

IMPACTS OF EP'S PERMIT APPLICATION

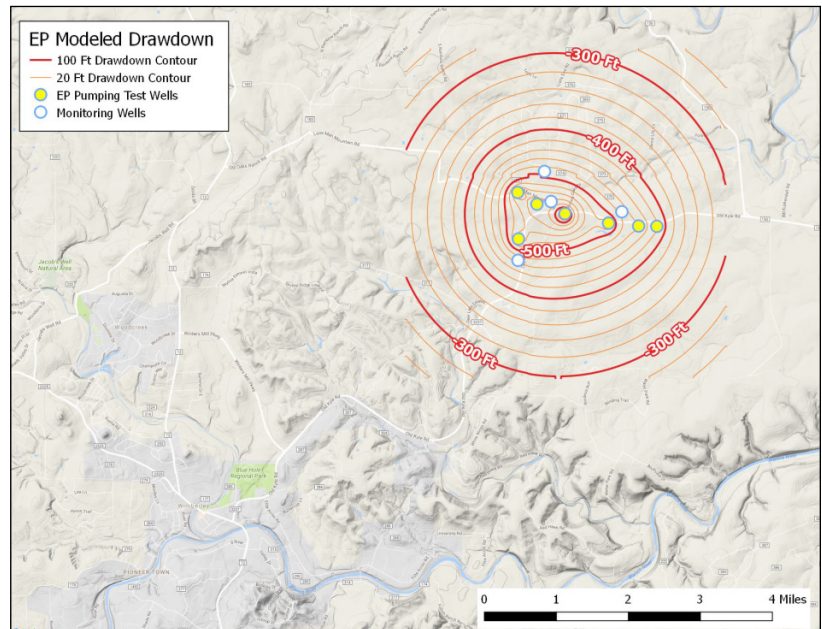
Electro Purification, LLC (EP) has a permit application pending with the Barton Springs Edwards Aquifer Groundwater Conservation District (BSEACD) for a Middle Trinity Aquifer well field in Hays County, TX. The permit application indicates that pumping rates will be phased in over time with a maximum permitted pumping rate of 2.5 million gallons per day (MGD), or approximately 912 million gallons per year, pumped from seven wells located on the Odell and Bridges properties.

BSEACD has determined that potentially unreasonable impacts will occur at residential wells in the vicinity of the well field. EP has submitted a compliance monitoring plan and impact avoidance plan to mitigate the potentially unreasonable impacts. BSEACD is currently reviewing the EP plan.

TESPA has reviewed the permit application, compliance plan and other supporting documents and has the following concerns.

- Excessive drawdown in vicinity of residential wells will occur. Drawdowns of 300 feet are projected a distance of two miles from the well field in the Middle Trinity Aquifer. (see map)
- EP has proposed an inadequate monitoring program and trigger well program to monitor and protect historic water supplies,
- Adequate safeguards must be incorporated into the permit such that pumping can be curtailed if unreasonable impacts occur during the life of the permit,
- The large scale pumping will cause aquifer mining, or overdraft in a portion of the Middle Trinity Aquifer with a currently undefined recharge zone, and
- Neither EP nor BSEACD have evaluated the impact the project will have on the GMA 10 or GMA 9 Desired Future Condition.

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Map of combined drawdown from pumping 2.5 MGD (1,700 gpm) after 1 year. (Modified from Figure 5, BSEACD Technical Memo 2018-0213).

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Tuesday, May 15 @ 7:00 PM

Blue Hole Pavilion

100 Blue Hole Lane, Wimberley, TX

RSVP:

tespatex@gmail.com