GMA 6

HB 30 (Brackish Water) Comments

GMA 6 Strongly supports the comments by others concerning the methods of determining how the proposed brackish water production zones will be established, quoted in part below:

“*Because of the vastly known differences between aquifer conditions and regional characteristics across the state, and the subjectivity of the aforementioned questions, HPWD strongly recommends the TWDB seek to define of what constitutes a significant impact, significant source, or a sufficient definition of separation of a hydrogeological barrier on an area by area basis with direct input from local GCD’s as well as local municipal, domestic and agricultural stakeholders located within a proposed brackish groundwater zone prior to designation. We adamantly believe there is not a one-size fits all definition to the proposed questions.*

*Additionally, HPWD strongly recommends the TWDB hold a minimum of two stakeholder meetings in each of the proposed areas prior to the designation of a zone in order to receive local input from residents and landowners as it relates to the defining questions, the economic impact of designating a brackish groundwater production zone and the impact if any to private property rights.*

*We believe if the TWDB reaches out to local residents and landowners in their respective home areas, and afford them the ability to provide input in the identification and designation process of brackish groundwater production zones, this will incentivize the utilization of brackish groundwater furthermore reducing the use of fresh groundwater resources*”

We strongly support the idea that: “*We adamantly believe there is not a one-size fits all definition to the proposed questions.”*

GMA 6 believes that using 1000 mg/L TDS as a lower limit of brackish water is too low and does not accurately reflect conditions in our area. The proposed definition may fit climatic & geologic conditions in the areas to the east with higher annual average rainfall and lower evaporation rates, but does not accurately reflect conditions in GMA 6 and areas to the west with lower average rainfall and higher evaporation rates. A hasty scan of TWDB data for Childress, Fisher, Cottle & Hardeman County for TDS shows a range from 2111 to 3393 mg/L TDS. Note that these counties are almost entirely covered by the Blaine formation/Aquifer. We recommend that the minimum TDS level be raised for the GMA 6 area and the western part of the state be raised to at least 2500 mg/L.

The Blaine formation/aquifer is found in 12 counties in GMA 6. Some additional Blaine formation is shown in southern Wheeler and northern Nolan counties. The majority of the mapped Blaine formation is located in GMA 6.

The Blaine formation/aquifer is the only major *or* minor aquifer mapped in 2 of the counties in GMA 6 (Cottle & King). Two other counties have minimal additional aquifer assets mapped (Seymour aquifer in Childress & Stonewall).

The Blaine formation/aquifer accounts for approximately half or more of the potential available groundwater (based on mapped area) in 3 counties (Collingsworth, Fisher & Hardeman) in GMA 6.

The Blaine formation/aquifer accounts for approximately one third of the potential available groundwater (based on mapped area) in Foard county

Four counties have minor or insignificant mapped areas of Blaine formation (Hall, Kent, Knox, Jones).

Responses to the question: “How should we define significant impact? ”

1. Designation of a brackish production zone in any county where the subject aquifer is the only major or minor aquifer available is a significant impact.

2. Designation of a brackish production zone in any county where the subject aquifer covers one fourth or more of the county area is a significant impact.

Responses to the question: “how should we define “separated by hydrogeologic barriers sufficient to prevent significant impacts?”

1. Hydrogeologic barriers should not be used to prevent impacts to karst, faulted, or fractured rock aquifers.

2. There must be a significant physical barrier such as non-fractured clay of at least 100 feet measured vertical separation between aquifers.

Responses to the question: How should we define “significant source” of water supply for municipal, domestic, or agricultural purposes?”

1. Any county where the subject aquifer is the only major or minor aquifer available constitutes a significant source.

2. Any county where the subject aquifer covers one fourth or more of the county area constitutes a significant source.

SUMMARY

1. GMA 6 opposes the establishment of any designated “brackish water production zone” in the Blaine formation/aquifer.

2. The Blaine formation/aquifer is the sole potential groundwater source in significant areas of GMA 6.

3. Groundwater assets are limited in GMA 6. Availability of any amount of groundwater from the mapped Blaine formation is questionable in many areas.

4. In the areas where the Blaine is associated with the Seymour aquifer, the only other aquifer of significance near the Blaine, there is no physical or hydrogeologic boundary between the 2 aquifers.

5. The Blaine formation/aquifer is a significant, and often the only, water supply for rural domestic & livestock water supply, irrigation, and municipal water supply in GMA 6.

6. GMA 6 opposes the proposed use of the Blaine as an injection site for wastes from other brackish groundwater treatment processes located within or outside the GMA.

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