



## Wet Rock Groundwater Services, L.L.C.

*Groundwater Specialists*

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Barton Springs Edwards Aquifer Conservation District  
Attn: John Dupnik, General Manager  
1124 Regal Row  
Austin, Texas 78748

January 19, 2016

RE: Staff Review of a Temporary/Regular Permit Application submitted by **Needmore Water LLC**, for authorization to produce groundwater from the Middle Trinity Aquifer

Dear Mr. Dupnik,

This letter is in reply to your letter dated December 18, 2015 requesting additional information regarding the Needmore Water, LLC regular permit application.

**3-1.4(A)(7)(a,b,c,d) – Provide a written statement describing the nature, purpose, location, pumpage volume, demand trends, and conservation practices.**

**(a) Nature, Purpose, and Location**

- i. The LaMantia Ranch, locally known as Needmore Ranch (the Ranch), covers approximately 5,071 acres in western Hays County. The LaMantia Family purchased the Ranch from the Estate of John O'Quinn in the spring of 2011. Since purchasing the Ranch, the LaMantia Family has worked to improve the agricultural productivity and management across the Ranch, planning long-term to use the Ranch for such activities as a cattle yearling operation and open space for the Family. Greg LaMantia serves as the Family's manager of ranching operations. Since acquiring the Needmore Ranch, the LaMantia's have been working to restore the overgrazed pasture lands across the property. This multi-year process, which is ongoing, included the following steps:
  1. Remove all livestock from the property – the herd of cattle acquired with the ranch has been sold off. Some pastures have been fenced off to isolate and/or exclude wildlife, e.g., deer herds, etc.
  2. The overgrazed pasture lands have been allowed to lay fallow and recover from the overgrazing they experienced due to the prior owner's poor agricultural and animal husbandry management practices. The pastures also either have been or will be planted with improved grasses, including some non-native and annual species, e.g., hay grazer, coastal oats, that will require irrigation to supplement the available rainfall. Along with pasture rotations, the owners will also multi-crop annually rotating crops based upon seasons.
  3. Once the pastures have been allowed to recover and become reestablished for grazing purposes, the ranch will be restocked with both cattle and deer.

4. During the past year, Needmore Ranch has been researching and soliciting bids and cost estimated for various types of pipeline and related irrigation equipment, including center pivot systems. The irrigation of the property was for the purposes of watering native grasses on the property in the area surrounding the Blanco River in addition to other parts scattered throughout the Ranch. Previously the well has also been used to fill stock ponds located along Sycamore Creek.
- ii. The well is located at 29° 58' 12.99" N, 98° 2' 2.99" W. The produced groundwater will be distributed throughout the Ranch. The Ranch is located within both the Barton Springs Edwards Aquifer Conservation District (BSEACD) and the Hays Trinity GCD and water produced from the well will be used within and outside of the BSEACD on the Ranch property.
  - iii. No water will be resold, leased, or transported outside of the Ranch property.
- (b) Pumpage Volume**
- i. The proposed pumping rate at Well D within the Needmore Ranch is 550 gpm; this is based upon the "maximum production capacity" of the well calculated from previous aquifer testing as authorized by HB 3405. *See* Acts of 2015, 84<sup>th</sup> Leg. R.S. Ch. 975, § 4(a)(2) (defining "maximum production capacity"). Historically, a Grundfos 475S600-6A pump was used in the well. A Grundfos 475S600-7A is the largest pump that would fit within the well bore as drilled prior to the effective date of HB 3405, that can be used to produce at the maximum well capacity. Using the "maximum production capacity" of Well D as that term is defined in Section 4(a)(2) of HB 3405, the calculated production capacity was calculated to be 550 gallons per minute, or 289,080,000 gallons per year (887 ac-ft) capability on an annualized basis. That is the volume relied upon by Needmore in its Application, and is the Volume of production capacity Needmore seeks to be authorized in its Regular Permit. It is, therefore, the volume of production capacity Needmore has identified and used to develop its aquifer testing protocol to be implemented later this month. HB 3405 does not require historic application of water to any particular beneficial use or purpose as the criteria for granting either a Temporary or Regular permit. The current pump depth is set at 462 feet; future pump depths may be increased to 600 feet.
  - ii. Needmore Water, LLC has been issued a temporary permit volume of 179,965,440 gallons per year for the purpose of Agricultural Livestock (Recreation and Wildlife Management). Needmore Water, LLC is requesting an amount of 289,000,000 gallons per year which is based upon the maximum well capacity of the well as authorized by HB 3405. The proposed uses of the groundwater include Domestic, Agricultural, Livestock, Recreation and Irrigation purposes.
- (c) Demand Trends**
- i. Projected annual volume breakdown of the use of water. Based upon a lack of regulated history for groundwater production, and Needmore's recent acquisition of the property and land and resource restoration and rehabilitation efforts, and substantial rainfall during the period, groundwater production was not required. Accordingly, current and future needs are unknown. As specific needs and demands are identified and/or implemented, Needmore will coordinate with the District and report the same.
  - ii. For the next three years to five years, quarterly production volumes are anticipated to be evenly spread at 72,270,000 gallons per quarter
  - iii. Future demand will be dependent upon the success of revegetation, climatic conditions, and the livestock population at Needmore Ranch, and economic and market conditions.
- (d) Conservation Practice**
- Hundreds of acres have been reseeded within the north pasture with native seed mix, which require less intensive irrigation once established;



- The number of head of cattle onsite has been reduced to allow previously overgrazed pastures to recover;
- The Ranch received permission from the United States Army Corps of Engineers to construct a ponded water feature which is used for watering both domestic livestock, and the native wildlife. The pond is constructed in a location designed to capture rainfall sheet flow on the property, reducing the need for pumping; and
- Continual checks for irrigation system leaks are carried out by ranch hands; if a leak is discovered, irrigation valves are shut-off immediately and repairs are promptly made.

**3-1.4(A)(7)(g) – Hydrogeological report in accordance with Rule 3-1.4(D).**

Needmore Water is currently awaiting the start of the aquifer test and will complete the hydrogeological report after the testing is complete. We will coordinate these activities with the District.

**3-1.4(A)(7)(h) – User Conservation Plan (UCP), User Drought Contingency Plan (UDCP), and Drought Target Chart (DTC).**

**User Conservation Plan – Awaiting guidance from the District**

**User Drought Contingency Plan – Awaiting guidance from the District**

**Drought Target Chart – See Attached**

Should you or your Staff have any questions with respect to the responses above, please feel free to call me, or Ed McCarthy. You can reach me here in Austin at (512) 773-3226, and Mr. McCarthy at (512) 225-5606.

Thank you for your assistance in this regard. We look forward to continuing to work with you and your staff in the processing of these applications to the issuance of Needmore's Regular Permit.

Best wishes.

Sincerely,  
Wet Rock Groundwater Services, LLC



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Mr. Kaveh Khorzad, P.G.  
President/ Senior Hydrogeologist

cc: Needmore River Ranch II LLC  
Attn: Greg LaMantia, Manager

Needmore Water LLC  
Attn: Greg LaMantia, Manager

Ed McCarthy, Special Counsel

