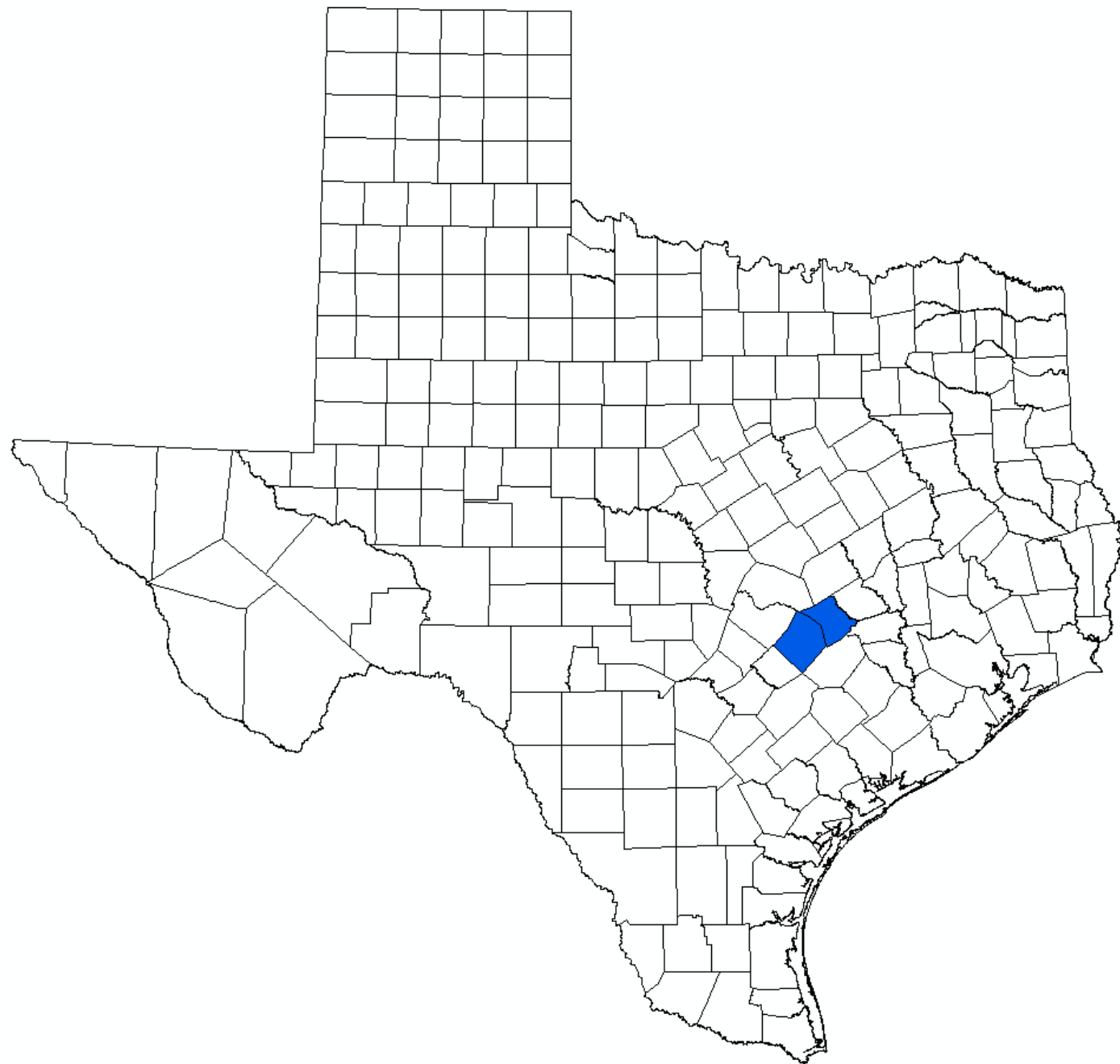


# GMA12 DFC Joint Planning



LPGCD Proposed DFC presentation

GMA12 Meeting

April 27, 2026



# GMA12 joint planning process

- 4 out of the 5 GCDs in GMA12 are being affected by production from outside their District for which we have no control over.
- Groundwater production is managed at the GCD level, but their impacts are regional.
- The long term management and depletion of the Carrizo-Wilcox aquifer must be managed regionally.

# GMA12 mitigation

- LPGCD wishes to enter into a mitigation ILA with POSGCD. Since 2022, POSGCD has repeatedly declined to enter into a mitigation ILA with the LPGCD. The recent POSGCD position is that BVGCD must be involved.
- In October 2023, the GMs and Presidents of BV, POS and LP all met and decided to bring the joint mitigation matter to their respective boards. The BVGCD board decided not to continue mitigation discussions. The LPGCD board unanimously approved further discussions.
- The plan is for the 3 middle GCDs to meet again and discuss a joint mitigation program.

# LPGCD GMA12 2025 Resolution

- The LPGCD goal has been to keep at least 50% remaining average well-based artesian head, based upon a 2024 study by Dr. Hutchison. This is the GMA12 directive approved by the LPGCD board in Resolution No. 2025-02-01.
- The LPGCD has spent hundreds of thousands of dollars this cycle to create a 3D geologic model, water level studies, water budget studies, drawdown and % remaining artesian head studies, GCD production impact studies (Factors 1, 3 and 4) and a Socioeconomic well impact study and GMA12 proposal (Factor 6).
- Science has been the centerpiece of the LPGCD DFC decisions.

**RESOLUTION ADOPTING LOST PINES GROUNDWATER CONSERVATION  
DISTRICT'S GMA12 DIRECTIVES**

WHEREAS, Lost Pines Groundwater Conservation District ("LPGCD"), Brazos Valley Groundwater Conservation District, Fayette County Groundwater Conservation District, Mid-East Texas Groundwater Conservation District, and Post Oak Savannah Groundwater Conservation District, political subdivisions of the State of Texas, are members of Groundwater Management Area 12 ("GMA12") for the purposes of joint planning to develop Desired Future Conditions ("DFCs");

WHEREAS, pursuant to Section 36.108(d-2) of the Texas Water Code, the District considers the balance between the highest practicable level of groundwater production and the conservation, preservation, protection, recharging, and prevention of waste of groundwater and control of subsidence in the management area when establishing the DFCs;

WHEREAS the District secured hydrogeologic and engineering consulting services to provide technical support in their effort to establish LPGCD's DFCs;

WHEREAS, LPGCD's General Manager is LPGCD's designated district representative at GMA 12; and

WHEREAS, the Board of Directors of the LPGCD seeks to direct the General Manager to facilitate his participation in developing the DFCs at GMA 12.

NOW, THEREFORE, BE IT RESOLVED the Lost Pines Groundwater Conservation District provide to its General Manager the following directives at the GMA12:

1. All GCDs within the GMA12 should use the same criteria and methodologies in order to provide a like-to-like comparison and consistency across the GMA12.

2. All GCDs should use the same GAM post-processor software so that there are no model variances between the GCDs at the GMA12.

3. In order to protect the aquifers for future generations and to maximize production, the 2070 DFC is to maintain at least a 50% remaining, average well-based artesian head.

4. All GCDs should include all issued permits in a GAM run.

5. Joint funding should be provided to develop a robust GMA12 socio-economic model.

6. Joint funding for the explanatory report should be based upon equal GCD proportions. As an exception, for this 2026 cycle, up to 30% has been approved.

LPGCD Resolution No.  
2025-02-01 advocates:

1. for all GCDs to use the same methodologies & no variance
2. to maintain at least 50% average well-based artesian head.
3. to include all granted permits in a GAM run
4. joint funding for a robust socioeconomic model – proposed at July 31, 2024 GMA12.

# LPGCD average % remaining well-based artesian head

- The % remaining average well-based artesian head study was recently updated, given additional well data and PS4-2mod. The Carrizo and Calvert Bluff % remaining are below 50%, at 41% and 38% respectively.
- The OPMAN model reveals these numbers are actually worse.

# LPGCD Remaining Artesian Head Percent (Average by Registered LPGCD Wells)

| Layer |               | PS4-2 | PS4-2mod |
|-------|---------------|-------|----------|
| 3     | Sparta        | 74%   | 74%      |
| 5     | Queen City    | 76%   | 74%      |
| 7     | Carrizo       | 44%   | 41%      |
| 8     | Calvert Bluff | 41%   | 38%      |
| 9     | Simsboro      | 63%   | 62%      |
| 10    | Hooper        | 71%   | 69%      |

Model: Central SP-QC-CW GAM v.3.02  
Drawdown =  $WL_{31Dec79} - WL_{01Jan11}$  (ft)  
DD Calculation Code: Spheros Python Script

# GMA12 timeline

- October, 2023 - first unanimous vote to evaluate the 9 factors using the adopted PS3-19 DFCs. BVGCD seconded this motion.
- GMA12 spent all of 2024 reviewing and evaluating the 9 factors with adopted DFCs.
- Sept, 2024 - BVGCD first presented their model run named the “Best Estimate” run.
- February, 2025 - BVGCD presented their “Best Estimate” run. GMA12 2<sup>nd</sup> unanimous vote to continue to evaluate the same/similar adopted DFCs.
- April, 2025 - the first official GAM run, PS4-1, was presented. BVGCD advocated for their “Best Estimate” run.
- June 27<sup>th</sup>, 2025 - GMA12 PS4-2, the second official GAM run, was first presented. BVGCD presented a “Bridge Run”.
- June, 2025 - BVGCD Settlement agreement

# GMA12 timeline cont'd

- Sept 3<sup>rd</sup> , 2025 - BVGCD first introduced another new model run named “Potential PS4-3”, their 3rd model run in 3 consecutive GMA12 meetings.
- November 20, 2025 – GMA12 3<sup>rd</sup> informal vote (4 to 1) to proceed with the evaluation of the 9 factors with PS4-2.
- April 2nd, 2026 - BVGCD presented to the GMA12 a BV-specific socio-economic report comparing the official PS4-2 to their “Potential PS4-3”.
- GMA12 evaluated PS4-2 against the 9 factors at the March 25, April 2<sup>nd</sup> and April 16<sup>th</sup> 2026 meetings. PS4-2 has been evaluated and improved over the course of the past 9 months.
- GMA12 voted 4 to 1 for the PS4-2 modv8 at the April 16, 2026 meeting.

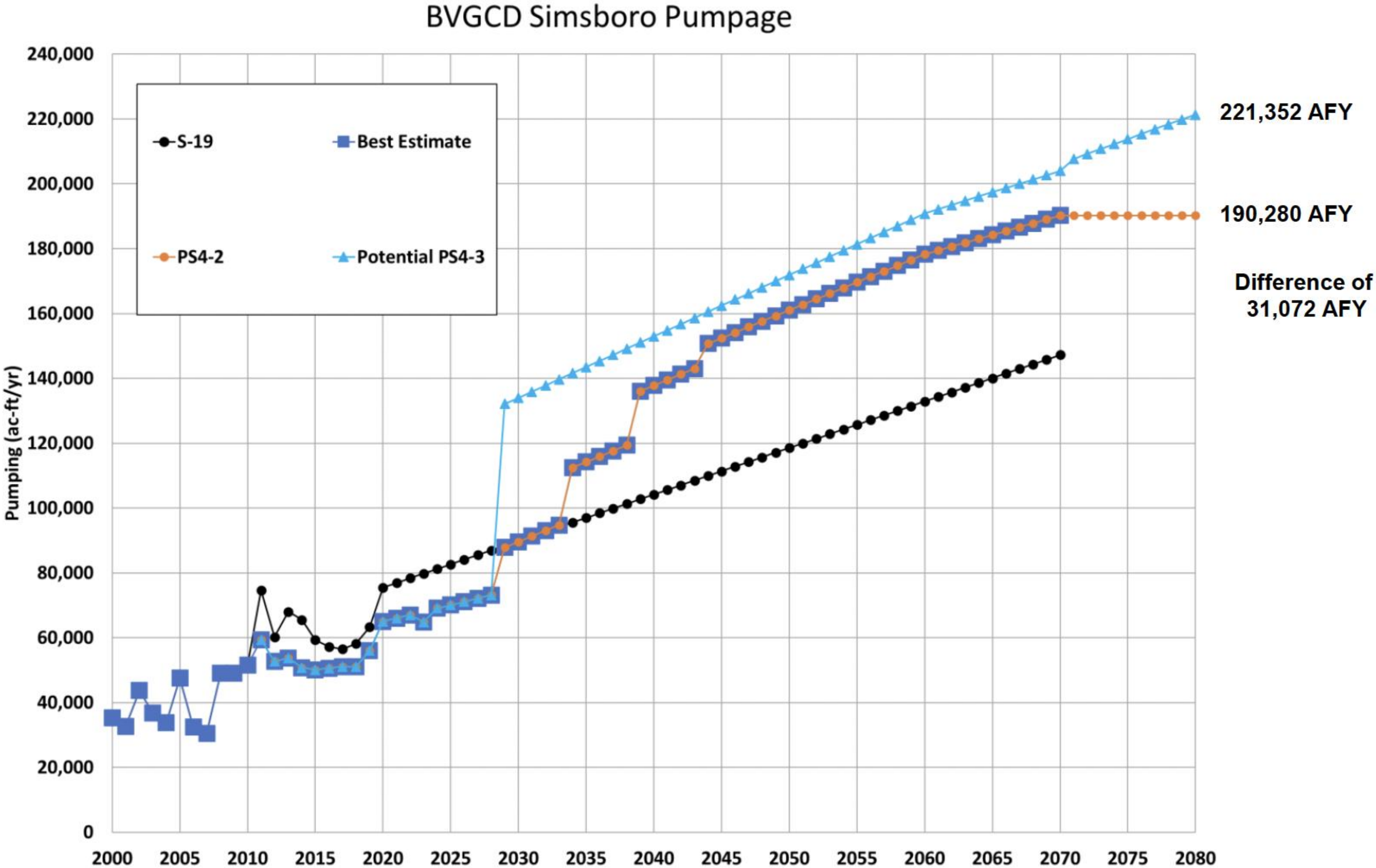
BVGCD Cause No. 24-002626-CV-472

Settlement agreement, June 2025

**THE “PARTIES AGREE NOT TO OBJECT TO A DFC FOR THE SIMSBORO FORMATION WITHIN GMA12 OF AT LEAST 329 FEET AVERAGE DISTRICT WIDE DRAWDOWN WITHIN THE DISTRICT FROM 2000 THROUGH 2070 (THE LOCALLY PREFERRED DFC). THE GM AGREES TO ADVANCE AND ADVOCATE FOR THE LOCALLY PREFERRED DFC IN EVERY JOINT PLANNING MEETING OF GMA12 AFTER THE EFFECTIVE DATE THROUGH MAY 2026 WITH THE GOAL OF HAVING THE LOCALLY PREFERRED DFC AS THE PROPOSED DFC IN THE MAY 1, 2026 PROPOSAL DATE.”**

# Comparison of Simsboro Pumping Scenarios

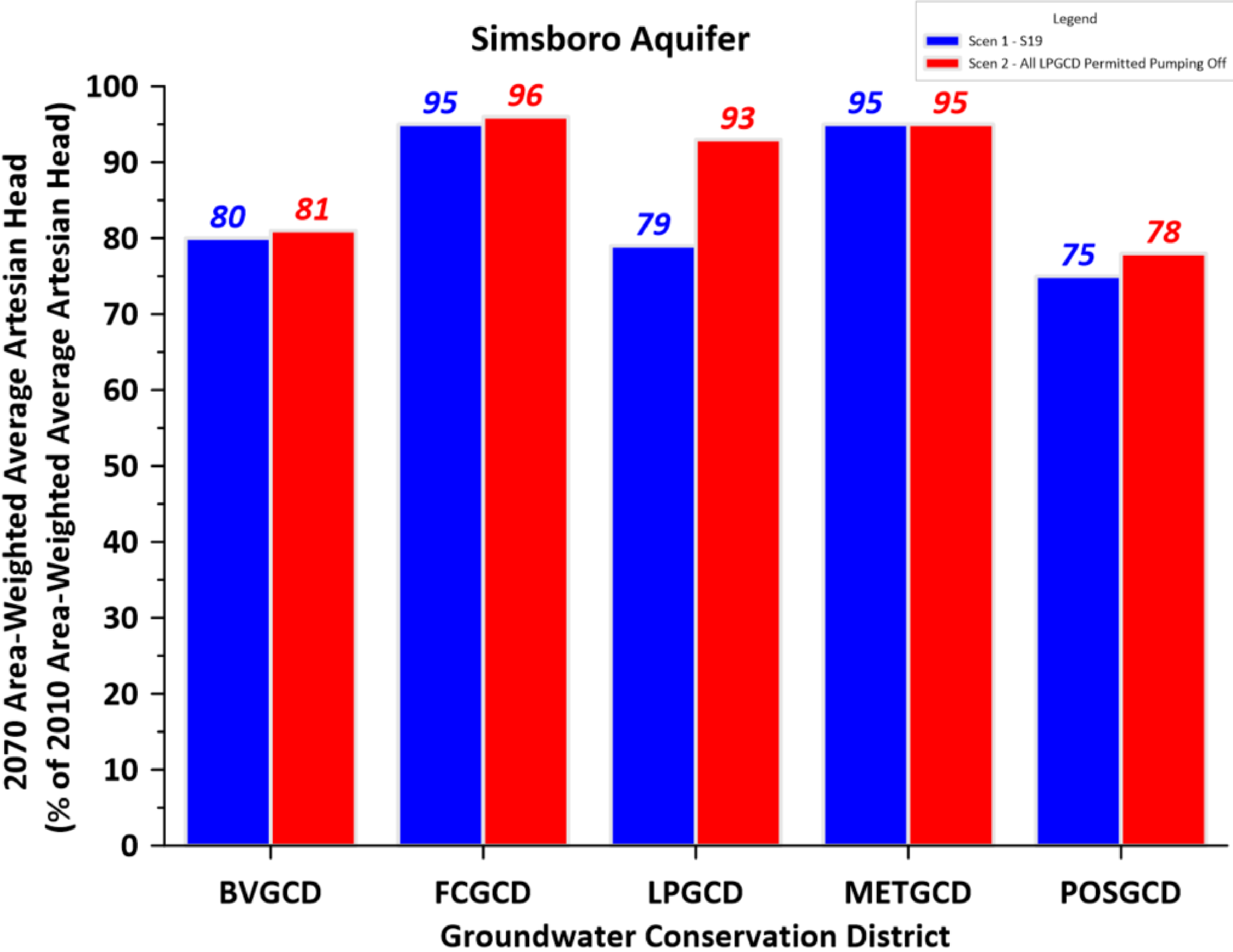
BVGCD PS4-2 is the exact pumpage as that proposed, in their Best Estimate run, from Sept 2024 thru Sept 2025.



Analysis of  
LPGCD  
production upon  
the other GMA12  
GCDs.

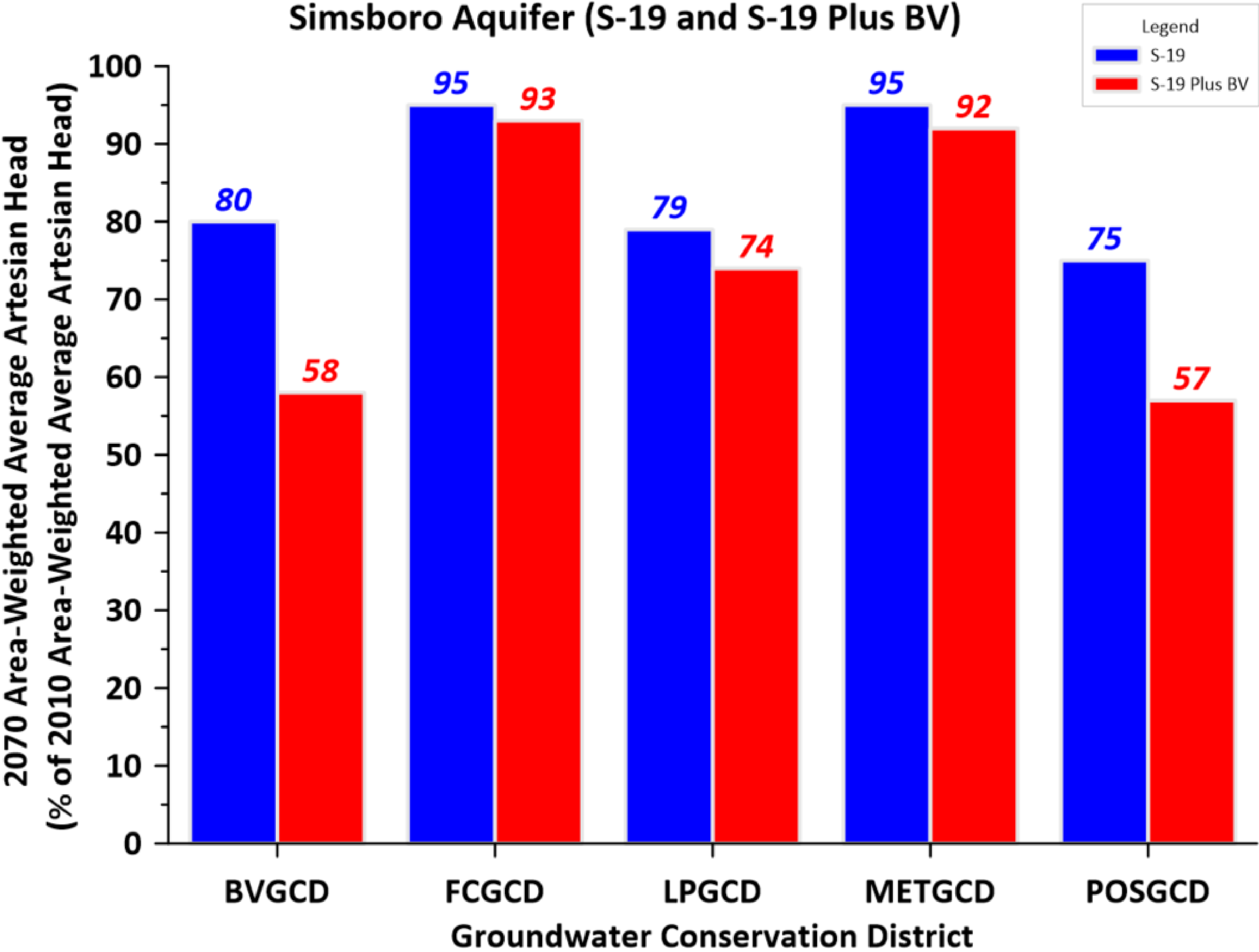
The LPGCD hardly  
affects any other  
GMA12 GCD

*Dr. Hutchison 9/18/24  
LPGCD board meeting*



# Analysis of BVGCD production upon the other GMA12 GCDs.

*Dr. Hutchison  
9/18/24 LPGCD  
board meeting*



## PS4-2 – LPGCD ASSUMPTIONS

- 2020-2024 pumping replaced with historical values
- Current permits start at their current average and escalate 0.8% per year until reaching limit
- Curtailment happens year after 90% of DFC reached (approximate) for aquifer layer
  - 35% for Wilcox layers
  - 30% for other layers
- Pumping in well fields divided proportionally

*This slide was presented at the June 27, 2025 GMA12 meeting and the September 2025 LPGCD board meeting. Reduction to permitted amounts doesn't make sense - that wouldn't slow the drawdown as the DFC approaches 100%. Reductions must be based on production and not permitted amount.*

# LPGCD non-exempt Permits & Production Limits

- Every LPGCD non-exempt permit includes the following special condition:

“This permit is issued subject to any future production limits adopted by the District under the District Rules.”

Every permittee is aware that they are subject to potential future LPGCD production limits.

- The reason for the PS4-2 Recharge pumping assumption is that the Recharge permit has 4 phases and Recharge may not request an increase from 25,000 AF unless their Simsboro “Estimated DFC” is less than the adopted DFC. Recharge has been paying permit fees on 25,000 AF, not 46,000 AF.

# GMA12 DFC

- BVGCD excluded 167,000 AF of granted permits in their model runs, but yet included new non-permitted demand in their Potential PS4-3 run.
- A "scientific" DFC process should use consistent methodologies among every GCD and throughout all cycles.
- Questions for BVGCD:
  - ☐ Have these BVGCD excluded permittees been contacted to help determine the disposition of these permits come September?
  - ☐ In September 2026, if these permits persist will BVGCD update their model run to include the continued permits?
  - ☐ Could BVGCD please provide a list of these 167,000 AF excluded permits?

# GMA12 Proposed DFCs

- Both LPGCD and POSGCD limit permitted production in the PS4-2mod .wel file, while BVGCD excluded granted permits. Clearly, the Carrizo-Wilcox aquifer is over permitted in GMA12.
- PS4-2mod is the BVGCD “Best Estimate” pumping thru 2070.
- The GCDs are not close to reaching their adopted Simsboro DFC; the Simsboro 2080 DFC will not be met within the next 5 years.
- LPGCD production will not be limited in the next 5 years.
- There is no disadvantage to keep the adopted LPGCD DFCs for 5 more years and reevaluate in the next 5 year DFC cycle.