2021 Llano Estacado (Region O)
Regional Water Plan

Technical Memorandum

September 2018

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Memo

Date: September 10, 2018
Project: 2021 Llano Estacado (Region O) Regional Water Plan
To: Texas Water Development Board
From: Paula Jo Lemonds, PE, PG, Grady Reed, and Zach Stein, PE - HDR, on behalf of the Llano Estacado (Region O) Regional Water Planning Group

Subject: 2021 Regional Water Plan Technical Memorandum

Introduction
The Texas Water Development Board (TWDB) regional water plan development guidance,1 requires that a Technical Memorandum be submitted to the TWDB. The Llano Estacado Regional Water Planning Group (LERWPG) submits this memorandum to fulfill the TWDB requirements for the 2021 Regional Water Plan (RWP) development. This memorandum includes documentation of the LERWPG's preliminary analysis of water demand projections, water availability, existing water supplies, and water needs and a declaration of the LERWPG's intent not to pursue simplified planning.

At a regular meeting of the LERWPG on August 8, 2018, and during a public comment period 14 days following the meeting, the LERWPG received comments from the public. No public comments were received at the LERWPG meeting or during the official comment period.

1.0 TWDB DB22 Reports
The TWDB's regional water plan development guidance,2 describes the State Water Planning Database (DB22) as the tool that "will synthesize regions' data and provide summary reports that shall be incorporated into the Technical Memorandum, initially prepared plan (IPP), and final adopted regional water plan (RWP)." The TWDB guidance document further states that RWPGs will complete and submit, via the DB22 interface, all data generated or updated during the current cycle of planning to the TWDB in accordance with TWDB specifications prior to submitting the Technical Memorandum and IPP.

This section includes the following TWDB DB22 reports that are required for the Technical Memorandum:

- Population Projections (TWDB DB22 Report #1),
- Water Demand Projections (TWDB DB22 Report #2),
- WUG Category Summary (TWDB DB22 Report #3),
- Source Water Availability (TWDB DB22 Report #4),

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1 TWDB, 2018. Second Amended General Guidelines for Fifth Cycle of Regional Water Plan Development.
2 Ibid.
• WUG Existing Water Supplies (TWDB DB22 Report #5),
• WUG Identified Water Needs/Surpluses (TWDB DB22 Report #6),
• Source Water Balance (TWDB DB22 Report #9),
• WUG Data Comparison to 2016 RWP (TWDB DB22 Report #10a), and
• Source Data Comparison to 2016 RWP (TWDB DB22 Report #10b)

TWDB DB22 Report Numbers 7 and 8 will be developed at a later date for inclusion into the 2021 RWP. Data entered by RWPGs into DB22 is rounded to the nearest whole number to avoid cumulative data errors.

1.1 WUG Population Projections
The TWDB DB22 WUG population projection report presenting population projections by WUG, county, and river basin are included in Appendix A.

1.2 WUG Water Demand Reports
The TWDB DB22 water demand report presenting water demand projections by WUG, county, and river basin are included in Appendix B.

1.3 WUG Category Summary Report
The TWDB DB22 WUG Category Summary report presenting population, demands, supplies, and needs by WUG category is included in Appendix C.

1.4 Source Water Availability Report
The TWDB DB22 Source Water Availability report presenting water availability by source is included in Appendix D.

1.5 WUG Existing Water Supplies Report
The TWDB DB22 Existing Water Supplies report presenting existing water supplies by WUG, county, and river basin is included in Appendix E.

1.6 WUG Identified Water Needs/Surpluses Report
The TWDB DB22 Identified Water Needs/Surpluses report presenting identified water needs by WUG, county, and river basin is included in Appendix F.

1.7 Source Water Balance Report
The TWDB DB22 Source Water Balance report with the condition that the total has to be zero or greater than zero, except for those sources that are thereby revealed in IPPs as potentially overallocated and create potential interregional conflicts, is included in Appendix G.

1.8 WUG Data Comparison to 2016 RWP Report
The TWDB DB22 WUG Data Comparison report presents availability, supply, demands, and needs compared to the 2016 RWP report is included in Appendix H.
1.9 Source Data Comparison to 2016 RWP Report

The TWDB DB22 Comparison of Availability, Supply, Demands, and Needs to 2016 RWP report presenting sources at an aggregated level and WUG supplies, demands, and needs at a county level is included in Appendix I.

2.0 Surface Water Availability

The LERWPG met on January 23, 2018, and discussed the process to determine the amount of surface water available from existing water rights and future water management strategies. During this meeting, Region O discussed specific variations from the standard TWDB guidance that will be employed to develop the 2021 LERWP.

The guidance provided by the TWDB in the base scope of work for the Fifth Cycle of Regional Water Planning requires the use of the Run 3 (full authorization) version of Water Availability Models (WAMs) maintained by the Texas Commission on Environmental Quality (TCEQ). These river-basin-scale models are used by the TCEQ for evaluating legal water available to applications for new or amended water rights, and as such, include some aspects that are not appropriate for water planning. This section includes model modification assumptions and yields used in developing the 2021 Llano Estacado Regional Water Plan.

2.1 Written Summary of Water Availability Models

Information regarding the WAM simulations used in determining surface water availability are included in this section. The model input and output files used to date are submitted with this memorandum as an electronic appendix, Appendix J.

For Red River Basin WAM simulations, the unmodified WAM was used. The Red River WAM ends in 1998 and does not include the most recent drought, so run of river reliabilities may be less than the modeled values.

Hydrologic Variances

In a letter dated March 28, 2018, Region O requested that the TWDB allow specific variations from the base TCEQ WAMs for analyses that determine surface water available to existing rights. In a letter dated May 18, 2018, TWDB approved the variances as described in this section.

For Lake Alan Henry (LAH) analyses, Region O received approval from the TWDB to conduct analyses using a stand-alone WAM developed specifically for LAH. In response to the ongoing drought in the mid-2000s, the City of Lubbock requested that HDR perform a yield analysis of LAH that extended through 2006 in order to better account for the impacts of that drought cycle. Additionally, a recent (2005) hydrographic survey of LAH by the TWDB indicates that the capacity of LAH has been reduced from its permitted capacity of 115,937 to 94,808 acre-feet (acft). This is due to sedimentation in the reservoir pool and inaccuracies in the determination of the storage capacity during initial construction.

Region O also received approval from the TWDB to conduct analyses using the TCEQ Brazos River Basin WAM as modified by the Brazos G Regional Water Planning Group (Brazos G WAM) for determining surface water reliabilities for the sake of inter-regional consistency. This model includes limited return flows for its reliability evaluations. A complete summary of the approved modifications
to the Brazos G WAM approved by the TWDB for use in the regional water planning process for Region G and Region O are included in Appendix K and Appendix L, respectively. These appendices include both the hydrologic variance request from the respective planning group and the subsequent approval letter from the TWDB.

2.2 Versions and Dates of WAM Simulations
This section lists the versions and dates of WAM simulations completed to calculate available surface water supply for Region O.

**Brazos River Basin**
For Brazos River Basin supply calculations, three models were used:

1. Unmodified Brazos WAM (TCEQ Run 3 including updated sediment conditions),
2. Brazos G WAM modified with TWDB-approved hydrologic variances,
3. Lake Alan Henry WAM (reservoir-specific model with TWDB-approved hydrologic variances

The modifications to the Brazos WAM simulations are described in Section 2.1. Table 2-1 summarizes the yield simulations completed.

Note that the unmodified WAM yields for Lake Alan Henry are much lower, even though they do not include hydrology from the new drought. The reason for this is that the Possum Kingdom Reservoir subordination is not included in the unmodified WAM. A subordination agreement states that contrary to the normal prior appropriation water right permit system in effect in general, as an exception, a water right is not required to curtail diversions or storage to pass inflows through its reservoir to maintain stream flows for a senior right.\(^3\) A Brazos G WAM simulation for Lake Alan Henry was not completed because the Lake Alan Henry WAM was created specifically to determine the supply available from Lake Alan Henry.

**Red River Basin**
For Red River Basin WAM simulations, the unmodified WAM was used.

**Dates of WAM Simulations**
The yield simulations were run on July 23, 2018, and August 6, 2018, by HDR staff.

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Table 2-1. Summary of WAM simulations completed to date

<table>
<thead>
<tr>
<th>River Basin</th>
<th>Model</th>
<th>Reservoir / Water Body</th>
<th>Firm that Performed Model Run</th>
<th>Date of Model Run</th>
<th>Decade and Type of Yield</th>
<th>Yield (acre-feet/year)</th>
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<td>Unmodified Brazos WAM</td>
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<td>July 23, 2018</td>
<td>2020 Firm</td>
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<td>Lake Alan Henry</td>
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<td>2020 Firm</td>
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<td></td>
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<td>Lake Alan Henry</td>
<td>HDR</td>
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<td>White River</td>
<td>HDR</td>
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<td>2020 and 2070 Firm</td>
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<td></td>
<td>Brazos G WAM</td>
<td>Brazos Run of River</td>
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<td>2020 and 2070</td>
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<td>HDR</td>
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<td>Unmodified Red WAM</td>
<td>Red Run of River</td>
<td>HDR</td>
<td>August 6, 2018</td>
<td>2020 and 2070</td>
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</table>

3.0 Groundwater Availability

The LERWPG uses the established modeled available groundwater (MAG) values for the Regional Water Planning Area (RWPA) in development of the 2021 Region O RWP.

**Non-MAG Availability**

MAG reports for the Region O RWPA did not include availabilities for “Other Aquifer.” To calculate RWPG-estimated availability, or non-MAG availability, for the “Other Aquifer” designation in the 2021 Regional Water Plan, the methodology used includes the following assumptions.

- Groundwater capacity is determined based upon historical groundwater pumpage reports available from the TWDB.
- Historical pumpage is reported for river basin portions of each county by aquifer for the time period 2007 through 2015.
- Well capacity is assumed to be the maximum annual pumpage during this time period.
4.0 Identification of Potentially Feasible Water Management Strategies

TWDB rules require that the process for identifying potentially feasible Water Management Strategies (WMSs) be documented at a public meeting (31 TAC §357.12(b)). This section describes the documented process used by the LERWPG to identify potentially feasible WMSs. On January 23, 2018, the LERWPG formally considered the process for identifying, evaluating and selecting WMSs as described below.

Process for identifying, evaluating and selecting WMSs:

1. Potentially include strategies identified in previous plans.
   a. Potentially include recommended and alternative strategies from 2016.
   b. Potentially include strategies evaluated, but not recommended in 2016.
   c. Potentially include strategies evaluated in previous Plans that were not moved forward.
2. Identify draft needs and develop additional ideas to meet those needs.
3. Maintain ongoing communication from local interests through the regional water planning process.

Then, an initial list of potentially feasible strategies is determined. Additional WMSs are included if local interests request them and the planning schedule and budget allow for the addition.

5.0 Potentially Feasible Water Management Strategies

A single tabular list of all potentially feasible WMSs identified by the LERWPG to date is included in Table 5-1.
Table 5-1. Tabular list of potentially feasible WMSs identified by the LERWPG to date

<table>
<thead>
<tr>
<th>Potentially Feasible Water Management Strategies</th>
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<tbody>
<tr>
<td>Municipal water conservation</td>
</tr>
<tr>
<td>Non-municipal water conservation</td>
</tr>
<tr>
<td>Reclaimed wastewater supplies and reuse</td>
</tr>
<tr>
<td>Local groundwater development</td>
</tr>
<tr>
<td>Water loss reduction</td>
</tr>
<tr>
<td>Groundwater desalination</td>
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<tr>
<td>LAH Water District Water Supply</td>
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<td>Bailey County Well Field capacity maintenance</td>
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<tr>
<td>Jim Bertram Lake 7</td>
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<tr>
<td>Lake Alan Henry Phase 2</td>
</tr>
<tr>
<td>North Fork scalping operation</td>
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<tr>
<td>South Lubbock well field</td>
</tr>
<tr>
<td>Potable reuse</td>
</tr>
<tr>
<td>Wolfforth CRMWA lease from Slaton</td>
</tr>
<tr>
<td>Direct potable reuse to North Water Treatment Plant</td>
</tr>
<tr>
<td>Direct potable reuse to South Water Treatment Plant</td>
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<tr>
<td>North Fork diversion at CR 7300</td>
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<tr>
<td>North Fork diversion to Lake Alan Henry pump station</td>
</tr>
<tr>
<td>Post Reservoir</td>
</tr>
<tr>
<td>Reclaimed water to aquifer storage and recovery</td>
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<tr>
<td>South Fork discharge</td>
</tr>
<tr>
<td>Transportation of water between counties of surplus and need</td>
</tr>
<tr>
<td>Brackish well field in Lubbock area</td>
</tr>
<tr>
<td>CRMWA aquifer storage and recovery</td>
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<tr>
<td>CRMWA II (Roberts County Wellfield)</td>
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<tr>
<td>Chloride control project</td>
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<tr>
<td>Enhanced recharge project</td>
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6.0 Simplified Planning Declaration

The TWDB guidelines for planning\(^4\) state:

> The Senate Bill 1511, 85th Legislative Session, provided RWPGs the option to implement simplified planning if there are no significant changes to the water availability, water supplies, or water demands in the regional water planning area. The TWDB has revised 31 TAC §357.10(33) to define the Technical Memorandum and 31 TAC §357.12 to add this

\(^4\) TWDB, 2018. Second Amended General Guidelines for Fifth Cycle of Regional Water Plan Development.
new simplified planning provision to the previously existing simplified planning rule, which had required that an RWPG determine in its analysis of water needs that there are sufficient existing water supplies in the regional water planning area to meet water needs for the 50-year planning period. The rule identifies the Technical Memorandum (the mid-point analysis of water demand projections, source availability, WUG supplies, and WUG needs calculations) as the decision point for an RWPG to declare its intent whether or not to pursue simplified planning in accordance with either simplified planning provision (adequate existing supplies or no significant changes in water demands, source availability, or WUG supplies). The threshold(s) for significant changes are to be defined by the RWPG however, significance may not be based solely on aggregated, region-wide comparisons without consideration of sub-regional changes. Simplified planning, by either provision, may only be implemented during off-census planning cycles.

The LERWPG will not pursue simplified planning for the development of the 2021 Region O RWP.

7.0 Summary of Public Comments
To comply with the TWDB Regional Water Planning Rules [31 TAC Section 357.21(c)(7)(C)], written comments from the public were accepted for a period of 14 days prior to and 14 days after the meeting where this Technical Memorandum was considered for approval by the LERWPG. Public comments were also accepted at the meeting where this Technical Memorandum was considered for approval by the LERWPG, held on August 8, 2018. No public comments were received at the meeting or during the official comment period.
Appendix A. TWDB DB22 Report #1 – WUG Population Projections
## Region O Water User Group (WUG) Population

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<th>2050</th>
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Appendix B. TWDB DB22 Report #2 – WUG Water Demand Projections
## Region O Water User Group (WUG) Demand

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*WUG supplies and projected demands are entered for each of a WUG’s region-county-basin divisions. The needs shown in the WUG Category Summary report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Before aggregating the difference between supplies and demands to the WUG category level, calculated surpluses are updated to zero so that only the WUGs with needs in the decade are included with the Needs totals.*
Appendix D. TWDB DB22 Report #4 – Source Water Availability
## Region O Source Availability

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*Salinity field indicates whether the source availability is considered ‘fresh’ (less than 1,000 mg/L), ‘brackish’ (1,000 to 10,000 mg/L), ‘saline’ (10,001 mg/L to 34,999 mg/L), or ‘seawater’ (35,000 mg/L or greater). Sources can also be labeled as ‘fresh/brackish’ or ‘brackish/saline’, if a combination of the salinity types is appropriate.*
# Region O Source Availability

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<th>SOURCE AVAILABILITY (ACRE-FEET PER YEAR)</th>
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*Salinity field indicates whether the source availability is considered ‘fresh’ (less than 1,000 mg/L), ‘brackish’ (1,000 to 10,000 mg/L), ‘saline’ (10,001 mg/L to 34,999 mg/L), or ‘seawater’ (35,000 mg/L or greater). Sources can also be labeled as ‘fresh/brackish’ or ‘brackish/saline’, if a combination of the salinity types is appropriate.*
## Region O Source Availability

### GROUNDWATER SOURCE TYPE

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**GROUNDWATER TOTAL SOURCE AVAILABILITY**

3,091,566, 2,083,813, 1,540,292, 1,258,948, 1,106,814, 1,019,716

### REUSE SOURCE TYPE

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**REUSE TOTAL SOURCE AVAILABILITY**

48,945, 51,353, 53,806, 55,497, 56,998, 58,252

### SURFACE WATER SOURCE TYPE

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**SURFACE WATER TOTAL SOURCE AVAILABILITY**

28,898, 28,618, 28,318, 27,998, 27,678, 27,018

**REGION O TOTAL SOURCE AVAILABILITY**

3,169,409, 2,163,784, 1,622,416, 1,342,443, 1,191,490, 1,104,986

*Salinity field indicates whether the source availability is considered ‘fresh’ (less than 1,000 mg/L), ‘brackish’ (1,000 to 10,000 mg/L), ‘saline’ (10,001 mg/L to 34,999 mg/L), or ‘seawater’ (35,000 mg/L or greater). Sources can also be labeled as ‘fresh/brackish’ or ‘brackish/saline’, if a combination of the salinity types is appropriate.*
Appendix E. TWDB DB22 Report #5 – WUG
Existing Water Supplies
## Region O Water User Group (WUG) Existing Water Supply

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## Region O Water User Group (WUG) Existing Water Supply

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## Region O Water User Group (WUG) Existing Water Supply

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## Region O Water User Group (WUG) Existing Water Supply

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### Region O Water User Group (WUG) Existing Water Supply

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# Region O Water User Group (WUG) Existing Water Supply

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## Region O Water User Group (WUG) Existing Water Supply

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Appendix F. TWDB DB22 Report #6 – WUG Identified Water Needs/Surpluses
### Region O Water User Group (WUG) Needs/Surplus*

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*WUG supplies and projected demands are entered for each of a WUG’s region-county-basin divisions. The needs shown in the WUG Needs/Surplus report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Surplus volumes are shown as positive values, and needs are shown as negative values in parentheses.
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*WUG supplies and projected demands are entered for each of a WUG's region-county-basin divisions. The needs shown in the WUG Needs/Surplus report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Surplus volumes are shown as positive values, and needs are shown as negative values in parentheses.
**Region O Water User Group (WUG) Needs/Surplus**

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*WUG supplies and projected demands are entered for each of a WUG's region-county-basin divisions. The needs shown in the WUG Needs/Surplus report are calculated by first deducting the WUG split's projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Surplus volumes are shown as positive values, and needs are shown as negative values in parentheses.*
## Region O Water User Group (WUG) Needs/Surplus*

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<th>Irrigation</th>
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### LUBBOCK COUNTY - BRAZOS BASIN

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### LYNN COUNTY - BRAZOS BASIN

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<th>Manufacturing</th>
<th>Mining</th>
<th>Steam Electric Power</th>
<th>Livestock</th>
<th>Irrigation</th>
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<td>(16,473)</td>
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### LYNN COUNTY - COLORADO BASIN

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<th>Steam Electric Power</th>
<th>Livestock</th>
<th>Irrigation</th>
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### MOTLEY COUNTY - RED BASIN

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### PARMER COUNTY - BRAZOS BASIN

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<th>Irrigation</th>
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<td>432</td>
<td>401</td>
<td>368</td>
<td>327</td>
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*WUG supplies and projected demands are entered for each of a WUG’s region-county-basin divisions. The needs shown in the WUG Needs/Surplus report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Surplus volumes are shown as positive values, and needs are shown as negative values in parentheses.*
## Region O Water User Group (WUG) Needs/Surplus*

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*WUG supplies and projected demands are entered for each of a WUG's region-county-basin divisions. The needs shown in the WUG Needs/Surplus report are calculated by first deducting the WUG split's projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Surplus volumes are shown as positive values, and needs are shown as negative values in parentheses.
Appendix G. TWDB DB22 Report #9 - Source Water Balance
### Region O Source Water Balance (Availability - WUG Supply)

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<th>2040</th>
<th>2050</th>
<th>2060</th>
<th>2070</th>
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<td>Brazos</td>
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<td>833</td>
<td>833</td>
<td>833</td>
<td>833</td>
<td>833</td>
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<td>Red</td>
<td>Brazos</td>
<td>Fresh</td>
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<td>0</td>
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<tr>
<td>Dockum Aquifer</td>
<td>Castro</td>
<td>Red</td>
<td>Brazos</td>
<td>Fresh</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>Castro</td>
<td>Red</td>
<td>Brazos</td>
<td>Fresh</td>
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<td>0</td>
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<td>Brazos</td>
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*Salinity field indicates whether the source availability is considered ‘fresh’ (less than 1,000 mg/L), ‘brackish’ (1,000 to 10,000 mg/L), ‘saline’ (10,001 mg/L to 34,999 mg/L), or ‘seawater’ (35,000 mg/L or greater). Sources can also be labeled as ‘fresh/brackish’ or ‘brackish/saline’, if a combination of the salinity types is appropriate.*
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*Salinity field indicates whether the source availability is considered ‘fresh’ (less than 1,000 mg/L), ‘brackish’ (1,000 to 10,000 mg/L), ‘saline’ (10,001 mg/L to 34,999 mg/L), or ‘seawater’ (35,000 mg/L or greater). Sources can also be labeled as ‘fresh/brackish’ or ‘brackish/saline’, if a combination of the salinity types is appropriate.*
Region O Source Water Balance (Availability - WUG Supply)

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<td>18,992</td>
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| REGION O TOTAL SOURCE WATER BALANCE |               |        |       |           | 233,076 | 109,623 | 92,014 | 96,181 | 96,928 | 98,879 |

*Salinity field indicates whether the source availability is considered ‘fresh’ (less than 1,000 mg/L), ‘brackish’ (1,000 to 10,000 mg/L), ‘saline’ (10,001 mg/L to 34,999 mg/L), or ‘seawater’ (35,000 mg/L or greater). Sources can also be labeled as ‘fresh/brackish’ or ‘brackish/saline’, if a combination of the salinity types is appropriate.*
Appendix H. TWDB DB22 Report #10a – WUG Data Comparison to 2016 RWP
### Region O Water User Group (WUG) Data Comparison to 2016 Regional Water Plan (RWP)*

<table>
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<tr>
<th>Region</th>
<th>WUG Type</th>
<th>2020 Planning Decade</th>
<th>2027 Planning Decade</th>
<th>Difference (%)</th>
<th>2016 RWP</th>
<th>2021 RWP</th>
<th>Difference (%)</th>
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<tr>
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<td>2016 RWP</td>
<td>2021 RWP</td>
<td>Difference (%)</td>
<td>Existing WUG Supply Total</td>
<td>2016 RWP</td>
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<td>Projected Demand Total</td>
<td>2016 RWP</td>
<td>2021 RWP</td>
<td>Difference (%)</td>
<td>Projected Demand Total</td>
<td>2016 RWP</td>
</tr>
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<td></td>
<td>Water Supply Needs Total</td>
<td>2016 RWP</td>
<td>2021 RWP</td>
<td>Difference (%)</td>
<td>Water Supply Needs Total</td>
<td>2016 RWP</td>
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<td>71</td>
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*WUG supplies and projected demands are entered for each of a WUG’s region-county-basin divisions. The needs shown in the WUG Data Comparison to 2016 RWP report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Before aggregating the difference between supplies and demands to the WUG county and category level, calculated surpluses are updated to zero so that only the WUGs with needs in the decade are included with the Needs totals.
Region O Water User Group (WUG) Data Comparison to 2016 Regional Water Plan (RWP)*

<table>
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<th>WUG TYPE</th>
<th>2020 PLANNING DECADE</th>
<th>2020 PLANNING DECADE</th>
<th>DIFFERENCE (%)</th>
<th>2020 PLANNING DECADE</th>
<th>2020 PLANNING DECADE</th>
<th>DIFFERENCE (%)</th>
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<td>-28.9%</td>
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<tr>
<td>WATER SUPPLY NEEDS TOTAL</td>
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<td>Projected Demand Total</td>
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## Region O Water User Group (WUG) Data Comparison to 2016 Regional Water Plan (RWP)*

<table>
<thead>
<tr>
<th>Region</th>
<th>Water User Group (WUG) Type</th>
<th>Existing WUG Supply Total</th>
<th>Projected Demand Total</th>
<th>Water Supply Needs Total</th>
<th>Difference (%)</th>
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<td>2021 RWP</td>
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</tbody>
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<tr>
<td><strong>2020 PLANNING DECADE</strong></td>
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<tr>
<td><strong>2016 RWP</strong></td>
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<tr>
<td>WATER SUPPLY NEEDS TOTAL</td>
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<tr>
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<td>EXISTING WUG SUPPLY TOTAL</td>
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<td>PROJECTED DEMAND TOTAL</td>
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<td>WATER SUPPLY NEEDS TOTAL</td>
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<td>EXISTING WUG SUPPLY TOTAL</td>
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<td>**GARZA COUNTY</td>
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<tr>
<td>EXISTING WUG SUPPLY TOTAL</td>
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<table>
<thead>
<tr>
<th>Region</th>
<th>Water User Group (WUG) Type</th>
<th>Existing WUG Supply Total</th>
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<th>Water Supply Needs Total</th>
<th>2016 RWP</th>
<th>2021 RWP</th>
<th>Difference (%)</th>
<th>2016 RWP</th>
<th>2021 RWP</th>
<th>Difference (%)</th>
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| Region O Water User Group (WUG) Data Comparison to 2016 Regional Water Plan (RWP)* |
|---------------------------------|------------------|------------------|------------------|
|                                  | 2020 PLANNING DECADE | 2070 PLANNING DECADE |
|                                  | 2016 RWP | 2021 RWP | DIFFERENCE (%) | 2016 RWP | 2021 RWP | DIFFERENCE (%) |
| WATER SUPPLY NEEDS TOTAL         | 0        | 0        | 0.0%           | 0        | 0        | 0.0%           |
| HOCKLEY COUNTY | IRRIGATION WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 83,365   | 138,733  | 66.0%          | 52,686   | 46,493   | -11.8%         |
| PROJECTED DEMAND TOTAL          | 131,207  | 131,866  | 0.5%           | 107,813  | 73,589   | -31.7%         |
| WATER SUPPLY NEEDS TOTAL        | 47,642   | 0        | -100.0%        | 55,127   | 27,096   | -50.8%         |
| HOCKLEY COUNTY | LIVESTOCK WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 468      | 408      | -12.8%         | 625      | 408      | -34.7%         |
| PROJECTED DEMAND TOTAL          | 238      | 133      | -44.1%         | 304      | 157      | -48.4%         |
| WATER SUPPLY NEEDS TOTAL        | 35       | 0        | -100.0%        | 45       | 0        | -100.0%        |
| HOCKLEY COUNTY | MANUFACTURING WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 1,185    | 700      | -40.9%         | 1,200    | 700      | -41.7%         |
| PROJECTED DEMAND TOTAL          | 1,185    | 576      | -51.4%         | 1,203    | 691      | -42.6%         |
| WATER SUPPLY NEEDS TOTAL        | 0        | 0        | 0.0%           | 3        | 0        | -100.0%        |
| HOCKLEY COUNTY | MINING WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 1,707    | 1,547    | -9.4%          | 1,547    | 1,547    | 0.0%           |
| PROJECTED DEMAND TOTAL          | 18       | 18       | 0.0%           | 15       | 15       | 0.0%           |
| WATER SUPPLY NEEDS TOTAL        | 0        | 0        | 0.0%           | 15       | 0        | -100.0%        |
| HOCKLEY COUNTY | MUNICIPAL WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 3,357    | 6,909    | 105.8%         | 2,349    | 6,536    | 178.2%         |
| PROJECTED DEMAND TOTAL          | 3,019    | 3,018    | 0.0%           | 3,383    | 3,385    | 0.1%           |
| WATER SUPPLY NEEDS TOTAL        | 18       | 0        | -100.0%        | 1,111    | 0        | -100.0%        |
| LAMB COUNTY | COUNTY-OTHER WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 450      | 575      | 27.8%          | 600      | 575      | -4.2%          |
| PROJECTED DEMAND TOTAL          | 435      | 401      | -7.8%          | 596      | 492      | -17.4%         |
| WATER SUPPLY NEEDS TOTAL        | 0        | 0        | 0.0%           | 0        | 0        | 0.0%           |
| LAMB COUNTY | IRRIGATION WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 126,104  | 184,075  | 46.0%          | 28,179   | 7,414    | -73.7%         |
| PROJECTED DEMAND TOTAL          | 325,356  | 259,451  | -20.3%         | 268,045  | 194,185  | -27.6%         |
| WATER SUPPLY NEEDS TOTAL        | 199,252  | 75,376   | -62.2%         | 239,866  | 186,771  | -22.1%         |
| LAMB COUNTY | LIVESTOCK WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 2,080    | 5,225    | 151.2%         | 788      | 5,225    | 563.1%         |
| PROJECTED DEMAND TOTAL          | 2,969    | 3,940    | 32.7%          | 3,427    | 6,271    | 83.0%          |
| WATER SUPPLY NEEDS TOTAL        | 889      | 0        | -100.0%        | 2,639    | 1,046    | -60.4%         |
| LAMB COUNTY | MANUFACTURING WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 336      | 1,000    | 197.6%         | 635      | 1,000    | 57.5%          |
| PROJECTED DEMAND TOTAL          | 616      | 807      | 31.0%          | 781      | 940      | 20.4%          |
| WATER SUPPLY NEEDS TOTAL        | 280      | 0        | -100.0%        | 146      | 0        | -100.0%        |
| LAMB COUNTY | MINING WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 16       | 108      | 575.0%         | 0        | 108      | 100.0%         |
| PROJECTED DEMAND TOTAL          | 586      | 586      | 0.0%           | 333      | 333      | 0.0%           |
| WATER SUPPLY NEEDS TOTAL        | 570      | 478      | -16.1%         | 333      | 225      | -32.4%         |
| LAMB COUNTY | MUNICIPAL WUG TYPE |
| EXISTING WUG SUPPLY TOTAL       | 2,128    | 5,073    | 138.4%         | 1,928    | 5,073    | 163.1%         |
| PROJECTED DEMAND TOTAL          | 1,966    | 1,966    | 1.5%           | 1,860    | 1,961    | 5.4%           |

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<table>
<thead>
<tr>
<th>Region</th>
<th>Water User Group (WUG) Data Comparison to 2016 Regional Water Plan (RWP)*</th>
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<tbody>
<tr>
<td></td>
<td>2020 PLANNING DECADE</td>
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<tr>
<td></td>
<td>2016 RWP</td>
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*WUG supplies and projected demands are entered for each of a WUG’s region-county-basin divisions. The needs shown in the WUG Data Comparison to 2016 RWP report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Before aggregating the difference between supplies and demands to the WUG county and category level, calculated surpluses are updated to zero so that only the WUGs with needs in the decade are included with the Needs totals.
### Region O Water User Group (WUG) Data Comparison to 2016 Regional Water Plan (RWP)*

<table>
<thead>
<tr>
<th>Region</th>
<th>O Water User Group (WUG)</th>
<th>Existing WUG Supply Total</th>
<th>Projected Demand Total</th>
<th>Water Supply Needs Total</th>
<th>2016 RWP</th>
<th>2021 RWP</th>
<th>Difference (%)</th>
<th>2016 RWP</th>
<th>2021 RWP</th>
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<td>483</td>
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<td>134.6%</td>
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<td>161</td>
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<td>106.9%</td>
<td>5,634</td>
<td>7,339</td>
<td>30.3%</td>
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</tbody>
</table>

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<table>
<thead>
<tr>
<th>Region</th>
<th>Water User Group (WUG)</th>
<th>Exist WUG Supply Total</th>
<th>Existent Water Supply Volume</th>
<th>Projected Demand Total</th>
<th>Existent Water Supply Volume</th>
<th>Projected Demand Total</th>
<th>Difference (%)</th>
<th>Difference (%)</th>
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*WUG supplies and projected demands are entered for each of a WUG’s region-county-basin divisions. The needs shown in the WUG Data Comparison to 2016 RWP report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Before aggregating the difference between supplies and demands to the WUG county and category level, calculated surpluses are updated to zero so that only the WUGs with needs in the decade are included with the Needs totals.
## Region O Water User Group (WUG) Data Comparison to 2016 Regional Water Plan (RWP)*

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<tr>
<th>Region O</th>
<th><strong>WATER SUPPLY NEEDS TOTAL</strong></th>
<th><strong>EXISTING WUG SUPPLY TOTAL</strong></th>
<th><strong>PROJECTED DEMAND TOTAL</strong></th>
<th><strong>WATER SUPPLY NEEDS TOTAL</strong></th>
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<td>DIFFERENCE (%)</td>
<td>2016 RWP</td>
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<td>3,718</td>
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<td>1,486</td>
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<td>7,864</td>
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<td><strong>REGION O</strong></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2,000,640</td>
<td>2,976,690</td>
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<td>976,717</td>
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<td>1,731,832</td>
<td>706,374</td>
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<td>2,240,096</td>
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</table>

*WUG supplies and projected demands are entered for each of a WUG’s region-county-basin divisions. The needs shown in the WUG Data Comparison to 2016 RWP report are calculated by first deducting the WUG split’s projected demand from its total existing water supply volume. If the WUG split has a greater existing supply volume than projected demand in any given decade, this amount is considered a surplus volume. Before aggregating the difference between supplies and demands to the WUG county and category level, calculated surpluses are updated to zero so that only the WUGs with needs in the decade are included with the Needs totals.
Appendix I. TWDB DB22 Report #10b – Source Data Comparison to 2016 RWP
## Region O Source Data Comparison to 2016 Regional Water Plan (RWP)

<table>
<thead>
<tr>
<th>Region</th>
<th>Groundwater Availability Total (acre-feet per year) 2016</th>
<th>Groundwater Availability Total (acre-feet per year) 2021</th>
<th>Difference (%) 2016</th>
<th>Groundwater Availability Total (acre-feet per year) 2016</th>
<th>Groundwater Availability Total (acre-feet per year) 2021</th>
<th>Difference (%) 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bailey County</td>
<td>41,563</td>
<td>98,512</td>
<td>137.0%</td>
<td>15,443</td>
<td>35,648</td>
<td>130.8%</td>
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<tr>
<td>Briscoe County</td>
<td>34,751</td>
<td>35,335</td>
<td>1.7%</td>
<td>12,406</td>
<td>12,764</td>
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<td>Castro County</td>
<td>271,304</td>
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<td>114,768</td>
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<td>-75.7%</td>
</tr>
<tr>
<td>Cochran County</td>
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<td>102,734</td>
<td>181.7%</td>
<td>22,895</td>
<td>43,647</td>
<td>90.6%</td>
</tr>
<tr>
<td>Deaf Smith County</td>
<td>145,791</td>
<td>179,181</td>
<td>22.9%</td>
<td>145,791</td>
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<td>-69.7%</td>
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<tr>
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<td>20,954</td>
<td>19,208</td>
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<td>18,833</td>
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<td>-26.9%</td>
</tr>
<tr>
<td>Floyd County</td>
<td>120,749</td>
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<td>86,132</td>
<td>91,884</td>
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</tr>
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<td>Garza County</td>
<td>137,468</td>
<td>224,400</td>
<td>63.2%</td>
<td>70,998</td>
<td>47,739</td>
<td>-32.8%</td>
</tr>
<tr>
<td>Hale County</td>
<td>134,877</td>
<td>221,232</td>
<td>64.0%</td>
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<tr>
<td>Hockley County</td>
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<td>-14.9%</td>
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<tr>
<td>Lamb County</td>
<td>137,648</td>
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<td>70,998</td>
<td>47,739</td>
<td>-32.8%</td>
</tr>
<tr>
<td>Lubbock County</td>
<td>20,000</td>
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<td>-100.0%</td>
<td>20</td>
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<td>-100.0%</td>
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<tr>
<td>Lynn County</td>
<td>103,995</td>
<td>113,519</td>
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<td>82,501</td>
<td>72,552</td>
<td>-12.1%</td>
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</table>
## Region O Source Data Comparison to 2016 Regional Water Plan (RWP)

<table>
<thead>
<tr>
<th></th>
<th>2020 Planning Decade</th>
<th>2070 Planning Decade</th>
<th>Difference (%)</th>
<th>2020 Planning Decade</th>
<th>2070 Planning Decade</th>
<th>Difference (%)</th>
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</thead>
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<td>Reuse Availability Total (acre-feet per year)</td>
<td>346</td>
<td>346</td>
<td>0.0%</td>
<td>346</td>
<td>346</td>
<td>0.0%</td>
</tr>
<tr>
<td>Surface Water Availability Total (acre-feet per year)</td>
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<td>0</td>
<td>-100.0%</td>
<td>30</td>
<td>0</td>
<td>-100.0%</td>
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<tr>
<td>Motley County</td>
<td>GROUNDWATER Availability Total (acre-feet per year)</td>
<td>23,572</td>
<td>18,345</td>
<td>-22.2%</td>
<td>22,733</td>
<td>17,462</td>
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<td>SURFACE WATER Availability Total (acre-feet per year)</td>
<td>10</td>
<td>4</td>
<td>-60.0%</td>
<td>10</td>
<td>4</td>
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<tr>
<td>Parmer County</td>
<td>GROUNDWATER Availability Total (acre-feet per year)</td>
<td>63,067</td>
<td>157,465</td>
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<td>35,125</td>
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<td>REUSE AVAILABILITY TOTAL (acre-feet per year)</td>
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<tr>
<td></td>
<td>SURFACE WATER AVAILABILITY TOTAL (acre-feet per year)</td>
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<td>0</td>
<td>-100.0%</td>
<td>10</td>
<td>0</td>
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<td>Reservoir County</td>
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<td>130,859</td>
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<td>24,359</td>
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<tr>
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<td>GROUNDWATER AVAILABILITY TOTAL (acre-feet per year)</td>
<td>197,204</td>
<td>190,768</td>
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<tr>
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<td>GROUNDWATER AVAILABILITY TOTAL (acre-feet per year)</td>
<td>61,638</td>
<td>138,940</td>
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<tr>
<td>Region O</td>
<td>GROUNDWATER AVAILABILITY TOTAL (acre-feet per year)</td>
<td>2,247,378</td>
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<td>REUSE AVAILABILITY TOTAL (acre-feet per year)</td>
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<td>SURFACE WATER AVAILABILITY TOTAL (acre-feet per year)</td>
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<td>28,898</td>
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<td>23,570</td>
<td>27,018</td>
</tr>
</tbody>
</table>
Appendix J. WAM input and output files

Electronic submittal of files
Appendix K. Region G Hydrologic Variance Information
Memorandum

Date: Friday, February 23, 2018
Project: 2021 Brazos G Regional Water Plan
To: Jeff Walker, Executive Administrator, Texas Water Development Board
CC: Brazos G RWPG, Thomas Barnett, Stephen Hamlin
From: David D. Dunn, P.E.

Subject: Hydrologic Variance Request for Surface Water Availability Analyses in Brazos G

The Brazos G Regional Water Planning Group (Brazos G) met on February 7, 2018 and discussed the process to determine the amount of surface water available from existing water rights and future water management strategies. During this meeting, Brazos G discussed specific deviations from the standard Texas Water Development Board (TWDB) guidance that will be employed to develop the 2021 Brazos G Regional Water Plan. As you know, the guidance provided by the TWDB in the base scope of work for the Fifth Cycle of Regional Water Planning requires the use of the Run 3 (full authorization) version of the Brazos River Basin and Brazos-San Jacinto Coastal Basin Water Availability Model (Brazos WAM) maintained by the Texas Commission on Environmental Quality (TCEQ). This model is used by the TCEQ for evaluating legal water available to applications for new or amended water rights, and as such, includes some aspects that limit its usefulness for water planning.

Brazos G requests that the TWDB allow specific variations from the base TCEQ Brazos WAM for analyses that determine surface water available to existing rights. These variations will allow a more accurate assessment of supplies available to existing water rights, and will provide consistency with the analyses used to develop the 2006, 2011 and 2016 Brazos G Plans. The resulting WAM containing these necessary modifications to the TCEQ Brazos WAM will be referred to as the “Brazos G WAM.”

1. Utilize naturalized flow and evaporation data developed by the Brazos River Authority (BRA) to extend the period of record through 2015.

The TCEQ Brazos WAM includes a period of record of 1940 – 1997. This period of record does not include the severe drought experienced recently, which in some areas of Texas has replaced the 1950’s drought as the “drought of record.” The BRA, in support of the development of its Water Management Plan for its recently-granted System Operations Permit, has extended the naturalized flow and evaporation datasets through 2015 in order to analyze the impact of the new potential drought of record on the agency’s water supplies. The hydrology has been updated throughout the Brazos Basin. Although developed in response to TCEQ requirements for the BRA’s Management Plan, the TCEQ does not consider these extended flows to be the “official” dataset for analyzing water right appropriations because the flow naturalization process did not include adjust gaged records for water rights with authorized annual diversions less than 1,000 acre-feet, reservoirs with storage less than 5,000 acre-feet, or wastewater effluent discharges less than 1 million gallons per day. The resulting naturalized flows are somewhat more conservative (smaller) than those that would have been developed with a full flow naturalization process because diversions and water added to storage are added back into the gage flows during the flow naturalization process. The smaller return flows would
make an even smaller difference. Brazos G believes that this is a relatively small limitation in comparison to the opportunity to utilize an extended period of record that encompasses the existing and potentially new “droughts of record” in the Brazos Basin.

**Benefit:** Improved estimation of flows available to existing water rights considering the likelihood that a new drought of record exists in many parts of the Brazos Basin.

2. Separate individual BRA contractual diversions from cumulative contractual diversions.

The TCEQ Brazos WAM formerly assumed all diversions from storage occur lakeside and did not take into account the multiple BRA contracts located throughout the basin. The more recent TCEQ Brazos WAM now accumulates the BRA’s contracts within various reaches throughout the river basin. Those cumulative contractual diversions will need to be broken out to individual contract holders in the input data set to that water available to specific WUGs and WWPs can be determined.

**Benefits:** Improved estimates of water available to WUGs and WWPs that receive supplies from BRA.


The Brazos G WAM will include a certain level of current and future return flows (wastewater treatment plant effluent) discharged by entities located throughout the basin that are permitted to discharge in excess of 0.9 million gallons per day (MGD). These return flows are based on historical discharges and projected future discharges assuming an aggressive plan for future reuse of each entity’s effluent. For determining a conservatively low estimate of return flows available to existing water rights, it was assumed that 25% of existing levels of discharge would be directly reused and not continued to be discharged, and 50% of any increases in wastewater plan flows would be reused. These return flow amounts were reviewed and acknowledged by each entity during the development of the 2006 Plan and were used during the development of the 2006, 2011 and 2016 Plans following approval by the TWDB. These return flow amounts will be revisited for the 2021 Plan and will be adjusted for any changes including new discharges, new reuse permits and requests by entities to revise their estimated discharges.

**Benefits:** Improved estimates of water available to existing water rights; improved estimates of streamflows throughout the Brazos Basin; provide an estimate of wastewater flows potentially available for direct reuse throughout the Brazos Basin.

4. Update reservoir operating rules to work correctly under recent drought conditions.

The reservoir operating rules in the TCEQ Brazos G WAM were developed to allow the BRA’s system of reservoirs to optimize water supply through the drought of the 1950’s. However, these operating rules do not allow the system to operate optimally during the more recent drought. The BRA has developed an alternative set of rules that allow the reservoir system to operate optimally through both the 1950’s and more recent drought, and the Brazos G WAM will incorporate these rules into the model.
5. Include existing subordination agreements in the Brazos G WAM. (utilized in the 2006, 2011 and 2016 Brazos G Plans)

Several agreements exist between parties in the Brazos River Basin whereby one party agrees to not exercise a priority call on the other party’s upstream junior water right during times of low flow. This increases water available to the junior water right and decreases water available to the downstream senior water right when insufficient flows exist to satisfy both water rights. Some subordination agreements are included by TCEQ in the TCEQ Brazos WAM, but only those that are identified specifically in the language of the water rights involved. Many others are not included in the language of any water right and therefore are not included in the TCEQ Brazos WAM. The Brazos G WAM will be modified to include additional subordination agreements between entities in the Brazos Basin that are not included in the TCEQ Brazos WAM. Specific agreements currently identified to be added to the Brazos G WAM include:

- Possum Kingdom Reservoir water rights are subordinated to Lake Alan Henry;
- Possum Kingdom Reservoir water rights are subordinated to the City of Stamford’s California Creek pump-back operation into Lake Stamford;
- Lake Waco is subordinated to the City of Clifton’s 1996 priority date water right;
- Possum Kingdom Reservoir water rights are subordinated to rights held by the West Central Texas Municipal Water District in Hubbard Creek Reservoir; and
- Possum Kingdom Reservoir water rights are subordinated to rights held by the City of Abilene to divert flows from the Clear Fork of the Brazos River into Lake Fort Phantom Hill.

Some of these may already be incorporated into the TCEQ Brazos WAM. Other subordination agreements will also be incorporated when identified during the planning process.

**Benefits:** Provides a more realistic determination of water available to existing water rights; improved estimates of streamflows throughout the Brazos Basin.

6. Utilize safe yield analyses for reservoirs upstream of Possum Kingdom Reservoir and for Lake Palo Pinto. (utilized in the 2011 and 2016 Brazos G Plans)

Supplies available from reservoirs will use either a firm or safe yield depending on the location of the reservoir and the preference of the reservoir owner. In the upper Brazos Basin (upstream of Possum Kingdom Reservoir), both 1-year and 2-year safe yields are used by reservoir owners as their preferred basis of supply. These same approaches will be used, as requested by individual reservoir owners to best reflect the operation of their facilities. In addition, the Palo Pinto County Municipal Water District No. 1 has decided to operate on a percent storage reserve basis for Lake Palo Pinto, which is approximately equivalent to a 0.5-year safe yield. The same safe and firm yield assumptions employed in the 2016 Plan will be used in the 2021 Plan, unless a change is specifically requested by a reservoir owner. For reservoirs in which a 0.5-, 1-, or 2-year safe yield is used as the basis for supply, Brazos G will also determine and report the firm yield, as required by TWDB guidance.

**Benefits:** Provides a more realistic method for determining water supplies in west Texas because it matches that area’s preferred approach for managing reservoir water supplies.
7. Utilize the Brazos Mini-WAM to determine supplies in the Clear Fork portion of the Brazos Basin.

During the Phase I studies leading into the 2011 planning cycle, Brazos G developed a subset of the Brazos WAM that extended the period of record through June 2008 for a portion of the upper Brazos Basin (16 primary control points) including the Clear Fork of the Brazos River. This model is referred to as the “Brazos Mini-WAM.” This model was used to determine water available to rights in the applicable portion of the Brazos Basin for the 2011 and 2016 Brazos G Plans. Hydrology for this model has now been updated through 2015 to incorporate the potential new drought of record. Naturalized streamflows for this model were developed using all water rights in the subwatershed and therefore are somewhat more precise than those developed by the BRA for the entire Brazos Basin. Brazos G requests that Brazos G Mini-WAM be used to determine surface water supplies for its applicable portion of the upper Brazos Basin, if it is determined that it provides greater than a 10-percent difference in supply (yield or run-of-river) than results from using the hydrology updated by the BRA.

Benefit: The Brazos G Mini-WAM may provide a better estimate of water available to water rights in the applicable part of the Brazos Basin; provide water supply estimates consistent with recent permitting and management decisions made by the City of Abilene.

8. Utilize the same water supply model for strategy evaluations as is used to determine supplies available to existing water rights.

TWDB guidance requires that evaluations of new water management strategies utilize a strict application of the TCEQ Run 3 WAM. The rationale for this guidance is to ensure that the supply from a water management strategy is consistent with what might actually be permitted by the TCEQ. However, TCEQ takes into account more information than a simple application of the WAM when making water right permitting decisions. Additionally, many water management strategies utilize or are intended to supplement existing supplies, and therefore should be evaluated consistent with the existing supplies they are intended to supplement. The existing supply and the supplementing water management strategy need to be evaluated consistently. Furthermore, the same aspects of the Run 3 WAM that limit its usefulness for determining supplies available to existing rights also limit its ability to determine supplies to new water management strategies. The TCEQ Run 3 WAM is a legal permitting tool that has only limited utility for water supply planning. Brazos G requests that the Brazos G WAM be utilized to evaluate water management strategies instead of the base TCEQ Run 3 WAM.

Benefits: This will provide a consistent basis of evaluation between existing supplies and new water management strategies.

Brazos G thanks the TWDB for considering these alternative technical approaches for determining surface water supplies to existing water rights and new water management strategies. We welcome any questions you may have regarding this hydrologic variance request for surface water supplies. Note that we have coordinated with the technical consultants for Region O and Region H, and they have indicated they intend to utilize the same approaches as outlined above.

Please direct any questions to the Brazos G technical consultant, David Dunn of HDR at david.dunn@hdrinc.com or (512) 912-5136.
April 17, 2018

Mr. Wayne Wilson  
Region G Chair  
c/o Wilson Cattle Company  
7026 East OSR  
Bryan, TX 77808  

RE: Brazos G Regional Water Planning Group (RWPG) request for approval to modify surface water availability hydrologic assumptions for development of the 2021 Brazos G Regional Water Plan (RWP)

Dear Mr. Wilson:

The Texas Water Development Board (TWDB) has reviewed the request submitted by Mr. David Dunn on behalf of the Brazos G RWPG dated February 23, 2018 for approval of alternative water supply assumptions to be used in determining surface water availability. This letter confirms that the TWDB approves the following requests:

1. Utilize naturalized flow and evaporation data developed by the Brazos River Authority (BRA), which extends the hydrologic record through 2015.
2. Separate BRA individual contractual diversions from cumulative contractual diversions.
3. Include a conservative estimate of current and future return flows.
4. Incorporate updated reservoir system operating rules to more accurately reflect recent conditions.
5. Include existing subordination agreements in the Brazos G Water Availability Model (WAM).
6. Utilize 0.5, 1, or 2-year safe yields for reservoirs upstream of Possum Kingdom Reservoir and for Lake Palo Pinto (to be clearly specified, by reservoir, in the 2021 Brazos G RWP).
7. Utilize the Brazos Mini-WAM to determine supplies in the Clear Fork sub-basin of the Brazos basin.

Region G also requested to use the same water supply assumptions for strategy evaluations as used for existing supply. While the use of these modified conditions may be reasonable for planning purposes, WAM RUN 3 would be utilized by the Texas Commission on Environmental Quality for analyzing permit applications. It is acceptable to use modified conditions for water management strategy supply evaluations only if the yield produced is...
more conservative for surface water appropriations than WAM RUN 3. However, TWDB is of the understanding that the modified conditions will result in greater yields than WAM RUN 3. Therefore, strategy evaluations involving new surface water appropriations must be based on WAM RUN 3. Accounting for subordination agreements and use of future return flows are acceptable modifications for strategy evaluations as outlined in Exhibit C, Section 5.2.1.

Although the TWDB approves the use of safe yields for developing estimates of current water supplies, firm yield for each reservoir must still be reported to TWDB in the online planning database and plan documents.

While the TWDB authorizes these modifications to evaluate existing water supplies for development of the 2021 Brazos G RWP, it is the responsibility of the RWPG to ensure that the resulting estimates of water availability are reasonable for drought planning purposes and will reflect conditions expected in the event of actual drought conditions; and in all other regards will be evaluated in accordance with the contract Exhibit C, Second Amended General Guidelines for Fifth Cycle of Regional Water Plan Development.

If you have any questions, please do not hesitate to contact Tom Barnett, project manager for Region G, at 512-463-4209 or via email at thomas.barnett@twdb.texas.gov.

Sincerely,

Jeff Walker
Executive Administrator

c w/o enc: Mr. Stephen Hamlin, Brazos River Authority
Mr. David Dunn, HDR, Inc.
Ms. Paula Jo Lemonds, HDR, Inc.
Ms. Simone Kiel, Freese & Nichols, Inc
Mr. Tom Barnett, TWDB
Appendix L. Region O Hydrologic Variance Information
March 28, 2018

Region O Project Manager
Texas Water Development Board
PO Box 13231
Austin, Texas 78711

Re: Procedures for determining surface water availability and water supplies for the 2021 Llano Estacado Regional Water Plan (Region O)

The Llano Estacado Regional Water Planning Group (Region O) met on January 23, 2018 and discussed the process to determine the amount of surface water available from existing water rights and future water management strategies. During this meeting, Region O discussed specific deviations from the standard Texas Water Development Board (TWDB) guidance that will be employed to develop the 2021 Llano Estacado Regional Water Plan.

As you know, the guidance provided by the TWDB in the base scope of work for the Fifth Cycle of Regional Water Planning requires the use of the Run 3 (full authorization) version of Water Availability Models (WAMs) maintained by the Texas Commission on Environmental Quality (TCEQ). These river-basin-scale models are used by the TCEQ for evaluating legal water available to applications for new or amended water rights, and as such, include some aspects that are not appropriate for water planning.

Region O requests that the TWDB allow specific variations from the base TCEQ WAMs for analyses that determine surface water available to existing rights.

1. Brazos WAM. Region O requests permission to conduct analyses using the TCEQ Brazos River Basin WAM as modified by the Brazos G Regional Water Planning Group (Brazos G WAM) for determining surface water reliabilities for the sake of inter-regional consistency. This model includes limited return flows for its reliability evaluations.

2. Canadian WAM. Also to promote inter-regional consistency, Region O requests permission to use yield values developed by the Panhandle Regional Water Planning Group using the TCEQ Canadian River Basin WAM for determining firm yield in that basin for water supplies supporting Region O Water User Groups (WUGs), specifically Lake Meredith.

3. Colorado WAM. Region O requests permission to use surface water reliability values developed by the Region F Regional Water Planning Group using the TCEQ Colorado River Basin WAM for determining reliability and yield
in that basin for water supplies supporting Region O Water User Groups (WUGs) to promote inter-regional consistency.

4. Red River WAM. Region O requests permission to use surface water reliability values developed by the Panhandle Regional Water Planning Group using the TCEQ Red River Basin WAM for determining reliability and yield in that basin for water supplies supporting Region O Water User Groups (WUGs), specifically Mackenzie Reservoir.

5. Lake Alan Henry Analysis. Region O requests permission to conduct analyses using a stand-alone WAM developed specifically for Lake Alan Henry. In response to the ongoing drought in the mid-2000s, the City of Lubbock requested that HDR perform a yield analysis of Lake Alan Henry (LAH) that extended through 2006 in order to better account for the impacts of that drought cycle. Additionally, a recent (2005) hydrographic survey of LAH by the TWDB indicates that the capacity of LAH has been reduced from its permitted capacity of 115,937 to 94,805 acre-feet (acft). This is due to sedimentation in the reservoir pool and inaccuracies in the determination of the storage capacity during initial construction. Both the drought extending through 2006 and the reduced storage capacity could substantially reduce the computed yield of the reservoir.

The model developed for Lubbock uses WAM naturalized flows through 1997 and then extends the period of record through 2006 using relationships consistent with the WAM methodology. The benefit to using this subset of the Brazos WAM is that it will provide a better estimate of the yield of Lake Alan Henry.

6. Utilize the same water supply model for strategy evaluations as is used to determine supplies available to existing water rights. TWDB guidance requires that evaluations of new water management strategies utilize a strict application of the TCEQ Run 3 WAM. The rationale for this guidance is to ensure that the supply from a water management strategy is consistent with what might actually be permitted by the TCEQ. However, TCEQ takes into account more information than a simple application of the WAM when making water right permitting decisions. Additionally, many water management strategies utilize or are intended to supplement existing supplies, and therefore should be evaluated consistent with the existing supplies they are intended to supplement. The existing supply and the supplementing water management strategy need to be evaluated consistently. Furthermore, the same aspects of the Run 3 WAM that limit its usefulness for determining supplies available to existing rights also limit its ability to determine supplies to new water management strategies. The TCEQ Run 3 WAM is a legal permitting tool that has only limited utility for water supply planning. Region O requests that the Brazos G WAM be utilized to evaluate water management strategies instead of the base TCEQ Run 3 WAM. The benefit to this methodology is that it will provide a consistent basis of evaluation between existing supplies and new water management strategies.

Region O thanks the TWDB for considering these alternative technical approaches for determining surface water supplies to existing water rights and new water management strategies. We welcome any questions you may have regarding this hydrologic variance request for surface water supplies.
Please direct any questions to the Region O technical consultant, Paula Jo Lemonds of HDR at paula.lemonds@hdrinc.com or (512) 912-5127.

Sincerely,

[Signature]

Aubrey Spear, Chairman
Llano Estacado Regional Water Planning Group – Region O
May 18, 2018

Mr. Aubrey Spear  
Region O Chair  
c/o City of Lubbock  
P.O. Box 2000  
Lubbock, TX 79457

RE:  Region O Regional Water Planning Group (RWPG) request for approval to modify surface water availability hydrologic assumptions for development of the 2021 Llano Estacado (Region O) Regional Water Plan (RWP)

Dear Mr. Spear:

The Texas Water Development Board (TWDB) has reviewed the request submitted by the Region O RWPG dated March 28, 2018 for approval of alternative water supply assumptions to be used in determining surface water availability. This letter confirms that the TWDB approves the following requests:

1. Utilize the hydrologic variances approved for use by the Brazos G RWPG to conduct analyses for the Brazos River Basin.
2. Utilize yield values approved for use by the Region A RWPG for the Canadian River Basin.
3. Utilize yield values approved for use by the Region F RWPG for the Colorado River Basin.
4. Utilize yield values approved for use by the Region A RWPG for the Red River Basin.
5. Utilize a stand-alone Water Availability Model (WAM) for Lake Alan Henry that was developed for the City of Lubbock.

Region O also requested to use the same water supply assumptions for strategy evaluations as used for existing supply. While the use of these modified conditions may be reasonable for planning purposes, WAM RUN 3 would be utilized by the Texas Commission on Environmental Quality for analyzing permit applications. It is acceptable to use modified conditions for water management strategy supply evaluations only if the yield produced is more conservative for surface water appropriations than WAM RUN 3. However, the TWDB is of the understanding that the modified conditions could result in greater or lesser yields than WAM RUN 3 on a case-by-case basis. Therefore, strategy evaluations involving new surface water appropriations must be based on WAM RUN 3 when modified conditions would be less conservative. Accounting for subordination agreements and use of future...
return flows are acceptable modifications for strategy evaluations as outlined in Exhibit C, Section 5.2.1.

While the TWDB authorizes these modifications to evaluate existing water supplies for development of the 2021 Brazos G RWP, it is the responsibility of the RWPG to ensure that the resulting estimates of water availability are reasonable for drought planning purposes and will reflect conditions expected in the event of actual drought conditions; and in all other regards will be evaluated in accordance with the contract Exhibit C, Second Amended General Guidelines for Fifth Cycle of Regional Water Plan Development.

If you have any questions, please do not hesitate to contact Tom Barnett, project manager for Region 0, at 512-463-4209 or via email at thomas.barnett@twdb.texas.gov.

Sincerely,

Jeff Walker  
Executive Administrator

c w/o enc:  Ms. Kelly Davila, South Plains Association of Governments  
Ms. Paula Jo Lemonds, HDR, Inc.  
Mr. David Dunn, HDR, Inc.  
Ms. Simone Kiel, Freese & Nichols, Inc  
Mr. Tom Barnett, TWDB