



Wet Rock Groundwater Services, L.L.C.
Groundwater Specialists
TBPB Firm No: 50038
317 Ranch Road 620 South, Suite 203
Austin, Texas 78734 • Ph: 512-773-3226
www.wetrockgs.com

December 14, 2017

Mr. John Dupnik, P.G.
Barton Springs Edwards Aquifer Conservation District
1124 Regal Row
Austin, Texas 78745

RE: Administrative Completeness Review of Well Modification Applications submitted by Electro Purification, LLC, for authorization to permanently complete seven (Bridges Wells No. 1, 2, 3, 4 and Odell Wells No 1, 2, 3) previously drilled test wells proposed to produce from the Middle Trinity Aquifer.

Dear Mr. Dupnik:

This letter serves as Electro Purification's ("EP") response to additional information requested by the Barton Springs Edwards Aquifer Conservation District (the District) in your letter dated October 11, 2017.

3-4.4(A)(7)(a) – Nature, Purpose and Location

EP is submitting a production permit in the amount of 2.5 million gallons per day (mgd) for an annual volume of 912.50 million gallons per year. The production permit includes pumping seven wells (Bridges 1-4; and Odell 1-3); however, production from three wells (Bridges 1 & 2; and Odell 2) will be used as the source for public supply for approximately the first three years of the permit. As such, the remaining wells (Bridges 3 & 4; Odell 1 & 3) will not be used as public supply wells until a later point in time. For this reason, we are submitting the Well Modification Application to reflect three public supply wells ((Bridges 1 & 2; and Odell 2) and four proposed exempt wells (Bridges Well Nos. 3, 4 and Odell Well Nos. 1, 3). In the future, the proposed exempt wells (Bridges Well Nos. 3, 4 and Odell Well Nos. 1, 3) will be converted into public supply wells.

Until needed for municipal production, the four proposed exempt wells (Bridges Well Nos. 3, 4 and Odell Well Nos. 1, 3) will be used for livestock and domestic use by the owners of the respective tracts. Initially, the wells will be completed as exempt wells, pursuant to District rules, and available to the landowners immediately thereafter for such exempt beneficial uses. Until the landowners decide to install their pumps and communicate their intended use to the District, the four wells will be capped, pursuant to District Rules. The proposed receiving area for each of the four exempt wells, respectively, is the Bridges Ranch and Odell Ranch. The anticipated use would be for livestock at the location of the well, and potentially domestic use back at the existing homestead on the Bridges and Odell properties, respectively.

If the District considers designating any of the exempt wells as monitoring wells, with the respective landowner's consent, any of the proposed exempt wells may be considered as designated long-

term monitoring wells.

3-4.4(A)(7)(b) – Pumpage Volume

The timeframe in which pumps will be installed in the four proposed exempt wells is unknown. As noted above, during the interim, the wells will be completed and capped. Sometime in the future the wells will have pumps placed and in use. At the time pumps are installed, they will comply with District Rules for maximum exempt production volumes.

At such time as EP determines the need to bring any of the wells on line for municipal production purposes, EP will take the following steps:

- A) notify the District of EP's intent to bring the well(s) online as a municipal supply well(s), and
- B) provide the District with plans and specifications for the recompletion of the well(s) from an exempt well to a municipal supply well, and
- C) apply to the TCEQ for authorization to convert the well(s) from a domestic well(s) to a municipal supply well(s), and
- D) coordinate with the District to develop an Aquifer Testing Plan for the new municipal supply well(s) to verify the current modeling assumptions, and
- E) file, if necessary, appropriate amendment applications with the district to modify the currently requested permit.

3-4.4(A)(7)(c) – Well Construction Schematics

Please find attached to this letter updated well schematics. Bridges Well Nos. 3, 4 and Odell Well Nos. 1, 3 are shown as being completed as domestic exempt wells, in the future when they are converted into public supply wells, the construction will be similar to what is proposed for Bridges 1 & 2 and Odell 2. This will include setting a 14-inch steel casing to the top of the Cow Creek Member and pressure cemented in place using Type H cement within an 18 ½-inch borehole. Since Odell 1 currently is completed as a Lower Glen Rose well, that well during conversion into a public supply well will include drilling out the cement plug and completing the well with 14-inch steel casing set to the top of the Cow Creek Member and pressure cemented in place using Type H cement within an 18 ½-inch borehole.

Regarding the type H cement on PWS wells, I contacted Vera Poe at TCEQ (Plan Review Section) and copied District staff on the email. Ms. Poe indicated that the TCEQ requires only Class A or B cement, and that an "exception" would need to be acquired to use type H. The District staff is currently working with the TCEQ to acquire approval for type H. If not, EP will ask for an exception to use type H cement from the TCEQ.



Please call me at 512-773-3226 if you have any questions or require additional information.

Respectfully submitted,



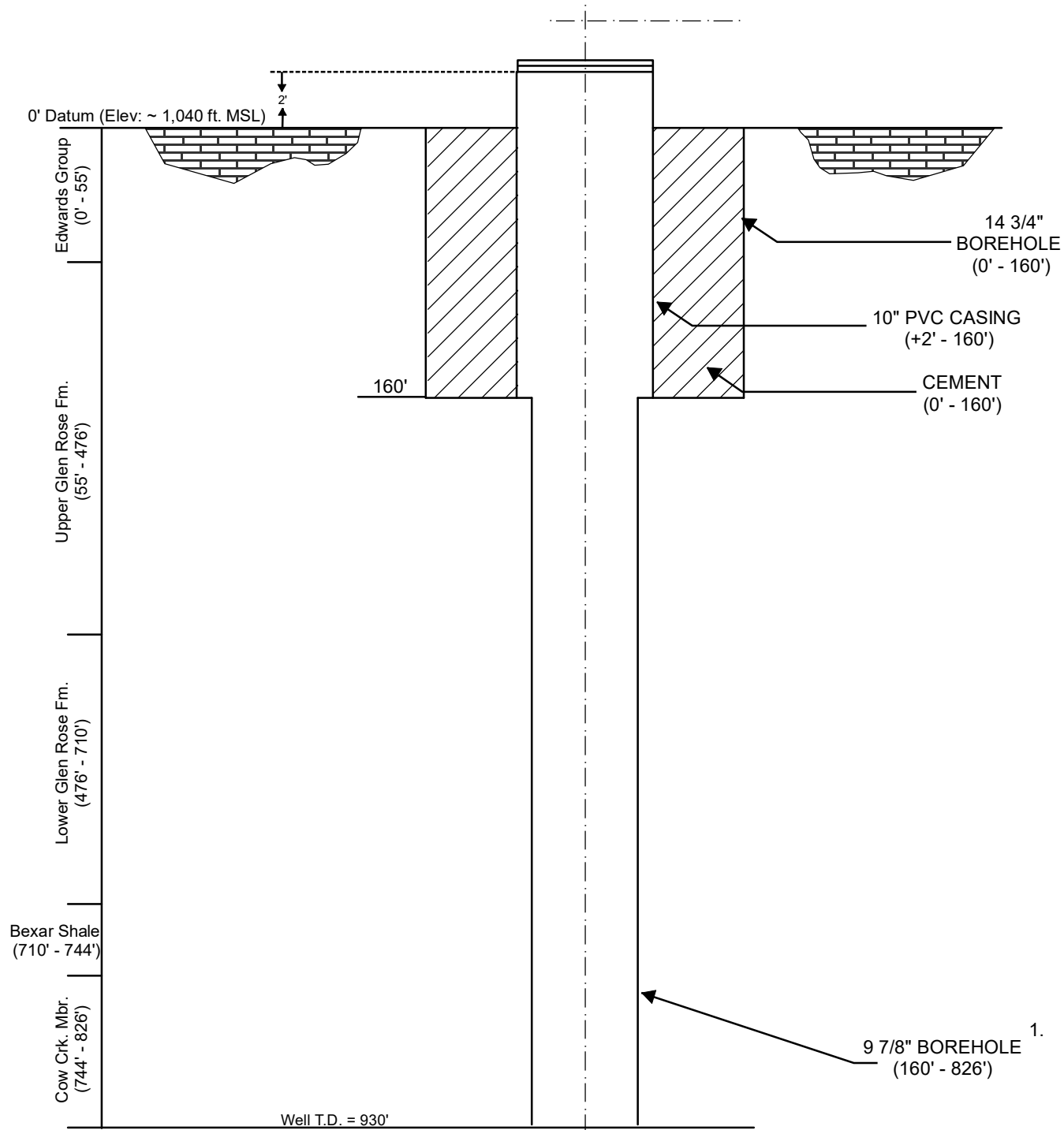
Kaveh Khorzad, P.G.

KK/bms
ENCL:

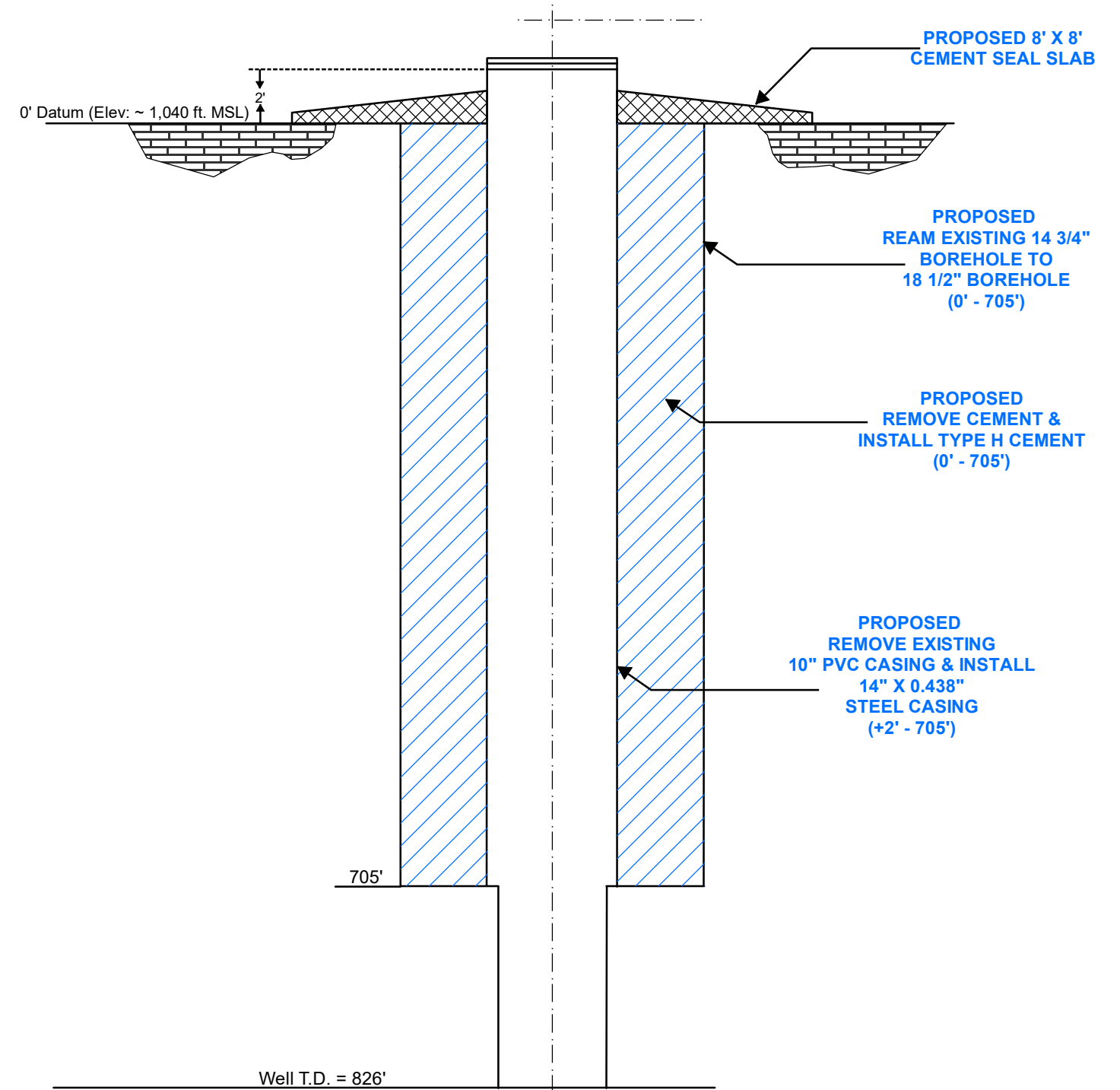
cc: Electro Purification, LLC



Existing Well Profile



Proposed Improvements



Notes:

1. Well profile based upon State Well Report (Tracking # 364899) The pilot hole was originally drilled to 930 ft. However the borehole sloughed off from the Hammet Clay downwards reducing the total depth.

SCALE: NONE
APPROVED BY: KK DATE: 10-26-17
REVISED BY: DATE:
DRAWING NO: W-1
SHEET: 1 OF 7

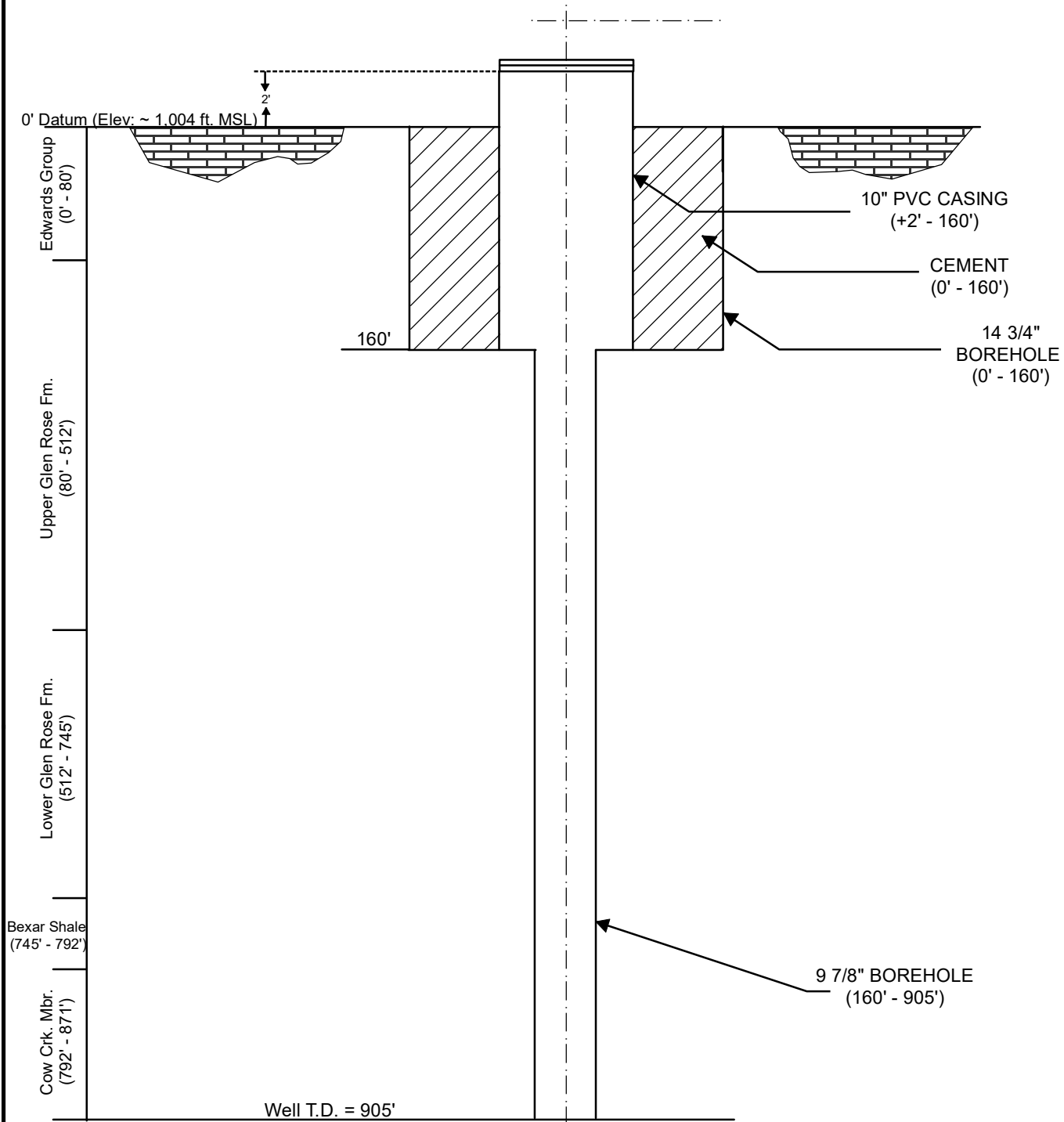
Well Profile: Bridges Well No. 1

Electro Purification, LLC
Hays County, Texas

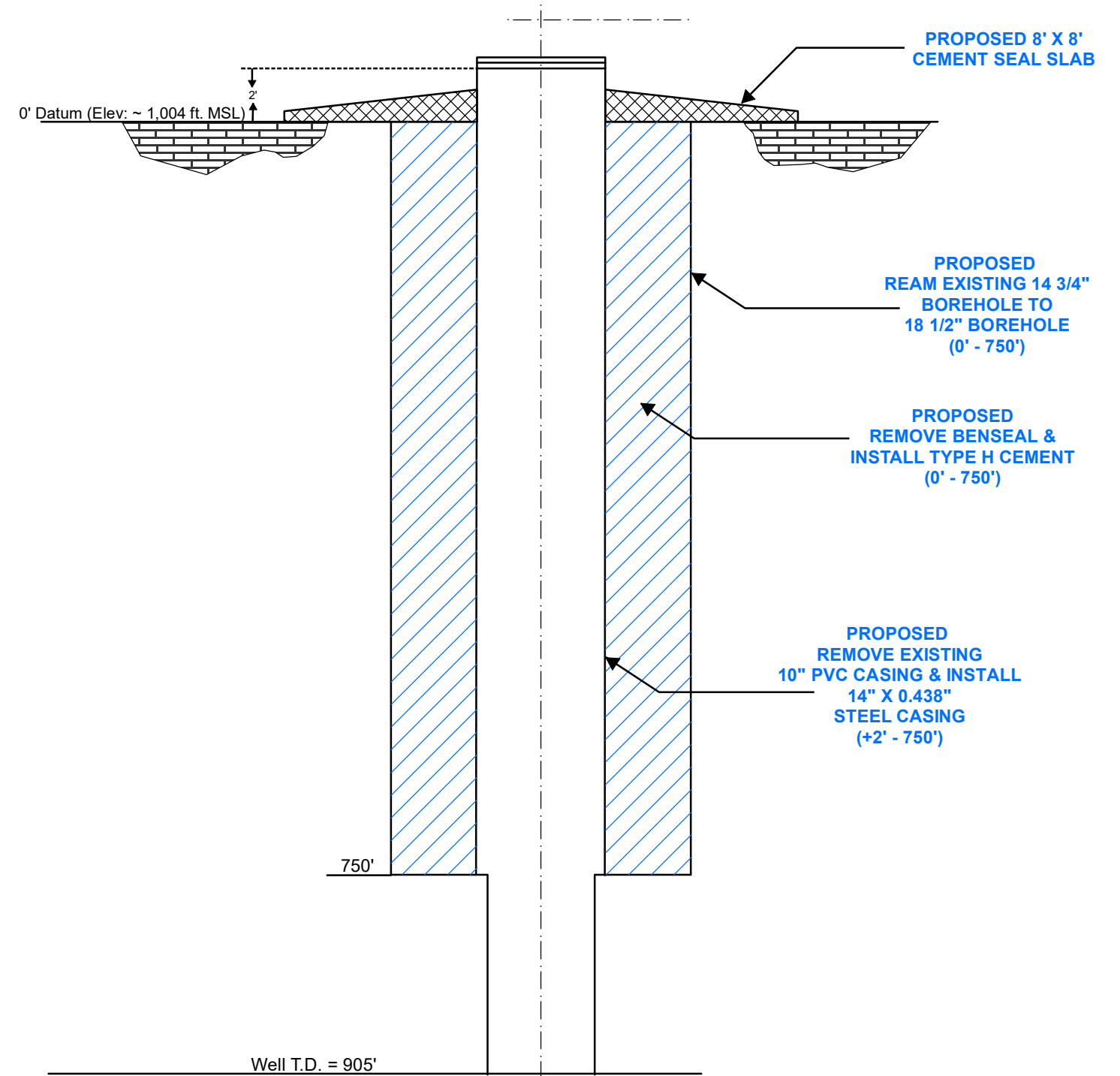


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Existing Well Profile



Proposed Improvements



Notes:

- 1. Well profile based upon State Well Report (Tracking # 364900).

SCALE: NONE
APPROVED BY: BB DATE: 10-26-17
REVISED BY: DATE:
DRAWING NO: W-6
SHEET: 6 OF 7

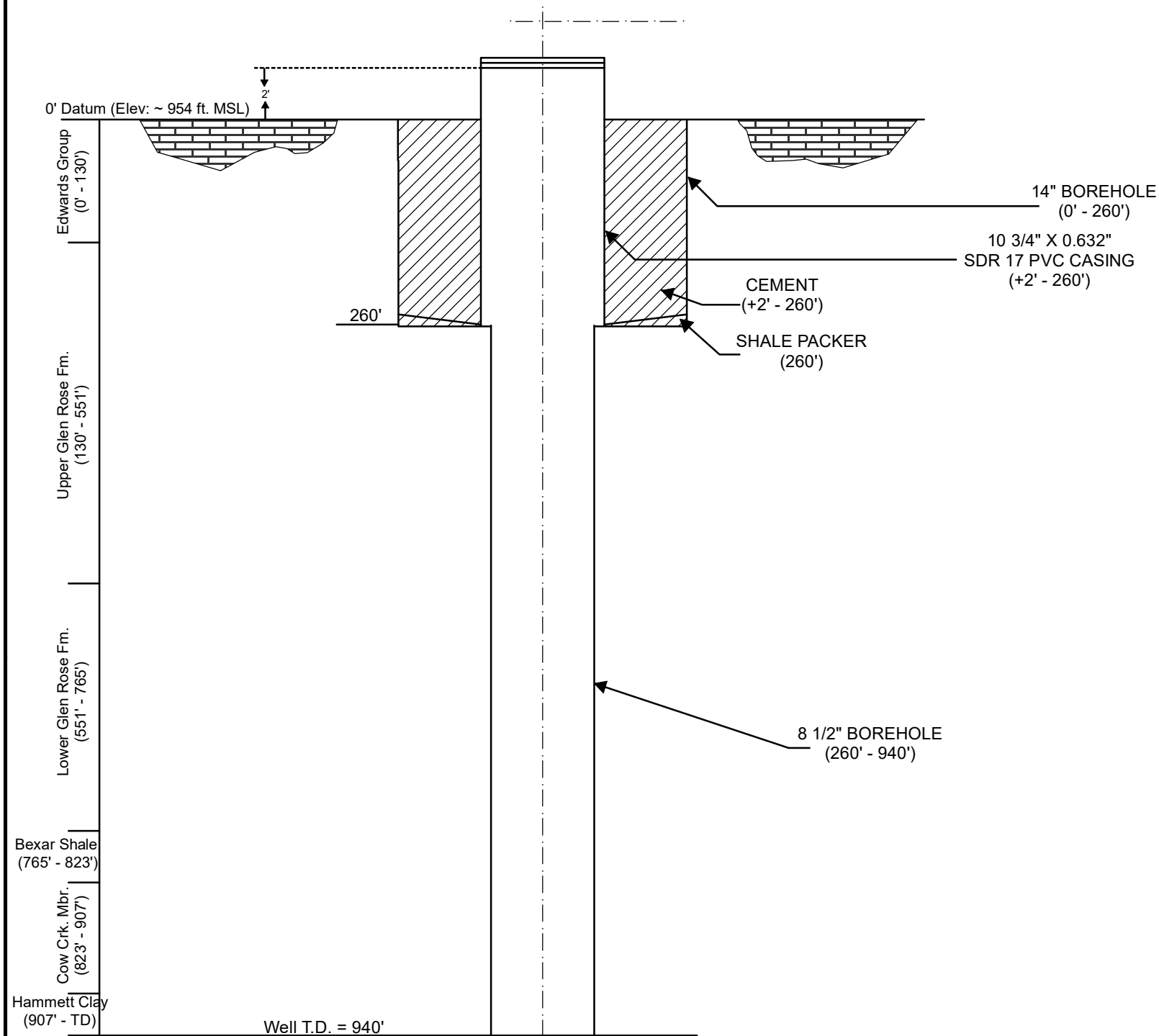
Well Profile: Bridges Well No. 2

Electro Purification, LLC
Hays County, Texas

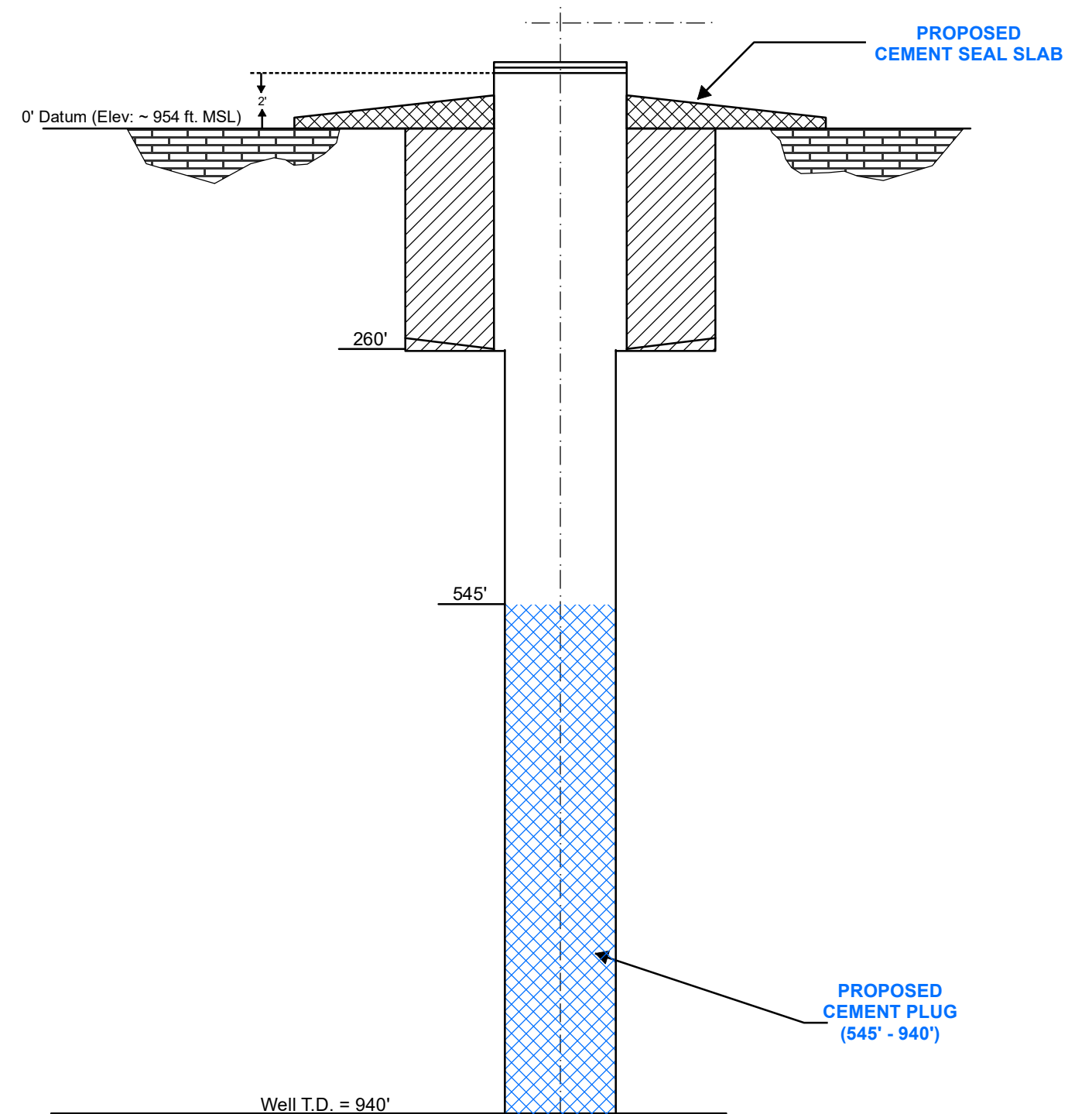
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Existing Well Profile




Proposed Improvements



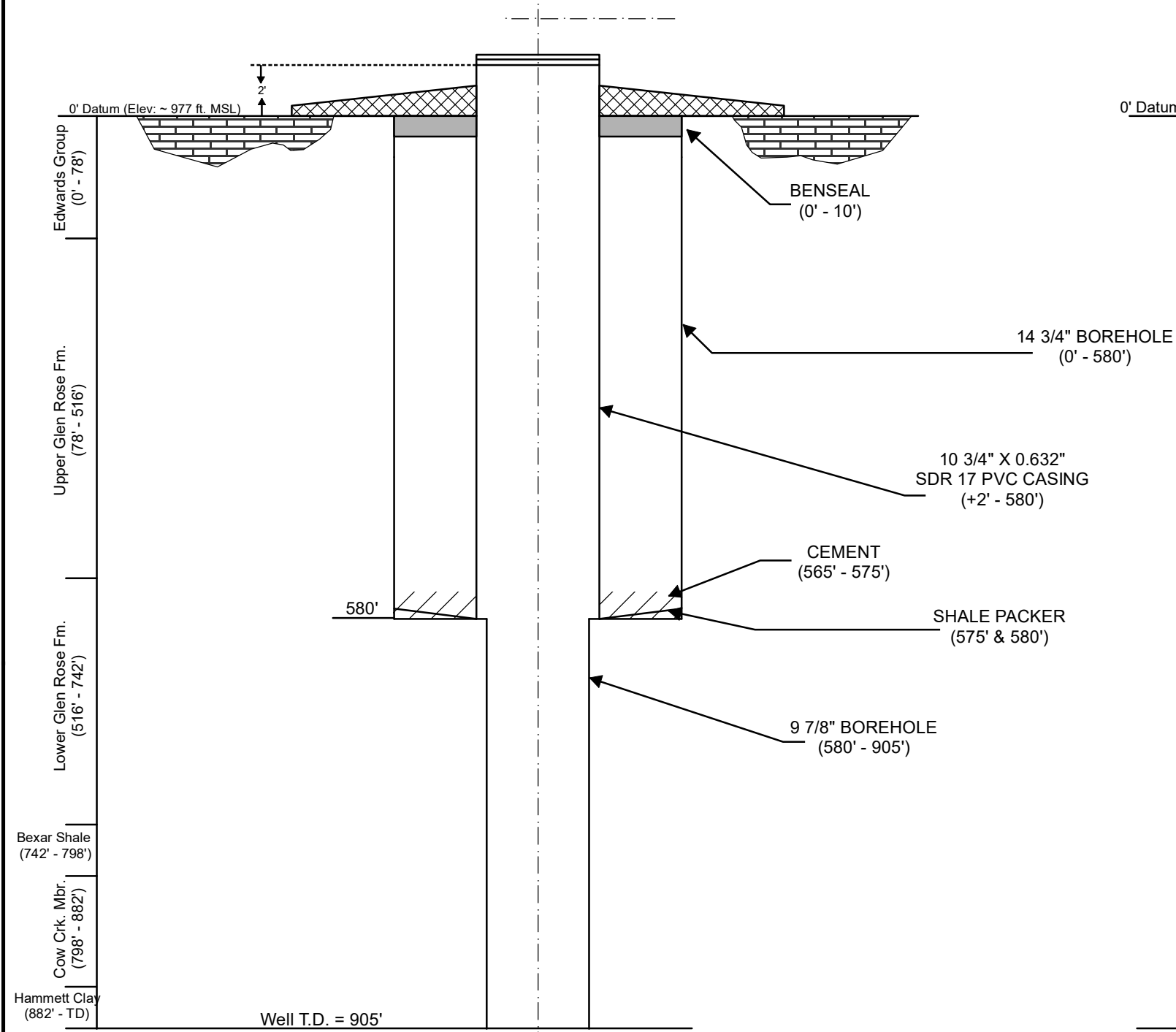
Notes:

- 1. Well profile based upon State Well Report (Tracking # 353110)

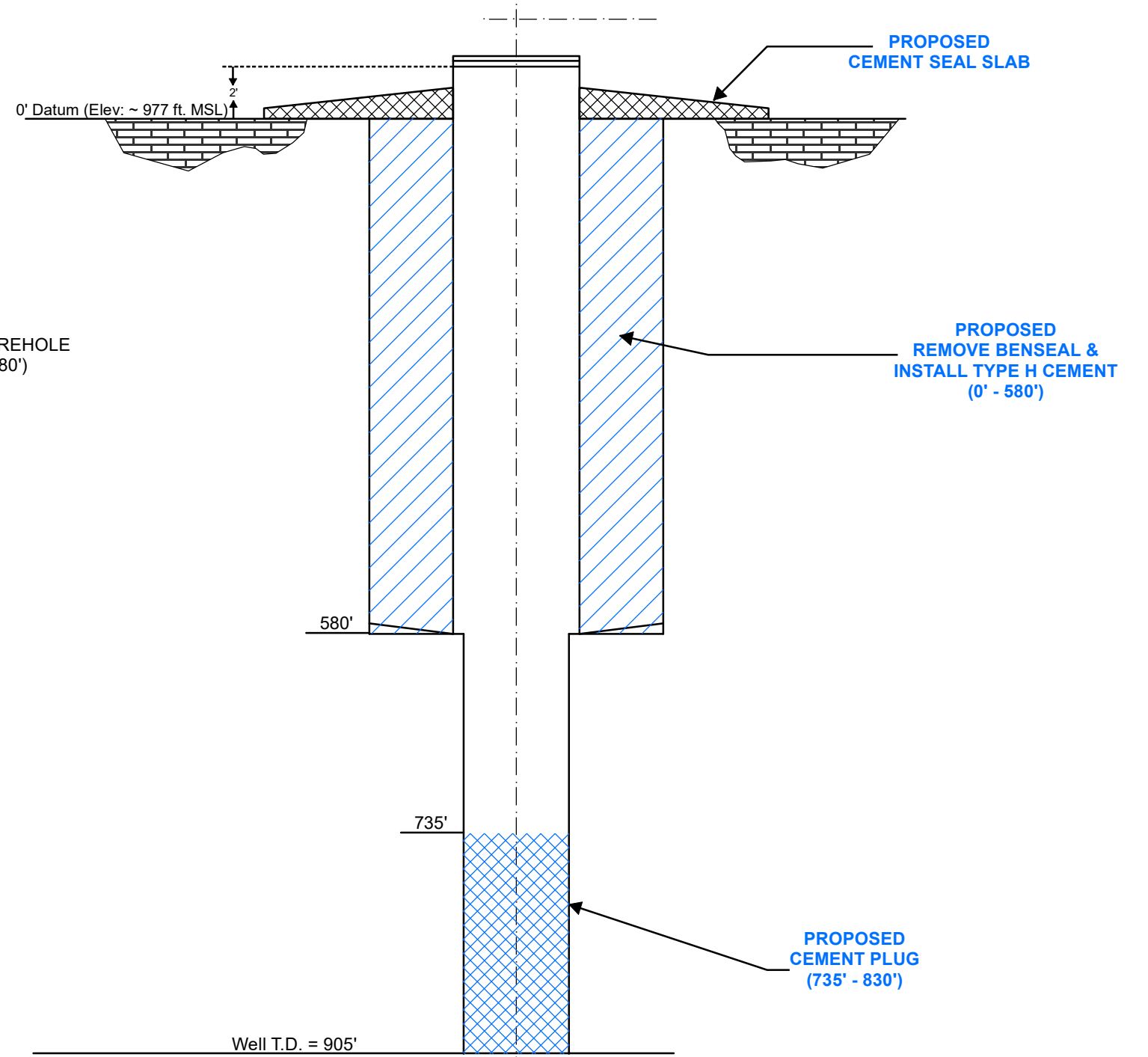
SCALE: NONE
APPROVED BY: KK DATE: 10-26-17
REVISED BY: DATE:
DRAWING NO: W-3
SHEET: 3 OF 7

Well Profile: Bridges Well No. 3	
Electro Purification, LLC Hays County, Texas	
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Existing Well Profile



Proposed Improvements



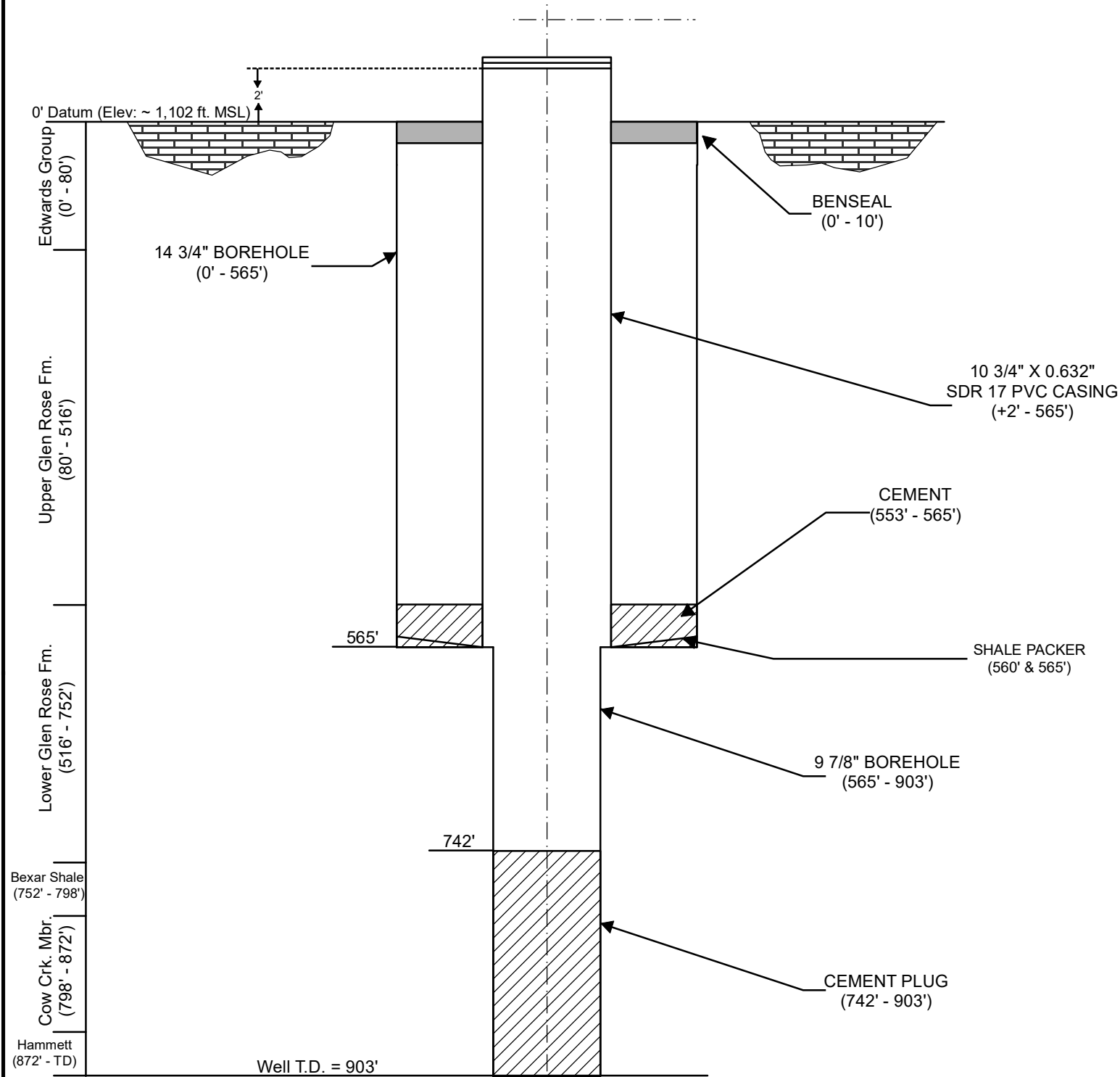
Notes:

1. Well profile based upon State Well Report (Tracking # 388365)

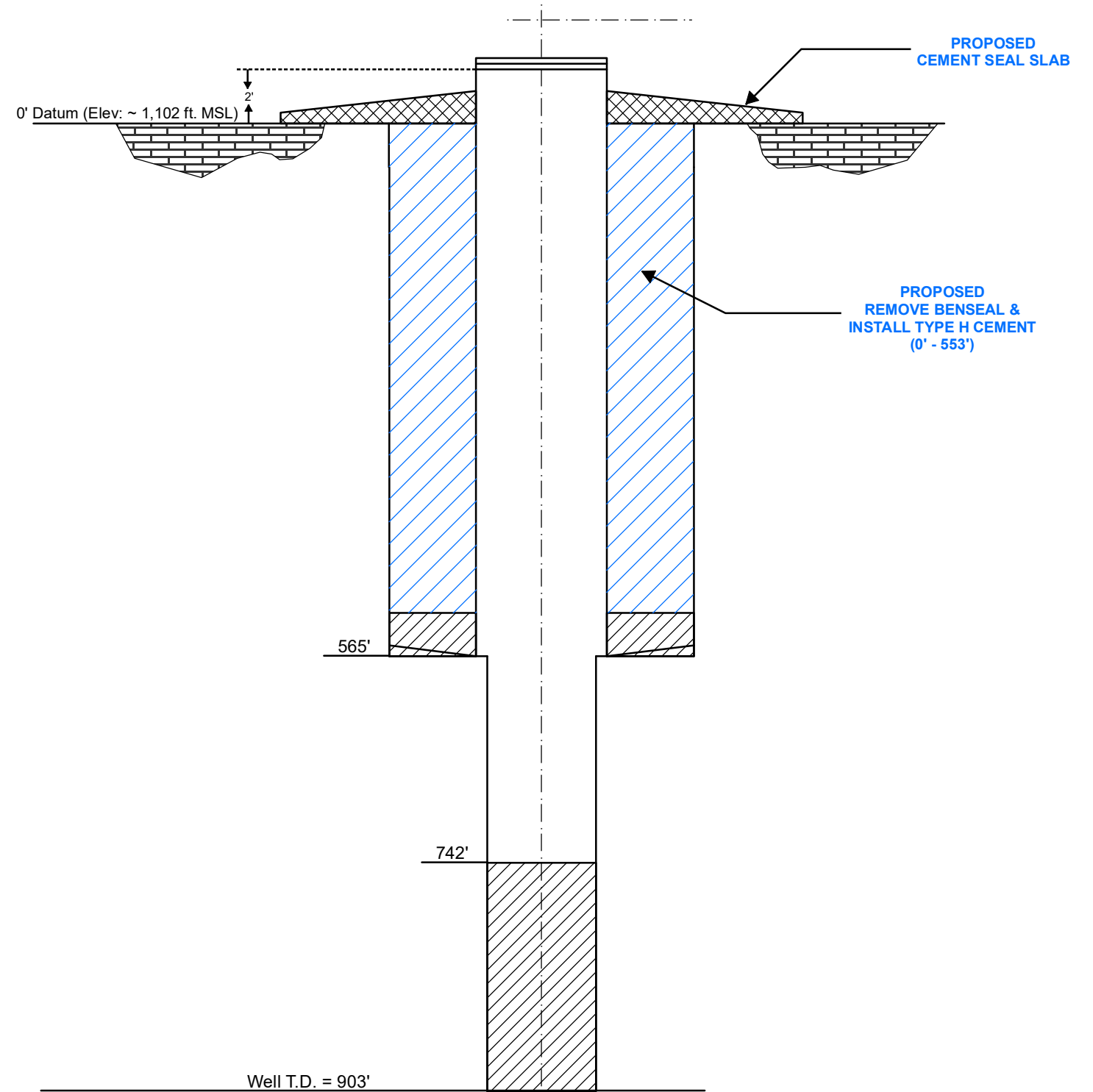
SCALE: NONE
APPROVED BY: KK DATE: 10-26-17
REVISED BY: DATE:
DRAWING NO: W-4
SHEET: 4 OF 7

Well Profile: Bridges Well No. 4	
Electro Purification, LLC Hays County, Texas	
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Existing Well Profile



Proposed Improvements



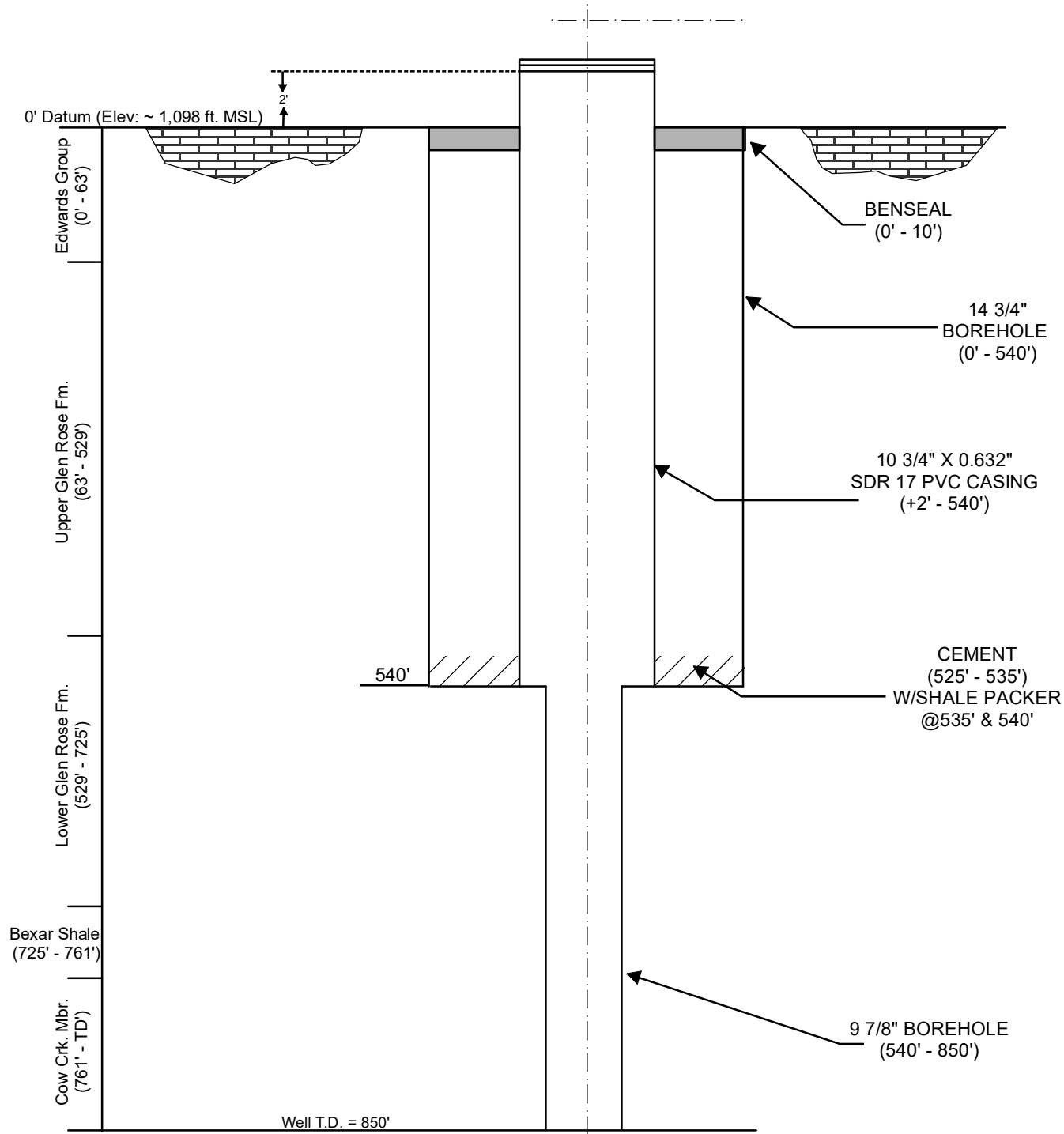
Notes:

1. Well profile based upon State Well Report (Tracking # 388355)

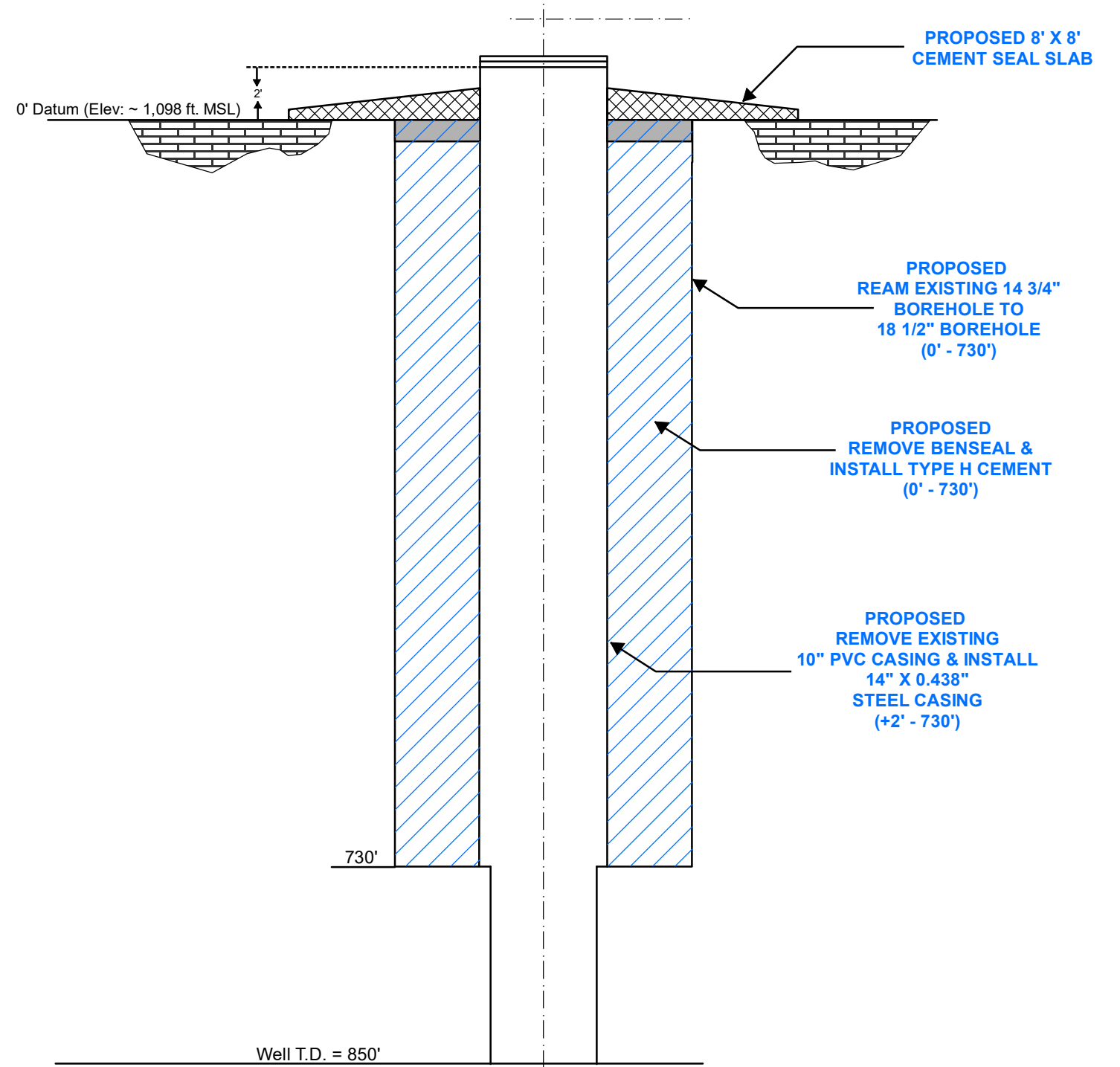
SCALE: NONE
APPROVED BY: KK DATE: 10-26-17
REVISED BY: DATE:
DRAWING NO: W-1
SHEET: 5 OF 7

Well Profile: Odell Well No. 1	
Electro Purification, LLC Hays County, Texas	
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Existing Well Profile



Proposed Improvements



Notes:

1. Well profile based upon State Well Report (Tracking # 388364)

SCALE: NONE
APPROVED BY: BB DATE: 6-23-17
REVISED BY: DATE:
DRAWING NO: W-2
SHEET: 2 OF 4

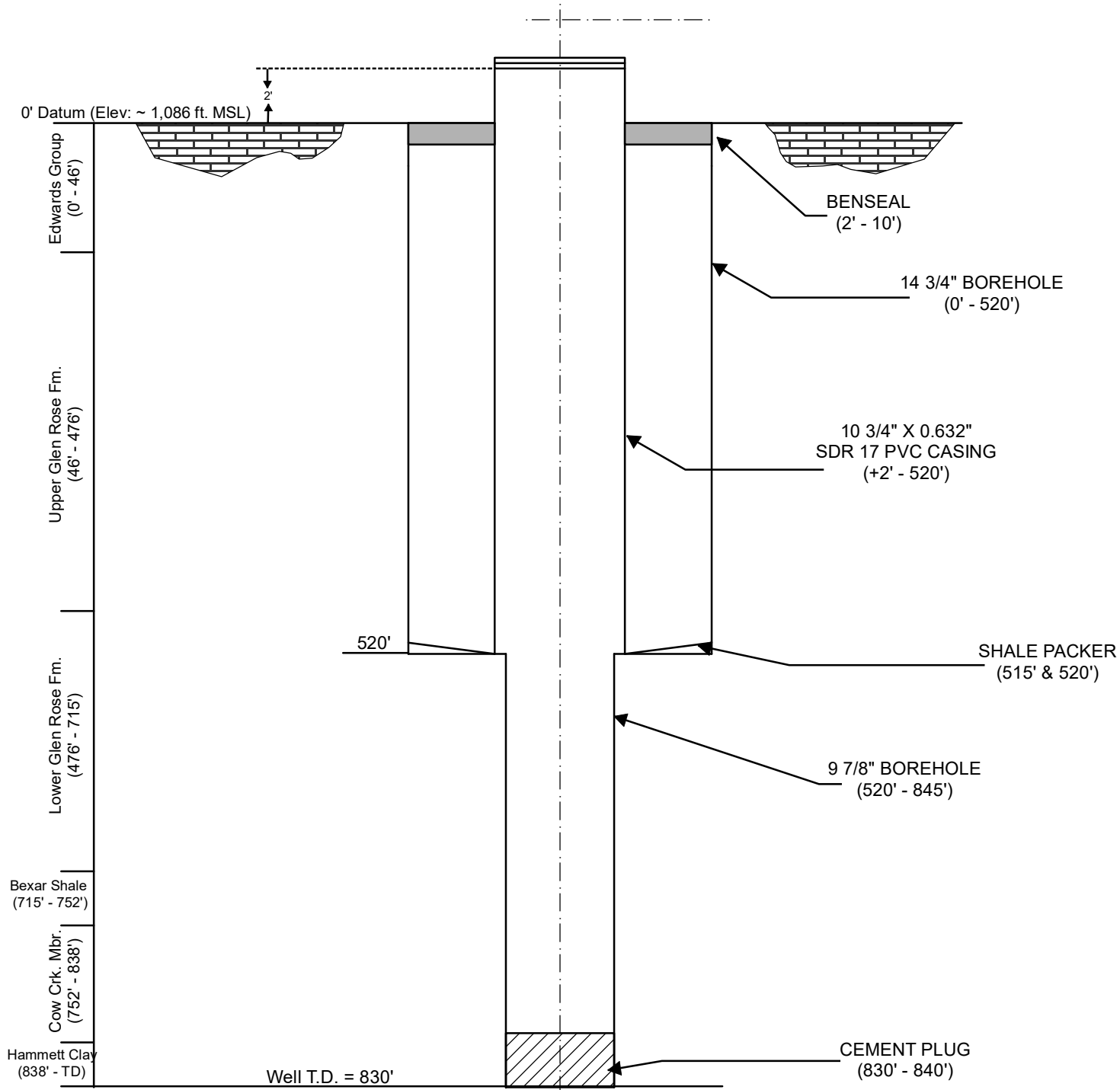
Well Profile: Odell Well No. 2

Electro Purification, LLC
Hays County, Texas

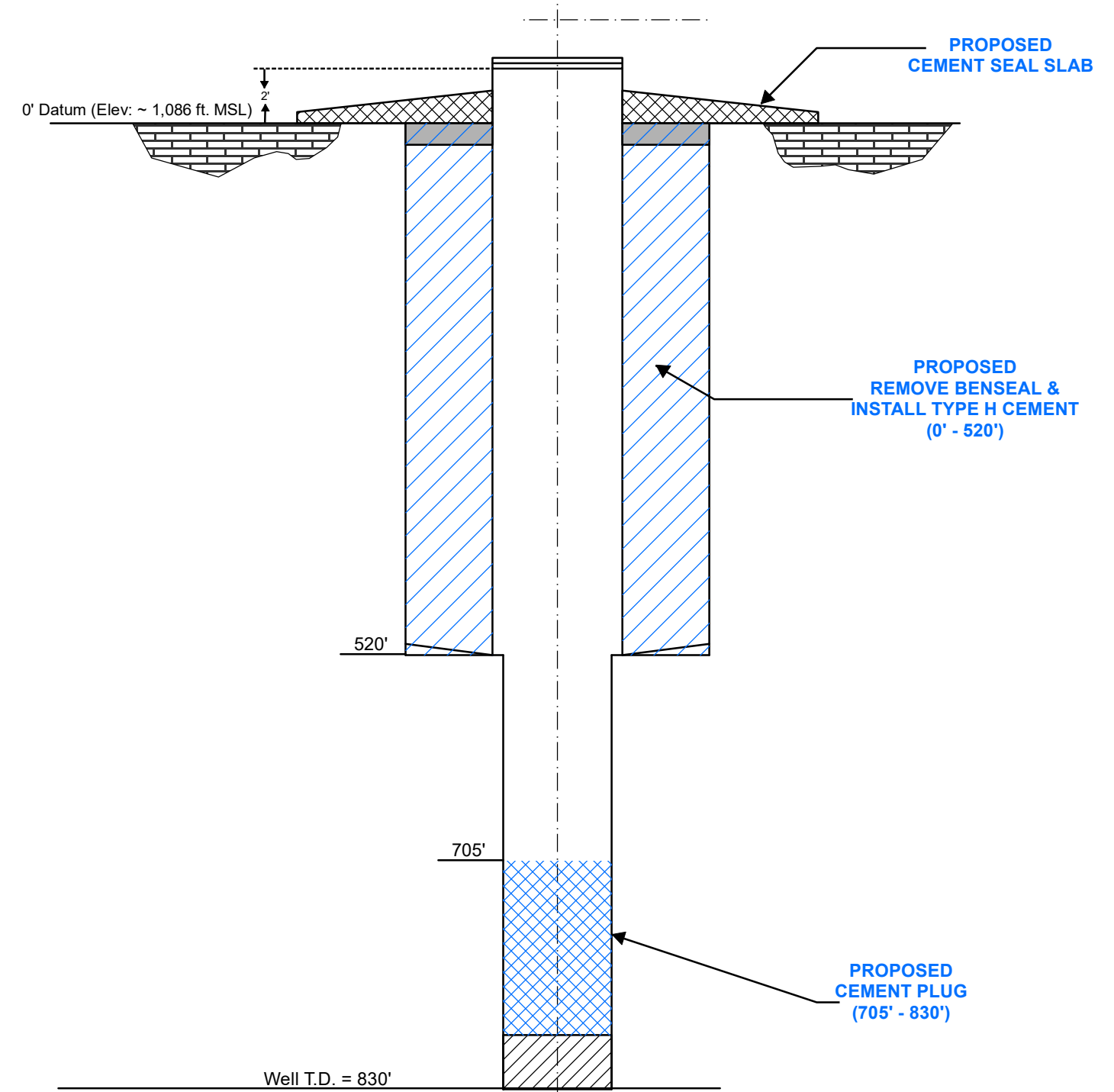
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Existing Well Profile



Proposed Improvements



Well T.D. = 830'

Well T.D. = 830'

Notes:

- 1. Well profile based upon State Well Report (Tracking # 388365)

Well Profile: Odell Well No. 3

Electro Purification, LLC
Hays County, Texas

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SCALE: NONE

APPROVED BY: KK DATE: 10-26-17

REVISED BY: DATE:

DRAWING NO: W-7

SHEET: 7 OF 7