

⁶ TWC § 35.002(11).

⁷ TWC § 36.108(d).

⁸ TWC § 36.001(30).

⁹ TWC § 36.108(d).

groundwater resources consistent with the management goals under TWC § 36.1071(a).¹⁰

After all the GCDs have submitted district summaries relating to the proposed DFCs, the GCD representatives shall reconvene to review the reports, consider any GCD's suggested revisions to the proposed DFCs, and finally adopt the DFCs for the GMA. The DFCs must be approved by a resolution adopted by a two-thirds vote of all the GCD representatives. The GCD's representatives shall file an explanatory report of the proposed DFCs for the GMA to the TWDB.¹¹ After a district receives notification from the TWDB that the DFC's explanatory report is administratively complete, the district shall adopt the applicable DFCs.¹² Each GCD in the GMA "shall ensure that its management plan contains goals and objectives consistent with achieving the DFCs of the relevant aquifers as adopted during the joint planning process."¹³ All rulemaking shall consider the goals in the management plan.¹⁴

B. Groundwater Ownership and GCDs

The groundwater ownership right entitles the landowner to drill for and produce the groundwater below the surface but does not entitle a landowner the right to capture a specific amount of groundwater.¹⁵ The TWC authorizes GCDs to place limitations on the right to produce groundwater in an effort to conserve and protect the sustainability of aquifers.¹⁶ The TWC also allows a GCD to issue production permits up to the point that the total volume of exempt and permitted groundwater production will achieve an applicable DFC.¹⁷ To ensure that a GCD achieves its DFCs, the TWC authorizes a GCD to promulgate rules to regulate the withdrawal of groundwater by setting production limits on wells, limiting the amount of water produced based on acreage or tract size, limiting the amount of water that may be produced from a defined number of acres assigned to an authorized well site, limiting the maximum amount of water that may be produced on the basis of acre-feet per acre or gallons per minute per well site per acre, managed depletion, or any combination of these methods.¹⁸

After the GMA adopts a DFC and submits their explanatory report, TWDB determines the Modeled Available Groundwater (MAG) which is the amount of water that the executive administrator of TWDB determines may be produced on an average annual basis to achieve a DFC established under Section 36.108.¹⁹ The TWC requires that GCDs "shall consider," among other things, the MAG for the GCD when issuing permits.²⁰

¹⁰ TWC § 36.108(d-2).

¹¹ TWC § 36.108(d-3).

¹² TWC § 36.108(d-4).

¹³ TWC § 36.1085.

¹⁴ TWC § 36.101(a)(5).

¹⁵ TWC § 36.002(c) and (d).

¹⁶ TWC § 36.116(a)(2).

¹⁷ TWC § 36.1132.

¹⁸ TWC § 36.116(a)(2).

¹⁹ TWC § 36.001(25).

²⁰ TWC § 36.1132(b)(1).

IV. PETITION FOR INQUIRY

TWC § 36.3011 allows affected persons, defined to include an owner of land within a management area, to file a Petition with the Commission requesting an inquiry into specific actions of a GCD. The Petitioner states that the City is situated wholly within GMA 9, the Hill Country Priority GMA, and Blanco County; as such, the ED finds that the City of Johnson City is an affected person pursuant to TWC § 36.3011(a).

The Petitioner alleged the following:

1. That the District fails to adopt rules;
2. That the groundwater in the management area is not adequately protected by the rules adopted by the District; and
3. That the groundwater in the management area is not adequately protected due to the failure of the District to enforce substantial compliance with its rules.²¹

These allegations are made pursuant to TEXAS WATER CODE (TWC) § 36.3011(b)(3), (8), and (9), and 30 TEXAS ADMINISTRATIVE CODE (TAC) § 293.23(b)(3), (8), and (9).

In addition to the claims made in the PFI, the City requested that the Commission review the District's decision to deny the City's recent application for a groundwater permit and select a panel to, "resolve the dispute by any lawful means."²² While the City cited to the relevant issues for the Commission to review, the City did not document or otherwise provide evidence to show that the conditions alleged in the Petition pursuant to TWC § 36.3011(b)(3), (8), and (9) exist. The primary focus of the PFI is the City's application with the District for a groundwater permit.

V. BLANCO-PEDERNALES RESPONSE

Blanco-Pedernales responded to the allegations in the Petition that match the basis for a Petition pursuant to TWC § 36.3011(b)(3), (8) and (9) and 30 TAC § 293.23(b)(3), (8), and (9). The District also addressed the City's claims regarding the application and provided the following responses:

A. Blanco-Pedernales has adopted rules

Blanco-Pedernales stated that it has adopted rules.²³ The District stated that the City failed to provide any supporting evidence for this claim and instead chose to focus on a guidance document that was not adopted as a rule.²⁴ The District noted that the City has not petitioned for rulemaking or otherwise requested that the District's rules be changed.²⁵ The District argued that the City did not provide an argument to support the allegation that the District failed to adopt rules or that its rules were inadequate to protect groundwater in the GMA.²⁶

²¹ PFI at 1.

²² PFI at 4.

²³ Blanco-Pedernales Response at page 3; *see also* Exhibit A of Blanco-Pedernales Response.

²⁴ *Id.* at page 3.

²⁵ *Id.* at page 3.

²⁶ *Id.* at page 4.

B. Blanco-Pedernales' protection of groundwater within the GMA

Blanco-Pedernales stated that the City failed to document any example of the District failing to protect the groundwater within the GMA.²⁷ The District also stated that it should not be required to present evidence of their enforcement without any specific allegation from the City.²⁸ The District argued that the burden is on the City to raise evidence supporting the claims in the Petition.²⁹ In support of its argument, the District cited to the statutory and regulatory authority for the Commission to dismiss petitions when there is insufficient evidence to support the claims in the Petition.³⁰

In response to the City's allegations that the District failed to protect groundwater, the District provided the Groundwater Management Plan Implementation Report - FY2023-2024.³¹ The District argues that this report documents how the District has implemented the Management Plan and has met its standards.³² The District claimed that water levels historically have risen over the last three years and it predicts that the groundwater levels will recover in the future after suffering drought conditions.³³

VI. NO RESPONSES FILED BY OTHER GCDs AND NON-GCD ENTITIES

Any GCD that is within or adjacent to GMA 9 may file a response to the validity of the specific claims raised in the Petition.³⁴ No other GCD or non-GCD entities responded to the PFI.

VII. ED'S RECOMMENDATION

After reviewing the Petition and the District's response, the ED finds that the Petitioner has not provided sufficient evidence to support the allegations made against Blanco-Pedernales in the Petition.

Accordingly, the ED recommends that the Commission dismiss the City's request to solicit a panel to review the District's decision regarding the City's application for a groundwater permit.

A. The Petition fails to offer an adequate basis for the City's claims under TWC §§ 36.3011(b)(3), (8), and (9).

A petitioner seeking an inquiry into allegations that a District has failed to comply with its statutory obligations is obligated to present sufficient evidence supporting its allegations.³⁵ The City fails to do that. While citing to the bases of

²⁷ *Id.* at page 4.

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.* See TWC § 36.3011(c) [T]he commission shall...dismiss the petition if the commission finds that the evidence is not adequate to show that any of the conditions alleged in the petition exist ; see also 30 TAC § 293.23(g)The Commission may dismiss the petition if it finds that the evidence required by subsections (c) and (d) of this section is not sufficient to show that the items contained in subsection (b)(1)-(9) of this section exist.

³¹ Blanco-Pedernales Response at page 4. See also Exhibit C to Blanco-Pedernales Response.

³² Blanco-Pedernales Response at page 5.

³³ *Id.*

³⁴ 30 TAC § 293.23(f).

³⁵ TWC § 36.3011(c).

inquiry pursuant to TWC § 36.3011(b), the Petition does not include any evidence that would support these claims. Instead, the City describes the procedural history of how the District denied their recent groundwater application and argues that this denial was evidence that the District failed in its statutory obligations under TWC Chapter 36.

As noted in the District's response, the City has not alleged that the District failed to adopt any specific rule protecting groundwater. In its response to the PFI, the District presented a copy of its rules which implement the District's Management Plan within the GMA.³⁶

The District also presented evidence that it has enforced its rules to protect groundwater, as evidenced in the discussion on page 5 of the District's response.³⁷ The ED agrees that these documents clearly demonstrate that the district has both adopted rules and effectively protected groundwater through the enforcement of its rules. Petitioner has offered no evidence to the contrary.

For these reasons, the ED recommends that the Commission dismiss the Petition pursuant to TWC § 36.3011(c).

B. The City's request to solicit a panel for review of their groundwater application falls outside the Commission's jurisdiction to consider.

TWC § 36.3011(c) explicitly defines the scope of what the Commission may do in response to a petition for inquiry. Within 90 days of receipt of a petition, the Commission shall either grant the petition and appoint a review panel, or dismiss the petition if it finds that the evidence is not adequate to show that any of the conditions alleged in the petition exist. Pursuant to the statute, the petitioning party is obliged to submit adequate evidence supporting its claims in order for the petition to be granted. In the matter before the Commission, the PFI lacks any such evidence.

Citing TWC §§ 36.3011(b)(3), (8), and (9), the City referenced the basis for the Petition but failed to provide any evidence supporting these claims. Instead, it requested the Commission review the District's action on the City's application for groundwater.

However, there is no basis in TWC Chapter 36 for such a review. The criteria under TWC § 36.3011(b) establishes nine reasons for which affected persons may petition the Commission for inquiry. None of them include or otherwise contemplate the type of claim that the City alleges in their PFI: that the District exceeded its authority under TWC § 36.114(h) when processing an application for groundwater.

There is neither a regulatory nor statutory basis for the Commission to select a panel in this circumstance. Should the City be dissatisfied with any order made by the District, including an appeal of a decision on a permit application, they are entitled to file a suit against the district or its directors to challenge the validity of the law, rule, or order.³⁸ Such a suit shall be filed in a court of competent jurisdiction in any county in which the district or any part of the district is located.³⁹ Should the City seek an

³⁶ See Blanco-Pedernales Response, Attachments A and B.

³⁷ See Blanco-Pedernales Response, Attachment C. The District's Groundwater Management Plan Implementation Report - FY2023-2024 details how the district implemented the plan and achieved DFCs.

³⁸ TWC § 36.251(a).

³⁹ TWC § 36.251(c).

appeal to the District's decision, it must first exhaust all remedies pursuant to the District's rules.⁴⁰

For these and all the reasons outlined in the ED's response, the City's Petition should be dismissed pursuant to TWC § 36.3011(c).

VIII. REVIEW PANEL

Within 90 days of receiving a petition for inquiry, the Commission shall either dismiss the petition or select a review panel, which will consist of a chairperson and four other members.⁴¹ If the Commission determines to not dismiss the petition, it must issue an order appointing the members of the review panel and directing them to, not later than the 120th day after appointment, "review the petition and any evidence relevant to the petition and, in a public meeting, consider and adopt a report to be submitted to the Commission."⁴²

Within 45 days of receiving the report, the ED or the Commission "shall take action to implement any or all of the panel's recommendations."⁴³

The Commission, after notice and hearing in accordance with Chapter 2001, Government Code, shall take action the Commission considers appropriate, including:

- (1) issuing an order requiring the district to take certain actions or to refrain from taking certain actions;
- (2) dissolving the board in accordance with Sections 36.305 and 36.307 and calling an election for the purpose of electing a new board;
- (3) requesting the attorney general to bring suit for the appointment of a receiver to collect the assets and carry on the business of the GCD; or
- (4) dissolving the district in accordance with TWC §§ 36.303(a), 36.304, 36.305, and 36.308.⁴⁴

A. Review Panel Member Solicitation

Although the Executive Director is recommending that the Petition be dismissed, consistent with prior practice the Executive Director solicited nominations for review panel members in the event the Commission decides to appoint a review panel. From July 1, 2025, to July 21, 2025, the ED solicited nominations for volunteers to serve on a five-member review panel to consider the Petitioner's Petition for Inquiry. One nomination was received. The completed nomination form is included as Attachment A.

The TWC requires the commission to appoint a director or general manager of a district located outside the management area that is the subject of the petition and may not appoint more than two members of the review panel from any one district.⁴⁵

⁴⁰ *Id.*

⁴¹ TWC § 36.3011(c); *see also* 30 TAC § 293.23(g).

⁴² TWC § 36.3011(e).

⁴³ TWC § 36.3011(h); 30 TAC § 293.23(i).

⁴⁴ 30 TAC § 293.22(e)(1-4).

⁴⁵ TWC § 36.3011(d).

The nominee willing to serve on the review panel is from GMA 14, which is not adjacent to GMA 9.

B. Suggested Review Panel Members

If the Commission decides to appoint a review panel in response to this Petition, the ED recommends the following nominee for consideration by the Commission in order of tenured experience with respect to groundwater district service:

- Zach Holland, General Manager, Bluebonnet GCD; GMA 14

The disinterested staff nonvoting recording secretary available and willing to serve is Peggy Hunka, P.G. of the TCEQ Water Availability Division.

The recommended review panel member has indicated to the ED that they do not own land or have any other holdings or interests within or adjacent to GMA 9 and they are willing to travel and serve at their own expense.

C. Insufficient Review Panel

Should the Commission decide to appoint a review panel, it will consist of only one member and not the required five members. The ED recognizes that a review panel of fewer than five voting members is not consistent with TWC § 36.3011(c); however, the ED believes she has exhausted the available options to obtain members willing to serve on a review panel.

IX. CONCLUSION

The ED has thoroughly reviewed both the Petition as well as Blanco-Pedernales' response. The ED finds that Blanco-Pedernales has adequately demonstrated that it has adopted rules, that the groundwater in the management area is adequately protected by the rules adopted by the district, and the groundwater in the management area is adequately protected because the district has enforced substantial compliance with its rules. The City's request for a review of the District's decision on their groundwater application does not meet the statutory requirements to be granted. The ED recommends the Petition be dismissed.

Respectfully submitted,

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Kelly Keel,
Executive Director

Phillip Ledbetter, Director
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Charmaine Backens, Deputy Director
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REPRESENTING THE EXECUTIVE DIRECTOR OF
THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on August 1, 2025, the Executive Director's Response To Petition For Inquiry & Blanco-Pedernales Groundwater Conservation District's Response was filed with the Texas Commission on Environmental Quality's Office of the Chief Clerk, and a complete copy was served to all parties listed in the attached Service List via electronic transmission.



Harrison Cole Malley, Staff Attorney
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Attachment A



Review Panel Nomination Form for Groundwater Conservation District Directors or Managers

Nominee Information	Person Nominating Information
<i>Name:</i> _____ <i>Title:</i> _____	<i>Name:</i> _____ <i>Title:</i> _____
<i>Address/City/State:</i> _____	<i>Address/City/State:</i> _____
<i>Nominee's Groundwater Management Area:</i> _____	<i>Affiliation:</i> _____
<i>Nominee's Groundwater Conservation District:</i> _____	<i>Phone:</i> _____ <i>Fax:</i> _____
<i>Tenure with District:</i> _____	<i>Email:</i> _____
<i>Phone:</i> _____ <i>Fax:</i> _____	
<i>Email:</i> _____	

Questions about Nominee	Yes	No	Comments
Is nominee willing to serve on a review panel in accordance with Texas Water Code, §36.3011 and Title 30, Texas Administrative Code, §293.23?	<input type="checkbox"/>	<input type="checkbox"/>	
Is nominee willing to serve as chairman of a review panel?	<input type="checkbox"/>	<input type="checkbox"/>	
Is nominee willing to travel and serve at own expense?	<input type="checkbox"/>	<input type="checkbox"/>	
Does nominee own land or have any other holdings or interests <u>in</u> _____ ?	<input type="checkbox"/>	<input type="checkbox"/>	
Does nominee own land or have any other holdings or <u>interests</u> adjacent to _____ ?	<input type="checkbox"/>	<input type="checkbox"/>	
Does nominee own land or have any other holdings or interests in the _____ ?	<input type="checkbox"/>	<input type="checkbox"/>	
Please make a brief statement of the nominee's background and qualifications to serve on a review panel:			

Send Nomination Forms To:		
Peggy Hunka, P.G., MC-147 Texas Commission on Environmental Quality PO Box 13087 Austin TX 78711-3087 Cell: 512-468-7282 Tel: 512-239-2789	- or -	peggy.hunka@tceq.texas.gov (put "Nominations" in the subject line)

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TCEQ Docket No. 2025-0917-MIS

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