

March 26, 2013

TO: Board Members of the Fort Bend Subsidence District  
FROM: Ronald J Neighbors, General Manager  
SUBJECT: Findings regarding the Proposed Electro Purification LLC application

The drafts of the drawdown and subsidence effects of the requested pumpage related to the Electro Purification, LLC are attached to this report. The results are only for the pumpage included in the application to the Bluebonnet Groundwater Conservation District. It does not include any additional pumpage that may be applied for in the future by these applicants or others.

Drawdowns of this well field could cause problems with other existing wells in the area which is a normal problem all well owners face when pumpage around them increases. We have seen numerous wells that have to be replaced because of declines in the water levels in the aquifer.

The subsidence associated with the pumpage is shown and speaks for itself. This area is in a flood prone area and will certainly increase that potential of flooding and enlarge the flood plain. The subsidence could also pose some problems in developing the Allens Creek Reservoir.

Representatives of Richmond and Rosenberg apparently put up a trial balloon about utilizing imported groundwater several months ago. The idea in itself is not necessarily adverse. Many cities across Texas have and continue to look for water sources to serve their city. There are many locations of pumpage that would not have adverse conditions because of their locations. If the original proposal had been detailed as to location the indications would likely have been negative rather than neutral. There have been other pumpers facing subsidence regulations over the years that have looked at the possibility of importing groundwater as an alternate supply. In each case they have determined it was not the most economical or feasible answer. The location of this proposed pumpage is to assist the cities by providing the least expensive approach with a shorter distance.

The mission of the Fort Bend Subsidence District (FBSD) is to stop and prevent subsidence. This mission is not carried out by allowing pumpage which contributes to drawdowns and subsidence within the FBSD. This proposed pumpage will cause subsidence in areas of the FBSD that are already within or close to the flood plain. This proposal would amount to a transfer of the problem from one part of the FBSD to another. The general subject proposed, importing groundwater as an alternate supply could and should be considered as long as they can demonstrate with clear and convincing evidence that the groundwater withdrawals will not cause groundwater level declines or subsidence within the District. I do not believe that Richmond and Rosenberg knew that there would be a problem of causing subsidence within the District or they would not have pursued this application.

The issue of future permits from the Bluebonnet District or other Districts should not be our concern unless it poses drawdowns and subsidence to FBSD citizens and then we should oppose vigorously.

The GRP currently in place for Richmond and Rosenberg does not include the importation of groundwater. It would seem advisable to refer this report to the Regulatory Plan Committee for review and ask them to develop a recommendation to the Board. The Board then can adopt a plan that is clear and fair to all concerned.







