

**SOAH DOCKET NO. 952-19-0705**

Application of Lower Colorado River	§	<b>BEFORE THE LOST PINES</b>
Authority (LCRA) for Eight Operating and	§	
Transport Permits in Bastrop County,	§	<b>GROUNDWATER</b>
Texas (Well Nos. 58-55-5-0032; 58-55-4-	§	
0016; 58-55-4-0017; 58-55-4-0018; 58-55-	§	<b>CONSERVATION DISTRICT</b>
4-0019; 58-55-4-0020; and 58-55-4-0021).	§	

**FIRST AMENDED UNOPPOSED REQUEST FOR PARTY STATUS**

**I. INTRODUCTION**

Each of the individuals named below has submitted a request for contested case hearing in regards to the application by the Lower Colorado River Authority (LCRA) for the permits identified above, and wishes to request party status in the contested case hearing to be held with regard to those applications. Based on conferences with counsel for LCRA and counsel for the General Manager of the Lost Pines Groundwater Conservation District (“Lost Pines”) neither the LCRA nor the General Manager oppose the admission of the following individuals as a party in this matter:

Hugh Brown, Philip Cook, Claire and Michael Wunderlin, Suzanne Ragan, Kathryn “Kay” Rogers, Roger P. Fuller, Andrew and Mary Wier, Philip and Deborah Alley, Steve and Suzannah Amable, Larry and Irene Campbell, Newton and Fran Ellis, Roger Fleming, Kermit Heaton, John Ricke, Jr., Lewis Sharpe, III, David Teuscher, Arthur Norman Aronsen, III, Hollie Denton, Michael and Tammy Hagerud, Kay Linenberger and Aya Linenberger-Lueders, Mark and Penny Whiting, Dr. Christian Abee, Michael MacLeod, Tommy Claiborne, Sue Pardue, Felix and Beverly Villareal, John Watson, Douglas and Dorothy Marousek, Carol and Ernest Pease, Tiger Davis, Herman Herms, Pines and Praries Land Trust c/o Melanie Pavlas, Donna Nelson, Maria and Paul Tuttrup, Bert Godkin, Circle D Homeowner’s Association c/o Jeannie Jessup, Sandi Schneiderman, Sue

Ellen Christiansen, Esther Martinez, Stephen Shaw, Becky Jean Nichols, Paul E. Cox, and Keith and Judy Everett.

## **II. QUALIFICATION FOR PARTY STATUS**

Under the Texas Water Code, a person with a personal justiciable interest affected by a permit application is entitled to party status in a contested case hearing held with regard to a permit application Tex. Water Code § 36.415(b)(2). This is equivalent to the test for constitutional standing.

### *1. Hugh Brown*

Hugh Brown owns more than 100 acres at 3026 County Road 316 near Lexington, Texas in Lee County (Exhibit “1”). On his property he owns a well which is completed into the Simsboro formation. LCRA’s modeling reflects a drawdown within the Simsboro Aquifer of approximately 150 feet beneath Mr. Brown’s property. Considering the updip location of Mr. Brown’s property, and the unconfined nature of the Simsboro Aquifer at his property, the drainage of water from this aquifer as a result of LCRA’s pumping in addition to other authorized pumping will potentially lower the water level to a degree that leaves his well dry.

### *2. Philip Cook*

Philip P. Cook owns property (2.2 acres) at 1182 Shiloh Road A and B with a groundwater well that provides domestic use groundwater to residences at that property. This well is registered with LPGCD as Well No. 586120016 (Exhibit “2”). This well is completed into the Simsboro Aquifer, and draws water from the Simsboro Aquifer. Dr.

George Rice has concluded that the Groundwater Availability Model ("GAM") analysis performed for the LCRA permit applications indicate that LCRA's pumping will cause a drawdown in this well (Exhibit "44").

3. Claire and Michael Wunderlin

Claire Snider Wunderlin and Michael Wunderlin own an approximately five acre property near 352 Kelley Road near Bastrop, Texas. On this property they own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 5855712 (Exhibit "3"). This well is used as the source of water for the property, including the source of water for a pond that forms a wetland for a variety of flora and fauna including the endangered "Houston Toad" species. This well is relied upon to implement management activities that support the wildlife tax exemption for the property. The Wunderlin well draws water from the Carrizo and Calvert Bluff Aquifers, and are in such proximity to the proposed LCRA wells that the withdrawal of water as proposed will drain water from beneath their property, and reduce the water level within their well. LCRA's modeling shows a drawdown at the Snider property of 250 feet to 300 feet in the Simsboro formation. Modeling by Mr. George Rice shows that the LCRA pumping will also result in drawdowns within the Calvert Bluff aquifer, including within the area where the Wunderlin well draws groundwater from that aquifer.

This drainage of water from beneath the Snider property, and drainage of water from the formations in which they own a well, will impact their use and enjoyment of their property and result in the impairment of their groundwater rights. Accordingly, Claire

Snider Wunderlin and Michael Wunderlin would be adversely impacted by the proposed permits.

4. Suzanne Ragan

Suzanna Ragan owns approximately 3.00 acres at 689 South Old Potato Road, Paige, Bastrop County. That property has two groundwater wells (Well Nos. 585560034 and 585560035). Ms. Ragan also owns an interest with her two sons, an interest in the 143.971 acres at 613 South Old Potato Road, Paige, Bastrop County (Exhibit "4"). Based on the location of the properties, the pumping proposed by LCRA will cause a drawdown in the Simsboro foundation under the properties and will cause drawdown in the other Aquifer formations under the properties and at the wells. Dr. George Rice has concluded that the proposed pumping will cause drawdowns in aquifers that underlie the Ragan wells i.e, the Carrizo, Calvert Bluff, Hooper and Simsboro Aquifers (Exhibit "44").

5. Roger P. Fuller

Roger P. Fuller own approximately 70.41 acres at 1090 Private Road 3321, Lee County. This property has one groundwater well (Well No. 584870010), that is used for livestock. Mr. Fuller also owns approximately 114.51 acres at 1955 County Road 106, Lee County. This property has two groundwater wells (Well Nos. 5848805 and 5848708), these wells are used for irrigation and livestock. Mr. Fuller additionally owns approximately 145 acres at 2187 County Road, Lincoln, Lee County, as well as an undivided interest with his sister-in-law, in approximately 345 acres at 3910 FM 1624, Lincoln, Lee County (Exhibit "5"). Based on the location of the property, the pumping

proposed by LCRA will cause a drawdown in the Simsboro formation under the properties, and will cause drawdown in the other Aquifer formations under the properties and at the wells.

6. Kathryn "Kay" Rogers

Kathryn "Kay" Rogers owns approximately 66.1260 acres at 1362 Old Sayers Road, Bastrop, Bastrop County, as well as 38.3330 acres at 127 Winfield Thicket Road, Bastrop, Bastrop County. There is a groundwater well on the 1362 Old Sayers property (Well No. 5854106) for livestock (Exhibit "6"). The proposed pumping will cause drawdown of the Simsboro formation under the property, as well as other Aquifer formations under the property and at the well. Dr. George Rice has concluded that the well owned by Ms. Rogers probably draws from the Hooper Aquifer (Exhibit "44").

7. Andrew and Mary Wier

Andrew and Mary Wier own approximately 16.2320 acres at 321 Sage Road, Bastrop, Bastrop County. This property has a groundwater well (Well No. 585460016) used for domestic purposes and irrigation (Exhibit "7"). The proposed LCRA pumping will cause a drawdown in the Simsboro formation under the property as well as cause a drawdown in the other Aquifer formations under the property. Dr. George Rice has concluded that the Wier well probably draws water from the Simsboro Aquifer (Exhibit "44").

8. Philip and Deborah Alley

Philip and Deborah Alley own approximately 11.4770 acres at 804 Cottle Town Road, Smithville, Bastrop County. This property has a groundwater well (Well No. 5863222) that is the source of their water supply on the property for irrigation and livestock (Exhibit “8”). The pumping proposed by the LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property and at the well.

9. Steve and Suzannah Amable

Steve and Suzannah Amable own approximately 5.200 acres at 332 Sage Road, Bastrop, Bastrop County. On that property is a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585460002. That groundwater well is used as the sole source of domestic water supply on this property (Exhibit “9”). The projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer (“Aquifer”) by the proposed LCRA Project, Permit No. 58-55-4, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and at the well and will cause drawdown in the other Aquifer formations under the property and the well.

10. Larry and Irene Campbell

Larry and Irene Campbell own approximately 11.2190 acres at 272 Old Firetower Road, Bastrop, Bastrop County. On that property there is a groundwater well (Well No. 585460002). That groundwater well is used as the sole source of domestic water supply on this property (Exhibit “10”). Based on the location of the property, the proposed LCRA

Project, Permit No. 58-55-4, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property and at the well. Dr. George Rice has concluded that the well owned by the Campbells likely draws groundwater from the Calvert Bluff Aquifer (Exhibit “44”).

*11. Newton and Fran Ellis*

Newton and Fran Ellis own approximately 3.9480 acres at 347 Old Firetower Road, Bastrop, Bastrop County. On that property, there is a groundwater well (Well No. 585540022). That groundwater well is used as a domestic water supply for this property (Exhibit “11”). Based on the location of the property, the proposed LCRA Project, Permit No. 58-55-4, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property and at the well. Dr. George Rice has concluded that the well owned by Mr. and Mrs. Ellis likely draws groundwater from the Calvert Bluff Aquifer (Exhibit “44”).

*12. Roger Fleming*

Roger Fleming owns an undivided interest in approximately 86.5400 acres at 420 Oak Hill Cemetery Road, Bastrop, Bastrop County with his three siblings (Property ID R10684, Owner: “Virginia Hogwood et al”). On that property there is a groundwater well (Well No. 585510013). The well is used as a water supply for domestic purposes and as a supplemental water source for wildlife as part of the requirements for a wildlife exemption on this property (Exhibit “12”). Based on the location of the property, the pumping

proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property and at the well. Dr. George Rice has concluded that the well owned by Robert Fleming likely draws groundwater from the Calvert Bluff Aquifer (Exhibit “44”).

### 13. Kermit Heaton

Kermit Heaton owns two parcels of land comprised of approximately 148.13 acres and approximately 2.846 acres at 363 Paint Creek Road S., Paige, Bastrop County. This property has a groundwater well (Well No. 5855325). Mr. Heaton owns an additional approximately 22.189 acres that adjoin 363 Paint Creek Road S. The groundwater well is used to supply water for livestock and irrigation purposes on these properties. An unnamed creek that runs into Paint Creek traverses the property and is a source of water for livestock on the property (Exhibit “13”). Based on the District’s map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer by the proposed LCRA Project, the pumping proposed by LCRA will cause a drawdown under the property, other aquifer formations under the property, and will likely negatively impact the surface water supply on the property upon which he depends. Dr. George Rice has concluded that the well owned by Mr. Heaton draws groundwater from the Queen City Aquifer. Dr. George Rice further concludes that the proposed pumping will not likely cause a drawdown of the Queen City Aquifer at this well. However, the proposed pumping will cause drawdowns in other aquifers that underlie the Heaton property (Carrizo, Calvert



Bluff, Simsboro, and Hooper) (Exhibit "44").

*14. John Ricke, Jr.*

John Ricke, Jr. own approximately 68.2000 acres at 246 South Shore Rd., Bastrop, Bastrop County. That property has a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585490030. That groundwater well is used to supply water for domestic purposes on this property (Exhibit "14"). Based on the location of the property, the proposed LCRA Project, Permit No. 58-55-4, the pumping proposed by LCRA will cause the indicated drawdown of the Simsboro formation under the property, and drawdowns on other Aquifer formations under the property and at the well. Dr. George Rice has concluded that Mr. Ricke's well probably draws water from the Calvert Bluff Aquifer (Exhibit "44").

*15. Lewis Sharpe, III*

Lewis Sharpe, III owns approximately 13.052 acres at 224 Pine Valley Drive, Paige, Bastrop County. This property has a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 5855516. That groundwater well is used to supply water for domestic and livestock purposes on this property. Alum Creek also traverses the property as an intermittent source of water supply for the livestock on this property (Exhibit "15"). Based on the location of the property, the proposed LCRA Project, Permit No. 58-55-4, the pumping proposed by LCRA will cause: the indicated drawdown of the Simsboro formation under the property; drawdowns on other Aquifer formations under the property and at the well; and negative impacts on the surface water supply on the

property, upon which Mr. Sharpe depends for livestock. Dr. George Rice has concluded that Mr. Sharpe's well probably draws water from the Calvert Bluff Aquifer (Exhibit "44").

*16. David Teuscher*

David Teuscher owns approximately 93.37 acres at 2291 Hwy. 21E, Paige, Bastrop County. On that property, there is a groundwater well (Well No. 5855628). The well is used for domestic water supply and for livestock on the property (Exhibit "16"). Based on the location of the property, the proposed LCRA Project, Permit No. 58-55-4, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property and at the well. Dr. George Rice has concluded that Mr. Teuscher's well probably draws from the Carrizo Aquifer (Exhibit "44").

*17. Arthur Norman Aronsen, III*

Arthur Norman Aronsen, III, owns an undivided interest (with Hollie R. Denton and John B. Denton) in approximately 49.99 acres at 205 Ponderosa Loop in Bastrop, Bastrop County. On that property there is a jointly owned groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585550035. The groundwater well is the property's sole source of water (Exhibit "17"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property and at the well.

18. Hollie Denton

Hollie Denton owns an undivided interest (with Arthur Norman Aronsen, III and John B. Denton) in approximately 49.99 acres at 205 Ponderosa Loop in Bastrop, Bastrop County. On that property there is a jointly owned groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585550035. The groundwater well is the property's sole source of water (Exhibit "18"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property and at the well.

19. Michael and Tammy Hagerud

Michael and Tammy Hagerud own 9.995 acres at 626 Oak Hill Cemetery Road, Bastrop, Bastrop County. The property has a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585460017. That groundwater well is used to supply water for domestic water supply and irrigation purposes on this property (Exhibit "19"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property and at the well.

20. Kay Linenberger and Aya Linenberger-Lueders

Kay Linenberger own 1.000 acre at 1014 N. SH 95, Bastrop, Bastrop County, and, with her daughter Aya Linenberger-Lueders as the sole heir of Hubert Linenberger, own an undivided interest in 106.5460 acres at 1014 SH 95, Bastrop, Bastrop County, an undivided

interest in 100.7100 acres at 176 Phelan Road, Bastrop, Bastrop County, and an undivided interest in 90.0210 acres, BCAD Property # 31621, described as A38 HARRIS, ISAAC, ACRES 90.0210, Bastrop, Bastrop County. On those properties, together with the 1.5440 acre property owned 100% by Aya Linenberger-Lueders at 948 N. SH 95, Bastrop, Bastrop County (collectively, "Linenberger Properties"), they jointly own five groundwater wells which are registered with Lost Pines Groundwater Conservation District as Well Nos. 5854540, 5854541, 5854542, 5854543 and 585454. They each depend on those wells as water supply for domestic purposes and for livestock on the Linenberger Properties (Exhibit "20"). Based on the location of the Linenberger Properties, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the Linenberger Properties and at the Simsboro wells, and will cause drawdown in the other Aquifer formations under the Linenberger Properties and at the other wells. Dr. George Rice has concluded that the Linenberger wells will likely draw groundwater from the Simsboro and Calvert Bluff Aquifers (Exhibit "44").

21. Mark and Penny Whiting

Mark and Penny Whiting own approximately 9.931 acres at 614 Cottletown Road Unit B, Smithville, Bastrop County (Exhibit "21"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property.

22. Dr. Christian Abee

Dr. Christian Abee is the co-Trustee along with his spouse Karen Abee, of the Christian

R. & Karen Abee Living Trust ("Abee Trust"). The Abee Trust owns approximately 99.3640 acres at 172 Railroad Track Road, Paige, Bastrop County. The property is the Abee's principal residence. The property has a groundwater well (Well No. 5855322), and is the sole source of the domestic water supply on the property (Exhibit "22"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property and at the well. Dr. George Rice has concluded that the formations from which a groundwater well owned by the Abees likely draws groundwater from the Carizzo Aquifer (Exhibit "44").

#### 23. Michael MacLeod

Michael MacLeod own three lots with the physical address of 160 Abbey Lane, Smithville, Bastrop County, and which are comprised of 6.1880 acres, 11.856 acres, and 6.0470 acres, respectively. This property is also Mr. MacLeod's principal residence, the site of his olive orchard and loblolly pine plantings. The 11.856-acre parcel is dedicated to Houston Toad habitat. The well he proposes to drill is an integral part of the development plan for the property (Exhibit "23"). Based on the location of the properties, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under those properties, and will cause drawdown in the other Aquifer formations under those properties and at any site on the properties on which Mr. MacLeod would drill a well.

#### 24. Tommy Claiborne

Tommy Claiborne owns an undivided interest with Kathryn E. Rogers in approximately 4.29 acres at 159 Winfield Thicket Road, Bastrop, Bastrop County. He also owns an undivided interest with his brother Jack D. Claiborne, Jr. in approximately 37.0000 acres and an undivided interest with other family members in approximately 142.5700 acres which together comprise the historic "Claiborne Farm" at 123 Crafts Prairie Road, Bastrop, Bastrop County. The Claiborne Farm has been in continuous operation by the Claiborne family since 1848 and was honored in 2006 by the Texas Department of Agriculture's Family Land Heritage Program, as a farm or ranch in continuous agricultural production by the same family for 100 years or more (Exhibit "24"). Based on the location of the property, the pumping proposed by LCRA will cause the indicated drawdown of the Simsboro formation under the property and drawdowns of other Aquifer formations under the property.

25. Sue Pardue

Sue Pardue owns approximately 7.95 acres in the Circle D Subdivision, Bastrop, Bastrop County, described as Circle D Sec 2, Lot 31, ACRES 7.95, under BCAD R26038. Ms. Pardue also owns approximately 6.93 acres at 149 Blue Jack Oak Ln., Bastrop, Bastrop County, which is her principal residence (R26094) (Exhibit "25"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property.

26. Felix and Beverly Villareal

Felix and Beverly Villareal own approximately 4.8240 acres at 138 Oleander, Bastrop, Bastrop County (Exhibit "26"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property.

27. John Watson

John Watson owns property at 420 Oak Hill Cemetery Road, Bastrop, Bastrop County, which property includes 420 Oak Hill Cemetery Road Unit A, Bastrop and is comprised of approximately 86.54 acres. Mr. Watson owns a groundwater well on the property, which is registered with Lost Pines Groundwater Conservation District as Well No. 585510012. The groundwater well is the property's sole source of water supply (Exhibit "27"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property and at the well. Dr. George Rice has concluded that Mr. Watson's well probably draws water from the Queen City Aquifer. However, the proposed pumping will cause drawdowns in other aquifers that underlie the Watson property (Carrizo, Calvert Bluff, Simsboro, and Hooper) (Exhibit "44").

28. Douglas and Dorothy Marousek

Douglas and Dorothy Marousek own approximately 5.123 acres at 220 Sage Road, Bastrop, Bastrop County (Exhibit "28"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the

property and will cause drawdown in the other Aquifer formations under the property.

*29. Ernest and Carol Pease*

Ernest and Carol Pease own approximately 1.0700 acres at 125 Mallard Drive, Bastrop, Bastrop County. 125 Mallard Drive is the assigned 911 address for the property; the property is also known as 330 Cardinal Road, Paige, Bastrop, County in the public records (Exhibit "29"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdowns in the other Aquifer formations under the property.

*30. Tiger Davis*

Tiger Davis owns approximately 5.0060 acres at 185 O Grady Road, Smithville, Bastrop County (Exhibit "30"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property.

*31. Herman Herms*

Herman Herms owns own approximately 11 acres at 323 Old Pin Oak Road, Paige, Bastrop County. He also owns property described as A11 BASTROP TOWN TRACT, ACRES 223.8920, BCAD Property ID #26984, which has a common boundary with the Griffith League Scout Ranch and which was described on his protest of the LCRA proposed permit 58-55-4 as "on the west side of the Griffith League Property". Mr. Herms depends on spring-fed ponds (Ponds") on that property and on a wet weather creek



("Creek") which originates on that property and which is an unnamed tributary of a creek known as Spicer Creek. The Ponds and Creek are the sole sources of water supply for livestock on the property. Mr. Herms is the Trustee of the Herman Roy Herms Exempt Lifetime Trust, which owns the property described as A315 Tom, John, ACRES 148.0918, BCAD Property ID #26975, and which property was described on his protest of the LCRA proposed permit 58-55-4 as "on Stockade Ranch Road, Paige". Mr. Herms depends on an all-weather creek as the sole source of water supply for livestock on that property (Exhibit "31"). Based on the location of the properties, the pumping proposed by LCRA will cause: the indicated drawdown of the Simsboro formation under the properties; drawdowns on other Aquifer formations under the properties; and negative impacts on the surface water supply described herein on the properties, upon which Mr. Herms depends for his livestock.

32. Pines and Prairies Land Trust c/o Melanie Pavlas

Pines and Prairies Land Trust c/o Melanie Pavlas, Executive Director and the duly authorized representative of Pines and Prairies Land Trust ("PPLT"). PPLT is a Texas non-profit corporation duly formed in accordance with the laws of the State of Texas and is in good standing. The mission of PPLT is to protect natural and cultural resources and promote sustainable agriculture through education and preservation of open space in Central Texas. PPLT as an organization is not comprised of members who would individually have standing, but it is a unique landowner in that it protects over 1,000 acres of land in south central Texas, promotes sustainable agriculture and resource protection, works with the Natural Resources Conservation Service and Texas Parks and Wildlife

Department through the NRCS Environmental Quality Incentives Program and the TPWD Landowner Incentive Program, and engages in projects such as prairie restoration, habitat preservation and restoration, and protection of riparian and upland habitat of the Colorado River. PPLT owns an interest in several properties in Bastrop and Lee counties, which are grouped together for ease of reference herein as the “Billig Ranch”, “Colorado River Refuge” (“CRR”), and the “Yegua Knobbs Preserve” (“YKP”). These three groups were identified on the PPLT’s protest of the Applicant’s permit applications, filed with the Lost Pines Groundwater Conservation District on or about September 18, 2018, with the addresses of 208 Billig Lane, Paige, TX; Riverside Drive at Kaala Lane, Bastrop, TX; and 1106 Johnny Baker Road, Lexington, TX, respectively. PPLT owns approximately 677 acres at 208 Billig Lane, Paige, Bastrop County, known as the Billig Ranch, which is being restored by PPLT for sustainable agriculture and wildlife habitat. It is also potential habitat for the Houston Toad. Ongoing restoration projects currently include restoring acreage for Houston Toad as well as for the Monarch butterfly. On that property PPLT owns groundwater wells, two of which are registered with Lost Pines Groundwater Conservation District as Well Nos. 585530029 (PPLT “2”) and 585530030 (“PPLT 3”). Those groundwater wells are used as a source of water supply on this property for wildlife management and habitat restoration. There are also several ponds and creeks on the property. PPLT depends on preservation and protection of the property’s water resources to achieve its ultimate goal for Billig Ranch as an educational property for the community, to show that sustainable agriculture and resource protection go hand in hand. PPLT’s ownership of the CRR includes approximately 65 acres of donated property plus additional

lots in the Tahitian Subdivision of Bastrop, Bastrop County, including parcels identified at the Bastrop County Appraisal District as R35141, R35245, R23432, R23464, R34493, R34501, R40327, R40333, R40334, and R33657. The CRR is populated with old-growth riparian habitat as well as Post Oak savannah habitats and meadows, and is managed as a wildlife refuge with access to the Colorado River and over 3 miles of public trails. PPLT owns the approximately 302-acre YKP as an expanse of hills, woods, pastures, rough trail, ponds, spring and a bog north of McDade, Bastrop County, that extends into Lee County. YKP is potential habitat for the critically endangered Houston toad and contains other unique habitats such as the intriguing geology of the knobs, rare plants, a spring, creeks, ponds and a spring fed bog. PPLT has partnered with USFWS and the US Forest Service to conduct habitat restoration on site, and manages the property to protect the property's unique ecosystems and rich cultural resources. PPLT owns a groundwater well on YKP which is registered with Lost Pines Groundwater Conservation District as Well No. 584720024 ("PPLT 1"). The groundwater wells on the Billig Ranch and the YKP are used to assist management practices and activities that promote PPLT's mission of protection, preservation and restoration of habitat for both flora and fauna, the conservation and protection of natural resources, and promotion of sustainable agriculture (Exhibit "32"). Based on the location of the PPLT properties described herein, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under PPLT's properties and will cause drawdown in the other Aquifer formations under those properties and at its wells. Dr. George Rice has concluded that the proposed pumping will cause drawdowns in aquifers that underlie the Pines & Prairies Land Trust i.e, the Carrizo, Calvert Bluff,

Hooper and Simsboro Aquifers (Exhibit "44").

*33. Donna Nelson*

Donna Nelson owns own approximately 8.2500 acres at 214 Pine Path, Bastrop, Bastrop County (Exhibit "33"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property.

*34. Maria and Paul Tuttrup*

Maria and Paul Tuttrup own approximately 3.6400 acres at 307 Ponderosa Loop, Paige, Bastrop County (Exhibit "34"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause drawdown in the other Aquifer formations under the property.

*35. Bert Godkin*

Bert Godkin owns an undivided interest in approximately 12.800 acres at 1193 Shiloh Road, Cedar Creek, Bastrop County, and he owns the entirety of the dwelling on that property. Mr. Godkin owns part interest in a groundwater well located at 1193 Shiloh Road registered with the Lost Pines Groundwater Conservation District as Well No. 5861220, which is used for domestic purposes. He also owns 1.9990 acres of property adjoining 1193 Shiloh Road (Exhibit "35"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the properties and at the well, and will cause drawdown in the other Aquifer formations under the properties.

36. Circle D Homeowner's Association c/o Jeannie Jessup

Circle D Homeowner's Association c/o Jeannie Jessup, Vice President and the duly authorized representative of the Circle D Civic Association, also known as the Circle D Home Owners Association (collectively, "Circle D HOA"). The Circle D HOA Request for Contested Case Hearing ("Request") in this proceeding is incorporated herein by reference. The Request describes in detail the approximately 53.886 property at 926 FM 1441, Bastrop, Bastrop County owned by the Circle D HOA and which is referred to in the Request as the "HOA Property". The HOA Property is a park with surface water features comprised by a lake of significant size. The lake is integral to the amenities of the Circle D Subdivision. At least part of the lake's source of water supply is a creek known as "Spicer Creek", which flows into the HOA lake (Exhibit "36"). Based on the location of the HOA Property, the pumping proposed by LCRA will cause: the indicated drawdown of the Simsboro formation under the HOA Property; drawdowns on other Aquifer formations under the HOA Property; and negative impacts on the Circle D HOA's lake described herein and the water supply that lake depends on, including the creek known as Spicer Creek.

37. Sandi Schneiderman

Sandi Schneiderman and her spouse Dustin Cross own 2.041 acres at 134 Crenshaw Lane, Bastrop, Bastrop County. This property is their principal residence. Schneiderman and Cross also own approximately 2.714 acres at 125 Palmers Path, Bastrop, Bastrop County; another home on approximately 1.9930 acres at 191 Tiger Woods Drive, Bastrop,

Bastrop County; and five lots at 175 Shawnee Drive, Smithville, Bastrop County, described as LAKE THUNDERBIRD SEX 1, LOT 290, 291, 292, 293 & 294; BCAD #21814 (Exhibit "37"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property.

38. Sue Ellen Christiansen

Sue Ellen Christiansen owns property at 159 McBride Lane, Paige, Bastrop County comprised of approximately 99.957 acres and 1.0000 acre, together with an adjoining approximately 39.99 acres (Exhibit "38"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause a drawdown in the other Aquifer formations under the property.

39. Esther Martinez

Esther Martinez owns an undivided interest in approximately .8370 acres at 201 S. Buckhorn Drive, Bastrop, Bastrop County (Exhibit "39"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause a drawdown in the other Aquifer formations under the property.

40. Stephen Shaw

Stephen Shaw and Sonia Ruiz jointly own approximately 1.0000 acre at 102 Plover Street, Paige, Bastrop County. Mr. Shaw also owns 1.0900 acres and .8500 acre at 109 Bobwhite Street, Paige, Bastrop County (Exhibit "40"). Based on the location of the

property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause a drawdown in the other Aquifer formations under the properties.

*41. Becky Jean Nichols*

Becky Jean Nichols owns approximately 3.4400 acres at 628 Cardinal Drive, Paige, Bastrop County (Exhibit "41"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause a drawdown in the other Aquifer formations under the property.

*42. Paul E. Cox*

Paul E. Cox owns approximately 3.84 acres at 669 Cardinal Drive, Paige, Bastrop County (Exhibit "42"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property and will cause a drawdown in the other Aquifer formations under the property.

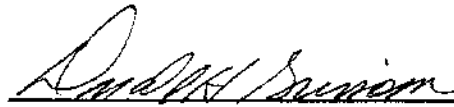
*43. Keith and Judy Everett*

Keith and Judy Everett own approximately .3900 acres at 132 Pony Grass Lane, Bastrop, Bastrop County (Exhibit "43"). Based on the location of the property, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under the property, and will cause drawdown in the other Aquifer formations under the property.

### **III. PRAYER**

For these reasons, the named individuals request to be admitted as a party in the above-referenced contested case hearing to consider LCRA's permit applications.

Respectfully submitted,  
Grissom & Thompson, LLP



Donald H. Grissom  
don@gandtlaw.com  
State Bar No. 08511550  
William W. Thompson, III  
bill@gandtlaw.com  
State Bar No. 19960050  
509 West 12<sup>th</sup> Street  
Austin, Texas 78701  
(512) 478-4059  
(512) 482-8410 Fax

OWEN & BOGART  
Ernest F. Bogart  
State Bar No. 02556500  
P.O. Box 690  
Elgin , Texas 78621  
512-281-3326  
Fax 512-281-5094

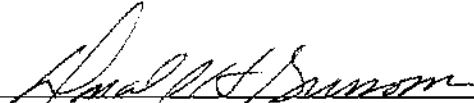
And

Law Office of Charles Carver  
Charles W. Carver  
State Bar No. 24086998  
P.O. Box 49402  
Austin, Texas 78765  
(512) 640-9611  
(512) 377-1757 fax  
[charles@cwcarverlaw.com](mailto:charles@cwcarverlaw.com)



**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document was served on the persons of record by U.S. Mail, E-mail or SOAH Filing on this 18 day of December 2018.

  
\_\_\_\_\_  
Donald H. Grissom

**SOAH DOCKET NO. 952-19-0705**

**APPLICATION OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY**

**AFFIDAVIT OF HUGH BROWN**

**STATE OF TEXAS §  
§  
COUNTY OF LEE §**

BEFORE ME, the undersigned Notary Public on this day, personally appeared Hugh Brown, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

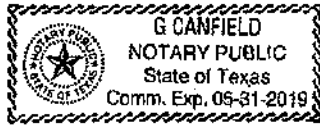
1. My name is Hugh Brown. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own more than 100 acres at 3026 County Road 316 near Lexington, Texas in Lee County.
3. On this property I own three groundwater wells, registered with Lost Pines Groundwater Conservation District as Wells No. 5839947, 5839948, and 5839949.
4. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property and at my wells as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my property.

FURTHER AFFIANT SAYETH NOT.



Hugh Brown  
Hugh Brown

SUBSCRIBED AND SWORN TO BEFORE ME this 14<sup>th</sup> day of December 2018.



G. Canfield  
Notary Public, State of Texas

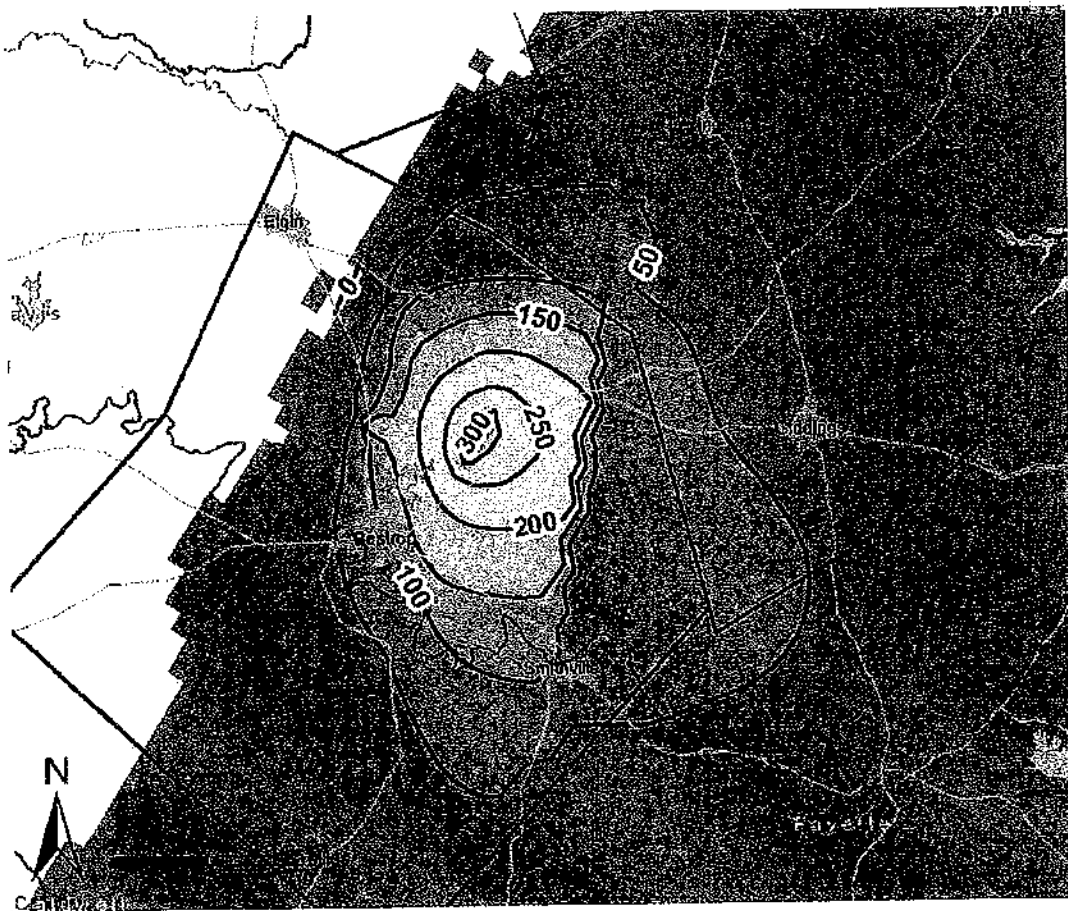
My Commission Expires:

5/31/2019

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



BROWN PROPERTY

APPLICATION LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR 8 §  
WELLS IN BASTROP COUNTY

STATE OF TEXAS   §  
COUNTY OF BASTROP   §

1. My name is Philip P. Cook. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I am a member of Environmental Stewardship.
3. I own 4.981 acres at 1182 A Shiloh Road and 1182 B Shiloh Road Cedar Creek. On that property I own a groundwater well, which is registered with the Lost Pines Groundwater Conservation District as Well No. 586120016. That groundwater well is used as a domestic water supply for residences on this property.
4. I also co-own property at 1192 Shiloh Road comprising approximately 12.8 acres. On that property, I own a groundwater well registered with the Lost Pines Groundwater Conservation district as Well No. 5861221 (6/4/01). That groundwater well is used for both domestic and agricultural uses.
5. I own part interest in a groundwater well located at 1193 Shiloh Road registered with the Lost Pines Groundwater Conservation District as Well No. 5861220 which is used for domestic purposes.

FURTHER AFFIANT SAYETH NOT.

Philip P. Cook  
Philip P. Cook

SUBSCRIBED AND SWORN TO BEFORE ME this 10 day of December 2018.



Hattie Campion  
Notary Public, State of Texas

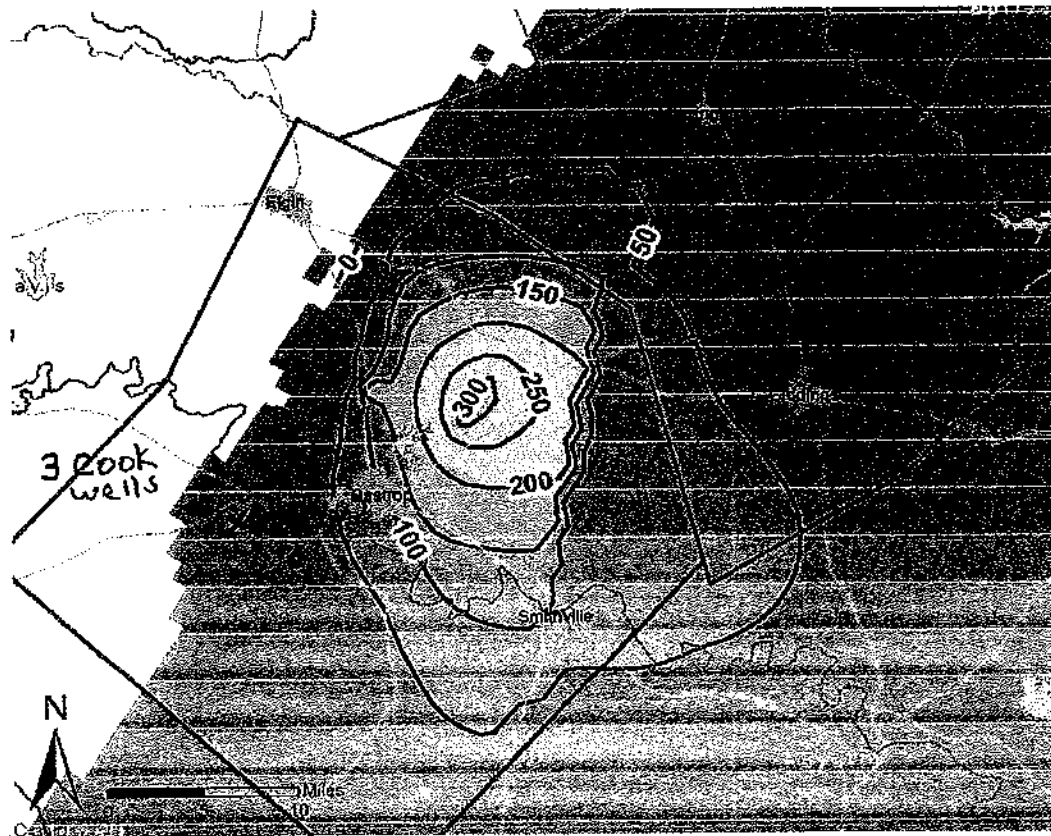
My Commission Expires:

Nov. 18, 2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



**SOAH DOCKET NO. 952-19-0705**

**APPLICATION OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY §**

**AFFIDAVIT OF CLAIRE SNIDER WUNDERLIN**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Claire Snider Wunderlin, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

1. My name is Claire Snider Wunderlin. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. With Michael Wunderlin, I jointly own an approximately five-acre property near 352 Kelley Road near Bastrop, Texas.
3. On this property I own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 5855712. This well is used as the source of water for my property, and is the source of water for a pond that forms a wetland for a variety of flora and fauna including the endangered "Houston Toad" species.
4. The property I jointly own at 352 Kelley Road near Bastrop Texas qualifies for a wildlife exemption from certain property taxes.
5. Well No. 5855712 is relied upon to implement management activities that support the wildlife tax exemption for that property.

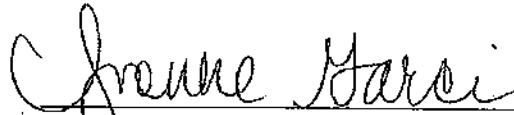


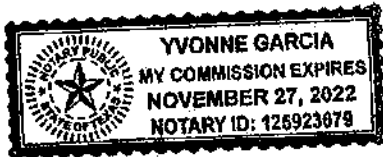
6. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property, and will cause drawdown in the other Aquifer formations under my property and at my well.

FURTHER AFFIANT SAYETH NOT.

  
Claire Snider Wunderlin

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December 2018.

  
Notary Public, State of Texas



My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.



x Wunderlin well location

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS**

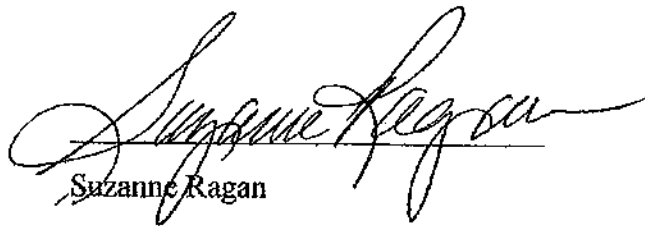
**AFFIDAVIT OF SUZANNE RAGAN**

STATE OF TEXAS §  
COUNTY OF BASTROP §

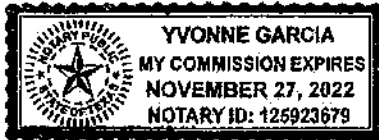
BEFORE ME, the undersigned Notary Public on this day, personally appeared Suzanne Ragan, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

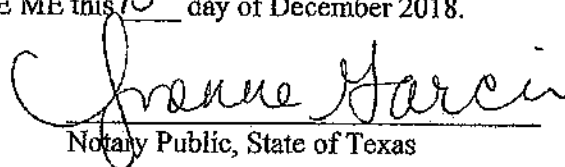
1. My name is Suzanne Ragan. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own approximately 3.00 acres at 689 South Old Potato Road, Paige, Bastrop County. On that property I own two groundwater wells, which are registered with Lost Pines Groundwater Conservation District as Well No. 585560034 (used for agricultural purposes) and Well Number 585560035 (used for domestic water supply and livestock purposes) on this property.
3. I also own, jointly with my two sons, an undivided interest in approximately 143.971 acres at 613 South Old Potato Road, Paige, Bastrop County. That property depends on surface stock tanks for livestock, and on the agricultural well described above when necessary.
4. Based on the location of my properties, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my properties as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my properties and at my wells.

FURTHER AFFIANT SAYETH NOT.

  
Suzanne Ragan

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



  
Notary Public, State of Texas

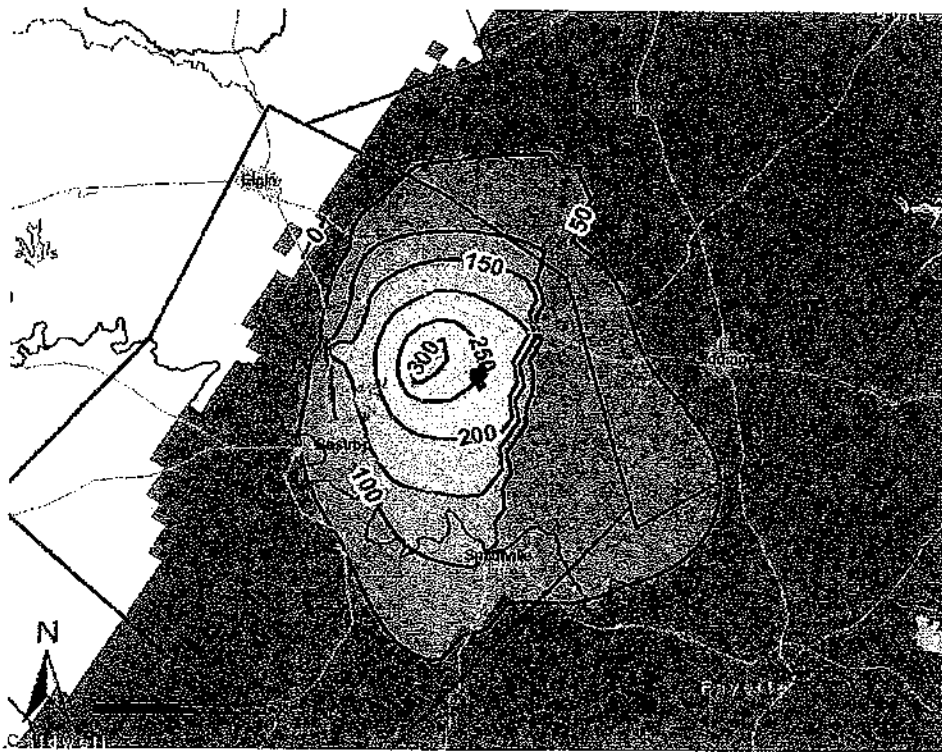
My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



RAGAN PROPERTY

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF KATHRYN E. ROGERS

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Kathryn E. Rogers, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Kathryn E. Rogers. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own approximately 38.3330 acres at 127 Winfield Thicket Road, Bastrop, Bastrop County.
3. I also own approximately 66.1260 acres at 1362 Old Sayers Rd, Elgin, Bastrop County. On that property, I own a groundwater well registered with the Lost Pines Groundwater Conservation District as Well No. 5854106. That groundwater well is used for domestic water and for livestock on my property.
4. Based on the location of my property, which I have located approximately on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached as Exhibit A, the pumping proposed by LCRA will cause the indicated drawdown of the Simsboro formation under my property, and drawdowns on other Aquifer formations under my property and at my well.

FURTHER AFFIANT SAYETH NOT.

Kathryn E. Rogers  
Kathryn E. Rogers

SUBSCRIBED AND SWORN TO BEFORE ME this 12 day of December 2018.



Cristina Carrillo  
Notary Public, State of Texas

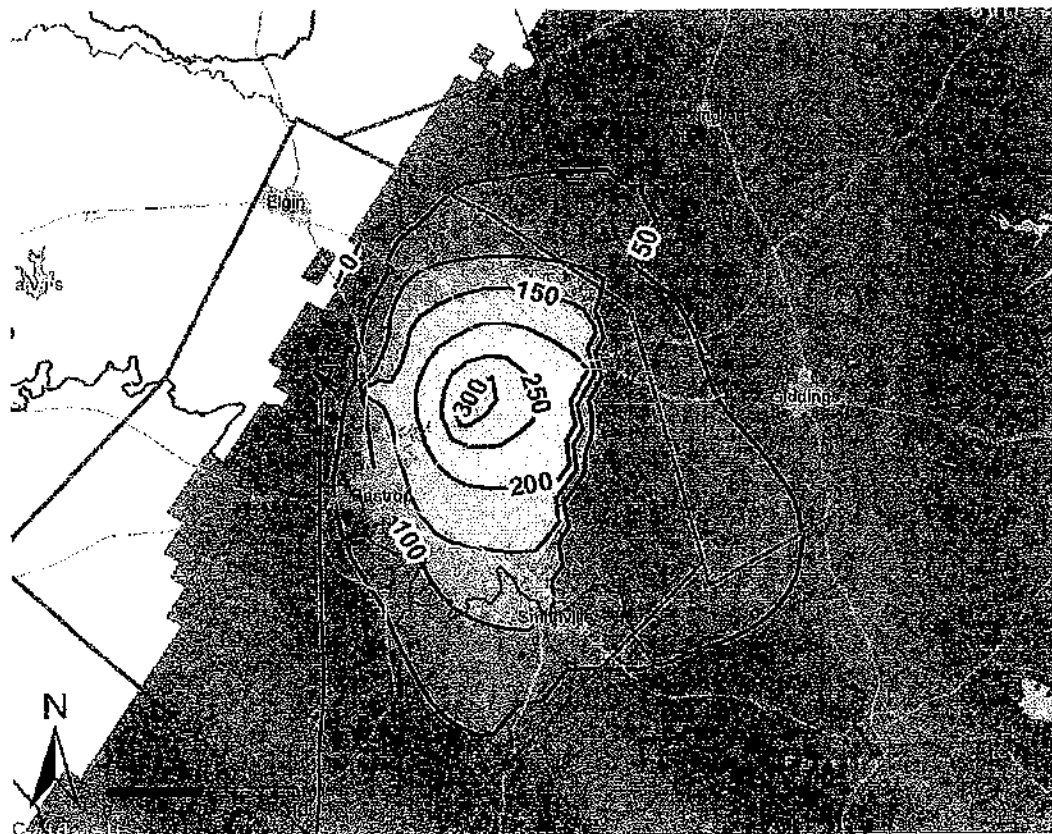
My Commission Expires:

08/28/2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



ROGERS PROPERTY



SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER COLORADO RIVER §  
AUTHORITY FOR OPERATING AND § BEFORE THE STATE OFFICE  
TRANSPORT PERMITS FOR EIGHT WELLS IN § OF  
BASTROP COUNTY, TEXAS § ADMINISTRATIVE HEARINGS

AFFIDAVIT OF ROGER P. FULLER

STATE OF TEXAS §  
COUNTY OF LEE §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Roger P. Fuller, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

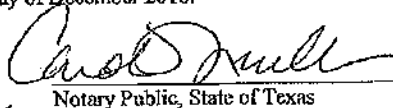
1. My name is Roger P. Fuller. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Kaye C. Fuller and I own approximately 70.41 acres at 1090 Private Road 3321, Lee County. On that property we also own a groundwater well which I registered with Lost Pines Groundwater Conservation District as Well No. 584870010. We depend on that well as a water supply for livestock on this property.
3. We also own approximately 114.51 acres at 1955 County Road 106, Lee County. On that property we also own two groundwater wells which are registered with Lost Pines Groundwater Conservation District as Well Nos. 5848805 and 5848708. We depend on one well as a water supply for irrigation and the other as a water supply for livestock on our property.
4. We also own approximately 145 acres at 2187 County Road 109, Lincoln, Lee County, and we own an undivided interest, with my sister-in-law, in approximately 345 acres at 3910 FM 1624, Lincoln, Lee County.
5. Based on the location of my properties, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my properties, and will cause drawdown in the other Aquifer formations under my properties and at my wells.

FURTHER AFFIANT SAYETH NOT.

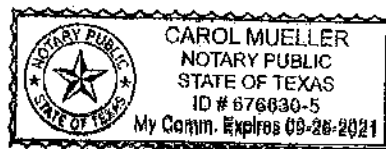


Roger P. Fuller

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December 2018.



Notary Public, State of Texas



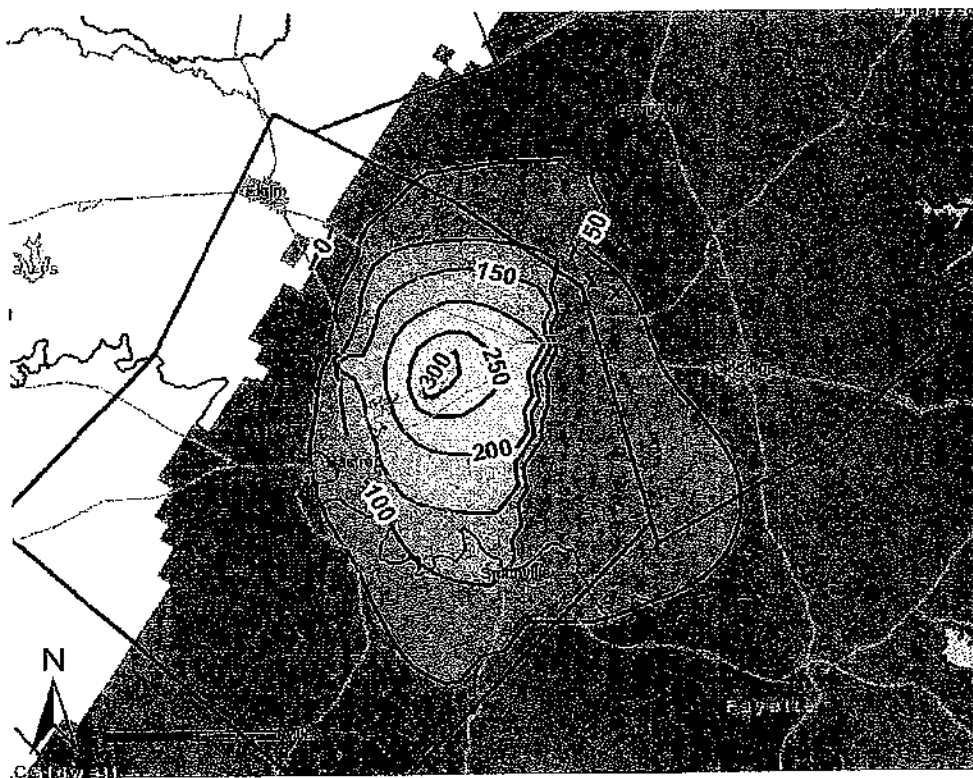
My Commission Expires:

9-26-2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



Fuller Properties

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS


AFFIDAVIT OF ANDREW A. WIER

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

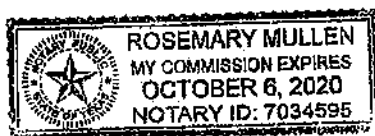
BEFORE ME, the undersigned Notary Public on this day, personally appeared Andrew A. Wier, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

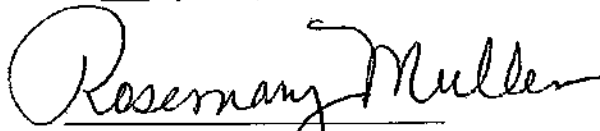
1. My name is Andrew A. Wier. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Mary G. Wier and I own approximately 16.2320 acres at 321 Sage Road, Bastrop, Bastrop County. On that property we also own a groundwater well which I registered with Lost Pines Groundwater Conservation District as Well No. 585460016.
3. The well is used as the water supply for domestic purposes and irrigation on this property.
4. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property and at our well as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property.

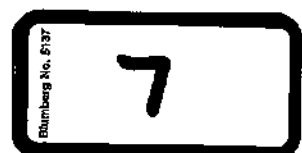
FURTHER AFFIANT SAYETH NOT.

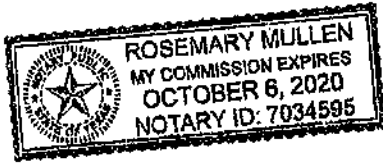
  
Andrew A. Wier

SUBSCRIBED AND SWORN TO BEFORE ME this 12 day of December 2018.



  
Notary Public, State of Texas





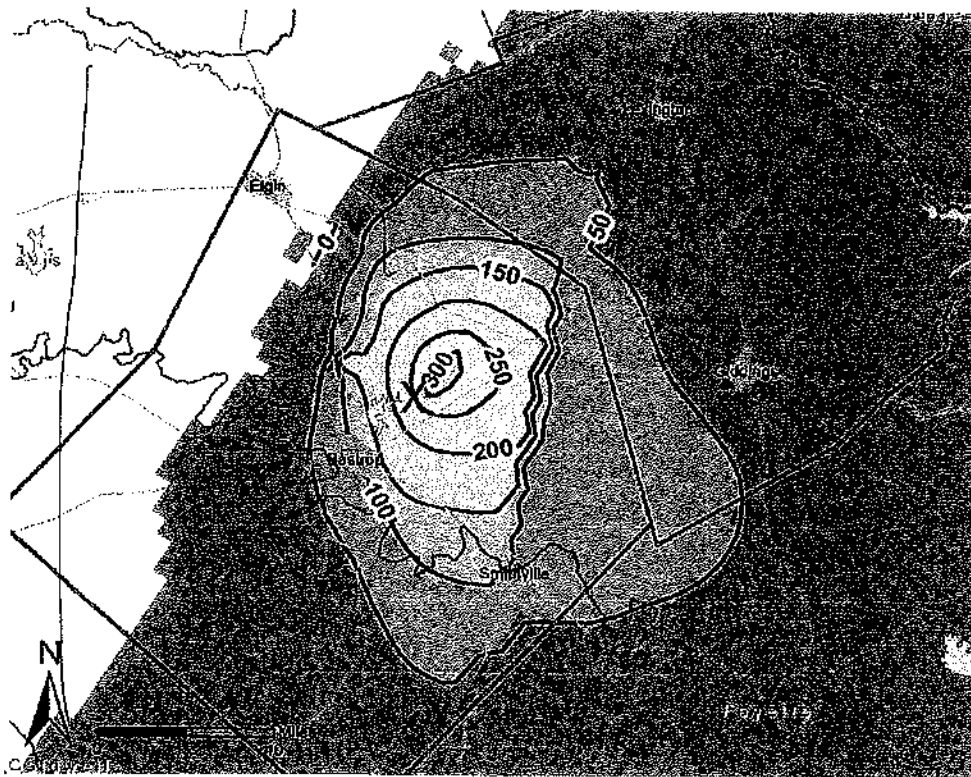
My Commission Expires:

10-6-2020

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM1.*



X - Andrew A & Mary G Wier property

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS

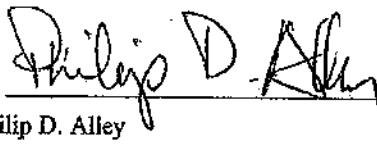
AFFIDAVIT OF PHILIP D. ALLEY

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

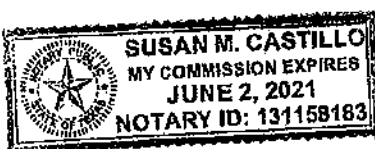
BEFORE ME, the undersigned Notary Public on this day, personally appeared Philip D. Alley, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

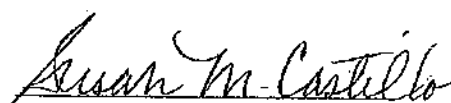
1. My name is Philip D. Alley. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Debra W. Alley and I own approximately 11.4770 acres at 804 Cottle Town Road, Smithville, Bastrop County. On that property we own a groundwater well, which we registered with Lost Pines Groundwater Conservation District as Well No. 5863222, which is the source of our water supply on this property for irrigation and livestock.
3. Based on the location of my properties, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my properties as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my properties and at my wells.

FURTHER AFFIANT SAYETH NOT.

  
Philip D. Alley

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



  
Notary Public, State of Texas

My Commission Expires:

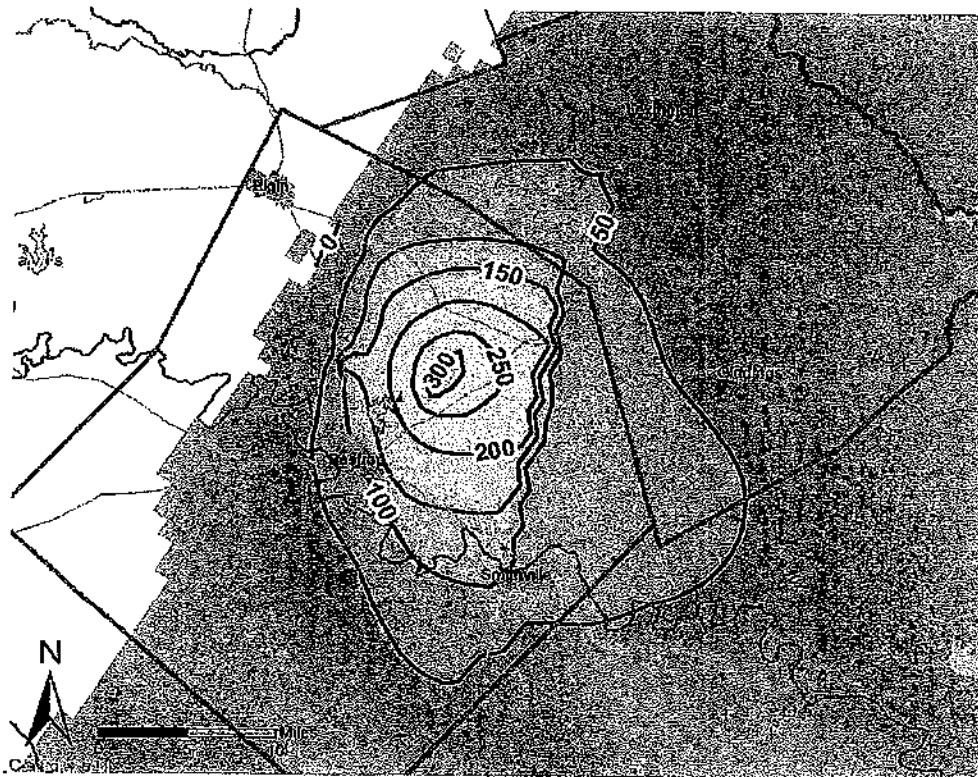
June 2, 2021



## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



ALLEY PROPERTY

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER  
COLORADO RIVER AUTHORITY §  
FOR OPERATING AND §  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS**

**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

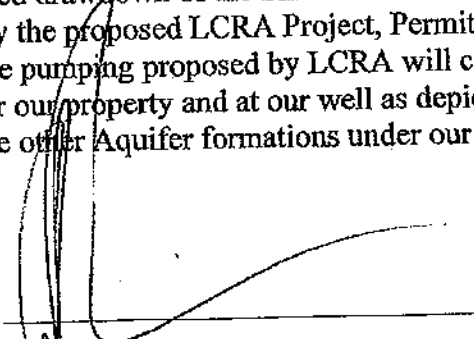
**AFFIDAVIT OF STEVE R. AMABLE**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Steve R. Amable, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

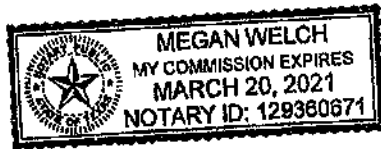
1. My name is Steve R. Amable. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Suzannah Amable and I own approximately 5.200 acres at 332 Sage Road, Bastrop, Bastrop County. On that property we own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585460002. That groundwater well is used as the sole source of domestic water supply on this property.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property and at our well as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property and also at our well.

FURTHER AFFIANT SAYETH NOT.

  
Steve R. Amable



SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



Megan Welch  
Notary Public, State of Texas

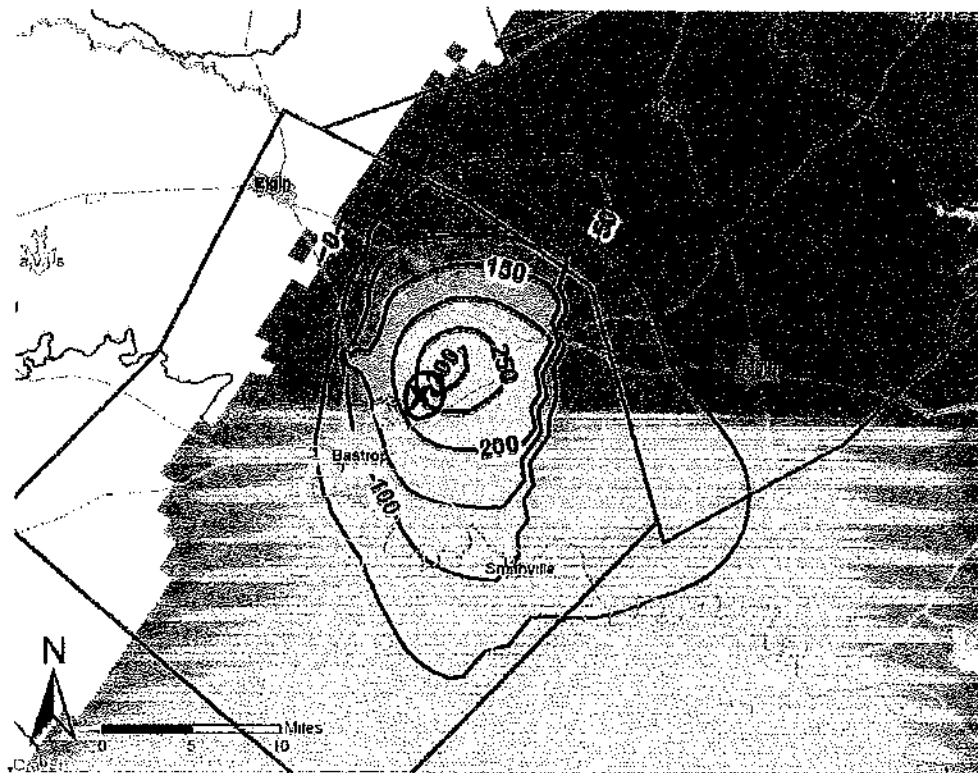
My Commission Expires:

03/20/2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



Amable Property

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS

AFFIDAVIT OF LARRY CAMPBELL

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

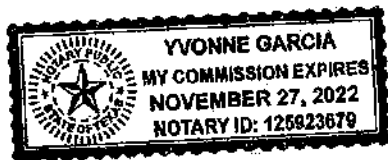
BEFORE ME, the undersigned Notary Public on this day, personally appeared Larry Campbell, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Larry Campbell. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Eileen Campbell and I own approximately 11.2190 acres at 272 Old Firetower Road, Bastrop, Bastrop County. On that property we own a groundwater well, which I registered with Lost Pines Groundwater Conservation District as Well No. 585460002. That groundwater well is used as the sole source of domestic water supply on this property.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property and at our well.

FURTHER AFFIANT SAYETH NOT.

  
Larry Campbell

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



Yvonne Garcia  
Notary Public, State of Texas

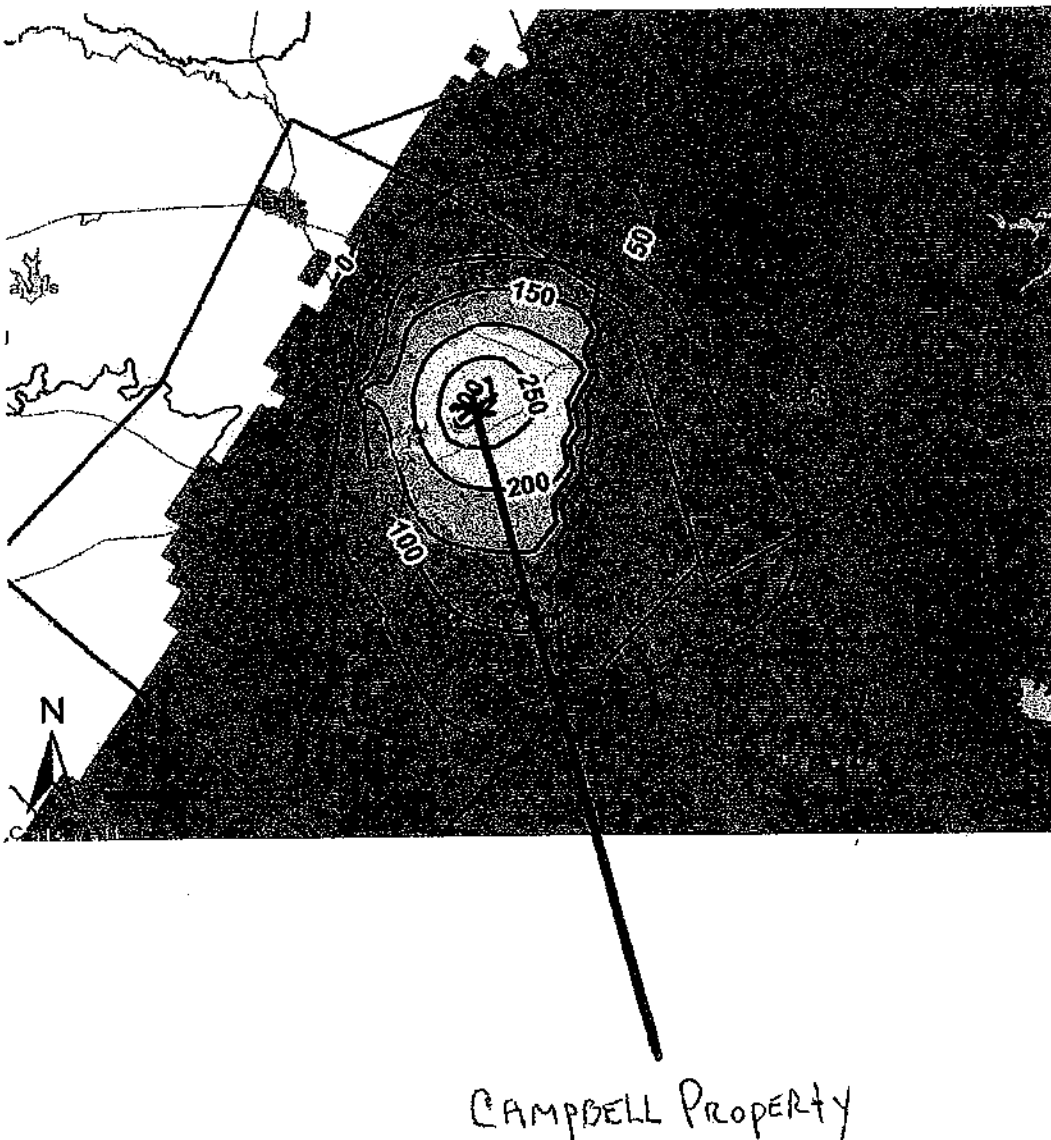
My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF NEWTON M. ELLIS

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

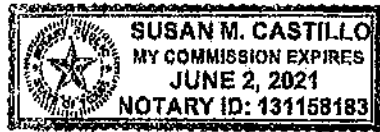
BEFORE ME, the undersigned Notary Public on this day, personally appeared Newton M. Ellis, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Newton M. Ellis, and I am also known as N Mac Ellis. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Frances Ellis and I own approximately 3.9480 acres at 347 Old Firetower Road, Bastrop, Bastrop County. On that property, we own a groundwater well registered with the Lost Pines Groundwater Conservation District as Well No. 585540022. That groundwater well is used as a domestic water supply for this property.
3. Based on the location of our property, as we have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property, and will cause drawdown in the other Aquifer formations under my property and at our well.

FURTHER AFFIANT SAYETH NOT.

Newton M. Ellis  
Newton M. Ellis

SUBSCRIBED AND SWORN TO BEFORE ME this 2<sup>th</sup> day of December 2018.



Susan M. Castillo  
Notary Public, State of Texas

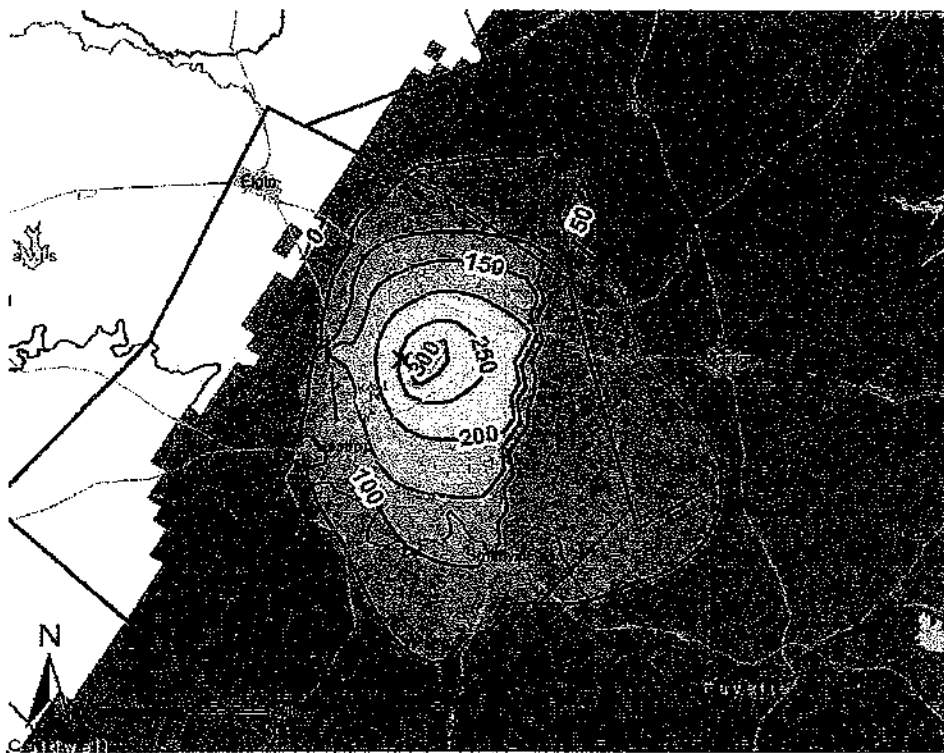
My Commission Expires:

June 2, 2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



ELLIS Property - X near center



**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

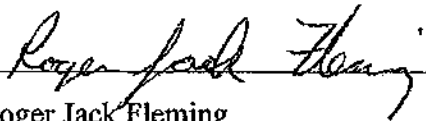
**AFFIDAVIT OF ROGER JACK FLEMING**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

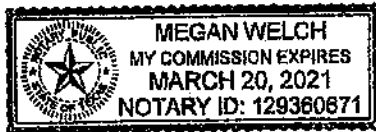
BEFORE ME, the undersigned Notary Public on this day, personally appeared Roger Jack Fleming, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

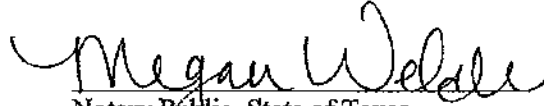
1. My name is Roger Jack Fleming. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own an undivided interest in approximately 86.5400 acres at 420 Oak Hill Cemetery Road, Bastrop, Bastrop County with my three siblings (Property ID R10684, Owner: "Virginia Hogwood et al"). On that property I also own in common with my siblings, a groundwater well which I registered with Lost Pines Groundwater Conservation District as Well No. 585510013. The well is used as a water supply for domestic purposes and as a supplemental water source for wildlife as part of my requirements for a wildlife exemption on this property.
1. Based on the location of my property, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property, and will cause drawdown in the other Aquifer formations under my property and at my well.

FURTHER AFFLIANT SAYETH NOT.

  
Roger Jack Fleming

SUBSCRIBED AND SWORN TO BEFORE ME this 12 day of December 2018.



  
Notary Public, State of Texas

My Commission Expires:

03/20/2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Slmsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



FLEMING - PROPERTY

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF KERMIT D. HEATON**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Kermit D. Heaton, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Kermit D. Heaton. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Tommie D. Heaton and I own two parcels of land comprised of approximately 148.13 acres and approximately 2.846 acres at 363 Paint Creek Road S., Paige, Bastrop County. On that property we own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 5855325. We own an additional approximately 22.189 acres that adjoin 363 Paint Creek Road S. The groundwater well is used to supply water for livestock and irrigation purposes on these properties.
3. An unnamed creek that runs into Paint Creek traverses our property and is a source of water for our livestock on our property.
4. Based on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer by the proposed LCRA Project, Permit No. 58-55-4, on the attached Exhibit A, and the location of my property as I have approximately located it on Exhibit A, the pumping proposed by LCRA will cause a drawdown under our property as depicted on Exhibit A, other aquifer formations under our property, and will likely negatively impact the surface water

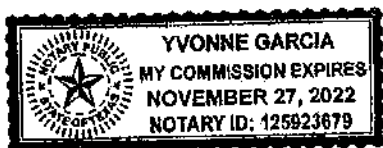
supply on our property upon which I depend.

FURTHER AFFIANT SAYETH NOT.

*Kermit D. Heaton*

Kermit D. Heaton

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



*Yvonne Garcia*  
Notary Public, State of Texas

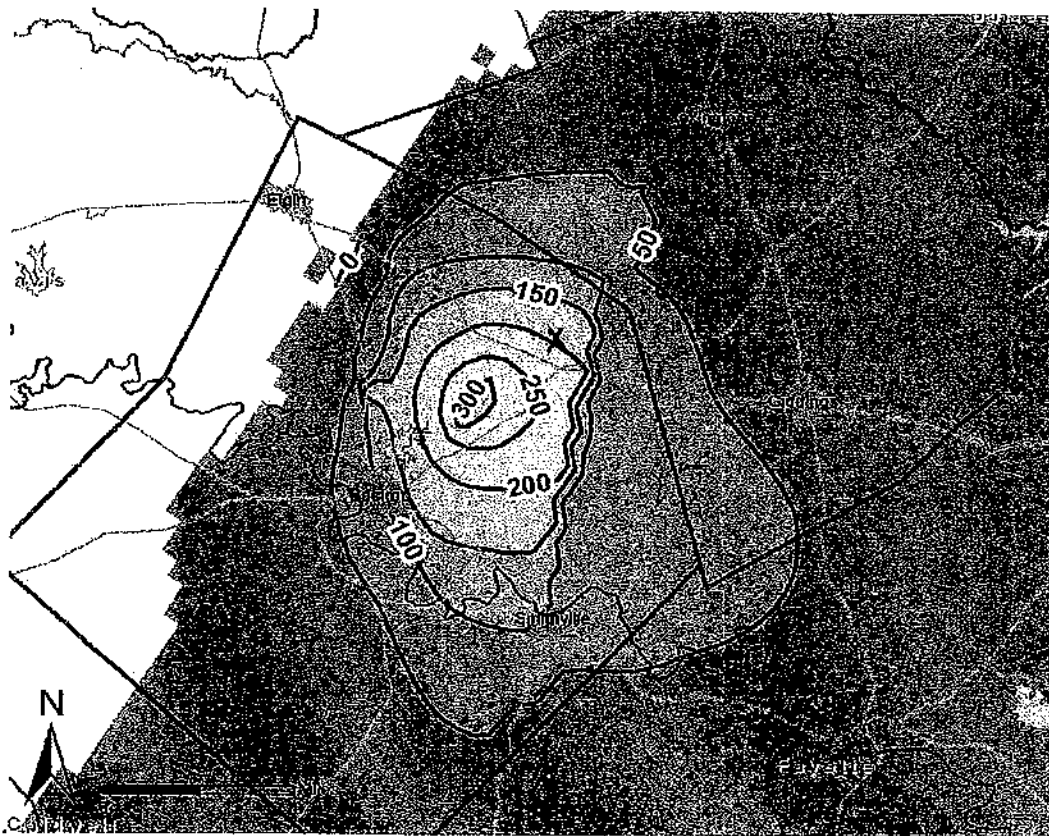
My Commission Expires:

11.27.2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



HEATON PROPERTY

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF JOHN H. RICKE, JR.**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

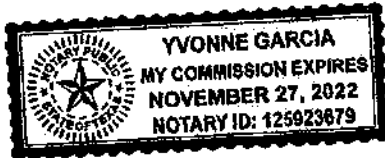
BEFORE ME, the undersigned Notary Public on this day, personally appeared John H. Ricke, Jr., known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is John H. Ricke, Jr. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Carol G. Ricke and I own approximately 68.2000 acres at 246 South Shore Rd., Bastrop, Bastrop County. On that property I own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585490030. That groundwater well is used to supply water for domestic purposes on this property.
3. Based on the location of my property, which I have located approximately on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached as Exhibit A, the pumping proposed by LCRA will cause the indicated drawdown of the Simsboro formation under my property, and drawdowns on other Aquifer formations under my property and at my well.

FURTHER AFFIANT SAYETH NOT.

John H. Ricke, Jr.  
John H. Ricke, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December. 2018



Yvonne Garcia  
Notary Public, State of Texas

My Commission Expires:

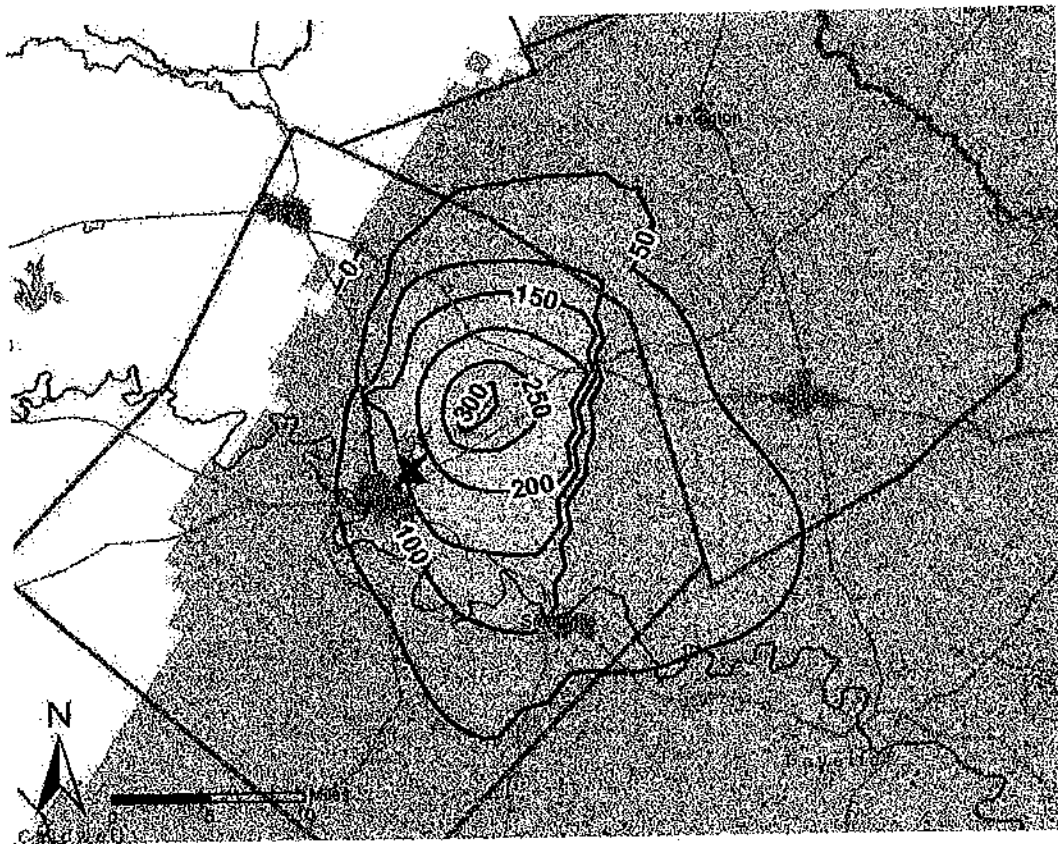
11.27.2022



## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



*RICKES PROPERTY*

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF LEWIS SHARPE III**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Lewis Sharpe III, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

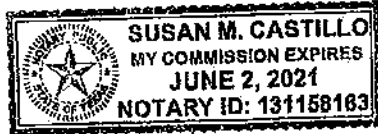
1. My name is Lewis Sharpe III. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Debbie Sharpe and I own approximately 13.052 acres at 224 Pine Valley Drive, Paige, Bastrop County. On that property I own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 5855516. That groundwater well is used to supply water for domestic and livestock purposes on this property. Alum Creek also traverses my property as an intermittent source of water supply for my livestock on this property.
3. Based on the location of my property, which I have located approximately on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached as Exhibit A, the pumping proposed by LCRA will cause: the indicated drawdown of the Simsboro formation under my property; drawdowns on other Aquifer formations under my property and at my well; and negative impacts on the surface water supply on my property, upon which I depend for livestock.

FURTHER AFFIANT SAYETH NOT.

Lewis Sharpe III

Lewis Sharpe III

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December.



Susan M. Castillo

Notary Public, State of Texas

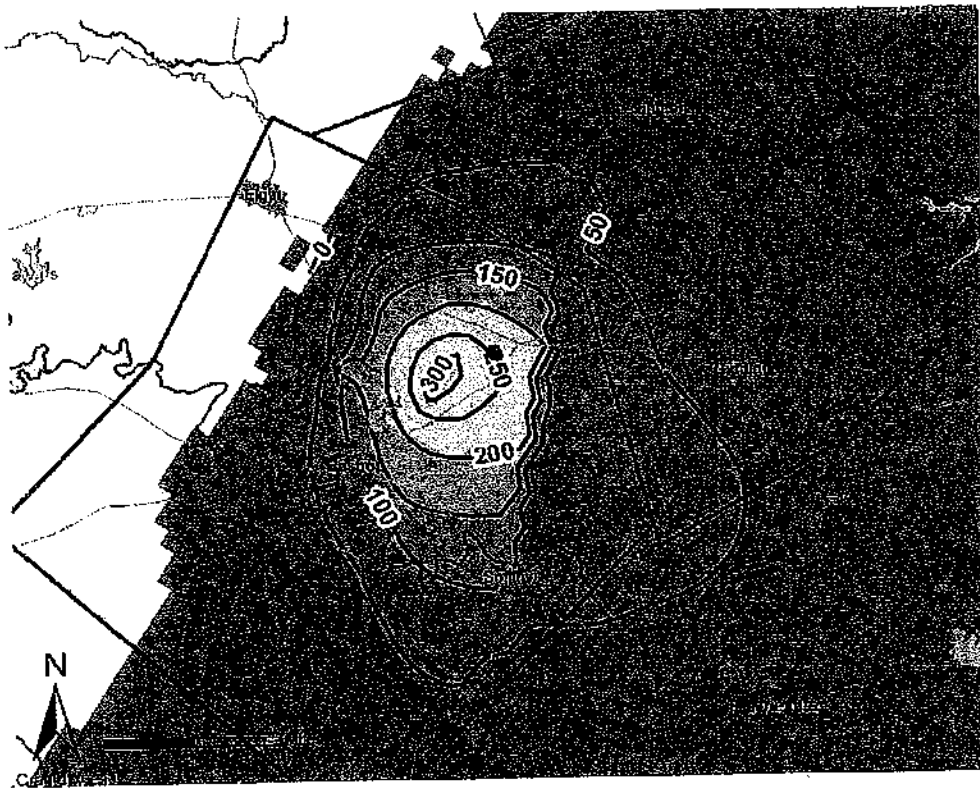
My Commission Expires:

June 2, 2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



• - Indicates Sharpe Well

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

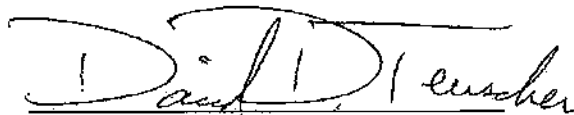
AFFIDAVIT OF DAVID D. TEUSCHER

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared David D. Teuscher, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

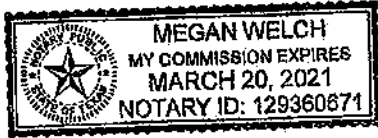
1. My name is David D. Teuscher. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Connie L. Teuscher and I own approximately 93.37 acres at 2291 Hwy. 21E, Paige, Bastrop County. On that property, we also own a groundwater well which I registered with Lost Pines Groundwater Conservation District as Well No. 5855628. The well is used for domestic water supply and for livestock on this property.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property and at our well.

FURTHER AFFIANT SAYETH NOT.



David D. Teuscher

SUBSCRIBED AND SWORN TO BEFORE ME this 13 day of December 2018.



Megan Welch  
Notary Public, State of Texas

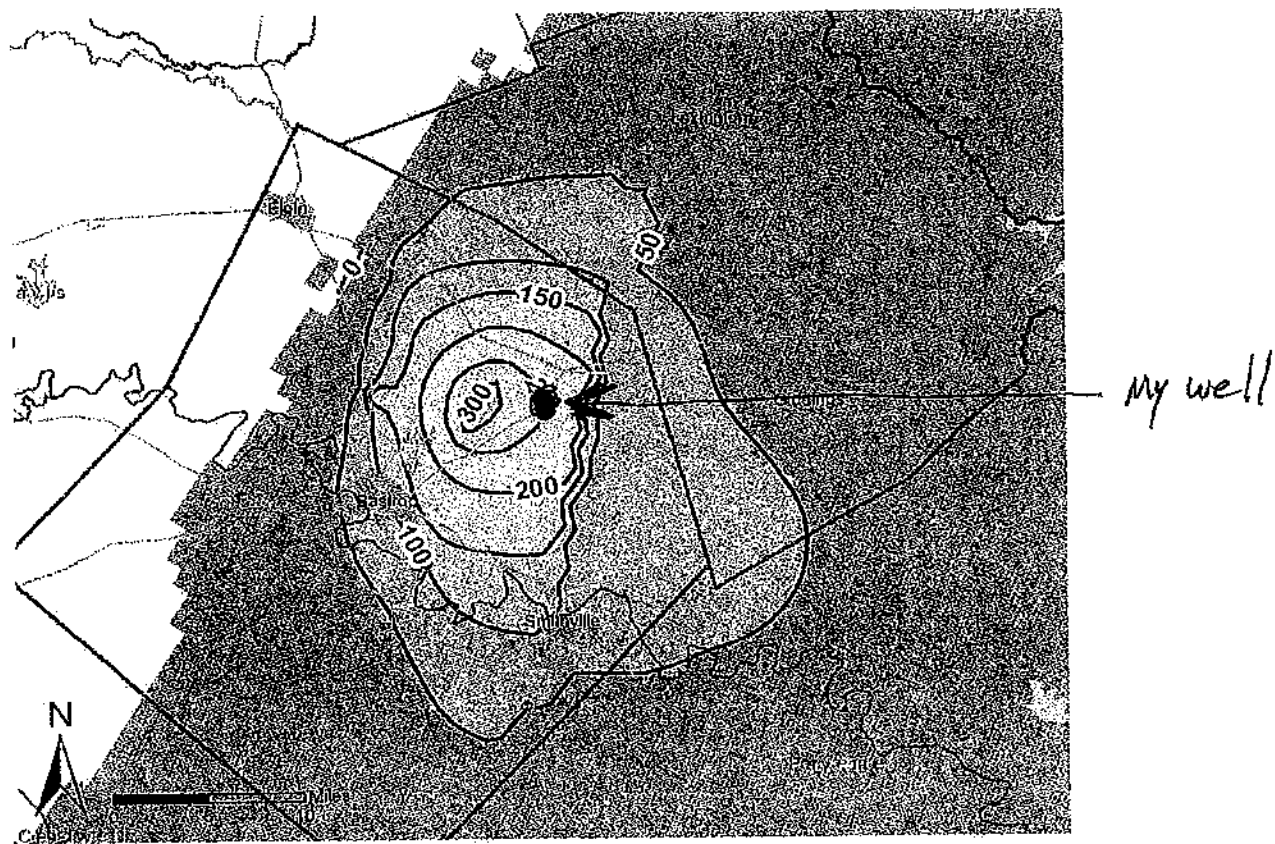
My Commission Expires:

03/20/2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



Attachment for Affidavit of David D. Teuscher  
Lost Pines Groundwater Conservation District registered  
as well # 5855628

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER § BEFORE THE STATE OFFICE  
AUTHORITY FOR OPERATING § OF  
AND TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF ARTHUR NORMAN ARONSEN III

STATE OF TEXAS §  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Arthur Norman Aronsen III, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Arthur Norman Aronsen III. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. Along with the marital community of Hollie R. Denton and John B. Denton, I own an undivided interest in approximately 49.99 acres at 205 Ponderosa Loop in Bastrop, Bastrop County. On that property we jointly own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585550035. The groundwater well is the property's sole source of water.
3. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property, and will cause drawdown in the other Aquifer formations under my property and at my well.

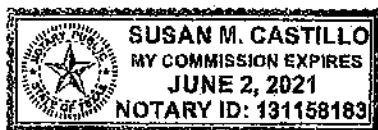
FURTHER AFFIANT SAYETH NOT.

*Arthur Norman Aronsen III*



Norman Arthur Aronsen III

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



Susan M. Castillo  
Notary Public, State of Texas

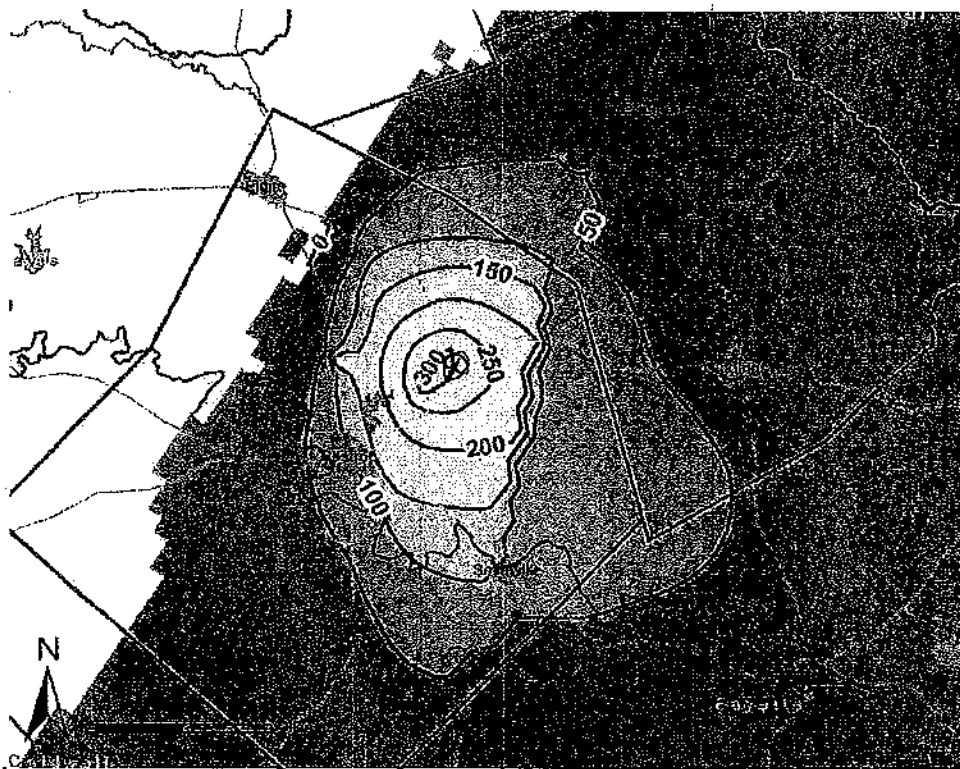
My Commission Expires:

June 2, 2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



ARONSEN-DENTON PROPERTY

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER § BEFORE THE STATE OFFICE  
AUTHORITY FOR OPERATING § OF  
AND TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF HOLLIE R. DENTON

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Hollie R. Denton, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

1. My name is Hollie R. Denton. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. Along with Arthur Norman Aronsen III, my spouse John B. Denton and I own an undivided interest in approximately 49.99 acres at 205 Ponderosa Loop in Bastrop, Bastrop County. On that property we jointly own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585550035. The groundwater well is the property's sole source of water.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property, and will cause drawdown in the other Aquifer formations under our property and at our well.

FURTHER AFFIANT SAYETH NOT.

Hollie R. Denton

Hollie R. Denton

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



Susan M. Castillo  
Notary Public, State of Texas

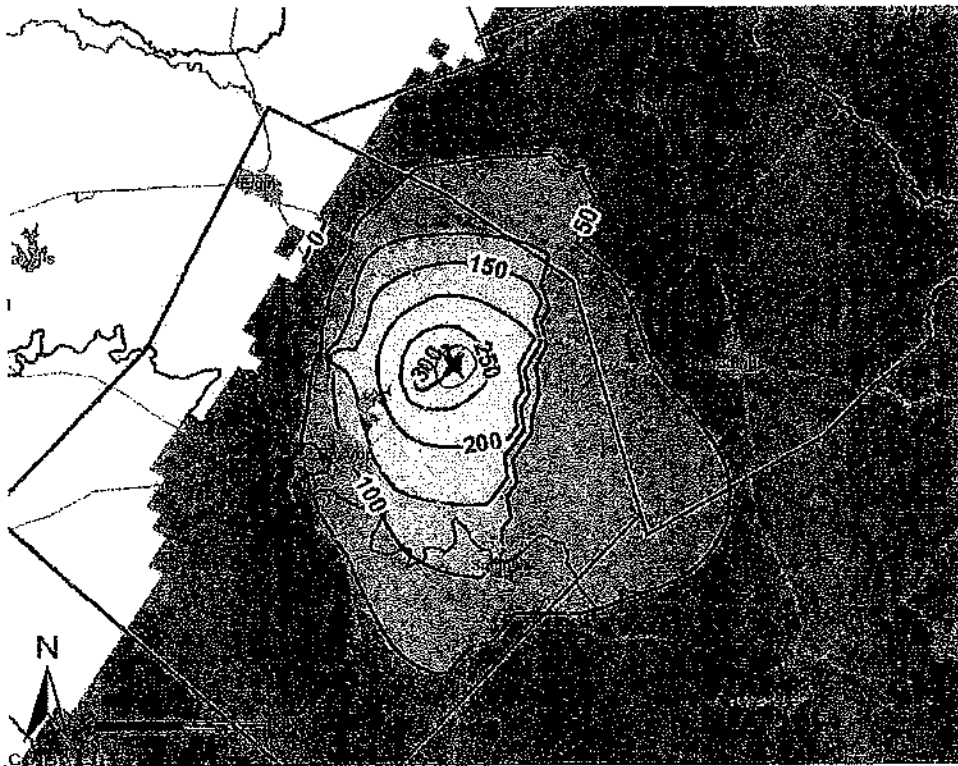
My Commission Expires:

June 2, 2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



DENTON-ARONSEN PROPERTY

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE**  
**COLORADO RIVER AUTHORITY § OF**  
**FOR OPERATING AND § ADMINISTRATIVE HEARINGS**  
**TRANSPORT PERMITS FOR §**  
**EIGHT WELLS IN BASTROP**  
**COUNTY, TEXAS**

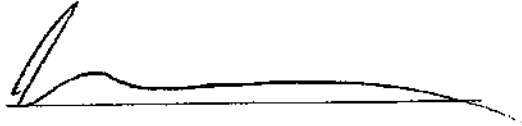
**AFFIDAVIT OF MICHAEL W. HAGERUD**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Michael W. Hagerud, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Michael W. Hagerud. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Tammie Vera Hagerud and I own 9.995 acres at 626 Oak Hill Cemetery Road, Bastrop, Bastrop County. On that property we own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585460017. That groundwater well is used to supply water for domestic water supply and irrigation purposes on this property.
1. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property, and will cause drawdown in the other Aquifer formations under my property and at my well.

FURTHER AFFIANT SAYETH NOT.



Michael W. Hagerud

SUBSCRIBED AND SWORN TO BEFORE ME this \_\_\_\_ day of December 2018.



Susan M. Castillo  
Notary Public, State of Texas

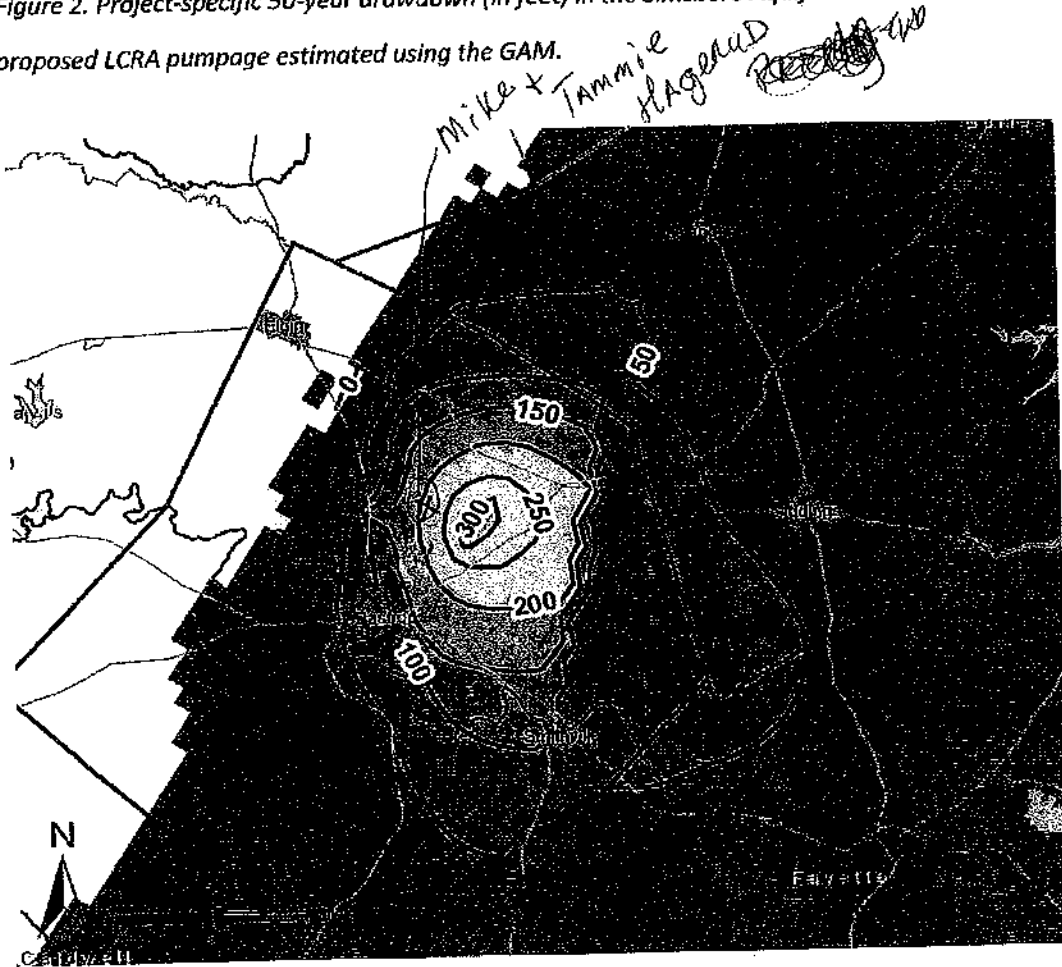
My Commission Expires:

June 2, 2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pine Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



Mike + Tammie Hagerud Property



**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF ANITA KAY LINENBERGER**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Anita Linenberger, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

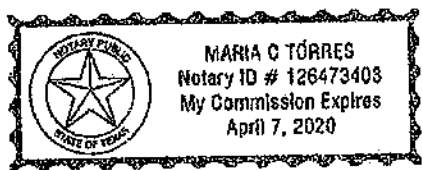
1. My name is Anita Kay Linenberger. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own 1.000 acre at 1014 N. SH 95, Bastrop, Bastrop County, and, with my daughter Aya Linenberger-Lueders as the sole heirs of my spouse and her father, Hubert Linenberger, I own an undivided interest in 106.5460 acres at 1014 SH 95, Bastrop, Bastrop County, an undivided interest in 100.7100 acres at 176 Phelan Road, Bastrop, Bastrop County, and an undivided interest in 90.0210 acres, BCAD Property # 31621, described as A38 HARRIS, ISAAC, ACRES 90.0210, Bastrop, Bastrop County. On those properties, together with the 1.5440 acre property owned 100% by Aya Linenberger-Lueders at 948 N. SH 95, Bastrop, Bastrop County (collectively, "Linenberger Properties"), we jointly own five groundwater wells which are registered with Lost Pines Groundwater Conservation District as Well Nos. 5854540, 5854541, 5854542, 5854543 and 585454. We each depend on those wells as water supply for domestic purposes and for livestock on the Linenberger Properties.
3. Based on the location of the Linenberger Properties, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping

proposed by LCRA will cause a drawdown in the Simsboro formation under the Linenberger Properties and at our Simsboro wells, and will cause drawdown in the other Aquifer formations under the Linenberger Properties and at our other wells.

FURTHER AFFIANT SAYETH NOT.

*Anita Kay Linenberger*  
Anita Kay Linenberger

SUBSCRIBED AND SWORN TO BEFORE ME this 13 day of December 2018.



*Maria C Torres*  
Notary Public, State of Texas

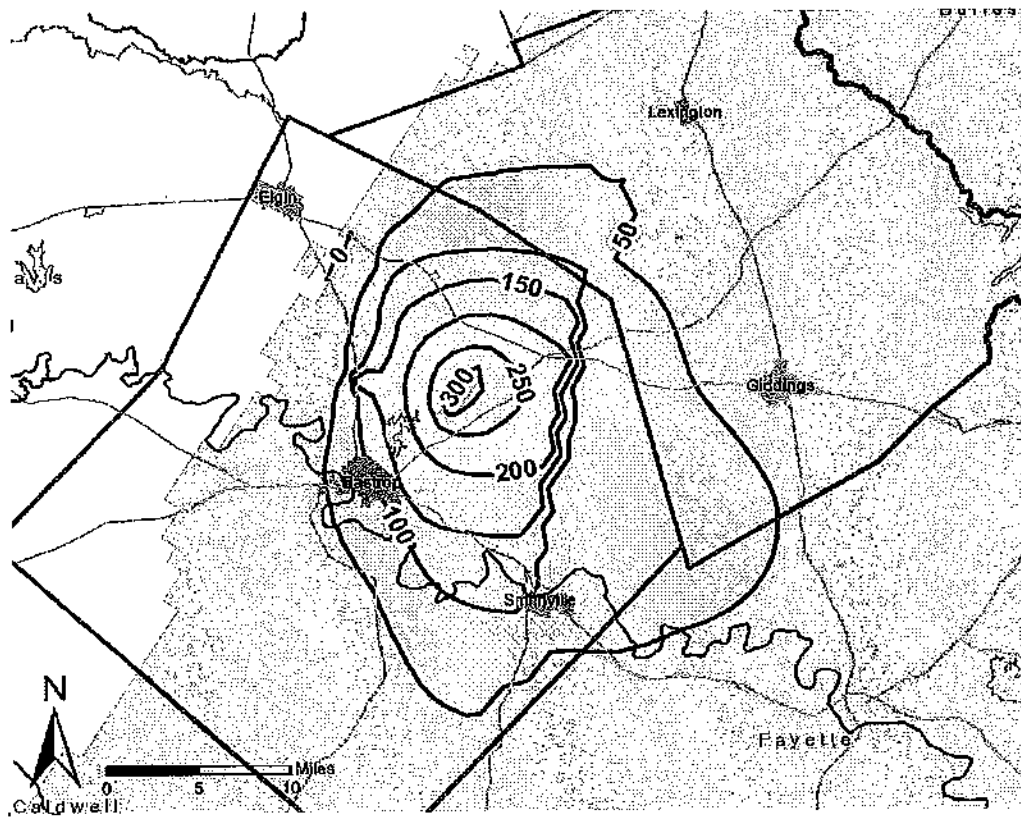
My Commission Expires:

4/7/20

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



# **EXHIBIT** **SIMSBORO AQUIFER WELLS WITHIN 5,000 FEET OF PROPOSED BASTROP WELL NO. 1** (UPDATED MARCH 22, 2015)

WELL OWNER	LATITUDE/LONGITUDE	LATITUDE	LONGITUDE	DEPTH OF FROM BASTROP WELL 1 (Feet)	DEPTH OF WELL	USE	SPECIFIC CONDUCTANCE	SOURCE OF INFORMATION
Lambert	N 30° 10' 10.7" W 97° 19' 4.5"	(Revised) 30.1694	(Revised) -97.31847	4,873	978	Domestic/Livestock	438 µS/cm	TWDB State Well Report #454311 and USGS Report No. 84-033 (1985)
Lambert	N 30° 9' 52.4" W 97° 19' 24.5"	30.1646	-97.3247	2,528	390	Domestic/Livestock	420 µS/cm	TWDB State Well Report #454312 and USGS Report No. 84-033 (1985)
Lambert	N 30° 9' 52.7" W 97° 19' 24.6"	30.1644	-97.3246	2,424	550	Livestock	Not Yet Obtained	USGS Report No. 84-033 (1985)
Lambert	N 30° 10' 10.2" W 97° 19' 4.4"	30.1695	-97.31844	4,910	300	Domestic	Not Yet Obtained	USGS Report No. 84-033 (1985)
Calvin Spencer	N 30° 9' 40.2" W 97° 20' 2.2"	30.1517	-97.34028	3,554	200	Domestic	561 µS/cm	TD from owner field verification of location
Tammy Odum	N 30° 9' 16.4" W 97° 19' 41.5"	30.1545	-97.32819	1,658	220	Domestic	Not Yet Obtained	State of Texas Well Report Tracking # 61460 and field verification
Tammy Odum	N 30° 9' 16" W 97° 19' 43"	30.155	-97.2917	1,521	225	Domestic	564 µS/cm	State of Texas Well Report Tracking # 65589 and field verification
Linda Odum	N 30° 9' 15" W 97° 19' 46.4"	30.1547	-97.32556	1,843	225	Domestic	568 µS/cm	State of Texas Well Report 1300D Registration, and field verification
David Odum	N 30° 9' 11.5" W 97° 19' 48.6"	30.15319	-97.30017	2,239	285	Domestic	557 µS/cm	LP-OD Registration and Driller and field verification
David Odum	N 30° 9' 10.9" W 97° 19' 48.1"	30.15308	-97.30003	2,261	550	Domestic	Not Yet Obtained	TD from Driller and field verification
Williamson	N 30° 10' 2.9" W 97° 19' 0.2"	30.16747	-97.31422	4,753	~600	Domestic	426 µS/cm	TD from owner field verification and USGS Report
Camp	N 30° 9' 50.9" W 97° 20' 7.2"	30.16742	-97.33533	4,769	440	Domestic	532 µS/cm	State of Texas Well Report Tracking # 772268 and field verification
Randall	N 30° 9' 43.1" W 97° 19' 1.4"	30.16197	-97.31706	3,701	358	Domestic	420 µS/cm	State of Texas Well Report and field verification of location
Vince	N 30° 9' 40.1" W 97° 19' 1.89"	30.16174	-97.31717	3,590	~600	Domestic	Not Yet Obtained	TD from owner
McCoy	N 30° 9' 45" W 97° 20' 31"	30.16324	-97.341945	4,572	225	Domestic		State of Texas Well Report Tracking # 11429
Lee Cox	N 30° 9' 13" W 97° 19' 0"	30.15361	-97.31892	3,726	390	Domestic		State of Texas Well Report Tracking # 57402
Pioneer Wellboring	N 30° 9' 10" W 97° 19' 24"	30.15443	-97.32333	2,409	340	Domestic		State of Texas Well Report Tracking # 112514
Gayle Cozart	N 30° 9' 51" W 97° 20' 35"				260	Domestic		State of Texas Well Report Tracking # 159727

Notes:  
 1. TD = Total Depth  
 2. Values include Other: Bluff, Simsboro and Boquer Aquifer Unit  
 3. Dr. Utman refers to his testimony and exhibits.



**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF AYA LINENBERGER-LUEDERS**

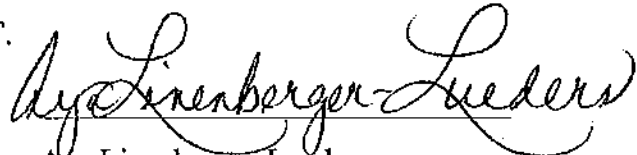
STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Aya Linenberger-Lueders, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:


1. My name is Aya Linenberger-Lueders. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own approximately 1.5440 acres at 948 N. SH 95, Bastrop, Bastrop County, and, with my mother Anita Kay Linenberger as the sole heirs of my spouse and her father, Hubert Linenberger, I own an undivided interest in 106.5460 acres at 1014 SH 95, Bastrop, Bastrop County; an undivided interest in 100.7100 acres at 176 Phelan Road, Bastrop, Bastrop County; and an undivided interest in 90.0210 acres, BCAD Property # 31621, described as A38 HARRIS, ISAAC, ACRES 90.0210, Bastrop, Bastrop County. On those properties, together with the 1.0000 acre property owned 100% by Anita Kay Linenberger at 1014 N. SH 95, Bastrop, Bastrop County (collectively, "Linenberger Properties"), we jointly own five groundwater wells which are registered with Lost Pines Groundwater Conservation District as Well Nos. 5854540, 5854541, 5854542, 5854543 and 585454. We each depend on those wells as water supply for domestic purposes and for livestock on the Linenberger Properties.
3. Based on the location of the Linenberger Properties, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping

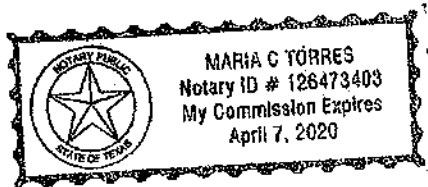
proposed by LCRA will cause a drawdown in the Simsboro formation under the Linenberger Properties and at our Simsboro wells, and will cause drawdown in the other Aquifer formations under the Linenberger Properties and at our other wells.

FURTHER AFFIANT SAYETH NOT.

  
Aya Linenberger-Lueders

SUBSCRIBED AND SWORN TO BEFORE ME this 13 day of December 2018.

  
Notary Public, State of Texas



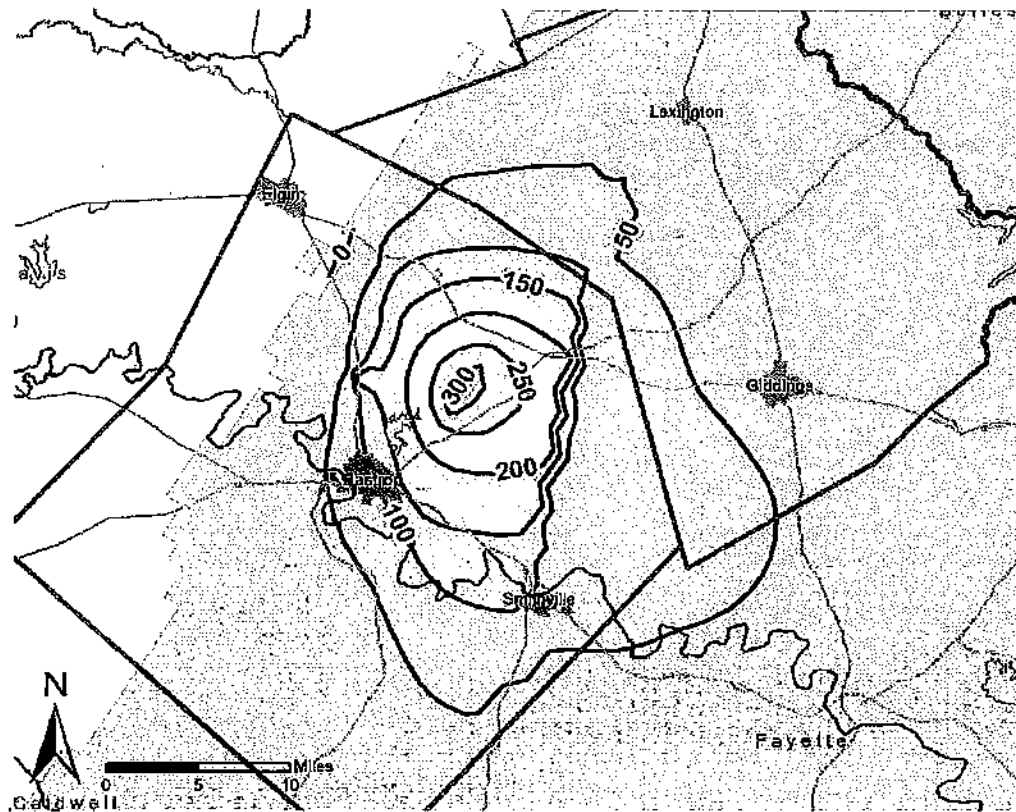
My Commission Expires:

4/7/20

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*





# **EXHIBIT** **SIMSBORO AQUIFER WELLS WITHIN 5,000 FEET OF PROPOSED BASTROP WELL NO. 1**

WELL OWNER	LATITUDE	LONGITUDE	DISTANCE BASTROP WELL-1 (Feet)	DATE OF WELL	USE	SPECIFIC CONDUCTANCE	SOURCE OF INFORMATION
Lambert	N 30° 10' 10.7" W 97° 19' 6.5"	(Observed) 30.1664	4,872	571	Domestic/Livestock	438 µS/cm	TWGS State Well # 854431 and USGS Report No. 84-4332 (1985) Fresh Water
Lambert	N 30° 9' 52.4" W 97° 17' 24.5"	30.16456	2,608	580	Domestic/Livestock	420 µS/cm	TWGS State Well # 854432 and USGS Report No. 84-4332 (1985) Dr. Ullman
Lambert	N 30° 9' 52.7" W 97° 17' 26.6"	30.16464	2,624	520	Livestock	Not Yet Observed	USGS Report No. 84-4333 (1985) and Dr. Ullman
Lambert	N 30° 10' 10.2" W 97° 19' 6.4"	30.1695	4,910	300	Domestic	Not Yet Observed	USGS Report No. 84-4333 (1985) and field verification
Calvin Spencer	N 30° 9' 40.2" W 97° 20' 25"	30.16117	3,864	200	Domestic	381 µS/cm	TD from owner field verification of conductivity
Tommy Odum	N 30° 9' 16.0" W 97° 19' 41.5"	30.15458	1,688	250	Domestic	Not Yet Observed	Status of Texas Well Report Tracking # 61420 and field verification
Tommy Odum	N 30° 9' 18" W 97° 19' 49"	30.155	1,821	235	Domestic	564 µS/cm	Status of Texas Well Report Tracking # 62889 and field verification
Linda Odum	N 30° 9' 15" W 97° 19' 46.4"	30.15417	1,843	255	Domestic	568 µS/cm	Status of Texas Well Report, LFGCD Registration, and field verification
David Odum	N 30° 9' 11.5" W 97° 19' 48.6"	30.15719	2,239	285	Domestic	557 µS/cm	LFGCD Registration and Driller and field verification
David Odum	N 30° 9' 16.0" W 97° 19' 48.1"	30.15303	2,281	559	Domestic	Not Yet Observed	TD from Driller and field verification
Williamson	N 30° 10' 23" W 97° 19' 02"	30.16747	4,768	600	Domestic	416 µS/cm	TD from owner field verification and conductivity
Crump	N 30° 8' 50.0" W 97° 20' 7.2"	30.14747	4,789	440	Domestic	519 µS/cm	Status of Texas Well Report Tracking # 57208 and field verification
Bruders	N 30° 9' 43.1" W 97° 19' 1.4"	30.16491	3,301	581	Domestic	410 µS/cm	Status of Texas Well Report and field verification of location
Yancey	N 30° 9' 40.1" W 97° 19' 1.89"	30.16114	3,320	600	Domestic	Not Yet Observed	TD from owner
McCombs	N 30° 9' 48" W 97° 20' 31"	30.16334	4,572	225	Domestic		Status of Texas Well Report Tracking # 61429
Lee Cox	N 30° 9' 13" W 97° 19' 6"	30.15760	3,726	380	Domestic		Status of Texas Well Report Tracking # 57432
Pioneer Building	N 30° 9' 16" W 97° 19' 24"	30.15445	2,109	240	Calvert Bluff and possible top of Simsboro?		Status of Texas Well Report Tracking # 611584
Chaple Chesser	N 30° 9' 53" W 97° 20' 35"	30.16000	280	200	Calvert Bluff and Simsboro		Status of Texas Well Report Tracking # 159227

Notes:  
1. TD = True Depth  
2. USGS includes Calvert Bluff, Simsboro and Brierley Aquifer Unit  
3. Dr. Ullman refers to its taxonomy and column.



SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

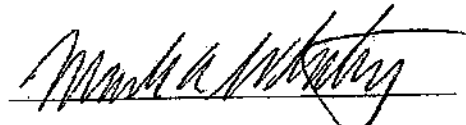
AFFIDAVIT OF MARK A. WHITING

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Mark A. Whiting, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Mark A. Whiting. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Penelope A. Whiting and I own approximately 9.931 acres at 614 Cottletown Road Unit B, Smithville, Bastrop County.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property.

FURTHER AFFIANT SAYETH NOT.

  
Mark A. Whiting

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December.



Lauren Cannon  
Notary Public, State of Texas

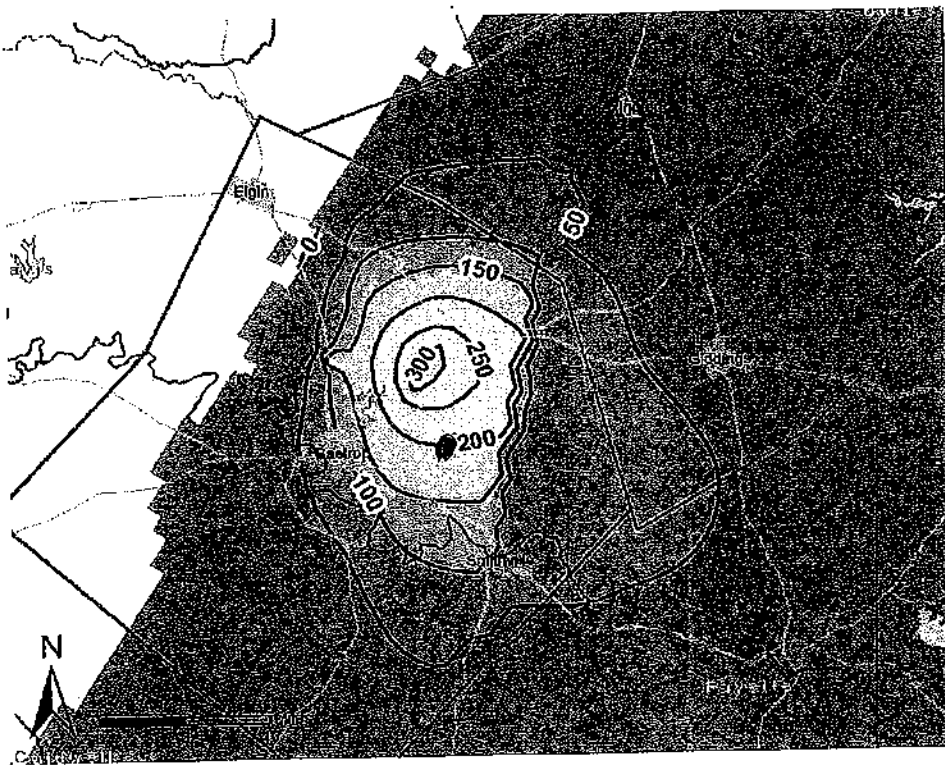
My Commission Expires:

March 1, 2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



614 Cottle town Rd

Mark A. + Penelope A. Whiting

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS**

**AFFIDAVIT OF CHRISTIAN R. ABEE**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Christian R. Abee, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Christian R. Abee. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I am the co-Trustee, along with my spouse Karen Abee, of the Christian R. & Karen Abee Living Trust ("Abee Trust"), and I am authorized to make this affidavit.
3. The Abee Trust owns approximately 99.3640 acres at 172 Railroad Track Road, Paige, Bastrop County. This property is our principal residence. On that property we own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 5855322, which is the sole source of our domestic water supply on this property.
4. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under this property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under this property and at our well.

FURTHER AFFIANT SAYETH NOT.

Christian R. Abee

Christian R. Abee, Trustee for  
Christian R. and Karen Abee Living  
Trust

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



Lauren Cannon  
Notary Public, State of Texas

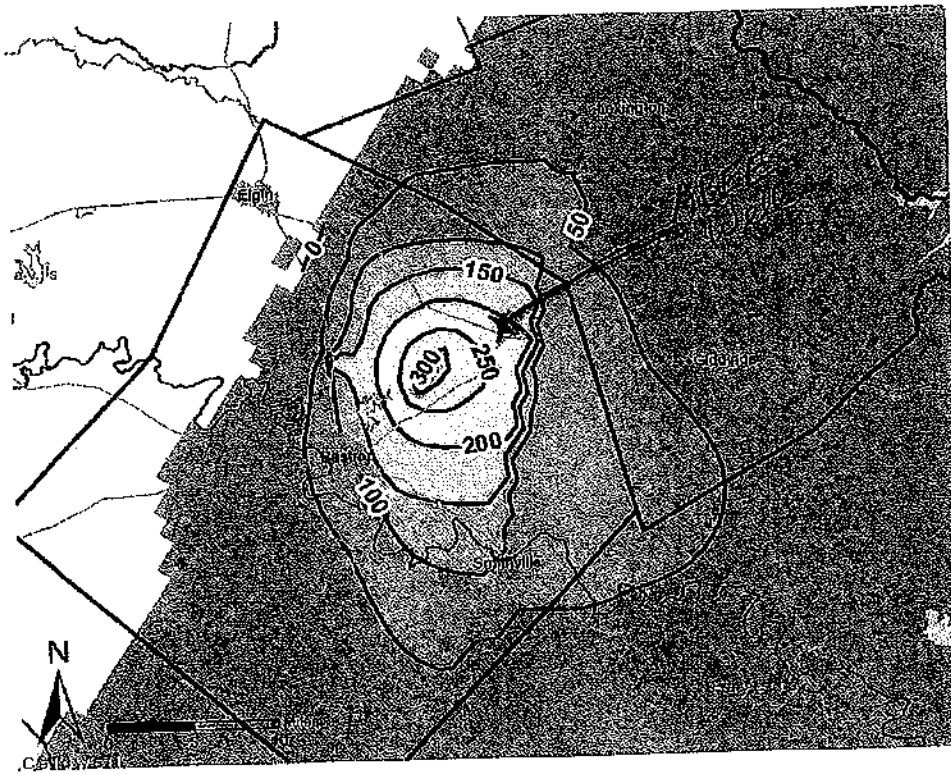
My Commission Expires:

March 1, 2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*





**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF MICHAEL C. MACLEOD**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Michael C. MacLeod, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Michael C. MacLeod. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Lynda A. MacLeod and I own three lots with the physical address of 160 Abbey Lane, Smithville, Bastrop County, and which are comprised of 6.1880 acres, 11.856 acres, and 6.0470 acres, respectively. This property is also our principal residence, the site of our olive orchard and loblolly pine plantings. The 11.856-acre parcel is dedicated to Houston Toad habitat.
3. The well we propose to drill is an integral part of the development plan for our property.
4. Based on the location of our properties, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under those properties, and will cause

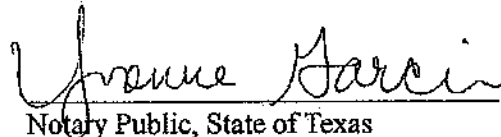
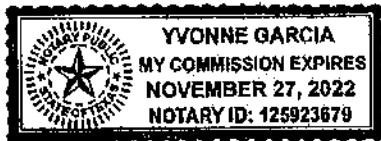
drawdown in the other Aquifer formations under those properties and at any site on the properties on which we would drill a well.

FURTHER AFFLIANT SAYETH NOT.



Michael C. MacLeod

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December 2018.

  
Notary Public, State of Texas

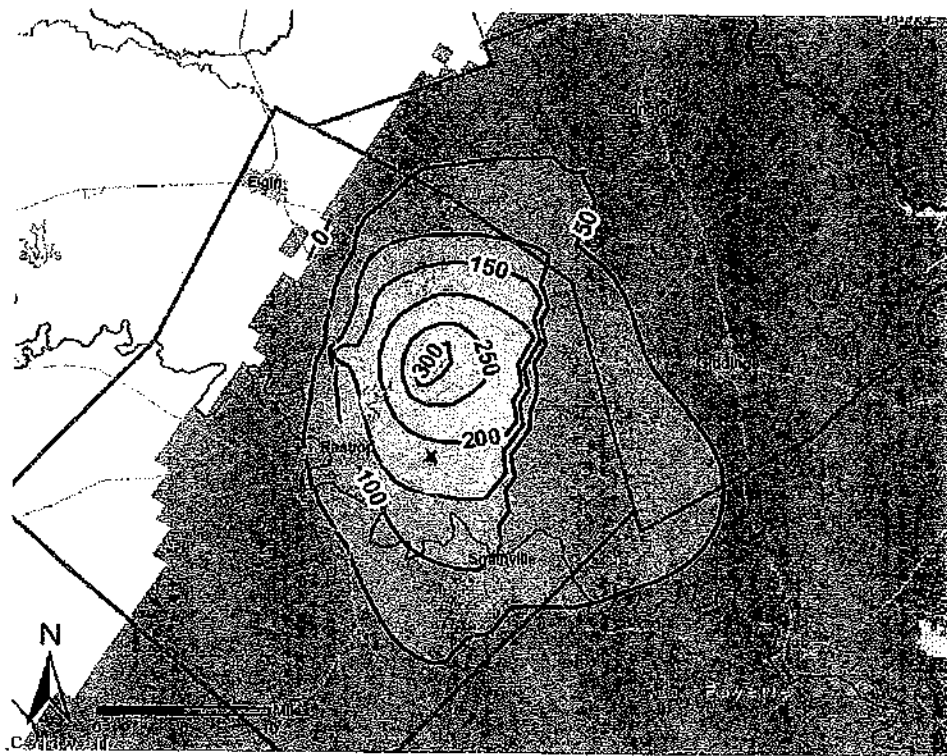
My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



MacLeod Property

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE**  
**COLORADO RIVER AUTHORITY § OF**  
**FOR OPERATING AND § ADMINISTRATIVE HEARINGS**  
**TRANSPORT PERMITS FOR §**  
**EIGHT WELLS IN BASTROP**  
**COUNTY, TEXAS**

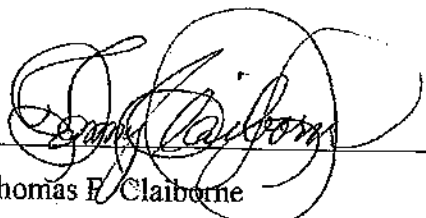
**AFFIDAVIT OF THOMAS F. CLAIBORNE**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

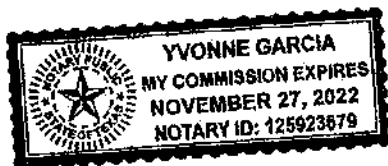
BEFORE ME, the undersigned Notary Public on this day, personally appeared Thomas F. Claiborne, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

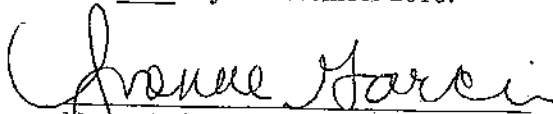
1. My name is Thomas F. Claiborne. I am over eighteen (18) years of age and of sound mind, I am not disqualified from signing this affidavit, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own an undivided interest with Kathryn E. Rogers in approximately 4.29 acres at 159 Winfield Thicket Road, Bastrop, Bastrop County.
3. I also own an undivided interest with my brother Jack D. Claiborne, Jr. in approximately 37.0000 acres and an undivided interest with other family members in approximately 142.5700 acres which together comprise the historic "Claiborne Farm" at 123 Crafts Prairie Road, Bastrop, Bastrop County. The Claiborne Farm has been in continuous operation by the Claiborne family since 1848 and was honored in 2006 by the Texas Department of Agriculture's Family Land Heritage Program, as a farm or ranch in continuous agricultural production by the same family for 100 years or more.
4. Based on the location of my property, which I have located approximately on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause the indicated drawdown of the Simsboro formation under my property and drawdowns of other Aquifer formations under my property.

FURTHER AFFIANT SAYETH NOT.

  
Thomas F. Claiborne

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December 2018.



  
Notary Public, State of Texas

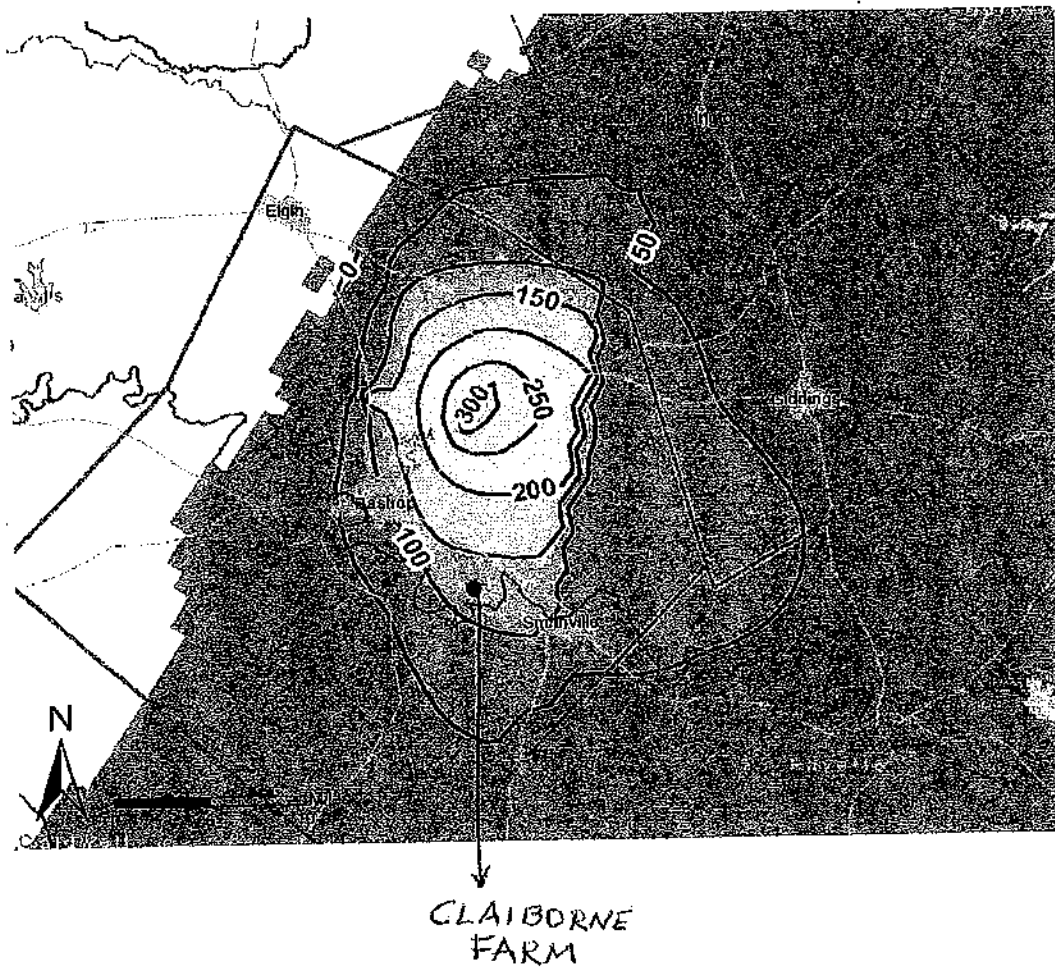
My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF SUSAN K. PARDUE

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Susan K. Pardue, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

1. My name is Susan K. Pardue. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own approximately 7.95 acres in the Circle D Subdivision, Bastrop, Bastrop County, described as Circle D Sec 2, Lot 31, ACRES 7.95, under BCAD R26038. I also own approximately 6.93 acres at 149 Blue Jack Oak Ln., Bastrop, Bastrop County, which is my principal residence (R26094).
3. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my property.

FURTHER AFFIANT SAYETH NOT.



Susan K. Pardue

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December 2018.



Lauren Cannon  
Notary Public, State of Texas

My Commission Expires:

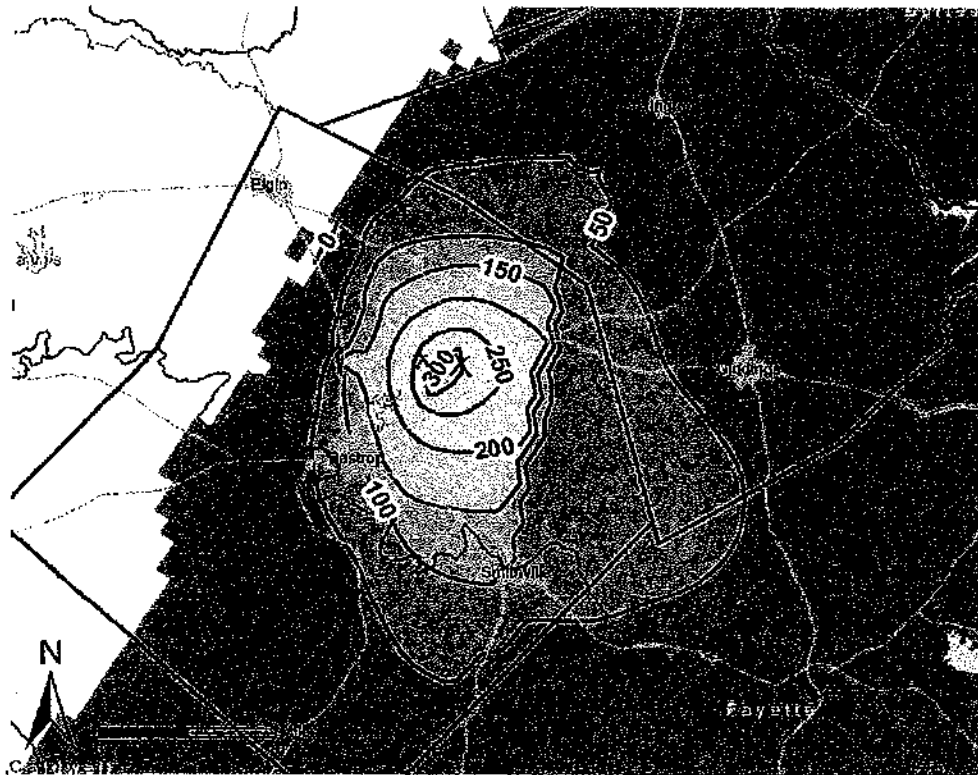
March 1, 2022



## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



Pardue Properties

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

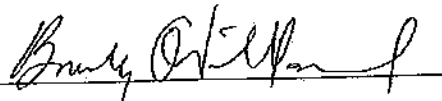
AFFIDAVIT OF BEVERLY A. VILLARREAL

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

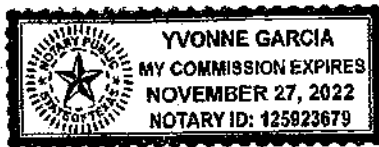
BEFORE ME, the undersigned Notary Public on this day, personally appeared Beverly A. Villarreal, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

1. My name is Beverly A. Villarreal. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse, Felix Villarreal, and I own approximately 4.8240 acres at 138 Oleander, Bastrop, Bastrop County.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property.

FURTHER AFFIANT SAYETH NOT.

  
Beverly A. Villarreal

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



Yvonne Garcia  
Notary Public, State of Texas

My Commission Expires:

11.27.2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



VILLARREAL PROPERTY

D/O = formally dropped out of SAWDF Team  
 N/W = no registered well or no well

✓ Abce Christian R. - non Sims

Abraham	Amir Abraham	Hakkinen	Joseph & Susanne Katrina Hakkinen
Alison	Melinda Alison	Lancaster	Chase Lancaster
✓ Alley	Phil & Debra Alley Non Sims	Leal	Martha Leal
✓ Amable	Steve Amable CB/Sims	Leitch	Scott Leitch left D/O
D/O Anderson	Matt & Patricia Anderson	Linenberger	Lueders Aya Linenberger-Lueders Sims
Arnell	George & Janet Arnell	MacLeod	Mike MacLeod NW
✓ Aronsen	Auther Aronsen non Sims	Marousek	Doug & Dorothy Marousek NW HOA Pt
Ashbrook	Joni Ashbrook	Martin	Chad Martin
Beisman	Cindy Beisman	Martinez	Richard Martinez
Benson	Shawna Benson	Martinez	Esther Martinez NW
Bies	Bree Benson-Bies & Jerry Bies	McDonald	Gordon & Lynn McDonald D/O
✓ Brown	Hugh Brown ES member Sims	McNabb	Danny & Diana McNabb ?? sent aff.
✓ Campbell	Larry & Eileen Campbell non Sims	Nelson	Donna Nelson NW
Castle	Sue Castle non Sims	Nichols	Becky Nichols NW
Chance	Ken Chance	Obst	Kirk & Melody Obst
✓ Christiansen	Sue Christiansen NW	Osborn	Laura Osborn
✓ Claiborne	Tommy Claiborne NW	✓ Pardue	Sue Pardue NW
✓ Cross	Dustin Cross NW	✓ Pavlas	Melanie Pavlas PPLT non Sims
✓ Cook	Phil Cook Sims	Pittman	William Pittman
✓ Cook	Gary Cook	Pullen	Joe Pullen
✓ Cox	Paul Cox NW	✓ Ragan	Suzanne Ragan non-Sims
Crawford	Zachary R Crawford	✓ Ricke	John Ricke non-Sims
David	Gail A David	Robinson	Janette Robinson
Davis	Tiger Davis NW	✓ Rogers	Kathryn Rogers non Sims (Hooper)
Douglas	Dave and Karen Douglas	✓ Schneiderman	Sandi Schneiderman NW (w/cros)
Edwards	Judy Edwards	Schroeder	Cole Schroeder
Eisenburg	Christine Eisenburg	Sepulveda	Sandy Sepulveda
Ellis	Newton & Fran Ellis non Sims	✓ Severn	Greg Severn sent affi ??
✓ Everette	Keith & Judy Everett NW	✓ Sharpe	Lewis Sharpe non Sims
✓ Fleming	Roger Fleming non-Sims	✓ Shaw	Steven Shaw & Sonia Ruiz sent aff ??
Frye	Geraldine Frye	Shivener	Lisa & Randall Shivener
✓ Fuller	Roger Fuller non Sims	Shivers	Nancy Shivers
Garrisi	Wendy J Garrisi	Sims	Jason Sims & Paula Hanks
D/O left Godkin	Bert Godkin Sims	Skabe	Ronda & Frank Skabe
Hakkinen	Joseph & Susanne Katrina Hakkinen	Skye	Catherine Skye
✓ Hagerud	Mike & Tammy Hagerud non Sims	Stokes	Sandra Stokes
✓ Heaton	Kermit Heaton non Sims	Tate James	Alan Tate
D/O left Herms	Herman Herms springs, creeks	Taylor	Benjamin & Mildred Taylor
o rep Hernandez	Elvis & Roxanne Hernandez	✓ Teuscher	David Teuscher Teuscher non Sims
Hewitt	Vicki Hewitt	✓ Tucker	Mark & Faye Tucker sent affi ??
Hilburn	Peggy Jo & Marshall Hilburn	✓ Tuttrup	Maria & Paul Tuttrup NW
Hochman	Johnathan Hochman	Vanoni	Mark & Mary Vanoni disqualified
left Hughes	Maela & Steve Hughes	Vaughan	Jimmie Anne Vaughan
Jensen	JC Jensen	✓ Villareal	Beverly & Felix Villareal NW
Johnson	Shannon Johnson	Walker	James & Kimberly Walker
Kellam	James Kellam	✓ Watson	John Watson non Sims
King	Heather King	Weber	William Weber
King	Pat King	White	Catherine & Charles White IV

✓ Doreen Ann & Ernest / ✓ CIRCLE DHOA NW ✓

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

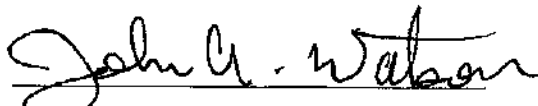
AFFIDAVIT OF JOHN A. WATSON

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

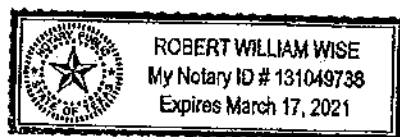
BEFORE ME, the undersigned Notary Public on this day, personally appeared John A. Watson, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

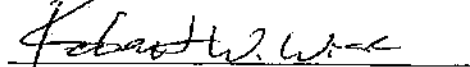
1. My name is John A. Watson. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own property at 420 Oak Hill Cemetery Road, Bastrop, Bastrop County, which property includes 420 Oak Hill Cemetery Road Unit A, Bastrop and is comprised of approximately 86.54 acres. On that property I own a groundwater well, which is registered with Lost Pines Groundwater Conservation District as Well No. 585510012. The groundwater well is the property's sole source of water supply.

FURTHER AFFIANT SAYETH NOT.

  
John A. Watson

SUBSCRIBED AND SWORN TO BEFORE ME this 12 day of December 2018.



  
Notary Public, State of Texas

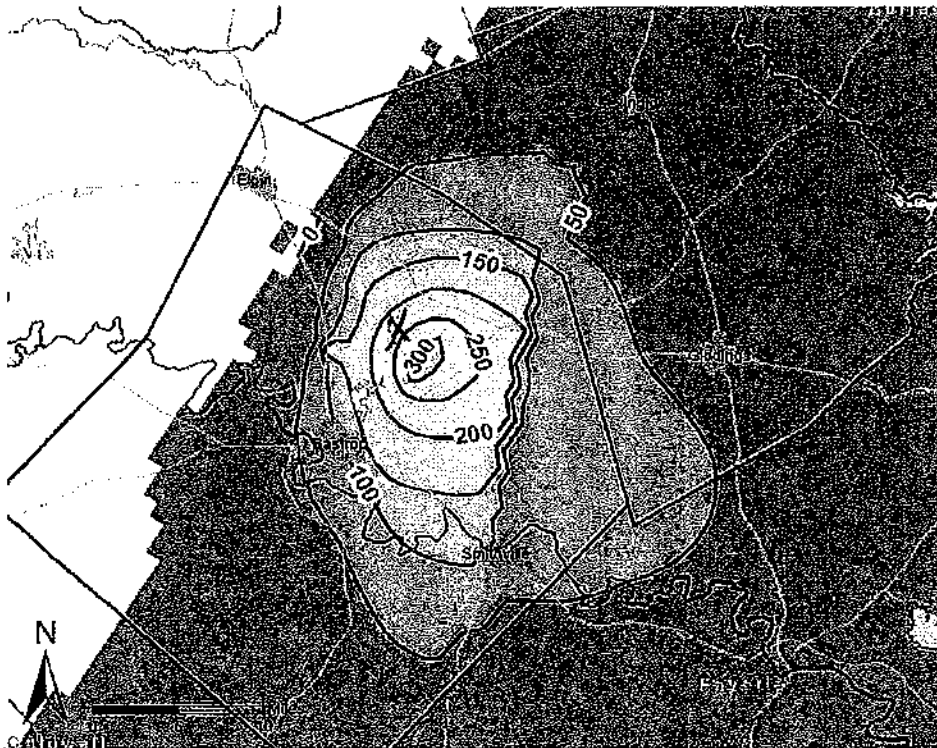
My Commission Expires:

3/17/21

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



John Watson Property

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF DOUG MAROUSEK

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Doug Marousek, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Doug Marousek, also known as Douglas Clinton Marousek. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Dorothy Marousek and I own approximately 5.123 acres at 220 Sage Road, Bastrop, Bastrop County.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property.

FURTHER AFFIANT SAYETH NOT.

Doug Marousek  
Doug Marousek



SUBSCRIBED AND SWORN TO BEFORE ME this 12 day of December.



Cristina Carrillo  
Notary Public, State of Texas

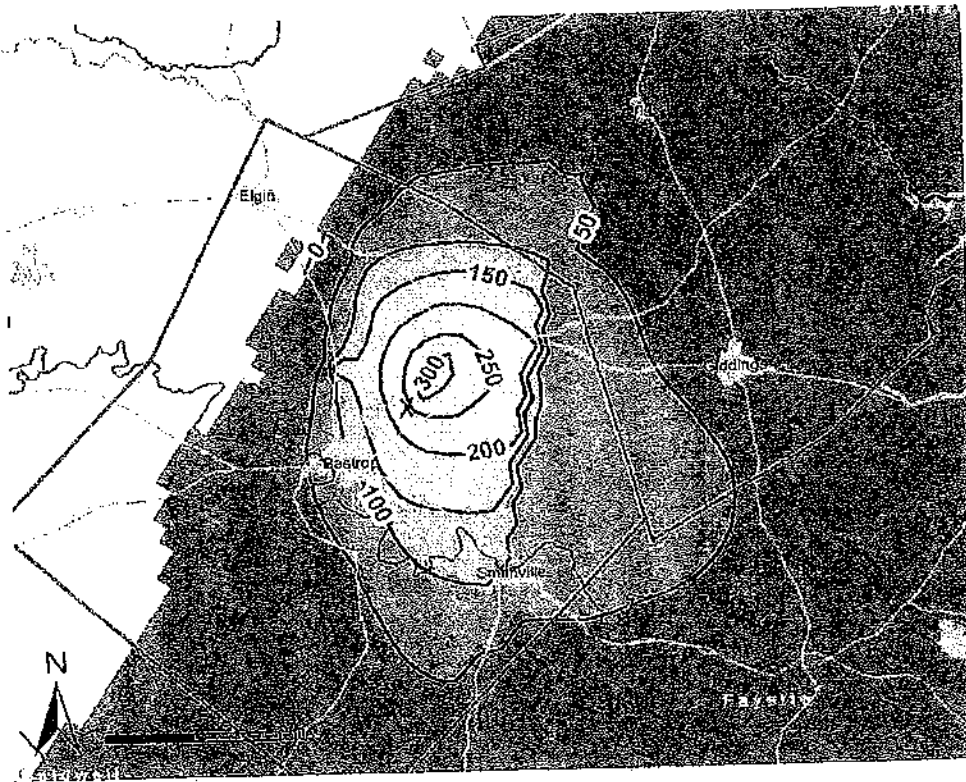
My Commission Expires:

08/28/22

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



x Marousek Property

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

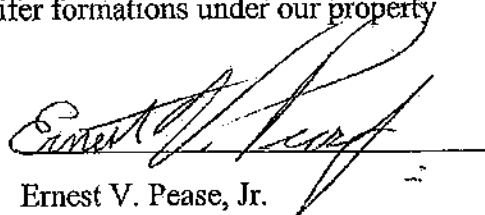
AFFIDAVIT OF ERNEST V. PEASE, JR.

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

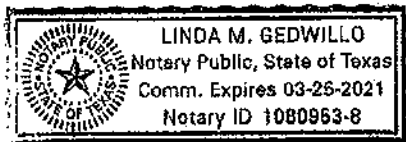
BEFORE ME, the undersigned Notary Public on this day, personally appeared Ernest V. Pease, Jr., known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Ernest V. Pease, Jr. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Carol Pease and I own approximately 1.0700 acres at 125 Mallard Drive, Bastrop, Bastrop County. 125 Mallard Drive is the assigned 911 address for the property; the property is also known as 330 Cardinal Road, Paige, Bastrop, County in the public records.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdowns in the other Aquifer formations under our property

FURTHER AFFIANT SAYETH NOT.

  
Ernest V. Pease, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December.



Linda M. Gedwillo  
Notary Public, State of Texas

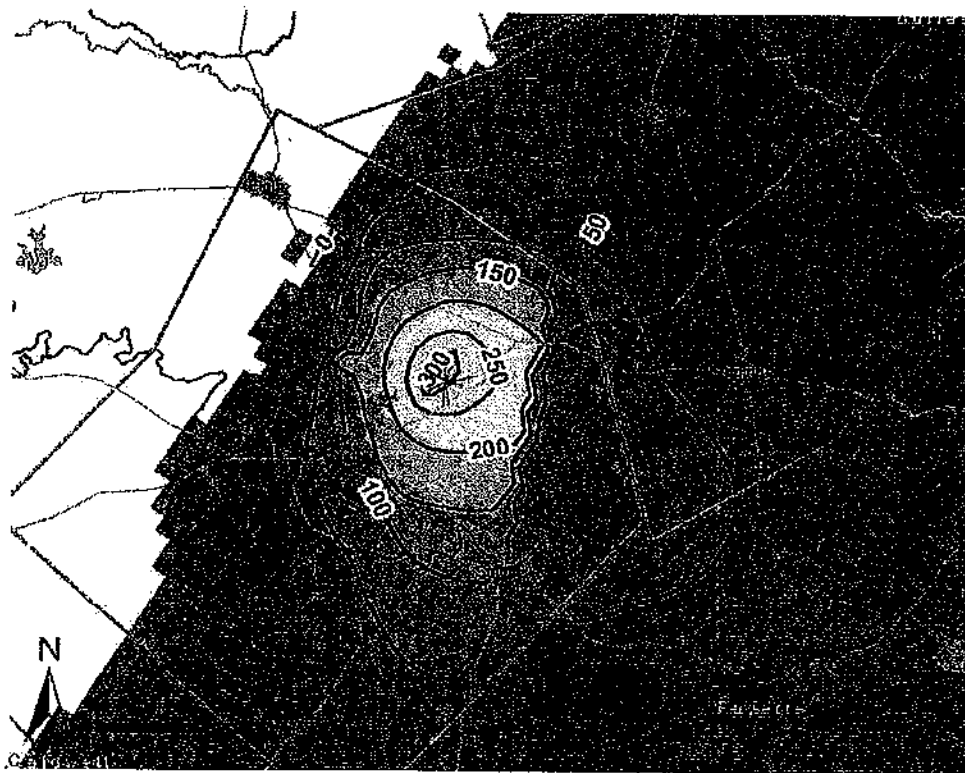
My Commission Expires:

3/26/2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



PEASE PROPERTY

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

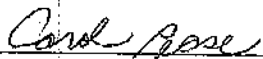
AFFIDAVIT OF CAROL PEASE

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

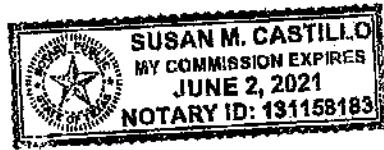
BEFORE ME, the undersigned Notary Public on this day, personally appeared Carol Pease, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

1. My name is Carol Pease. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Ernest V. Pease, Jr. and I own approximately 1.0700 acres at 125 Mallard Drive, Bastrop, Bastrop County. 125 Mallard Drive is the assigned 911 address for the property; the property is also known as 330 Cardinal Road, Paige, Bastrop, County in the public records.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdowns in the other Aquifer formations under our property

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Carol Pease

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December.



Susan M. Castillo  
Notary Public, State of Texas

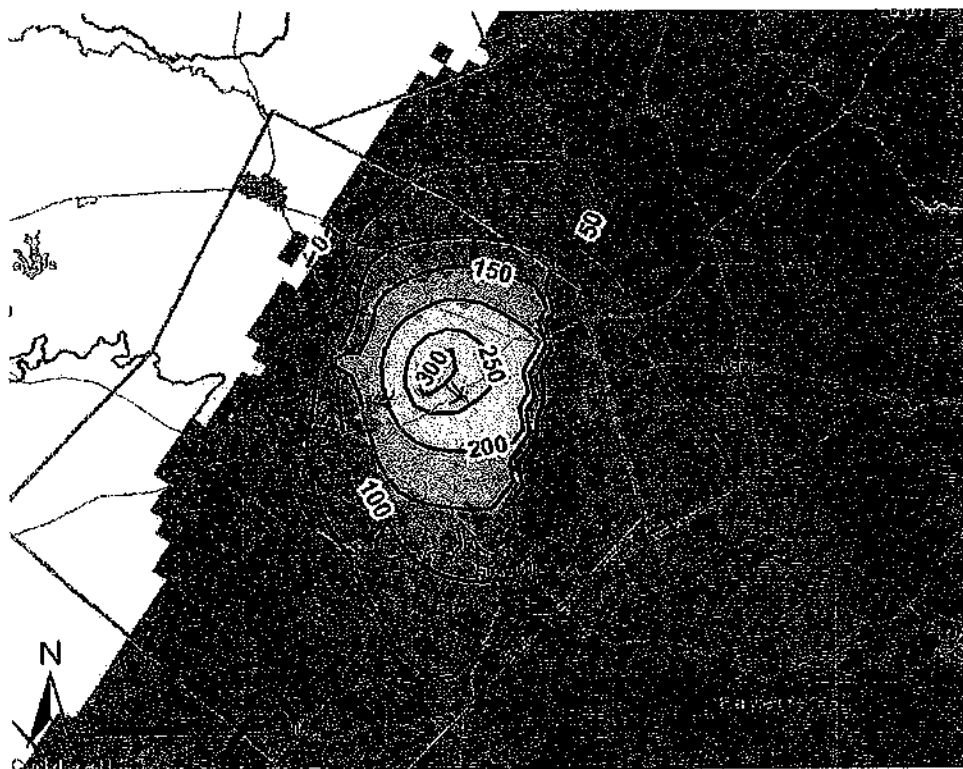
My Commission Expires:

June 2, 2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



PEASE PROPERTY



SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

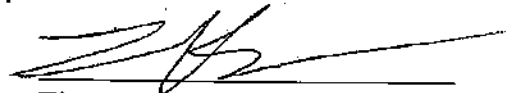
AFFIDAVIT OF TIGER DAVIS

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Tiger Davis, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

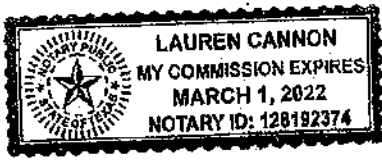
1. My name is Tiger Davis. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own approximately 5.0060 acres at 185 O Grady Road, Smithville, Bastrop County.
3. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property, and will cause drawdown in the other Aquifer formations under my property.

FURTHER AFFIANT SAYETH NOT.

  
Tiger Davis

SUBSCRIBED AND SWORN TO BEFORE ME this 12 day of December.





Lauren Cannon  
Notary Public, State of Texas

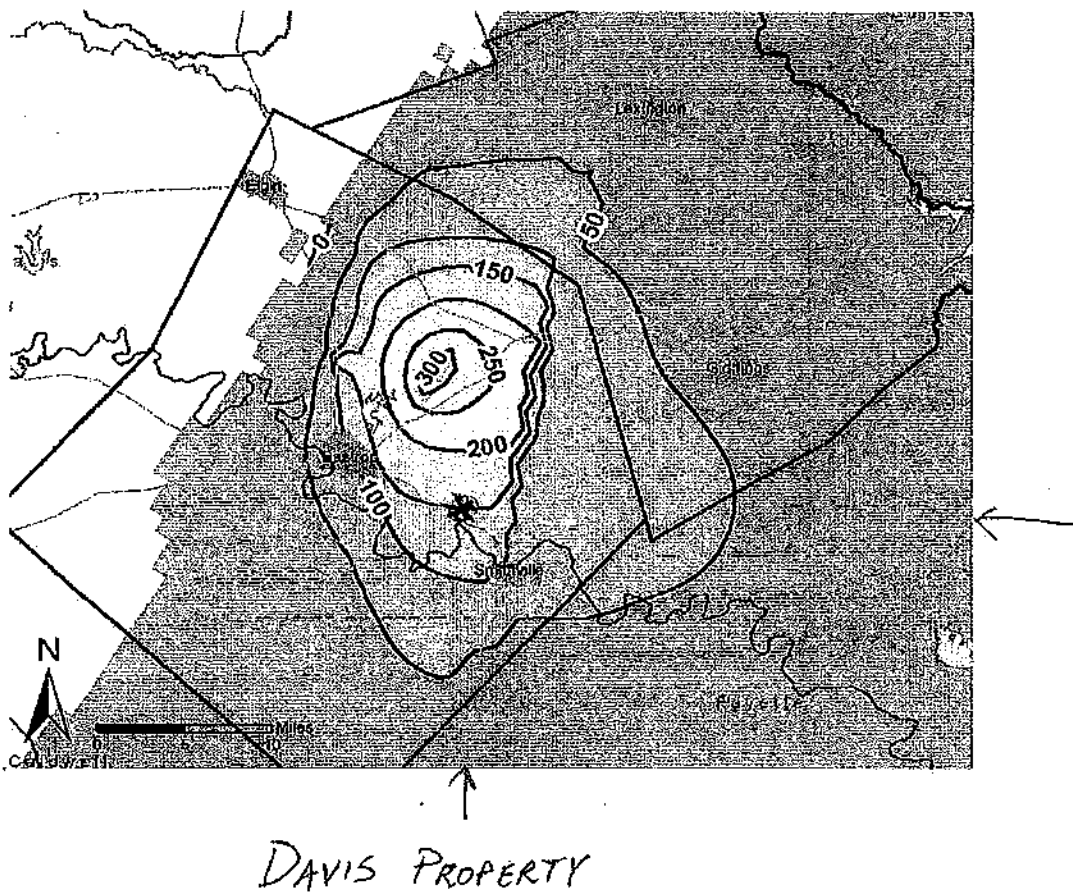
My Commission Expires:

March 1, 2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE**  
**COLORADO RIVER AUTHORITY § OF**  
**FOR OPERATING AND § ADMINISTRATIVE HEARINGS**  
**TRANSPORT PERMITS FOR §**  
**EIGHT WELLS IN BASTROP**  
**COUNTY, TEXAS**

**AFFIDAVIT OF HERMAN R. HERMS**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

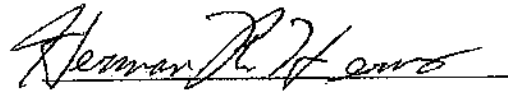
BEFORE ME, the undersigned Notary Public on this day, personally appeared Herman R. Herms, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Herman R. Herms. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Mary K. Herms and I own approximately 11 acres at 323 Old Pin Oak Road, Paige, Bastrop County.
3. We also own property described as A11 BASTROP TOWN TRACT, ACRES 223.8920, BCAD Property ID #26984, which has a common boundary with the Griffith League Scout Ranch and which was described on my protest of the LCRA proposed permit 58-55-4 as "on the west side of the Griffith League Property". We depend on spring-fed ponds (Ponds) on that property and on a wet weather creek ("Creek") which originates on that property and which is an unnamed tributary of a creek known as Spicer Creek. The Ponds and Creek are the sole sources of water supply for livestock on the property.
4. I am the Trustee of the Herman Roy Herms Exempt Lifetime Trust, which owns the property described as A315 Tom, John, ACRES 148.0918, BCAD Property ID #26975, and which property was described on my protest of the LCRA proposed permit

58-55-4 as "on Stockade Ranch Road, Paige". We depend on an all-weather creek as the sole source of water supply for livestock on that property.

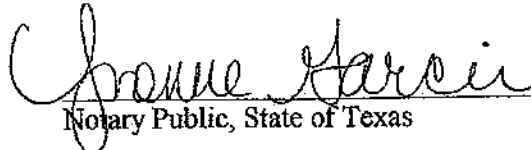
5. Based on the location of my properties, which I have located approximately on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause: the indicated drawdown of the Simsboro formation under my properties; drawdowns on other Aquifer formations under my properties; and negative impacts on the surface water supply described herein on my properties, upon which I depend for my livestock.

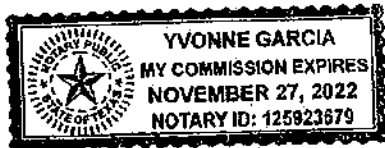
FURTHER AFFIANT SAYETH NOT.



Herman R. Herms

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December, 2018

  
Notary Public, State of Texas



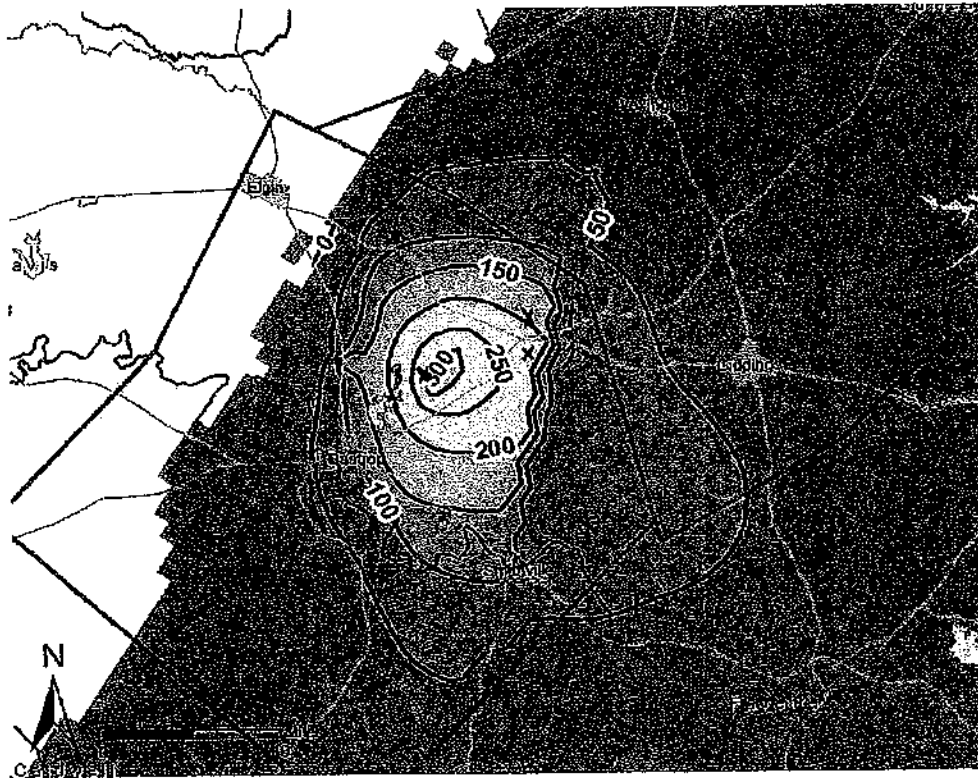
My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



*Hermis Properties*

**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF MELANIE PAVLAS**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Melanie Pavlas, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

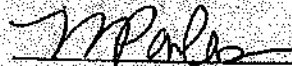
1. My name is Melanie Pavlas. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I hereby affirm that I am the Executive Director and the duly authorized representative of Pines and Prairies Land Trust ("PPLT"), and that I possess the legal authority to make this Affidavit on behalf of myself and the organization for which I am acting.
3. I further affirm that PPLT is a Texas non-profit corporation duly formed in accordance with the laws of the State of Texas and is in good standing. The mission of PPLT is to protect natural and cultural resources and promote sustainable agriculture through education and preservation of open space in Central Texas.
4. PPLT as an organization is not comprised of members who would individually have standing, but it is a unique landowner in that it protects over 1,000 acres of land in south central Texas, promotes sustainable agriculture and resource protection, works with the Natural Resources Conservation Service and Texas Parks and Wildlife Department through the NRCS Environmental Quality Incentives Program and the TPWD Landowner Incentive Program, and engages in projects such as prairie restoration, habitat preservation and restoration, and protection of riparian and upland habitat of the Colorado River.

5. PPLT owns an interest in several properties in Bastrop and Lee counties, which are grouped together for ease of reference herein as the "Billig Ranch", "Colorado River Refuge" ("CRR"), and the "Yegua Knobs Preserve" ("YKP"). These three groups were identified on the PPLT's protest of the Applicant's permit applications, filed with the Lost Pines Groundwater Conservation District on or about September 18, 2018, with the addresses of 208 Billig Lane, Paige, TX; Riverside Drive at Kaala Lane, Bastrop, TX; and 1106 Johnny Baker Road, Lexington, TX, respectively.
6. PPLT owns approximately 677 acres at 208 Billig Lane, Paige, Bastrop County, known as the Billig Ranch, which is being restored by PPLT for sustainable agriculture and wildlife habitat. It is also potential habitat for the Houston Toad. Ongoing restoration projects currently include restoring acreage for Houston Toad as well as for the Monarch butterfly. On that property PPLT owns groundwater wells, two of which are registered with Lost Pines Groundwater Conservation District as Well Nos. 585530029 (PPLT "2") and 585530030 ("PPLT 3"). Those groundwater wells are used as a source of water supply on this property for wildlife management and habitat restoration. There are also several ponds and creeks on the property. PPLT depends on preservation and protection of the property's water resources to achieve its ultimate goal for Billig Ranch as an educational property for the community, to show that sustainable agriculture and resource protection go hand in hand.
7. PPLT's ownership of the CRR includes approximately 65 acres of donated property plus additional lots in the Tahitian Subdivision of Bastrop, Bastrop County, including parcels identified at the Bastrop County Appraisal District as R35141, R35245, R23432, R23464, R34493, R34501, R40327, R40333, R40334, and R33657. The CRR is populated with old-growth riparian habitat as well as Post Oak savannah habitats and meadows, and is managed as a wildlife refuge with access to the Colorado River and over 3 miles of public trails.
8. PPLT owns the approximately 302-acre YKP as an expanse of hills, woods, pastures, rough trail, ponds, spring and a bog north of McDade, Bastrop County, that extends into Lee County. YKP is potential habitat for the critically endangered Houston toad and contains other unique habitats such as the intriguing geology of the knobs, rare plants, a spring, creeks, ponds and a spring fed bog. PPLT has partnered with USFWS and the US Forest Service to conduct habitat restoration on site, and manages the property to protect the property's unique ecosystems and rich cultural resources. PPLT owns a groundwater well on YKP which is registered with Lost Pines Groundwater Conservation District as Well No. 584720024 ("PPLT 1").
9. The groundwater wells on the Billig Ranch and the YKP are used to assist management practices and activities that promote PPLT's mission of protection, preservation and restoration of habitat for both flora and fauna, the conservation and protection of natural resources, and promotion of sustainable agriculture.



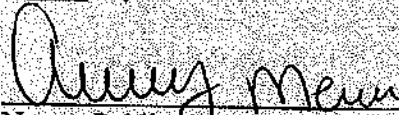
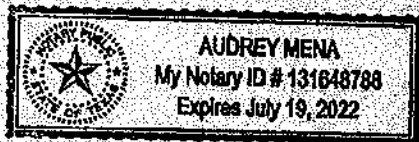
10. Based on the location of the PPLT properties described herein, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under PPLT's properties as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under those properties and at its wells.

FURTHER AFFLIANT SAYETH NOT.



Melanie Pavlas, Executive Director

SUBSCRIBED AND SWORN TO BEFORE ME this 14 day of December 2018.



Notary Public, State of Texas

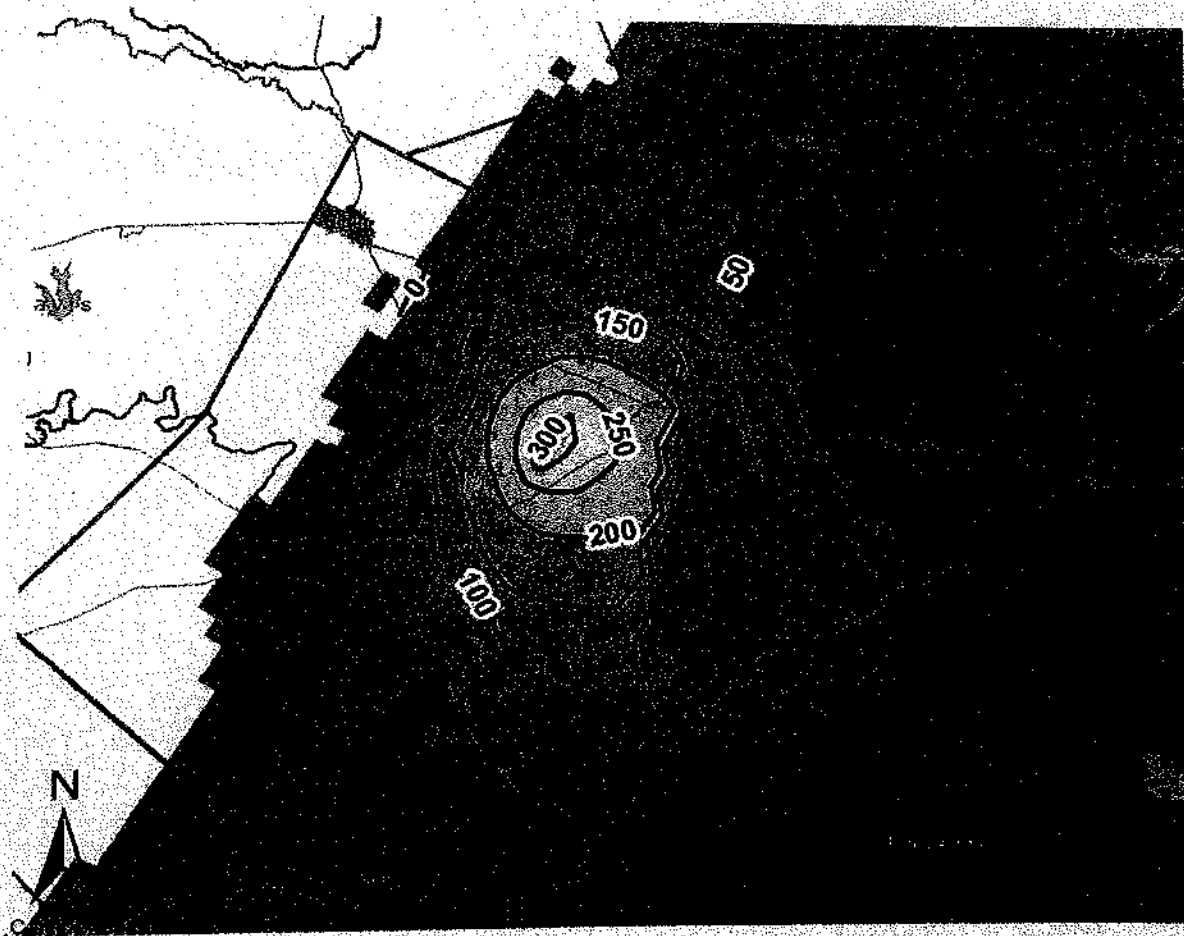
My Commission Expires:

July 19, 2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



X : Pines and Prairies Land Trust Properties

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR §  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF DONNA R. NELSON

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Donna R. Nelson, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

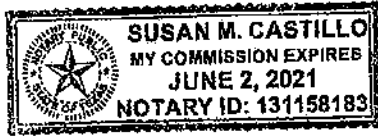
1. My name is Donna R. Nelson. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Eugene S. Nelson and I own approximately 8.2500 acres at 214 Pine Path, Bastrop, Bastrop County.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property.

FURTHER AFFIANT SAYETH NOT.

*Donna R. Nelson*

Donna R. Nelson

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December.



Susan M. Castillo

Notary Public, State of Texas

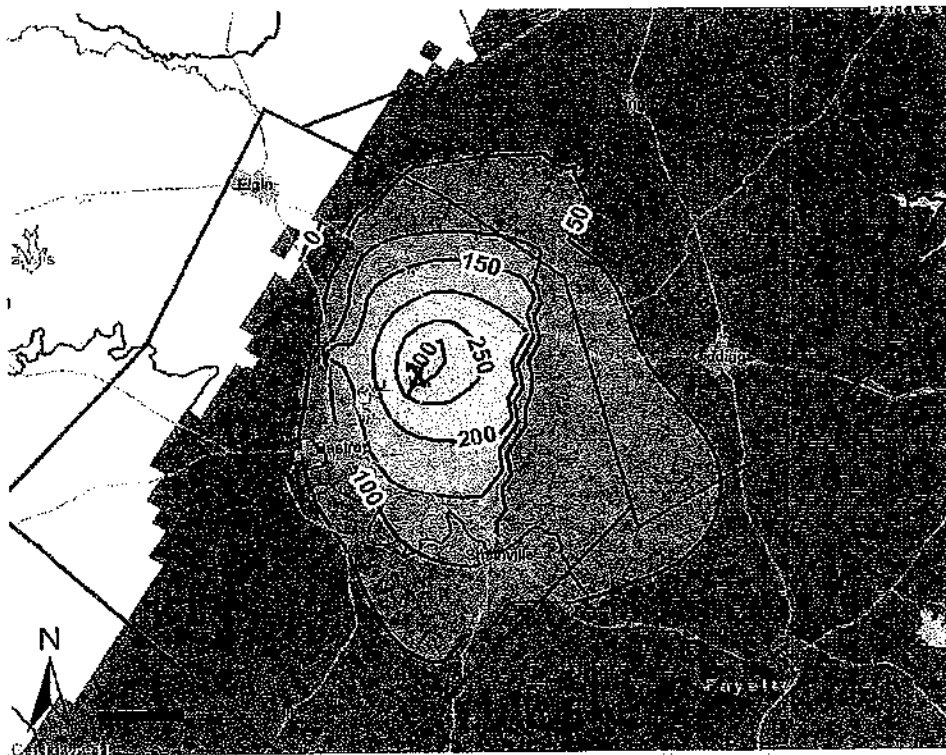
My Commission Expires:

June 2, 2021

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



*Nelson property*

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

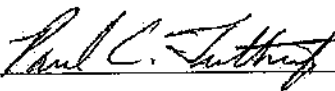
AFFIDAVIT OF PAUL C. TUTTRUP

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Paul C. Tuttrup, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

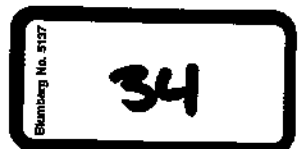
1. My name is Paul C. Tuttrup. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Maria Tuttrup and I own approximately 3.6400 acres at 307 Ponderosa Loop, Paige, Bastrop County.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property.

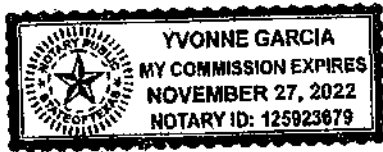
FURTHER AFFIANT SAYETH NOT.



Paul C. Tuttrup

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December 2018.





*Yvonne Garcia*  
\_\_\_\_\_  
Notary Public, State of Texas

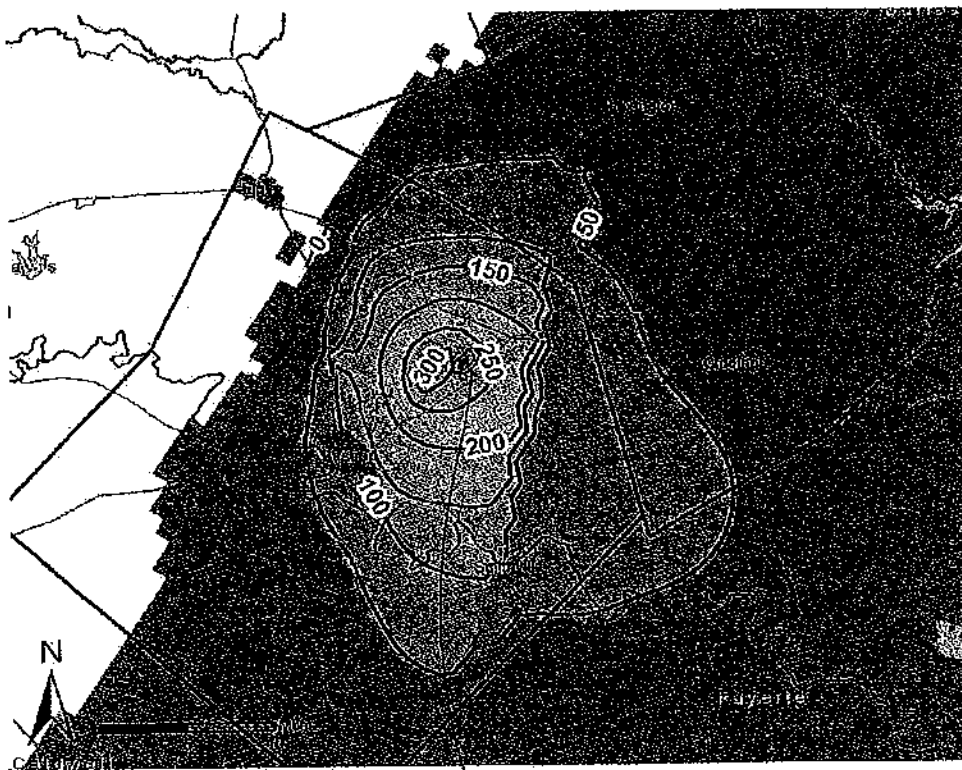
My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



*Tuttrup Property*



**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS**

**AFFIDAVIT OF BERT ALLAN GODKIN**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Bert Allan Godkin, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

- My name is Bert Allan Godkin. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
- I own an undivided interest in approximately 12.800 acres at 1193 Shiloh Road, Cedar Creek, Bastrop County, and I own the entirety of the dwelling on that property. I own part interest in a groundwater well located at 1193 Shiloh Road registered with the Lost Pines Groundwater Conservation District as Well No. 5861220, which is used for domestic purposes.
- I also own 1.9990 acres of property adjoining 1193 Shiloh Road.
- Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my properties and at my well, as depicted on Exhibit A, and will cause

drawdown in the other Aquifer formations under my properties.

FURTHER AFFIANT SAYETH NOT.

Bert Allan Godkin

Bert Allan Godkin

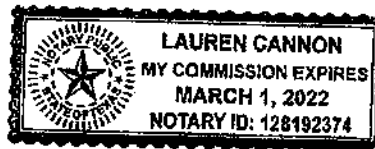
SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December.

Lauren Cannon

Notary Public, State of Texas

My commission expires:

March 1, 2022



**SOAH DOCKET NO. 952-19-0705**

**APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS**

**AFFIDAVIT OF JEANNIE JESSUP**

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Jeannie Jessup, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

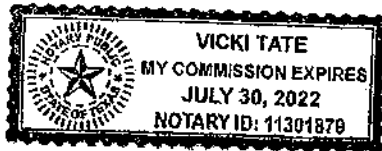
1. My name is Jeannie Jessup. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I hereby affirm that I am the Vice President and the duly authorized representative of the Circle D Civic Association, also known as the Circle D Home Owners Association (collectively, "Circle D HOA"), and that I possess the legal authority to make this Affidavit on behalf of myself and the organization for which I am acting.
3. The Circle D HOA Request for Contested Case Hearing ("Request") in this proceeding is attached hereto as Exhibit A and incorporated herein by reference. The Request describes in detail the approximately 53.886 property at 926 FM 1441, Bastrop, Bastrop County owned by the Circle D HOA and which is referred to in the Request as the "HOA Property". The HOA Property is a park with surface water features comprised by a lake of significant size. The lake is integral to the amenities of the Circle D Subdivision. At least part of the lake's source of water supply is a creek known as "Spicer Creek", which flows into the HOA lake.
4. Based on the location of the HOA Property, which I have located approximately on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit B, the pumping proposed by LCRA

will cause: the indicated drawdown of the Simsboro formation under the HOA Property; drawdowns on other Aquifer formations under the HOA Property; and negative impacts on the Circle D HOA's lake described herein and the water supply that lake depends on, including the creek known as Spicer Creek.

5. FURTHER AFFIANT SAYETH NOT.

Jeannie Jessup  
Jeannie Jessup

SUBSCRIBED AND SWORN TO BEFORE ME this 14<sup>th</sup> day of December 2018.



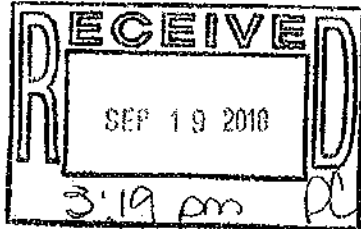
Vicki Tate  
Notary Public, State of Texas

My Commission Expires:

7-30-22

# EXHIBIT "A"

CIRCLE D CIVIC ASSOCIATION  
PO BOX 852  
BASTROP, TX 78602



Doug Marousek  
President

Jeannie Jessup  
Vice President  
Cell: 512.774.7818

September 19, 2018

Jim Totten  
General Manager  
Lost Pines Groundwater Conservation District

Re: Request for Contested Case Hearing Re Application of Lower Colorado River Authority (LCRA) for Eight Operating and Transport Permits in Bastrop County, Texas (Well Nos. 58-55-5-0032; 58-55-5-0033; 58-55-4-0016; 58-55-4-0017; 58-55-4-0019; 58-55-4-0020; and 58-55-4-0021). PERMIT NUMBER #58-55-4.

Dear Mr. Totten:

On behalf of Circle D Civic Association, aka Circle D Home Owners Association or Circle D HOA (collectively, "Circle D HOA"), we are submitting this request for a contested case hearing/party status regarding the above-referenced application ("Application"). We are the President and Vice President, respectively, of the Circle D HOA and either or both of us is authorized to make this request and be the official contact person. For your convenience, we have included Ms. Jessup's phone number as the contact number for the District.

The Information presented in this Request is true to the best of our belief, in reliance on public and other records of the Association. We specifically reserve the

right to modify or amplify any of this information in future to make it more accurate or complete.

It should be noted that this request is made by the Circle D HOA on its own behalf as the owner of real property in Bastrop County, and not on behalf of its membership generally, any specific member of the Circle D HOA, any specific resident of Circle D Subdivision or any other person.

The Circle D HOA seeks to contest the Application in its own right, because of the impacts on real property and surface water it owns in Bastrop County, described below ("HOA Property"), which is in close proximity to the property known as the "Griffith League Scout Ranch" ("Ranch"), and more specifically to the proposed LCRA well field on the Ranch, due to the fact of the wellfield's location just off the property line of the Circle D subdivision and within approximately one mile of the HOA Property itself. Specifically, LCRA's proposed permit will result in unreasonable drawdowns in aquifers located below the HOA Property, will have unreasonable adverse impacts on groundwater below the HOA Property and on the surface water resource located on the HOA Property.

Circle D HOA owns the property referred to herein as the HOA Property, which is located at 926 FM 1441 BASTROP, TX 78602, the legal description of which, based on records of the Bastrop County Appraisal District ("BCAD"), is CIRCLE D SEC 6, LOT RESERVE A, ACRES 53.886. The property ID# and Geographic ID of the property at BCAD is 28648 and R28648, respectively. The Neighborhood CD of the property at BCAD is NBHD0306. The BCAD reflects ownership of the property as 100% vested in the Circle D Civic Association.

This property is classified by BCAD as a "Park" and is used by the Circle D Community as a park with a surface water feature. The lake comprises a significant and integral part of the 53+ acres. The parkland and lake are focal points of the subdivision, both physically and aesthetically, and as such are two of the most important community amenities of the subdivision. The Circle D HOA has continuously maintained this property because of its importance to the Circle D community at large.

The Circle D HOA did not commission but is aware of studies conducted by a reputable hydrologist, using the state-approved Groundwater Availability Model, that demonstrates that LCRA pumping on the Ranch will have unreasonable impacts on the Simsboro formation, as well as other formations to which the Simsboro is connected in the Carrizo-Wilcox Aquifer. Drawdowns in formations of the Aquifer through LCRA pumping is believed by the Circle D HOA to be an unreasonable impact on the HOA Property and the Circle D HOA's private property rights, including its land, groundwater and surface water resources. Bottom line, the proposed pumping by LCRA is inconsistent with the sustainability of natural resources, specifically groundwater, and the Circle D HOA's lake.

As a landowner, Circle D HOA has a vested property right in the groundwater below its HOA Property and should be allowed to protect that property right, and the HOA Property to which it relates, as a part of the permitting process for the proposed LCRA Project. We specifically request a contested case be instituted and that the Circle D Civic Association be admitted as a party in any contested case that is instituted with respect to PERMIT NUMBER #58-55-4, comprising 8 operating and transport permits referenced above.

Please let us know any questions or comments, and please acknowledge receipt of this Request by stamping and returning to us a copy "Received" on the date of this letter or such later date as the Request is actually received by the District. We agree that return of the copy received may be accomplished by hand delivery of same back to any person who hand delivers our Request to you; otherwise we would appreciate receiving a copy by return mail.

Sincerely,

*Jeannie Jessup*

Jeannie Jessup, Vice President, on  
behalf of Circle D Civic Association,  
and for Doug Marousek, President

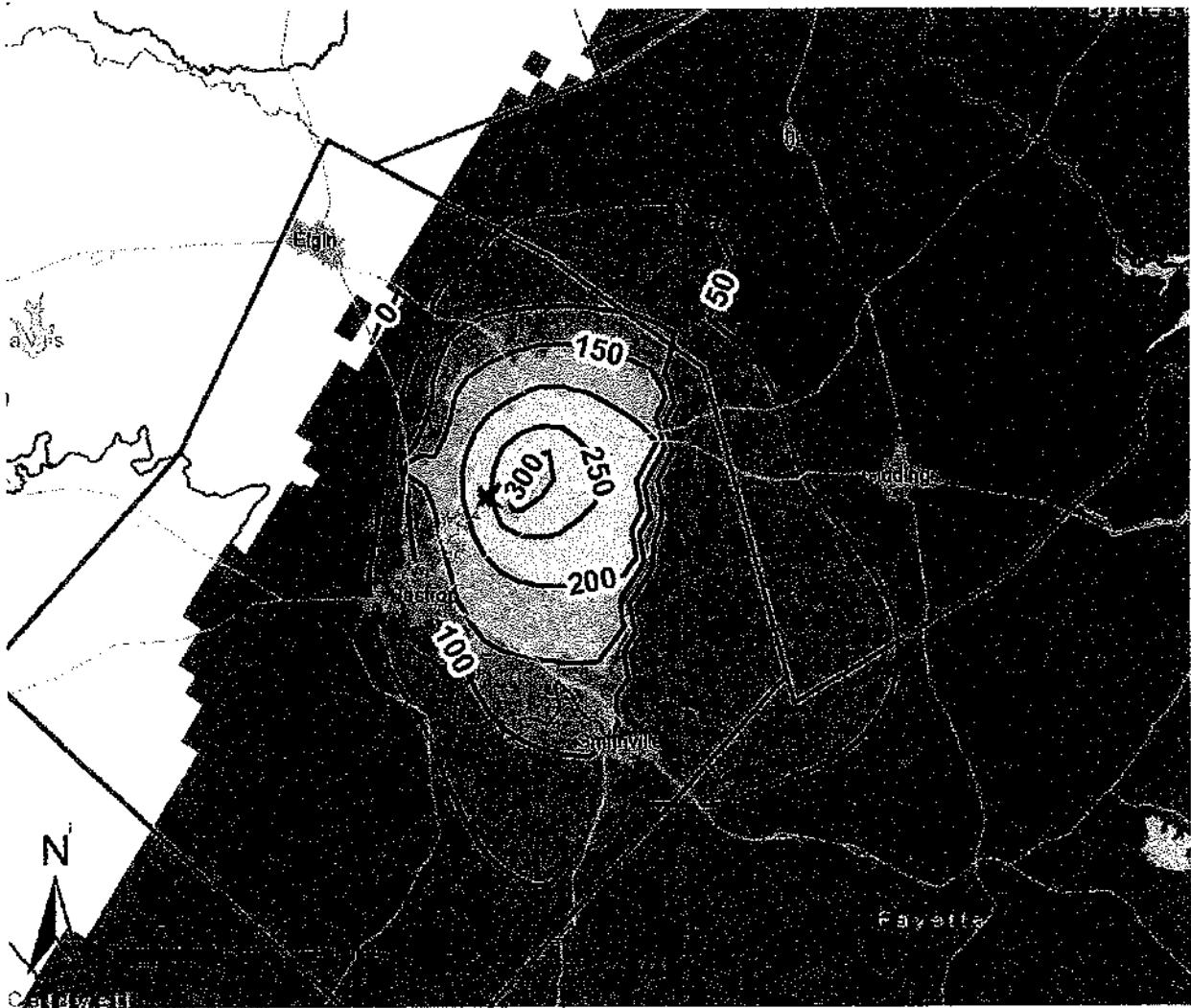
Delivered by email 9.19.2018



## EXHIBIT B TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



Circle D HOA Community Park + Lake

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS

AFFIDAVIT OF SANDI SCHNEIDERMAN

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Sandi Schneiderman, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

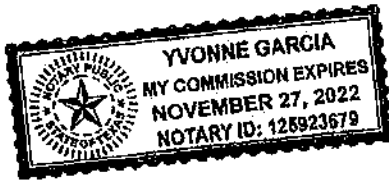
1. My name is Sandi Schneiderman. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Dustin Cross and I own approximately 2.041 acres at 134 Crenshaw Lane, Bastrop, Bastrop County, as our principal residence.
3. We also own approximately 2,714 acres at 125 Palmers Path, Bastrop, Bastrop County; another home on approximately 1.9930 acres at 191 Tiger Woods Drive, Bastrop, Bastrop County; and 5 lots at 175 Shawnee Drive, Smithville, Bastrop County, described as LAKE THUNDERBIRD SEC 1, LOT 290, 291, 292, 293 & 294; BCAD #21814.
4. Based on the location of our properties, which I have located approximately on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached as Exhibit A, the pumping proposed by LCRA will cause the indicated drawdown of the Simsboro formation under our properties, and drawdowns on other Aquifer formations under our properties.

FURTHER AFFIANT SAYETH NOT.

Sandi Schneiderman

Sandi Schneiderman

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.



Yvonne Garcia  
Notary Public, State of Texas

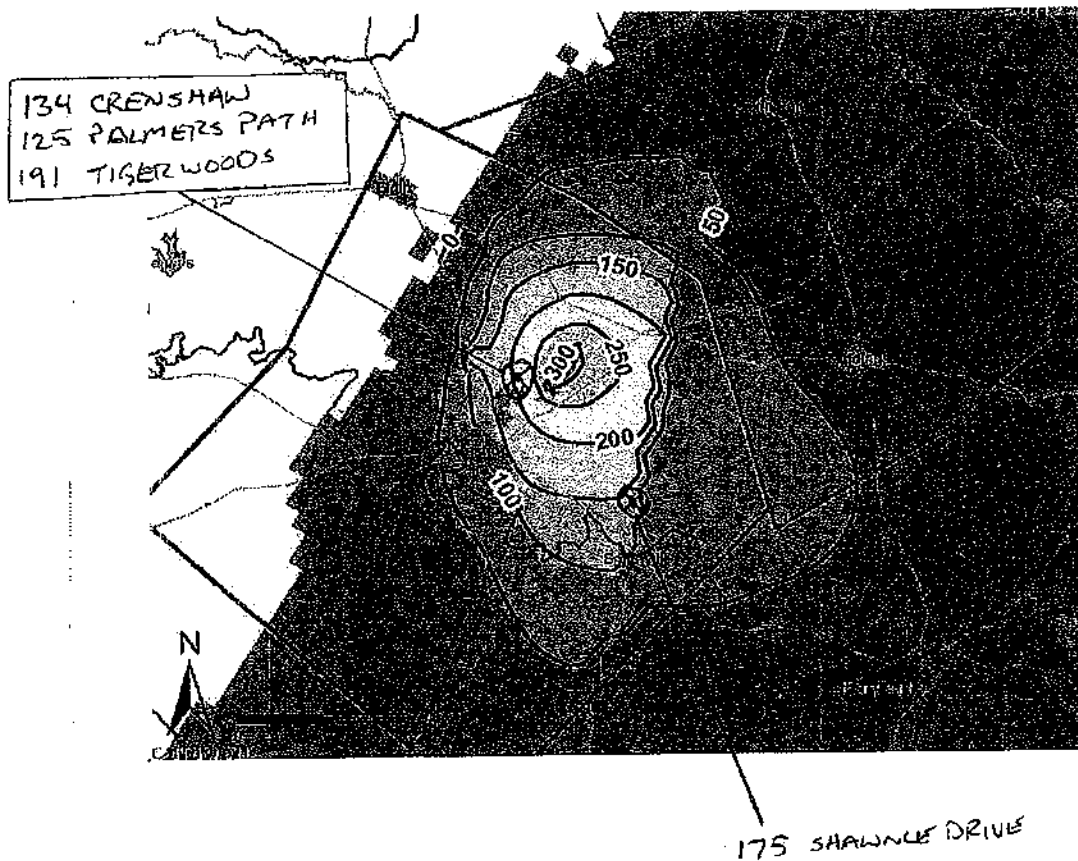
My Commission Expires:

11-27-2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.



SCHNEIDERMAN/CROSS PROPERTIES

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF SUE ELLEN CHRISTIANSEN

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Sue Ellen Christiansen, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

1. My name is Sue Ellen Christiansen. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own property at 159 McBride Lane, Paige, Bastrop County comprised of approximately 99.957 acres and 1.0000 acre, together with an adjoining approximately 39.99 acres.
3. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my property.

FURTHER AFFIANT SAYETH NOT.

\_\_\_\_\_  
Sue Ellen Christiansen

SUBSCRIBED AND SWORN TO BEFORE ME this \_\_\_\_ day of December 2018.

\_\_\_\_\_  
Notary Public, State of Texas

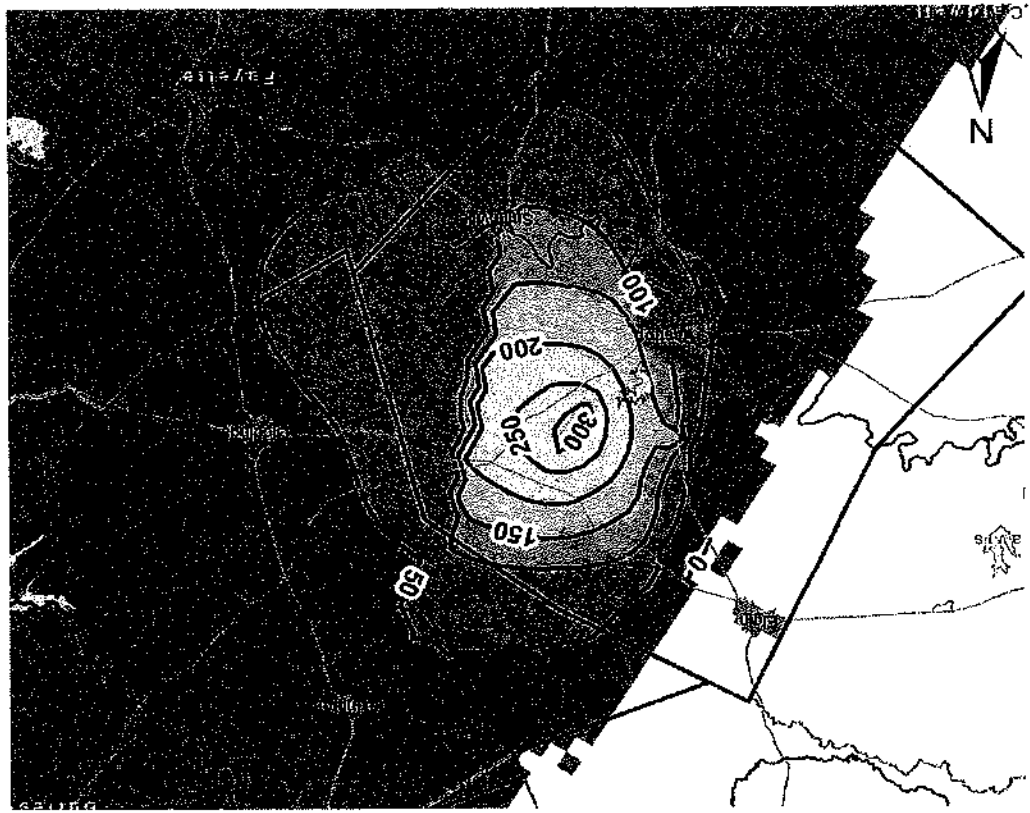
My Commission Expires:

\_\_\_\_\_

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF ESTHER MARTINEZ

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

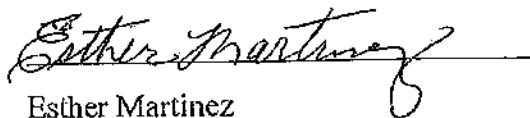
BEFORE ME, the undersigned Notary Public on this day, personally appeared Esther Martinez, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

1. My name is Esther Martinez. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.

2. I own an undivided interest in approximately .8370 acres at <sup>201</sup> ~~2201~~ S. Buckhorn Drive, Bastrop, Bastrop County. <sup>(Em)</sup>

3. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my property.

FURTHER AFFIANT SAYETH NOT.

  
Esther Martinez

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December 2018.





Lauren Cannon  
Notary Public, State of Texas

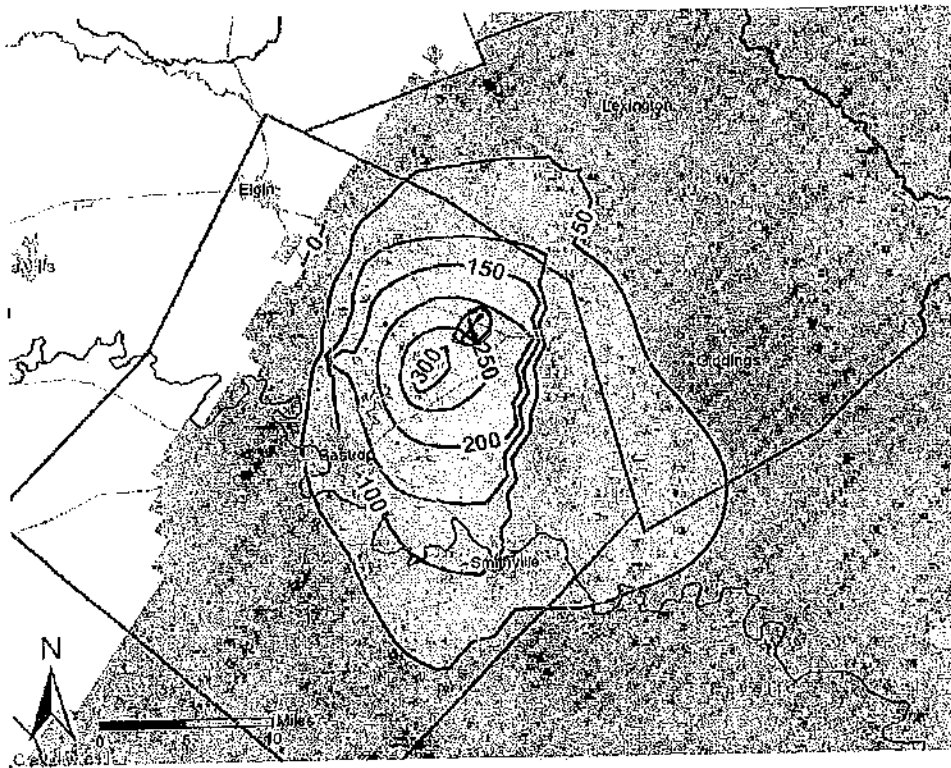
My Commission Expires:

March 1, 2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.



(X) Esther Martinez - Property

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS

AFFIDAVIT OF STEPHEN SHAW

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Stephen Shaw, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Stephen Shaw. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Sonia Ruiz and I jointly own approximately 1.0000 acre at 102 Plover Street, Paige, Bastrop County. I also own 1.0900 acres and .8500 acre at 109 Bobwhite Street, Paige, Bastrop County.
3. Based on the location of my properties, as I have approximately located them on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our properties as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our properties.

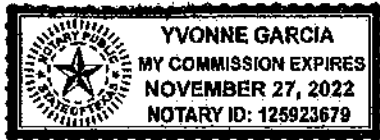
FURTHER AFFIANT SAYETH NOT.

Stephen Shaw

Stephen Shaw

SUBSCRIBED AND SWORN TO BEFORE ME this 13<sup>th</sup> day of December.

Yvonne Garcia  
Notary Public, State of Texas



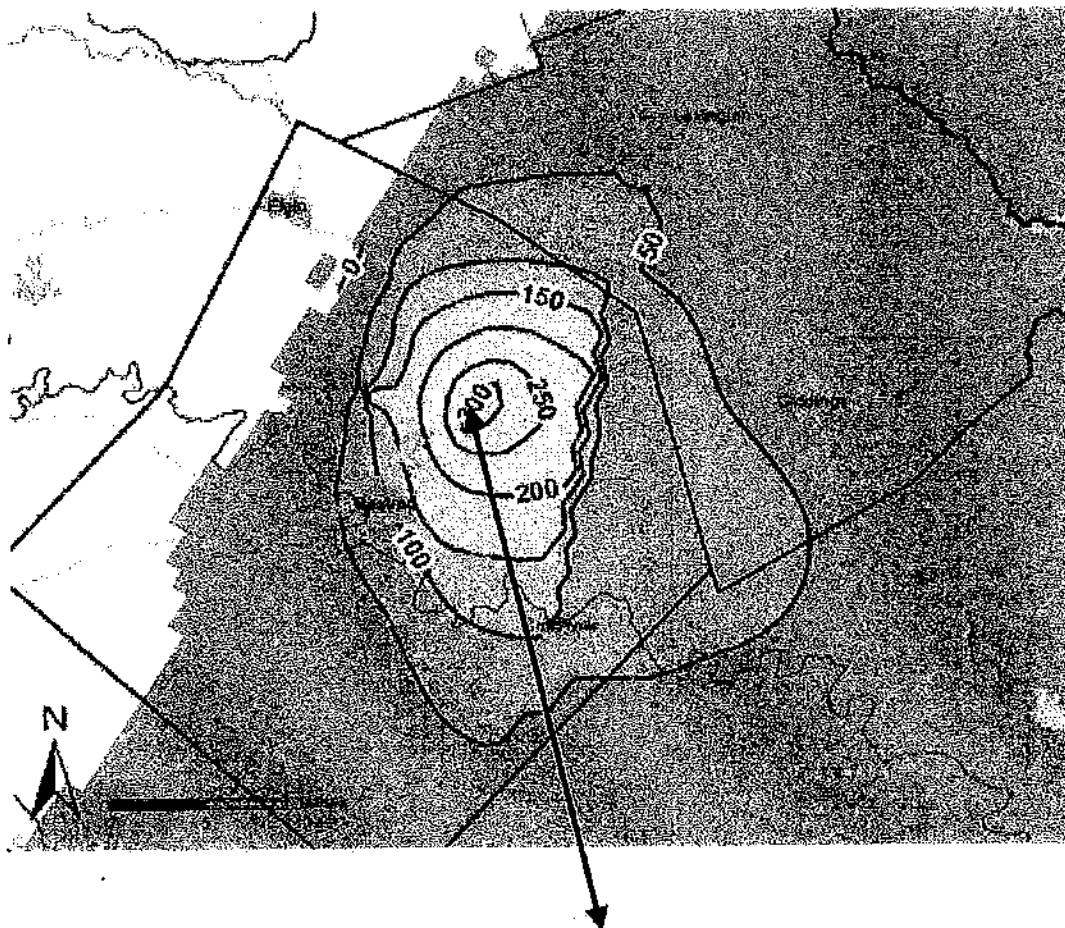
My Commission Expires:

11-27-18

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



SShaw  
properties

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP  
COUNTY, TEXAS

AFFIDAVIT OF BECKY JEAN NICHOLS

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Becky Jean Nichols, known to me to be the person whose name is subscribed hereto, and after being duly sworn on her oath stated the following:

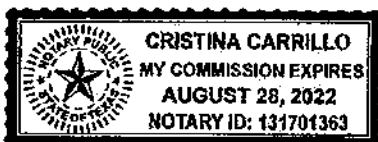
1. My name is Becky Jean Nichols. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. I own approximately 3.4400 acres at 628 Cardinal Drive, Paige, Bastrop County.
3. Based on the location of my property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my property as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my property.

FURTHER AFFIANT SAYETH NOT.

Becky Jean Nichols  
Becky Jean Nichols

SUBSCRIBED AND SWORN TO BEFORE ME this 14 day of December 2018.

Cristina Carrillo  
Notary Public, State of Texas



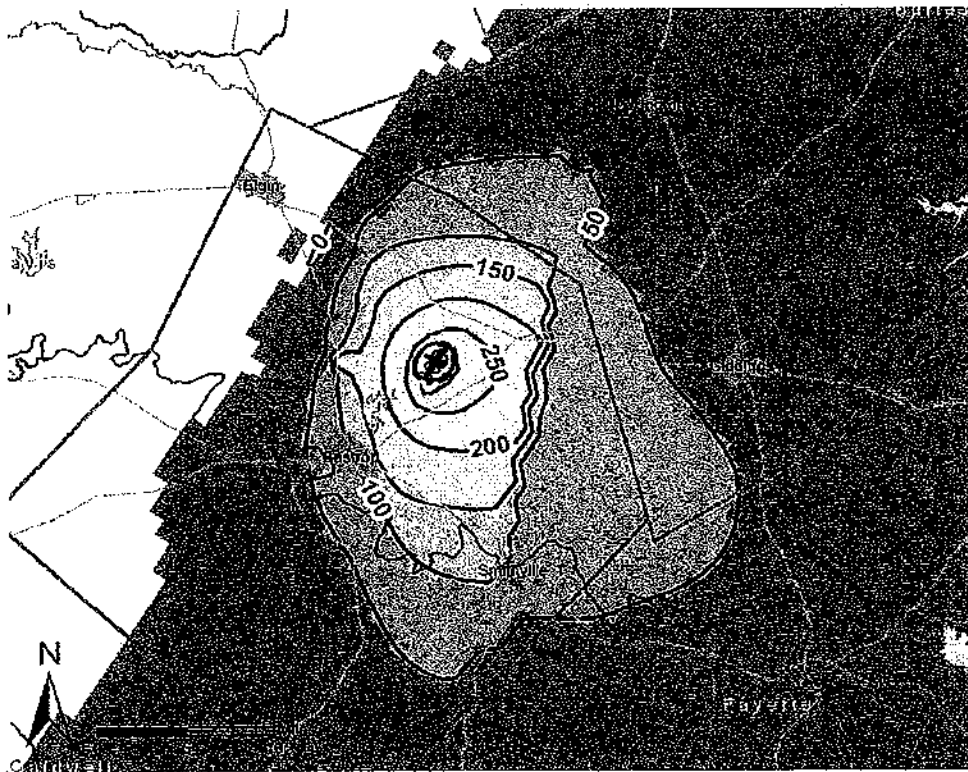
My Commission Expires:

08/28/22

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 (lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



Nichols property

SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS

AFFIDAVIT OF PAUL E. COX

STATE OF TEXAS §  
§  
COUNTY OF BASTROP §

BEFORE ME, the undersigned Notary Public on this day, personally appeared Paul E. Cox, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Paul E. Cox. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Ana R. Cox and I own approximately 3.84 acres at 669 Cardinal Drive, Paige, Bastrop County.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under my properties as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under my property.

FURTHER AFFLANT SAYETH NOT.

  
\_\_\_\_\_  
Paul E. Cox

SUBSCRIBED AND SWORN TO BEFORE ME this \_\_\_\_ day of December 2018.





Vicki Tate  
Notary Public, State of Texas

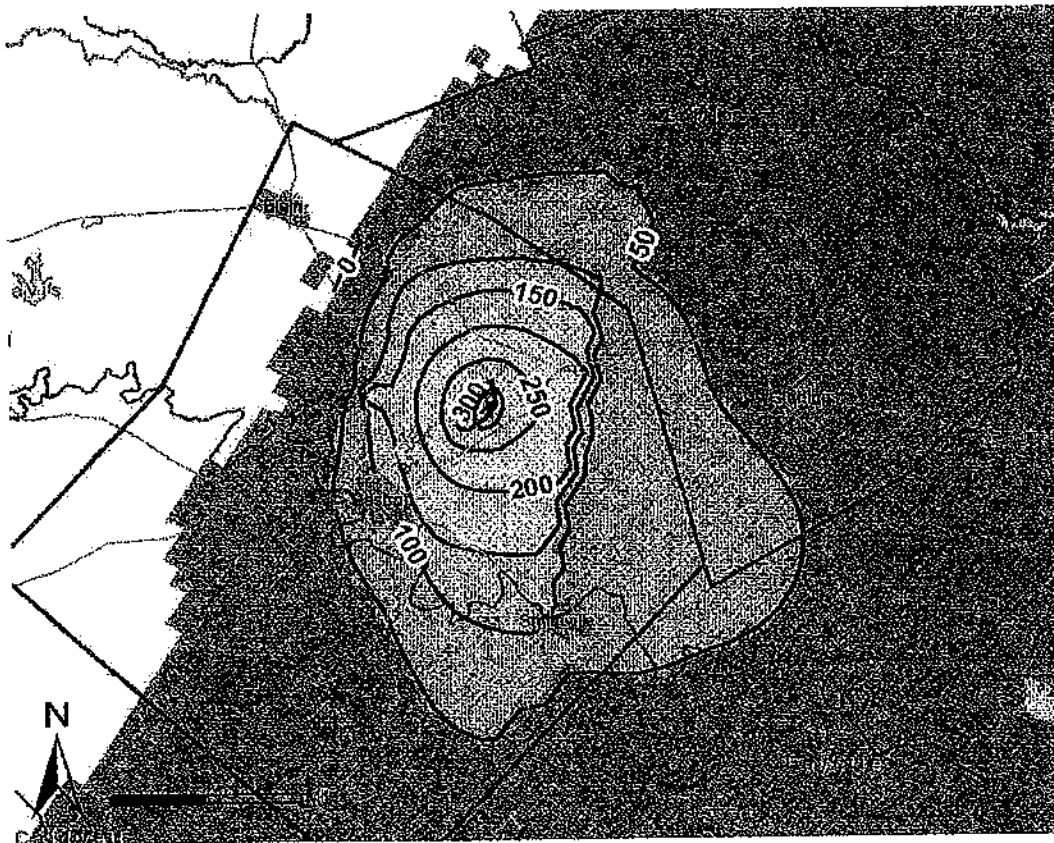
My Commission Expires:

7-30-22

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4 ([lostpineswater.org](http://lostpineswater.org))

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the proposed LCRA pumpage estimated using the GAM.*



SOAH DOCKET NO. 952-19-0705

APPLICATIONS OF LOWER §  
COLORADO RIVER AUTHORITY § BEFORE THE STATE OFFICE  
FOR OPERATING AND § OF  
TRANSPORT PERMITS FOR § ADMINISTRATIVE HEARINGS  
EIGHT WELLS IN BASTROP §  
COUNTY, TEXAS

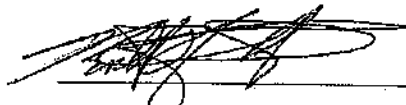
AFFIDAVIT OF KEITH G. EVERETT

STATE OF TEXAS §  
COUNTY OF BASTROP §

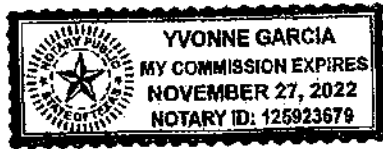
BEFORE ME, the undersigned Notary Public on this day, personally appeared Keith G. Everett Jean Nichols, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is Keith G. Everett, I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. My spouse Judith D. Everett and I own approximately .7910 acres at 132 Pony Grass Lane, Bastrop, Bastrop County.
3. Based on the location of our property, as I have approximately located it on the District's map of the project-specific projected drawdown of the Simsboro formation of the Carrizo-Wilcox Aquifer ("Aquifer") by the proposed LCRA Project, Permit No. 58-55-4, attached hereto as Exhibit A, the pumping proposed by LCRA will cause a drawdown in the Simsboro formation under our property, as depicted on Exhibit A, and will cause drawdown in the other Aquifer formations under our property.

FURTHER AFFIANT SAYETH NOT.

  
Keith G. Everett

SUBSCRIBED AND SWORN TO BEFORE ME this 12<sup>th</sup> day of December 2018.



Yvonne Garcia  
Notary Public, State of Texas

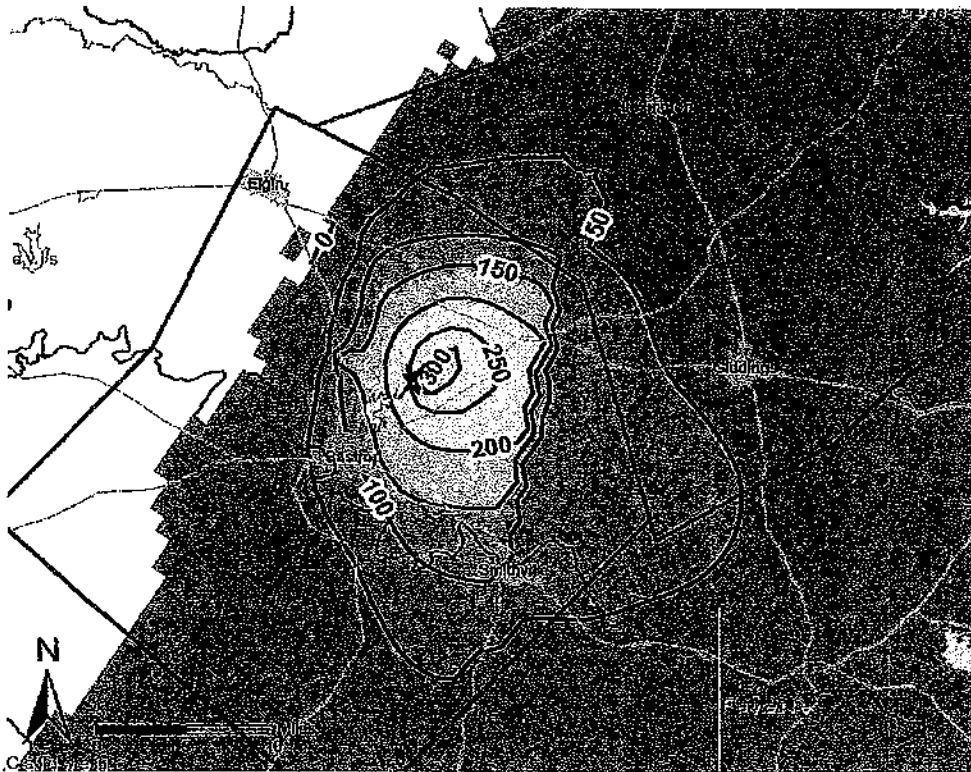
My Commission Expires:

11.27.2022

## EXHIBIT A TO AFFIDAVIT

Source: Review of LCRA Permit Application Packet, prepared by  
Andrew Donnelly, Daniel B. Stephens & Associates, Inc. for Lost Pines Groundwater Conservation  
District in connection with Lower Colorado River Authority, Permit Application, Permit #58-55-4  
(lostpineswater.org)

*Figure 2. Project-specific 50-year drawdown (in feet) in the Simsboro Aquifer attributable to the  
proposed LCRA pumpage estimated using the GAM.*



Everett Property

SOAH DOCKET NO. 952-19-0705

APPLICATION LOWER § BEFORE THE STATE OFFICE  
COLORADO RIVER AUTHORITY § OF  
FOR OPERATING AND § ADMINISTRATIVE HEARINGS  
TRANSPORT PERMITS FOR 8 §  
WELLS IN BASTROP COUNTY §

AFFIDAVIT OF GEORGE RICE

STATE OF TEXAS §  
COUNTY OF BEXAR §

BEFORE ME, the undersigned Notary Public on this day, personally appeared George Rice, known to me to be the person whose name is subscribed hereto, and after being duly sworn on his oath stated the following:

1. My name is George Rice. I am over eighteen (18) years of age and of sound mind, have never been convicted of a felony, and am otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.
2. Attachment A to this affidavit is an accurate copy of my current resume.
3. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Christian and Bette Abee likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
4. Based upon my evaluation I am able to conclude that the Abee's well probably draws water from the Carizzo Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Carizzo Aquifer at this well.
5. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Larry and Eileen Campbell likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused

by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.

6. Based upon my evaluation I am able to conclude that the Campbell's well, registered with Lost Pines Groundwater Conservation District (Application No. 5855414), probably draws water from the Calvert Bluff Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Calvert Bluff Aquifer at this well.
7. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Newton and Frances Ellis likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
8. Based upon my evaluation, I am able to conclude that the Ellis well, probably draws water from the Calvert Bluff Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Calvert Bluff Aquifer at this well.
9. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Roger Fleming likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of the well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
10. Based upon my evaluation I am able to conclude that the Fleming well probably draws water from the Calvert Bluff Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Calvert Bluff Aquifer at this well.
11. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Kermit Heaton likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
12. Based upon my evaluation I am able to conclude that the Heaton well, registered with Lost Pines Groundwater Conservation District (Registration No. 5855325), probably draws water from the Queen City Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely not cause a drawdown of the Queen

City Aquifer at this well. However, the proposed pumping will cause drawdowns in other aquifers that underlie the Heaton property, i.e., the Carrizo, Calvert Bluff, Simsboro, and Hooper aquifers.

13. Based on information provided to me, I have evaluated the formations from which the four groundwater wells owned by Linenberger likely draw groundwater. I have performed this evaluation by determining the intervals at which the wells are screened, and determining the formation likely present at those intervals. I have also correlated the location of these wells to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
14. Based upon my evaluation I am able to conclude that Linenberger wells 1, 2, and 3 probably draw water from the Simsboro Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Simsboro Aquifer at these wells.
15. Based upon my evaluation I am able to conclude that the Linenberger 4 well probably draws water from the Calvert Bluff and Simsboro aquifers. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Calvert Bluff and Simsboro aquifers at this well.
16. Based on information provided to me, I have evaluated the formations from which the four groundwater wells owned by the Pines & Prairies Land Trust likely draw groundwater. I have performed this evaluation by determining the intervals at which the wells are screened, and determining the formation likely present at those intervals. I have also correlated the location of these wells to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
17. Based upon my evaluation I am able to conclude that Pines & Prairies Land Trust well 1 probably draws water from the Queen City Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely not cause a drawdown of the Queen City Aquifer at this well. However, the proposed pumping will cause drawdowns in other aquifers that underlie the Pines & Prairies Land Trust property, i.e., the Carrizo, Calvert Bluff, Simsboro, and Hooper aquifers.
18. I am unable to determine the aquifer from which Pines & Prairies Land Trust wells 2, 3, and 4 draw water.
19. Based on information provided to me, I have evaluated the formations from which groundwater wells owned by Suzanne Ragan likely draw groundwater. I have performed this evaluation by determining the intervals at which the wells are screened, and determining the formation likely present at those intervals. I have also correlated the location of the wells to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority



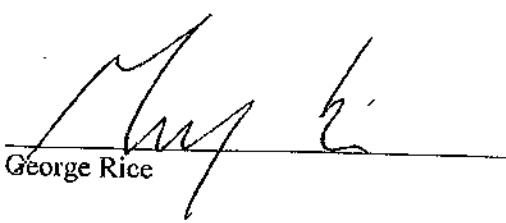
("LCRA") now under consideration in SOAH Docket No. 952-19-0705.

20. Based upon my evaluation I am able to conclude that the Ragan 1 and Ragan 2 wells, registered with Lost Pines Groundwater Conservation District (Registration Nos. 585560034 and 585560035, respectively), probably draw water from the Queen City Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely not cause a drawdown of the Queen City Aquifer at these wells. However, the proposed pumping will cause drawdowns in other aquifers that underlie the Ragan property, i.e., the Carrizo, Calvert Bluff, Simsboro, and Hooper aquifers.
21. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by John and Carol Ricke likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
22. Based upon my evaluation I am able to conclude that the Ricke well probably draws water from the Calvert Bluff Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Calvert Bluff Aquifer at this well.
23. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Kay Rogers likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
24. Based upon my evaluation I am able to conclude that the Rogers well probably draws water from the Hooper Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Hooper Aquifer at this well.
25. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Lewis and Debbie Sharpe likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
26. Based upon my evaluation I am able to conclude that the Sharpe well probably draws water from the Calvert Bluff Aquifer. I am further able to conclude that the

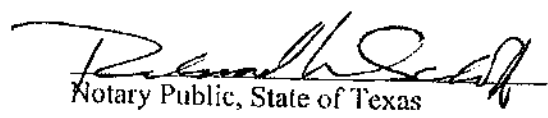
pumping proposed by LCRA will likely cause a drawdown of the Calvert Bluff Aquifer at this well.

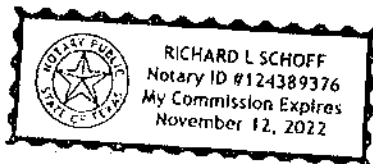
27. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by David and Connie Teuscher likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
28. Based upon my evaluation I am able to conclude that the Teuscher well, registered with Lost Pines Groundwater Conservation District (Registration No. 5855628), probably draws water from the Carrizo Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Carrizo Aquifer at this well.
29. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by John Watson likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
30. Based upon my evaluation I am able to conclude that the Watson well, registered with Lost Pines Groundwater Conservation District (Registration No. 585510012), probably draws water from the Queen City Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely not cause a drawdown of the Queen City Aquifer at this well. However, the proposed pumping will cause drawdowns in other aquifers that underlie the Watson property, i.e., the Carrizo, Calvert Bluff, Simsboro, and Hooper aquifers.
31. Based on information provided to me, I have evaluated the formations from which a groundwater well owned by Andrew and Mary Wier likely draws groundwater. I have performed this evaluation by determining the intervals at which the well is screened, and determining the formation likely present at those intervals. I have also correlated the location of this well to modeling of drawdown that will be caused by the groundwater permits requested by the Lower Colorado River Authority ("LCRA") now under consideration in SOAH Docket No. 952-19-0705.
32. Based upon my evaluation I am able to conclude that the Wier well probably draws water from the Simsboro Aquifer. I am further able to conclude that the pumping proposed by LCRA will likely cause a drawdown of the Simsboro Aquifer at this well.

FURTHER AFFIANT SAYETH NOT.

  
George Rice

SUBSCRIBED AND SWORN TO BEFORE ME this 13 day of December 2018.

  
Notary Public, State of Texas



My Commission Expires: Nov 12, 2022

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