Item #7b Belton Partners LLC Travel Center

Gamblin Engineering Group Texas P.E. Firm # F-22202



19125 Adrian Way, Suite 100 Jonestown, TX 78645

512-484-2033 GamblinEng@gmail.com

Mr. Dirk Aaron **General Manager Clearwater Underground Water Conservation District** 700 Kennedy Court Belton, TX 76513 Phone: 254.933.0120; Email: daaron@cuwcd.org

Subject: Combination Drilling Permit and Operating Permit Application for the Belton Partners, LLC proposed well on 12.62 acres of land southeast of the intersection of IH-35 and Dillard Rd., Bell County, Texas.

Dear Mr. Aaron:

Gamblin Engineering Group, LLC (Gamblin Engineering) is pleased to present this combination Drilling Permit and Operating Permit Application to the Clearwater Underground Water Conservation District (CUWCD) on behalf of Belton Partners, LLC for a proposed Non-Exempt, Well Classification 2 (N2), Public Water Supply well. The proposed well will be constructed on a 12.62 acre tract of land located within the southern boundary of the city limits of Belton, Texas southeast of the intersection of IH-35 and Dillard Road. The property is owned by Belton Partners, LLC and lies within the City of Belton's CCN. Groundwater allocated to this project will be utilized to service a proposed Travel Center which will provide fuel and convenience shopping services to the general public. Funding for the project is being provided through private sources.

The proposed well is designed to target the Edwards (Balcones Fault Zone) Aquifer and it is anticipated that the production zone will be from approximately 120 feet below ground surface (bgs) to 240 feet bgs (see Proposed Well Construction Drawing). The pumping rate from the well is anticipated to be intermittent and be from 20 to 40 gpm.

The proposed use of the groundwater form the well will include public restroom washing facilities and restaurant kitchen utilization, therefor, Public Water Supply permitting through the Texas Commission on Environmental Quality (TCEQ) will be required for this project. Included in the TCEQ permit requirements are detailed drawings and specifications meeting all the requirements in TCEQ regulations which will be shared with the CUWCD when developed.

The existing well (designated as "E-03-427P" in the CUWCD database) will be plugged and abandoned in accordance with CUWCD and Texas Department of Licensing and Regulation (TDLR) regulatory requirements.

NEEDS ASSESSMENT

Belton Partners, LLC originally requested service from the City of Belton for water supply. The City of Belton informed Belton Partners, LLC that it was not feasible for the City to supply water in the location that the proposed project is to be implemented.

The proposed Travel Center will include a truck stop and service center. Belton Partner, LLC consultants have estimated the following usage rates based on high volume truck stop and service center usage and flow rates for fixtures listed on Plumbing Fixture Schedules:

Peak Flow Rate ~ 4 gpm Average Pressure ~ 50 psi

Water Volume and Pressure Requirements: Gallons Annually ~ 803,000 gallons 814,628 pr 2.5 acreft/yr (DA)

Dirk Aaron July 23, 2021

Converting the annual usage estimate to acre-ft results in an annual production rate of approximately 2.5 acre-ft. Applying a 1.2 safety factor (1.2 x 2.5 acre-ft) results in the 3 acre-ft allocation of groundwater needed for this project.

Belton Partners, LLC will comply with CUWCD's Management Plan and comply with all of the District's rules and all groundwater use permits and plans promulgated pursuant to the District's rules.

Gamblin Engineering appreciates the opportunity to submit this information for review. We welcome any questions or comments you may have concerning this Drilling/Operating Permit Application. Please call me at 512.484.2033 or by email at wgamblin@gamblineng.com.

Kind regards,

With An, P.E.

William Gamblin, P.E. Principal Engineer

Drawings: Proposed Well Area Map Proposed Well Location Proposed Well Construction

<u>Attachments:</u> Attachment 1 – Class 2 Non Exempt Well Drilling Permit Application

		CLASSI	ICATIO	N 2
254 911.0120 Fac: 554 916.8390 c 1939, Below, 7x 7611. N-EXEMPT WELL, CLASSIFICATIO 1) A water well used for purposes 2) A water well that is drilled, equ	ON 2 is a well that satisfies other than domestic, livesto	ock or poultry; or	_	- 21 - 007 25,000 gallons/day.
one of the following: DRILLING PERMIT	OPERATING PER	NIT		MENDMENT
(Complete Sections 1, 2, 3, 4 & 7)	(Complete Sections 1, 5	5&7;	Modify Dilli	ng Permit
New Well	update Sections 2, 3, & different from Drilling			ections 1,2,3,4 & 7)
Replacement Well	Water to Remain in Dis	strict	Modify Oper (Complete So	ating Permit ections 1,5 & 7)
	Water to be Exported C	Dutside District*		ell Ownership ections 1 & 7)
n application for an Operating Permit must b asys of completing a new well, or reworking/re- sisting well. Hydrogeological Report is required for 1) O pplications requesting an annual maximum per ore than 37 acre-feet, or 2) amendments to inc production capacity of a public water supply, ommercial, industrial, agricultural or irrigation stield easing diameter greater than 6.5.8 inche- istrict Rule 6.9.2 Requests to export water outside the District mo- multi Section 7.	equipping an perating Permit mitted use of rease production municipal, s well with an s s as discussed in c ust also	State of Texas We within 60 days of NEW Per District Water Quality As installer and/or W sereen test, sampl Installer or Drille days of the well is punge the well is pung permanentl	Rule 9.3.3 at com sessment is require	to the District pletion of all wells d by the Pump t Staff will provide dinate with Pump nple within <u>45</u> rary pump to well not have 45 days. This
	timati nash786110@	sucglobal.net Tel	phone No.: (512)	203 - 5049
	San Ant		Texas (State)	78528 (Zip Code)
Address: 24026 Seven Winds (Street or P.O. Box)	San Ant	tonio (City)	Texas (State)	78528 (Zip Code)
Address: 24026 Seven Winds (Street or P.O. Box) Contact Person (if other than owner): Na	San Ant sruddin Mahesania	(City) Telepho	Texas (State) ne No.: (512) 20	78528 (Zip Code) 3 - 5049
Address: 24026 Seven Winds (Street or P.O. Box) Contact Person (if other than owner): Na f ownership of well has changed, name o	San Ant sruddin Mahesania previous owner	tonio (City) Telepho	Texas (State) ne No. (512) 20 State V	78528 (Zip Code) 3 - 5049
Address: 24026 Seven Winds (Street or P.O. Box) Contact Person (if other than owner): Na f ownership of well has changed, name o Property Location & Proposed Well Loo Owner of property (if different from well o	San Ant sruddin Mahesania previous owner sation owner): Same (Belton	tonio (City) Telephon n Partners,	Texas (State) ne No. (512) 20 State V	78528 (Zip Code) 3 - 5049 Vell No.
Address: 24026 Seven Winds (Street or P.O. Box) Contact Person (if other than owner): Na f ownership of well has changed, name of Property Location & Proposed Well Loo Owner of property (if different from well of Property is located 0 mill (Number)	San Ant sruddin Mahesania previous owner sation owner): Same (Belton cs S of Be (N.S.E.W) of C	tonio (City) Telephon n Partners, Iton Nearest City or T	Texas (State) the No. (512) 20 State V LLC) on IH 33 (1)	78528 (Zip Code) 3 - 5049 Vell No.
Contact Person (if other than owner): <u>Na</u> f ownership of well has changed, name of Property Location & Proposed Well Loo Owner of property (if different from well o	San Ant sruddin Mahesania previous owner sation owner): Same (Belton cs S of Be (N.S.E.W) of C	tonio (City) Telephon n Partners, Iton Nearest City or T	Texas (State) the No. (512) 20 State V LLC) on IH 35 (1) 0.2''N Longitu	78528 (Zip Code) 3 - 5049 Vell No.
Address: 24026 Seven Winds (Street or P.O. Box) Contact Person (if other than owner): Na f ownership of well has changed, name of Property Location & Proposed Well Loc Owner of property (if different from well of roperty is located 0mil- (Number)	San Ant sruddin Mahesania previous owner ration swner): Same (Belton s S of Be (N.S.E.W) of <u>Be</u> (N.S.E.W) of <u>Be</u> (N	tonio (City) Telephon n Partners, Iton Nearest City or T itude: 30°59' 70 9 % 70 9 % reach purpose: ltry: podify a Certifica	Texas (State) te No. (512) 20 State V LLC) on IH 3: (State) 0.2"N Longitu Agricu Other. te of Convenience	78528 (Zip Code) 3 - 5049 Vell No. 5 Name of Road) de: 97°30'03.0"W
Address: 24026 Seven Winds (Street or P.O. Box) Contact Person (if other than owner): Na f ownership of well has changed, name of Property Location & Proposed Well Loc Owner of property (if different from well of (Number) Acreage: 12.62 Bell CAD Property 1 Vell Description (Submit if State of Texa Proposed use of well and estimated an "Domestic: Industrial: "Total number of houses to be serviced "Notice is required of any application provide water or wastewater service w 5. Estimated distance from nearest:(<i>feet</i>) 10 N / S Property Line: <u>Box</u>	San Ant sruddin Mahesania previous owner ration swner): Same (Belton s S of Be (N.S.E.W) of <u>Be</u> (N.S.E.W) of <u>Be</u> (N	tonio (City) Telephon n Partners, Iton Nearest City or 1 itude: 30°59' 70 9 % reach purpose: Itry: y: modify a Certifica to the requested p rty Line: 400 ter Well: 400	Texas (State) te No. (512) 20 State V LLC) on IH 3: own) on IH 3: (State) On IH 3: Output (State) (St	78528 (Zip Code) 3 - 5049 Vell No. 5 Name of Road) de: 97°30'03.0"W Construction: and Necessity to ptic Leach Field; inclosure;

tax plat map indicating the location of the proposed well or the existing well to be modified, the subject property, and adjacent owners' physical addresses and mailing addresses. (Bell CAD maps if current will be accepted) Indicate the location of the proposed well or the existing well to be modified with a circle and dot, and the distance to

• the well from property lines. CUWCD will provide the location of all existing wells within ½ mile radius of the proposed well or the existing well to

. be modified.

NOTE: If this is a replacement well, indicate location of well that is being replaced and distance from the proposed well. Abandoned well must be properly capped or filled in accordance with state law and the rules of the District. Revised February 4, 2020 Admin Form 3

me: 🛄	Date Otto	GUT A Participad	Automatic Station	TDLR Pump Installer License Number
dress:	Seat Street	All the second states		TDLR Well Drillers License Number
	(Street or P O	Box)		Comments/notes
	(City)	(State)	(Zip Code)	

4. Completion Information

Provide the following information to the extent known and available at the time of application.

NOTE: Provide the complete driller's log and any mechanical log, or chemical analysis, within 60 days of completion of well. Well must be drilled within 30 feet of the location specified and not closer to any existing well or authorized well site than the District's minimum spacing rule requires.

If amending existing permit, explain requested amendment and reason for amendment:

Proposed Total Depth of Well. 235 ft: Borehole Diameter (Dia) 10 inches (in) from 0 to 235.
Dia. (2)in_fromtoCasing MaterialSteeli Inside Diameter (ID)in.
Screen: Yes O No 💿 Screen Type Open Hole : Screen Dia in from 120 to 240 ft:
of Packers <u>1</u> ; Pump Type , submersible : Power , electric ; Horsepower Rating <u>TBD</u> . Depth: <u>205</u> ft. Column Pipe ID: <u>2</u> in. Date Completed
Proposed Water Bearing Formation: Edwards BFZ
Operating Permit
NOTE: If requesting operating permits or permit renewals for multiple wells, please attach a separate sheet with the informatio
requested below for each well
Current operating permit annual production Requested increase/decrease
Include statement/documentation explaining requested production
Number of contiguous acres owned or leased on which water is to be produced 12.62
Total annual production requested with this operating permit. 25 acre-feet or 814,628 gallon
Requested annual volume to be exported out of the District Gallons (% of total pumpage)
NOTE: (1 acre-foot = 325,851 gallons) Withdrawals from all non-evempt wells Classification 2 must be reported to the District monthly-by the 10'
of the following month
Export Requirements If water is to be exported outside the District, describe the following issues and provide documents relevant to these issues
The availability of water in the District and in the proposed receiving area during the period requested
• The projected effect of the proposed export on aquifer conditions, depletion, subsidence or effects on existing permit
holders or other groundwater users within the District
• How the proposed export is consistent with the approved regional water plan and certified District Management Plan
•

abide by the terms of the District Rules, the District Management Plan, and orders of the Board of Directors. Lagree to comply with all District well plugging and capping guidelines as stated in the District Rules. Nasruddin Mahesania Managing member 07/26/2021

Typed Name of the Owern or Designee

Date

PERMIT TERMS: Drilling Permits—effective for 365 days from the date the permit application is approved by the Board Combination Drilling / Operating Permits—effective until the end of the calendar year in which it is issued. Permits may be renewed by the General Manager, subject to any changes necessary under proportional adjustment regulations. District Rules, or the District Management Plan.

SPACING/ACREAGE REQUIREMENTS: Refer to District Rules, Section 9.5. For a well with a column pipe size of 2" or less, a minimum tract size of 2 acres is required, with a 100' setback from other well sites, and a 50' setback from property lines. Acreage and setbacks increase with larger column pipe size.

NOTICE REQUIREMENTS: <u>Permit applicants must provide notice of filing as follows</u>: 1) publication in a newspaper of general circulation in the District. and 2) certified mail, return receipt requested, to all adjacent property owners and owners of wells located within ¼ mile radius of the existing well or proposed well that is the subject of the application. The District will provide the appropriate forms for notification. Applicant must provide 1) proof of publication of public notice; and 2) proof of receipt by certified mail of the public notice to property owners as

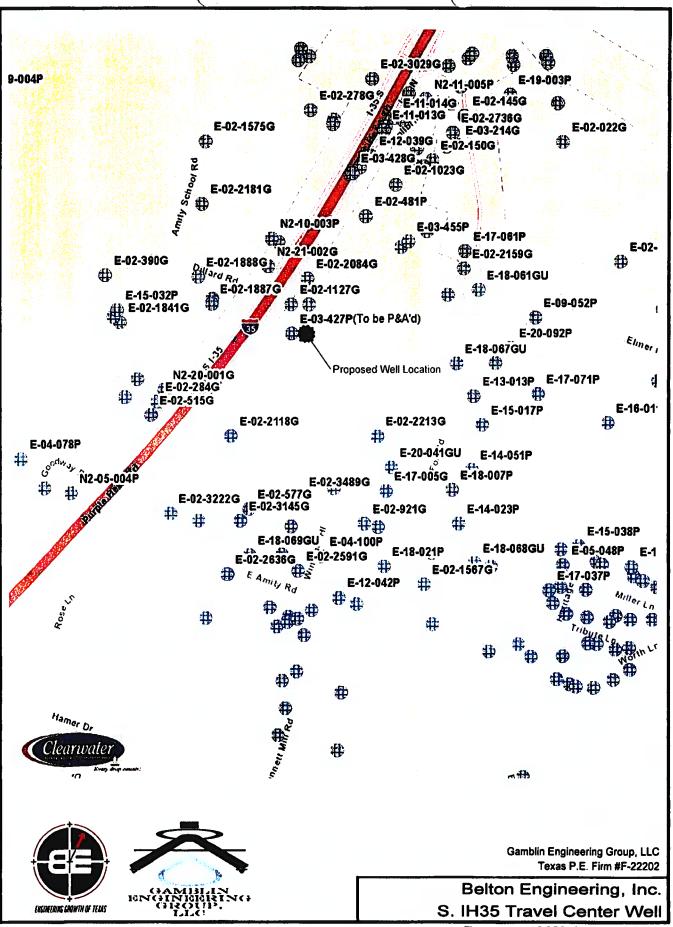
SUBMIT FOR ADMIN REVIEW

Drawings

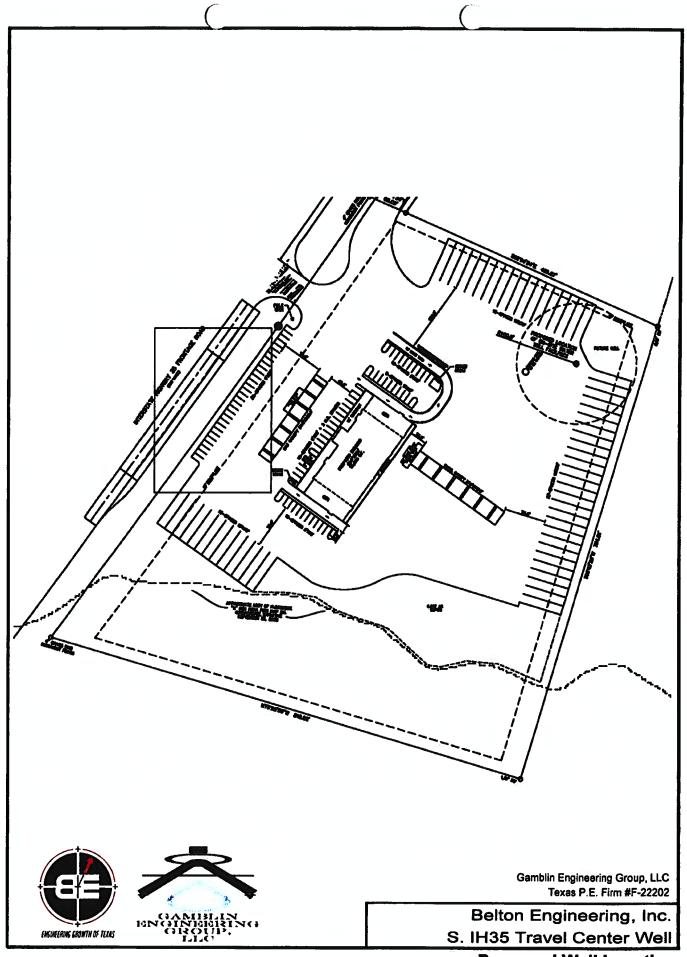
(

(

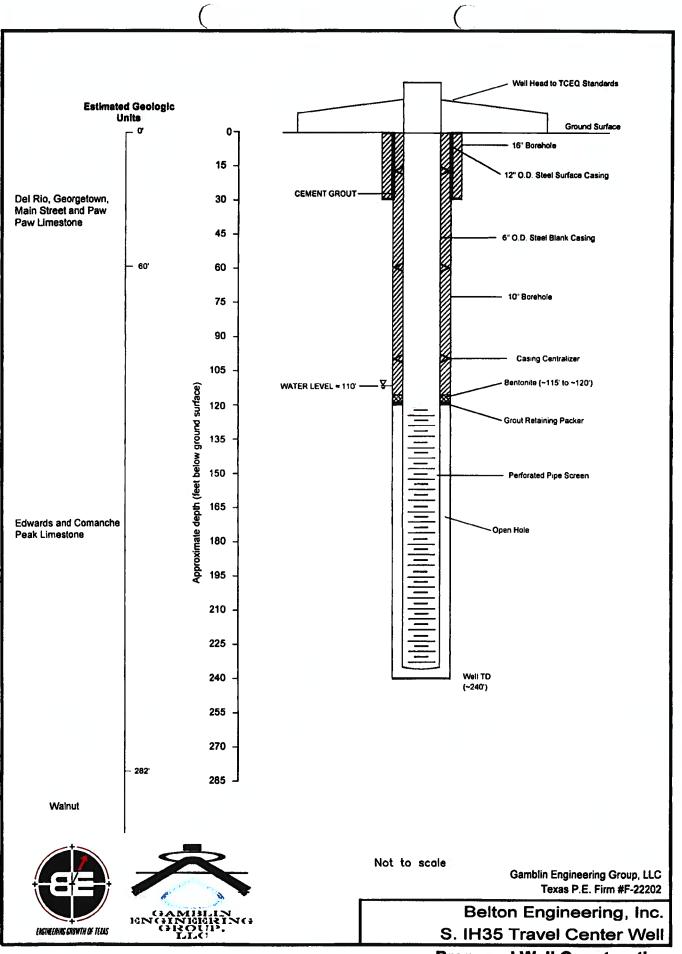
.



Proposed Well Area Map



Proposed Well Location



Proposed Well Construction

Bell CAD Property Details

Property De	tails
Account	
Property ID:	44489
Legal Description:	A0510BC G F LANKFORD, 22, (PT OF 16.260AC TR), ACRES 12.620
Geographic ID:	0544320000
Agent:	
Туре:	Real
Location	
Address:	IH 35 BELTON, TX
Map ID:	59B09 A38
Neighborhood CD:	LSALSARURE
Owner	
Owner ID:	884507
Name:	BELTON PARTNERS LLC
Mailing Address:	24026 SEVEN WINDS SAN ANTONIO, TX 78528
% Ownership:	100.0%
Exemptions:	For privacy reasons not all exemptions are shown online.

Property Values

Improvement Homesite Value:	\$0
Improvement Non-Homesite Value:	\$0
Land Homesite Value:	\$0
Land Non-Homesite Value:	\$226,554
Agricultural Market Valuation:	\$0
Market Value:	\$226,554
Ag Use Value:	\$0
Appraised Value:	\$226,554
Homestead Cap Loss: 😧	\$0
Assessed Value:	\$226,554

VALUES DISPLAYED ARE 2021 CERTIFIED VALUES.

DISCLAIMER Information provided for research purposes only. Legal descriptions and acreage amounts are for appraisal district use only and should be verified prior to using for legal purpose and or documents. Please contact the Appraisal District to verify all information for accuracy.

📕 Pr	operty Taxing Jurisdiction					
Entity	Description	Tax Rate	Market Value	Taxable Value	Estimated Tax	Freeze Ceiling
CAD	TAX APPRAISAL DISTRICT, BELL COUNTY	0.000000	\$226,554	\$226,554	\$0.00	
СВ	BELL COUNTY	0.396800	\$226,554	\$226,554	\$898.97	
RRD	BELL COUNTY ROAD	0.028500	\$226,554	\$226,554	\$64.57	
SSAL	SALADO ISD	1.374700	\$226,554	\$226,554	\$3,114.44	
TBE	CITY OF BELTON	0.630000	\$226,554	\$226,554	\$1,427.29	
WCLW	CLEARWATER U.W.C.D.	0.003272	\$226,554	\$226,554	\$7.41	

Total Tax Rate: 2.433272 **Estimated Taxes With Exemptions:** \$5,512.68 **Estimated Taxes Without Exemptions:** \$5,512.68

Property Improvement - Building

Property Land

Туре	Description	Acreage	Sqft	Eff Front	Eff Depth	Market Value	Prod. Value
DLCP	DRY LAND CROPLAND	8.338	363,203.28	0.00	0.00	\$149,684	\$0
DLCP	DRY LAND CROPLAND	4.282	186,523.92	0.00	0.00	\$76,870	\$0

Pro	perty Roll Valu	le History									
Year	Improvements	Land Market	Ag Valuation	Appraised	HS Cap Loss	Assessed					
2022	N/A	N/A	N/A	N/A	N/A	N/A					
2021	\$0	\$226,554	\$0	\$226,554	\$0	\$226,554					
2020	\$0	\$175,051	\$1,509	\$1,509	\$0	\$1,509					
2019	\$0	\$116,709	\$2,326	\$2,326	\$0	\$2,326					
2018	\$0	\$98,659	\$3,544	\$3,544	\$0	\$3,544					
2017	\$0	\$98,659	\$3,619	\$3,619	\$0	\$3,619					
2016	\$0	\$98,659	\$3,585	\$3,585	\$0	\$3,585					
2015	\$0	\$98,659	\$2,201	\$2,201	\$0	\$2,201					
2014	\$0	\$98,659	\$2,118	\$2,118	\$0	\$2,118					
2013	\$0	\$98,659	\$1,818	\$1,818	\$0	\$1,818					
2012	\$0	\$98,659	\$1,668	\$1,668	\$0	\$1,668					
2011	\$0	\$98,659	\$1,659	\$1,659	\$0	\$1,659					

Property Deed History

Deed Date	Туре	Description	Grantor	Grantee	Volume	Page	Number
10/14/2020	1	WARRANTY DEED	long, Gregory	BELTON PARTNERS LLC			2020056257
10/29/2007	1	WARRANTY DEED	BRUBAKER FAMILY REV TRUST	long, Gregory	Deed Num	200700046718	200700046718
6/13/2000	12	CORRECTION DEED	BRUBAKER, RAYMOND & WANDA	BRUBAKER FAMILY REV TRUST	4213	436	
6/22/1998	1	WARRANTY DEED	GUYER, ORPHA LEE	BRUBAKER, RAYMOND & WANDA	3815	14	

CUWCD Executive Summary

Staff Report Application for Drilling/Operating Permit N2-21-007P									
Applicant/Owner: Belton Partners LLC c/o Nasruddin Mahesania 24026 Seven Winds San Antonio, TX 78528 12.62-acre site Location of Well: 12.62-acre site Located at 7983 N. I-35, Salado, TX									
Proposed Annual Withdrawal; Rate of Withdrawal: 40 gpm Total: 2.5 ac-ft/yr or 814,628 gallons/year	30.9861661° / Lon Aquifer: Edwards BFZ	Proposed Use: Public water supply for a proposed travel center.	Nearest Existing Well: 5 wells within ¹ / ₄ mile; 22 wells within ¹ / ₂ mile.						

General Information

The applicant is requesting a drilling/operating permit, pursuant to District Rule 6.1, for a proposed new well (Well # N2-21-007P) to produce for public water supply for a proposed travel center on a 12.62-acre tract. The applicant plans to use the well to provide water to a proposed new travel center. The applicant is required to obtain a drilling/operating permit because this is a new well with a proposed use for public water supply. This well is considered a *Non-Exempt Well, Classification 2 (N2)*. All N2 wells are required to have a meter and report monthly production. The permit will be renewed annually by staff, unless the applicant's designated use changes, if the applicant fails to report monthly use, and if the condition of the well deteriorates and aquifer conditions change.

Special Provisions will be discussed with the board should the permit be approved, to ensure compliance and conservation. The permit will be renewed annually by CUWCD staff, unless the applicant's circumstances change, and/or special provisions are not complied with, and/or conditions of the Edwards BFZ aquifer merit curtailment of all permit holders in accordance with District Rules and Chapter 36 necessary to meet the DFC under statutory requirements.

The applicant is requesting an annual production volume of 2.5 acre-feet (814,628 gallons) for the purpose of public water supply to a proposed travel center on the district's application form. The well will be producing from the Edwards BFZ Aquifer at a maximum rate of 40 gallons per minute (gpm). Estimated annual production was calculated based on what the well is capable of producing and the needs of providing water to the travel center. In comparison to the exempt well privileges of 17 gpm or maximum 25,000 gallons per day is approximately 28 ac-ft/yr, thus applicant is requesting substantially less groundwater.

CUWCD consulting hydrogeologist, Mike Keester LRE Water LLC, has reviewed the application and has conducted the required drawdown analysis per district rules based on the application stating 2.5-acre feet/year. The applicant is required to pursue a permit with TCEQ for a public water supply well. Additional data will be afforded the district per the TCEQ requirement of an aquifer pumping test. Billy Gamblin (Gamblin Engineering) will testify to what this additional regulatory requirements are for the applicant.

This property lies within the City of Belton CCN #11133 (certificate of convenience and necessity) and the applicant has indicated he will not receive public water service to this property. The City of Belton has approved the use of a well in accordance stating that public water supply infrastructure is not in place along that segment of IH35 thus per their city ordinance requiring final approval of groundwater production within the city limits.

Per Rules 6.9 and 6.10

In deciding whether or not to issue a permit, the Board must consider the following:

- 1) **Does the application contain all the information requested?** The application is complete—all requested information has been provided.
- 2) Is the proposed use of groundwater dedicated to a beneficial use?

The water produced from this well will be used for public water supply for a travel center. Because it's for public water supply, they are also required to have the well permitted by TCEQ. Applicants' consultant (Gamblin Engineering Group LLC) is pursuing the appropriate approval from TCEQ and is engineering the well design and application process with CUWCD in accordance with TCEQ.

- 3) Has the applicant agreed to avoid waste and achieve water conservation? The applicant has agreed to avoid waste and achieve water conservation by signing the application form stating compliance with the District's Management Plan. Applicant understands the importance of water conservation measures in the business thus options for outside water conservation are vital to the sustainability of the aquifer.
- 4) Has the applicant agreed that reasonable diligence will be used to protect groundwater quality and that the applicant will follow well plugging guidelines at the time of well closure?

The applicant has agreed (by signing the application form) should the well deteriorate over time that state law and district rules require such well would be plugged before a replacement well can be drilled.

5) Does the proposed groundwater production well comply with spacing and production limitations identified in these rules? The proposed well will have a column pipe with an inside diameter of 2 inches. Based on this column pipe size, a minimum size tract of 2 acres is required, with a 100-foot spacing requirement from other wells, the 50-foot setback requirement from adjacent property lines is meet on all sides. District Rule 9.5.2 all property line setbacks have been agreed too.

The District rules do not impose production limitations other than those determined applicable in the review of the future operating permit and/or to prevent unacceptable

level of decline in water quality of the aquifer (known as proportional adjustment), or as may be necessary to prevent waste and achieve water conservation, minimize as far as practicable the drawdown of the water table or the reduction of artesian pressure, lessen interference between wells, or control and prevent subsidence. These issues are considered in Items 6 & 7 below and with staff recommendations to address potential concerns of adjacent property owners.

6) Does the proposed use of groundwater unreasonably affect existing groundwater and surface water resources or existing permit holders?

Based upon available information, there are 5 wells within $\frac{1}{4}$ mile of the well site. All 5 wells are active and completed to the Edwards BFZ aquifer. There are 22 additional wells within $\frac{1}{2}$ mile, of which are listed as active, inactive, capped, and plugged exempt and non-exempt wells.

Mike Keester, Hydrogeologist, LRE Water, has reviewed this application and has determined anticipated drawdown and has provided the <u>attached report</u>, with his conclusions and recommendations stating that the proposed well and permitted amount of 2.5 acre-feet/year will not diminish the ability of other aquifer users to produce water for a beneficial use from the Edwards BFZ Aquifer. He will also offer testimony as needed.

7) Is the proposed use of groundwater consistent with the District's Groundwater Management Plan?

The District's Groundwater Management Plan reflects a groundwater availability figure in the Edwards BFZ aquifer of **6,469 ac-ft/year Modeled Available Groundwater** (then reserve 825 ac-ft/year for exempt well use) thus **5,644 ac-ft/year is the Managed Available Groundwater for permitting.**

The board, per the district groundwater management plan, has evaluated groundwater available for permitting in the Edwards BFZ Aquifer and most recently evaluated the available groundwater for permitting (*consistent with the groundwater management plan <u>http://cuwcd.org/district-management-plan/</u> as stated on pages 9-13).*

The requested permit amount relative to the modeled available groundwater MAG determined by the Texas Water Development Board (TWDB) based on the desired future conditions (DFCs) established by the District for the Edwards BFZ Aquifer was set by CUWCD based on minimum spring flow of 200 ac-ft/month in January 2019. To achieve this DFC, the TWDB used a model that indicated the MAG was equal to 6,469 acre-feet per year from the Edwards BFZ Aquifer.

A summary of 2020 permit production, HEUP & OP Permit Analysis, pending applications and Exempt Well Reservations are for the Edwards BFZ Aquifer which is provided per District Report *(see attached Edwards BFZ Aquifer Status Report)*.

8) What is the Modeled Available Groundwater (MAG) calculations determined by the Executive Administrator of the Texas Water Development Board? Refer to #7 above. The modeled available groundwater will not be exceeded by granting this permit. *(see attached District Edwards BFZ Aquifer Status Report)*.

- 9) Per the Executive Administrator of the Texas Water Development Board's estimate of the current and projected amount of groundwater produced under the exemptions & exclusions in District Rule 6.3, does the District have adequate reservations of the MAG for exempt well users from the Edwards BFZ Aquifer? Reservation of Modeled Available Groundwater (MAG) for exempt well use will not be exceeded by granting this permit. 825 ac-ft is reserved vs 357 ac-ft estimated being used.
 - 10) Is the amount of groundwater authorized under all permits previously issued by the District exceeding the current MAG while taking in to account the reserved amount for exempt well users thus described as the managed available groundwater?

Refer to #7 above. Existing permits do not exceed the managed available groundwater (*modeled available groundwater – exempt well use = managed available groundwater*) for the Edwards BFZ aquifer <u>5,644 ac-ft per year</u>.

- 11) Has the general manager conducted a reasonable estimate of the amount of groundwater that is actually produced under permits issued by the District? The actual production from all permitted wells in in the Edwards BFZ Aquifer in 2020 was 2,189.47 acre-feet (87.13%) (Figures are based upon monthly production reports submitted to Clearwater by the permit holders in 2020 and 2021).
- 12) Has CUWCD taken into account the yearly precipitation and production patterns under District's the drought management plan for the Edwards BFZ Aquifer?

Clearwater is currently in no drought management stage based on the PDI system (average running total annual rainfall) over the Aquifer in the District, is currently at 36.992 inches rain received in the last 365 days (8/16/2021) thus 112.09% of annual expected rainfall of 33 inches. Permit holders did not exceed their total permitted amounts in 2020. The gravity of the drought of 2011-2015, 2018 and again in 2020 necessitated the need for all non-exempt permit applications to be evaluated based on conservative needs and usage that is not contradicted by the current drought contingency plan stage. Successful curtailments under SWSC drought plan as advised by CUWCD occurred successfully in the summer and early fall of 2020. Spring flow stabilized to levels necessary to protect spring flow.

Conclusions:

- CUWCD well records indicate that 5 wells (5 Edwards BFZ) are located within a ¹/₄mile radius and 18 additional Edwards BFZ wells, 1 Middle Trinity well, 1 Alluvial well and 2 undeclared wells are located within a ¹/₂-mile radius of the proposed well site. The wells listed as grandfathered exempt often have declared depths by the original registrant at incorrect depths based on limited information at the time.
- Proposed annual permit amount of 2.5 acre-feet (814,627 gallons/year) is substantially less than the allowed production of an exempt well under Chapter 36 and District rules to produce at a rate of 17 gallons per minute (or 25,000 gallons per day) for 365 days equaling 28-acre feet/year.

- The long-term pumping effects from the proposed well at the requested pumping amount are negligible and the combined effects from many wells with relatively small pumping rates can have a noticeable long-term effect on aquifer water levels per Keester's review, thus the drawdown will not diminish the ability of other aquifer users to produce water for a beneficial use. (*see Keester's Report*)
- District also will attain both a geophysical log and pumping test from the TCEQ requirements as described by Gamblin Engineering.

Recommendations:

- 1) Approve the application for Belton Partners LLC with the following N2 requirements and all agreed upon special conditions:
 - a. Require the well owner to have the driller/pump installer complete with the required sanitary seal if the proposed well will be closer than 100 feet and greater than 50 feet from the proposed on-site septic system.
 - b. Require that the well be equipped with a <u>removable plug</u> to allow clear access into the well for water level measurement by the District in addition to the standard requirement of a meter for monthly reporting to the district.
 - c. Require that the pump installer install a <u>measuring tube</u> alongside the column pipe to allow for measurement of the water level using an e-line or other direct measurement method.
 - d. The new well, per TCEQ requirements must have a pumping test and geophysical log thus we asked Mr. Gamblin to utilize the existing well (E-03-427P) has the observation well during the pumping test. This will need TCEQ approval and if denied by TCEQ (existing well per TCEQ requirements must first be plugged). If denied well N2-21-02G (R&A Hauling) is and alternative site at approximately 1000 feet from the proposed well.
 - e. Require that the existing well (E-03-427P) be plugged by a licensed pump installer prior to any on-site construction of the buildings and parking.
 - f. Require that the new well be measured by District Staff for the purpose including this additional data in the well monitoring program as a part of the DFC management effort by the district. Encourage applicant to install (with district assistance) an acoustic device aligned with the district's Wellntel continuous monitoring program.

CUWCD / LRE Geoscience Drawdown Analysis



Proposed Well ID: N2-21-007P

Well Name: Belton Partners LLC, Travel Center

Column Pipe Size: 2 Inches

Tract Size: 12.62 Acres

Aquifer: Edwards BFZ Aquifer

Proposed Annual Production: 2.5 Acre-Feet per Year

Proposed Instantaneous Pumping Rate: 40 gallons per minute

Proposed Well N2-21-007P is near an existing well identified as E-03-427P. Per Mr. William Gamblin, the existing well will be plugged and the new well will be completed as a public water supply well to meet the needs of a proposed travel center. Mr. Gamblin indicated the projected water usage for the center is 803,000 gallons with an average daily use of 2,200 gallons. Mr. Gamblin converted the projected annual use to 2.5 acre-feet with a peak instantaneous rate of 40 gallons per minute.

The potential effects of the proposed production on local water levels in the aquifer are calculated using the Theis equation¹ which relates water level decline (that is, drawdown) to the pumping rate of a well and properties of the aquifer. While the equation does not account for aquifer conditions which may affect the calculation of long-term water level declines (for example: aquifer recharge, faulting, or changes in aquifer structure), it does provide a very good, reliable, and straightforward method for estimating relatively short-term drawdown in and near a well due to pumping. As the duration of pumping and distance from the well increase, the uncertainty in the calculated drawdown also increases. To assess the potential effects from the proposed production, the equation uses values from the groundwater availability model datasets².

The following table presents the calculated drawdown at the proposed well and at other nearby wells completed in the same aquifer (see Figure 1). For *1-Day Drawdown*, we applied the proposed instantaneous pumping rate for a period of 24 hours. For *30-Day Drawdown*, we assumed peak pumping during the summer of about 15 percent more than the average monthly amount (that is, the proposed annual production rate divided by 12 then multiplied by 1.15). For *1-Year Drawdown*, we used the proposed annual production amount.

¹ Theis, C.V., 1935, The Relation Between the Lowering of the Piezometric Surface and the Rate and Duration of Discharge of a Well Using Ground-Water Storage: American Geophysical Union Transactions, v. 16, p. 519-524.

² Groundwater availability model (GAM) datasets include the Northern Edwards GAM, the Northern Trinty/Woodbine GAM (for the Upper and Middle Trinity aquifers), and the modified Northern Trinty/Woodbine GAM (for the Lower Trinity Aquifer).



	Distance from	1-Day	30-Day	1-Year
Well Name	Proposed Well (feet)	Drawdown (feet)	Drawdown (feet)	Drawdown (feet)
N2-21-007P				
New Travel	Not Applicable	13	Negligible	Negligible
Center Well				
E-03-427P				
(Owner's	20	3	Negligible	Negligible
Existing Well)				
E-02-1127G	440	Negligible	Negligible	Negligible
E-02-576G	516	Negligible	Negligible	Negligible
E-02-2084G	867	Negligible	Negligible	Negligible
N2-21-002G	1,098	Negligible	Negligible	Negligible
E-02-1887G	1,361	Negligible	Negligible	Negligible
E-02-1886G	1,378	Negligible	Negligible	Negligible
N2-10-002P	1,410	Negligible	Negligible	Negligible
E-02-1888G	1,726	Negligible	Negligible	Negligible
E-02-2118G	1,849	Negligible	Negligible	Negligible
E-02-2213G	2,060	Negligible	Negligible	Negligible
E-02-481P	2,125	Negligible	Negligible	Negligible
E-02-1158P	2,152	Negligible	Negligible	Negligible
N2-20-001G	2,202	Negligible	Negligible	Negligible
E-03-455P	2,297	Negligible	Negligible	Negligible
E-02-284G	2,384	Negligible	Negligible	Negligible
E-02-590G	2,460	Negligible	Negligible	Negligible
E-02-3489G	2,499	Negligible	Negligible	Negligible
E-02-504G	2,519	Negligible	Negligible	Negligible
E-02-1932G	2,549	Negligible	Negligible	Negligible
E-02-515G	2,557	Negligible	Negligible	Negligible
E-20-041GU	2,578	Negligible	Negligible	Negligible
E-02-2952G	2,623	Negligible	Negligible	Negligible
E-03-428G	2,624	Negligible	Negligible	Negligible
E-18-067GU	2,626	Negligible	Negligible	Negligible

The predicted drawdown presented above is based on our current understanding of the aquifer hydraulic properties and the estimated production from the proposed well. The predicted drawdown values presented do not include the effects from other wells pumping near the proposed well. Predicted drawdown of less than one (1) foot is considered negligible for analysis purposes due to inherent uncertainty in the aquifer hydraulic characteristics.

Water levels in the Edwards Aquifer can fluctuate by several feet annually. Overall, the Edwards Aquifer conditions are relatively stable in the area with regard to the water levels. Currently, water levels in the aquifer at the well location are below the elevation of the Salado Springs Complex indicating the well is not capturing flow that may otherwise discharge from the springs. Also, the predicted drawdown due to the proposed production will not measurably impact spring discharge. Figure 2 illustrates the location of the proposed Travel Center well relative to the Salado Springs Complex and the estimated water level surface in the Edwards Aquifer.



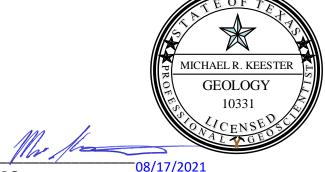
Recommendations

The pump installer should install an approved meter for monthly reporting of production to the District. A measuring tube alongside the column pipe to allow for measurement of the water level using an e-line or other direct measurement method is required. Upon discussion and coordination with the District, other automated water-level monitoring methods may be considered for installation with the well.

The new well will require a pumping test as part of the TCEQ approval process for use as a public water supply well. We recommend the District coordinate with Mr. Gamblin regarding the pumping test to assist in collecting aquifer hydrogeologic data. Depending on Belton Partners' development plans, we recommend using the existing well (E-03-427P) as an observation well during the pumping test. Using the existing well as an observation well will allow for the calculation of the local storage properties of the aquifer. Following completion of the aquifer test, the existing well could then be plugged as planned.

Geoscientist Seal

The following licensed professional geoscientist(s) have reviewed the results and recommendations presented in this report regard the potential effects due to production from the proposed well.



Michael R. Keester, PG Senior Project Manager | Hydrogeologist LRE Water, LLC



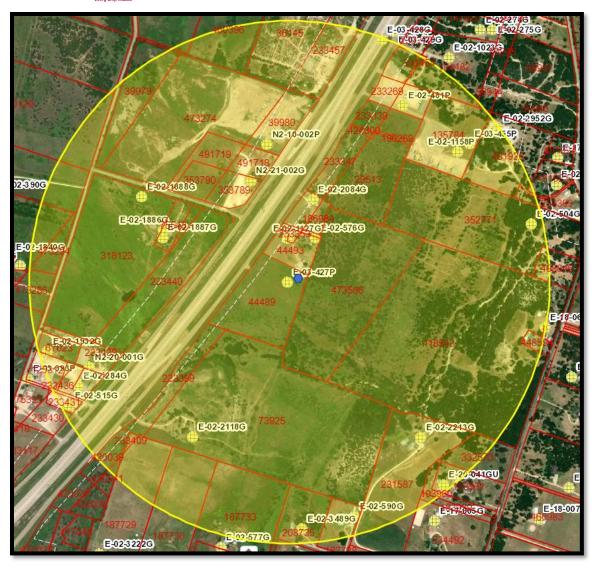


Figure 1. Proposed production well and other wells within one-half mile radius.



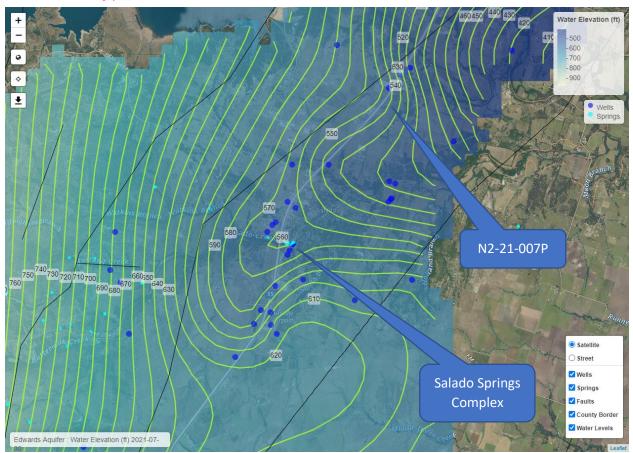


Figure 2. Potentiometric surface of the Edwards Aquifer based on recent water level measurements. Green lines are contours of the estimated water elevation surface. Groundwater flow is perpendicular to the line from high elevation to low elevation.

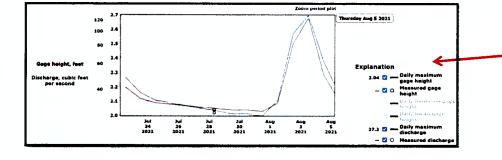
Edwards BFZ Aquifer Status Report

Edwards (BFZ) Aquifer Status Report - August 2021

<u>DFC Analysis Over Time</u> (2000-Present) Modeled Available Groundwater			<u>HEUP and OP Permit Analysis</u> Relative to the Modeled Available Groundwater		2021 YTD Prod. Jan - Jul 923.00 Ac-ft 36.71%	Pending Applications		Exempt Well Reservations				
	DFC Adopted * Minimum Spring Flow	Status of DFC ** Current / Low	MAG *** Ac-ft	HEUP Ac-ft	OP Ac-ft	Total Permitted _{Ac-ft}	2020 Actual Production	Available for Permitting Ac-ft	Pending Applications Ac-ft	Exempt Well Reservation Ac-ft	Exempt Well Use Estimation Ac-ft	Available Exempt Use Ac-ft
Edwards (BFZ) Aguifer	100 Ac-ft per month or 1.68 cfs	4280.97 Ac-ft 8/5/2021 vs 220 Ac-ft 08/20/2014	6469	2209.7	304.43	2514.13	2,189.47 Ac-ft 87.13%	3131.21	505.48	825	357	468

Desired Future Conditions (DFC) established by Clearwater UWCD and approved by GMA8 and TWBD, is the description of how the aquifer should look in the future (50 years based on maintaining the Salado Spring Complex discharge during a repeat of drought conditions similar to the drought of record in the 1950's, under drought of record, a five-day average of discharge amounting to 200 ac-ft-month is preferred and 100 ac-ft-/month is the minimum acceptable spring flow. Spring flow is measured and estimated by the USGS Gage in Salado Creek located below the Salado Creek Spring Complex.
 **Status of the DFC is the estimated spring flow over a five-day average from the springs releasing artesian pressure from the Edwards BFZ Aquifer expressed as acre feet per month of spring flow into Salado Creek.
 **The Modeled Available Groundwater (MAG) is the estimated amount of water available for permitting assigned to Clearwater UWCD by the Executive Administrator of TWDB, based on the desired future conditions.

<u>ZKX Investments N2-19-005P (500 ac-ft/yr)</u> Salado RV LLC N2-21-006P (2.98 ac-ft/yr) Belton Partners LLC N2-21-007P (2.5 ac-ft/yr)

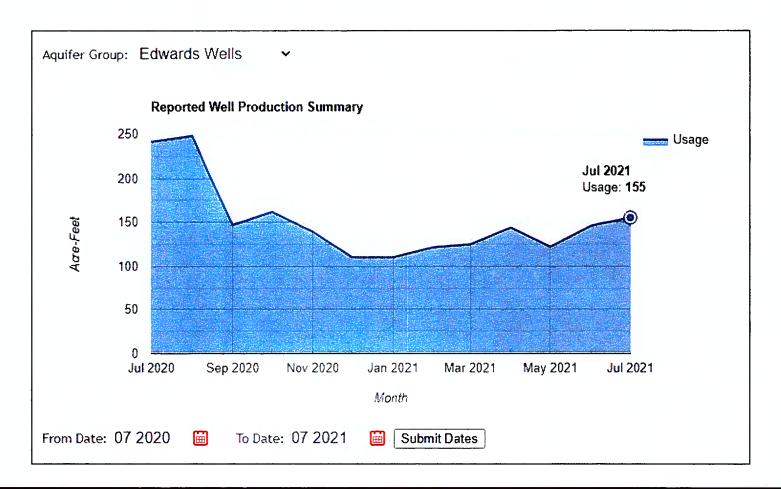


CFS is measured continuously at the downstream gage with USGS developing the rating curve according to industry standards and maintaining the information for public access on the USGS website.

5 - day average for July 31st - August 4th was 71.944 CFS = 4280.97 ac-ft/month

5 - day average for July 4th – July 8th was 87.38 CFS = 5199.47 ac-ft/month

Clearwater UWCD Status Report - August 25, 2021



Clearwater UWCD Status Report – August 25, 2021

Notification Documentation

August 3, 2020

NOTICE OF APPLICATION FOR DRILLING AND OPERATING PERMIT

Name Address City, TX Zip VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

RE: Application for an Operating Permit

To Whom It May Concern:

I Nasruddin Mahesania on behalf of Belton Partners, LLC, have submitted an application to the Clearwater Underground Water Conservation District (CUWCD) on July 26, 2021 for a combination drilling and operating permit on a new well (N1-21-007P) for 2.5 acre-feet or 814,627 gallons per year.

This permit will authorize the withdrawal from a well completed in the Edwards BFZ Aquifer with a 2 inch column pipe on a 12.62 acre tract located at 7983 N I-35, Salado, Texas, Latitude 30.9861661°/Longitude -97.500833° (well# N2-21-007P), to produce water for public water supply to proposed travel center in a proposed annual quantity not to exceed 2.5 acre-feet or 814,627 gallons per year total.

This application will be set for hearing before the CUWCD Board upon notice posted at the Bell County Clerk's Office and at the CUWCD Office. If you would like to support, protest, or provide comments on this application, you must appear at the hearing and comply with District Rule 6.10. For additional information about this application or the permitting process, please contact CUWCD at 700 Kennedy Court, Belton, Texas 76513, 254-933-0120. The applicant may be contacted at 24026 Seven Winds, San Antonio, TX 78528, or by phone at 512-203-5049.

Sincerely,

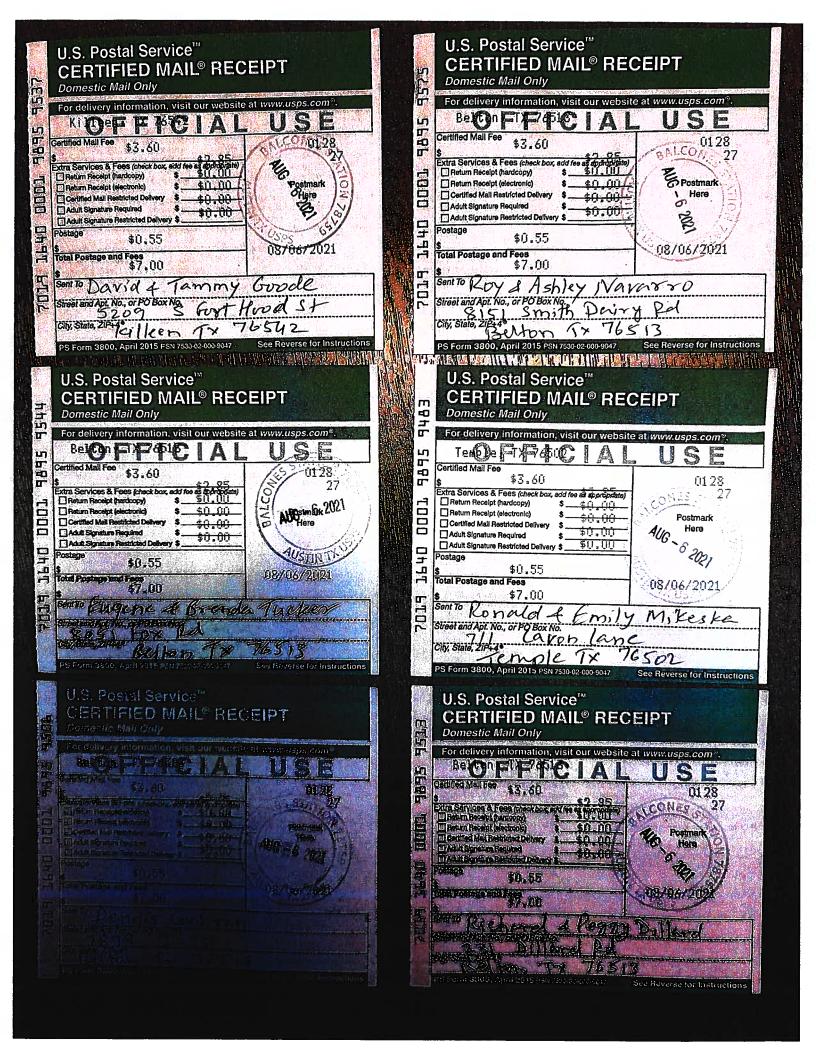
Nasruddin Mahesania

Mailing List

Eugene & Brenda Tucker
Dennis Cochran
Ronald & Emily Mikeska
Richard & Peggy Dillard
David & Tammy Goode
Roy & Ashley Navarro

N2-21-007P

8051 Fox Rd	Belton	ТХ	76513
7879 Interstate 35	Belton	ТΧ	76513
711 Lavon Ln	Temple	ТХ	76502
231 Dillard Rd	Belton	ТХ	76513
5209 S Fort Hood St	Killeen	ТΧ	76542
8151 Smith Dairy Rd	Belton	ТХ	76513



NOTICE OF APPLICATION FOR A COMBINATION DRILING AND OPERATING PERMIT FROM CLEARWATER UNDERGROUND WATER CONSERVATION DISTRICT

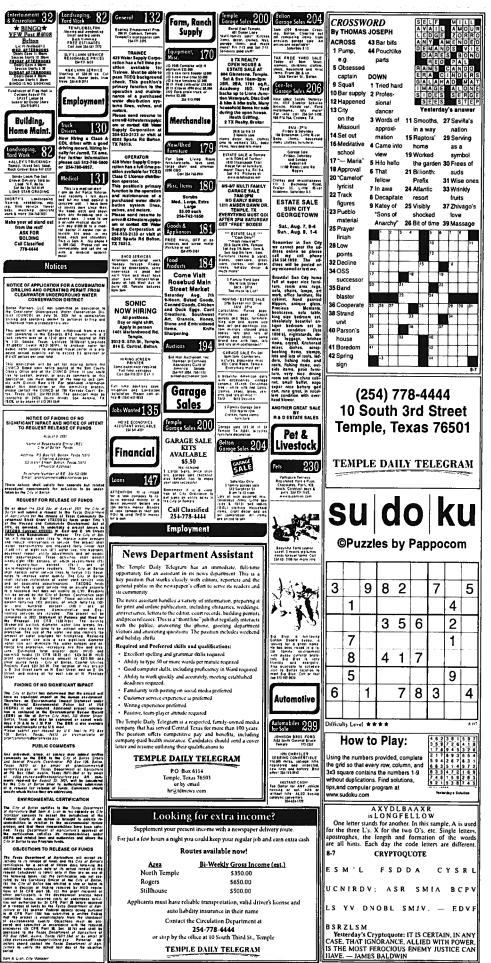
Belton Partners, LLC has submitted an application to the Clearwater Underground Water Conservation District (CUWCD) on July 26, 2021 for a combination drilling and operating permit to authorize drilling and withdrawal from a proposed new well.

This permit will authorize the withdrawal from a new well completed in the Edwards BFZ Aquifer with a 2 inch column pipe on a 12.62 acre tract located at 7983 N I-35, Salado, Texas, Latitude 30.9861661°/Longitude -97.500833° (well# N2-21-007P), to produce water for public water supply to proposed travel center in a proposed annual quantity not to exceed 2.5 acre-feet or 814,627 gallons per year total.

This application will be set for hearing before the CUWCD Board upon notice posted at the Bell County Clerk's Office and at the CUWCD Office. If you would like to support, protest, or provide comments on this application, you must appear at the hearing and comply with District Rule 6.10. For additional information about this application or the permitting process, please contact the CUWCD at 700 Kennedy Court, Belton, Texas 76513, 254-933-0120. The applicant may be contacted at 24026 Seven Winds, San Antonio, TX 78528, or by phone at 512-203-5049.

SATURDAY, August 7, 2021

TEMPLE DAILY TELEGRAM / 5B



Publisher's Affidavit

State of Texas County of Bell

Before Me, The Undersigned Authority, this day personally appeared Jane Moon after being by me duly sworn, says that she is the <u>Classified Manager Inside Sales</u> of the Temple Daily Telegram, a newspaper published in Bell County, Texas and that the stated advertisement was published in said newspaper on the following date(s):

August 7, 2021

For: Belton Partners, LLC Ad #: 16669779 Cost: \$125.10 Times Published: 1

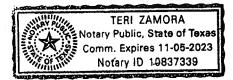
Lauren Ballard, Advertising Director

Subscribed and sworn to before me, this day: August 9, 2021

MÓ

Notary Public in and for Bell County Texas

(Seal)

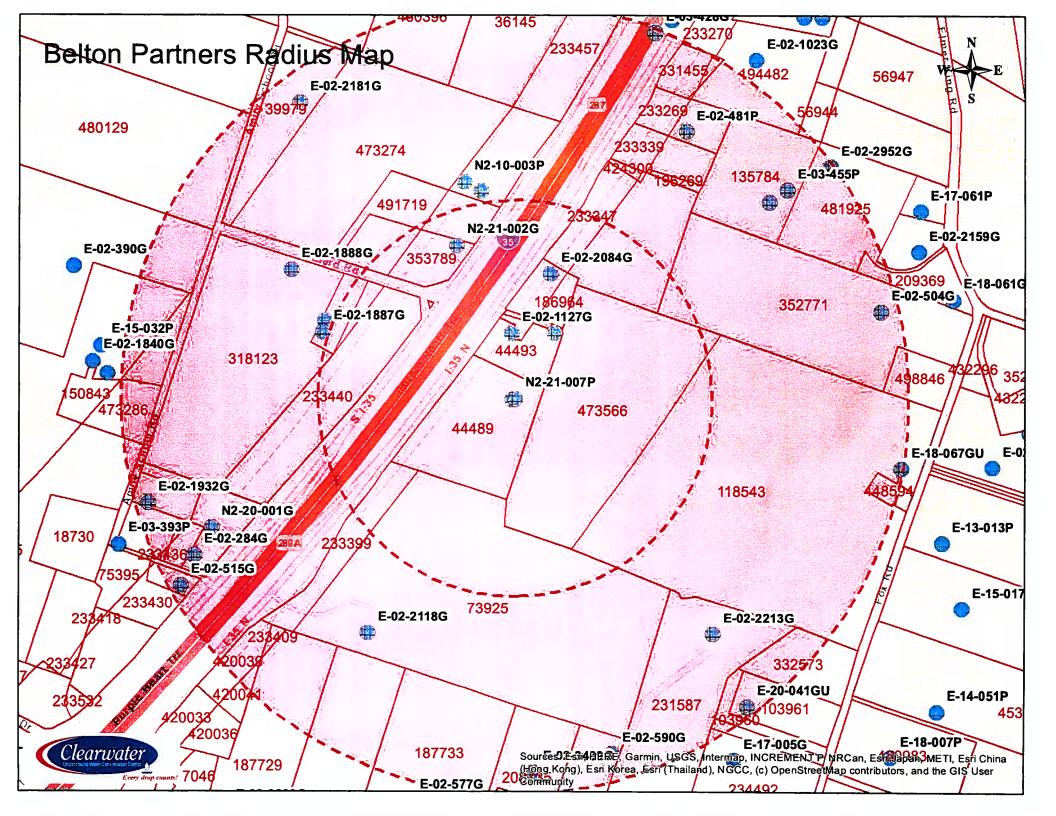


NOTICE OF APPLICATION FOR A COMBINATION DRILLING AND OPERATING PERMIT FROM CLEARWATER UNDERGROUND WATER CONSERVATION DISTRICT

Belton Partners, LLC has submitted an opplication to the Clearwater Underground Water Conservation District (CUWCD) on July 26, 2021 for a combination drilling and operating permit to authorize, drilling and withdrawai from a proposed new well.

This permit will authorize the withdrawal from a new well completed in the Edwards BFZ Aquifer with a 2 inch column pipe on a 12.62 acre tract located at 793 N 1-35, Salado, Texos, Latitude 30.984/5619/Langitude -97.50933° (wells N2.21-007P), to produce water for public water supply to proposed travel center in a proposed annual quantity not to exceed 2.5 acre-feet or 814.627 gallons per year total.

This application will be set for hearing before the CUWCD Board upon notice posted at the Bell County Clerk's Office and at the CUWCD Office. If you would like to support, protest, ar provide comments on this application, you must appear at the hearing and comply with District Rule 6.10. For additional information about this application or the permitting process, please contact the CUWCD at 700 Kennedy Court, Belton. Texas 75613, 254-733-0120. The applicant may be contacted at 24026 Seven Winds, San Antonio, TX 78528, or by phane at 512-203-5049.



N2-21-007P Contact List

Wells 1/4 Mile

73925

233399

Ronald & Emily Mikeska

Ronald & Emily Mikeska

711 Lavon Ln

711 Lavon Ln

Prop ID	Name	Address	<u>City</u>	<u>State</u>	Zip	<u>Well #</u>	<u>Status</u>	Depth	<u>Aquifer</u>	<u>Use</u>	Distance
44489	Belton Partners	24026 Seven Winds	San Antonio	тх	78528	E-03-427P	Active	150	Edwards BFZ	Livestock/Poultry	20 ft
44493	Dennis Cochran	7879 Interstate 35	Belton	тх	76513	E-02-1127G		130	Edwards BFZ	Livestock/Poultry	438 ft
44493	Dennis Cochran	7879 Interstate 35	Belton	тх	76513	E-02-576G	Active	152	Edwards BFZ	Domestic	514 ft
233349	David & Tammy Goode	5209 S Fort Hood St	Killeen	тх	76542	E-02-2084G		195	Edwards BFZ	Domestic	864 ft
353789	Roy & Ashley Navarro	8151 Smith Dairy Rd	Belton	тх	76513	N2-21-002G		170	Edwards BFZ	Industrial	1,098 ft
Wells 1/2 Mile											
73925	Ronald & Emily Mikeska	711 Lavon Ln	Temple	тх	76502	E-02-2118G	Activa	160	Edwards BFZ	Domestic	1 040 6
208735	Kenneth & Janette Shuler	329 Windmill Hill	Salado	TX	76571	E-02-3489G		195	Edwards BFZ		1,848 ft 2,490 ft
187738	Ernest Klechka	341 Windmill Hill	Salado	тх	76571		Active	375	Edwards BFZ	Domestic Domestic	•
231587	David & Stephanie Rembert	8650 Fox Rd	Belton	тх	76513	E-02-2213G		180	Edwards BFZ	Domestic	2,452 ft
103961	Mark Rogers	8410 Fox Rd	Belton	TX	76513	E-20-041GU		157	Edwards BFZ	Domestic	2,061 ft 2,575 ft
448594	Eugene & Brenda Tucker	8051 Fox Rd	Belton	тх	76513	E-18-067GU		192	Edwards BFZ	Domestic	2,575 ft 2,630 ft
352771	Matthew & Holly Thrasher	7746 Fox Trail	Belton	TX	76513		Active	192	Edwards BFZ	Livestock/Poultry	2,630 ft 2,522 ft
135784	Renfro Utilities	7411 Tollbridge Rd	Belton	тх	76513		Active	175	Edwards BFZ	Domestic	2,322 ft 2,148 ft
135784	Renfro Utilities	7411 Tollbridge Rd	Belton	TX	76513		Active	200	Edwards BFZ	Domestic	2,148 ft 2,287 ft
481925	Robert Gill	431 Elmer King Rd	Belton	тх	76513	E-02-2952G		unknown		Domestic	2,287 ft 2,618 ft
192974	B&L93 LLC	7371 Tollbridge Rd	Belton	тх	76513		Active	175	Edwards BFZ	Domestic	2,818 ft
	TXDot	-0					Plugged	150	Edwards BFZ	Not Used	2,118 ft 2,617 ft
39980	C J Evans Family Limited Partnership	1138 FM 2490 Unit B	Valley Mills	тх	76689	N2-10-002P	00	180	Edwards BFZ	Monitoring	1,410 ft
39980	C J Evans Family Limited Partnership	1138 FM 2490 Unit B	Valley Mills	тх	76689	N2-10-003P		1010	Middle Trinity	Monitoring	1,410 ft 1,488 ft
39979	C J Evans Family Limited Partnership	1138 FM 2490 Unit B	Valley Mills	тх	76689	E-02-2181G	••	75	Alluvial	Livestock/Poultry	2,453 ft
318123	Richard & Peggy Dillard	231 Dillard Rd	Belton	тх	76513	E-02-1888G		unknown	unknown	Domestic	1,731 ft
75543	Richard & Peggy Dillard	231 Dillard Rd	Belton	тх	76513	E-02-1886G		200	Edwards BFZ	Domestic	1,386 ft
75543	Richard & Peggy Dillard	231 Dillard Rd	Belton	тх	76513	E-02-1887G		150	Edwards BFZ	Domestic	1,368 ft
67023	Edwin Mabry	8401 Amity School Rd	Belton	тх	76513	E-02-1932G		170	Edwards BFZ	Domestic	2,549 ft
233439	Rohde Tarrant Properties LLC	4216 Cheshire Dr	Collevville	тх	76034	N2-20-001G		160	Edwards BFZ	Industrial	2,220 ft
130250	Bryan Wolff	14055 Crows Ranch Rd	Salado	тх	76571		Active	126	Edwards BFZ	Domestic	2,386 ft
233431	Bryan Wolff	14055 Crows Ranch Rd	Salado	тх	76571	E-02-515G	Active	135	Edwards BFZ	Domestic	2,570 ft
Adjacent Proper	ty										
473566	Eugene & Brenda Tucker	8051 Fox Rd	Belton	тх	76513						
44493	Dennis Cochran	7879 Interstate 35	Belton	тх	76513						
72025	Openial O. Castly, Milasola	744.4									

Temple

Temple

ТΧ

ТΧ

76502

76502