

**PLUM CREEK CONSERVATION DISTRICT  
MANAGEMENT PLAN  
(INCLUDING MANAGEMENT GOALS,  
OBJECTIVES & PERFORMANCE STANDARDS)**

**A. DISTRICT MISSION**

The Plum Creek Conservation District will strive to develop and implement water conservation and management strategies to protect, conserve, and prevent waste of the groundwater resources in the District for the benefit of the citizens, economy and environment of the District.

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**B. TIME PERIOD COVERED BY THIS PLAN**

This Management Plan becomes effective upon the adoption by the District's Board of Directors and certification by the Texas Water Development Board, and will remain in effect for a period of ten (10) years or until a revised plan is adopted and certified, whichever occurs first.

Items  
C1-3 7  
**C. STATEMENT OF GUIDING PRINCIPLES FOR THE MANAGEMENT OF GROUNDWATER WITHIN THE DISTRICT**

1. Introduction: The District recognizes that the groundwater resources of the region are of vital importance. The District was created, in part, to conserve, preserve, protect, and prevent waste of the groundwater resources within its jurisdiction. The District believes that this valuable water resource can be managed in a prudent and cost effective manner through education and conservation, coupled with reasonable regulation, including, if necessary, permitting of new and existing wells. The greatest threats to prevent the District from achieving the stated mission are inadequate information and inappropriate management, based in part on the lack of understanding of local conditions. A basic understanding of the aquifers and their hydrogeologic properties, as well as a quantification of resources is the foundation from which to build prudent planning measures. This Management Plan is intended as a tool to focus the thoughts and actions of those given the responsibility for the execution of the District activities.

2. Policy: It shall be the policy of the Board of Directors that the most beneficial use of groundwater in the District is to provide for future groundwater needs of the citizens. Groundwater shall be conserved, preserved, protected, and waste prevented within the District to maintain the viability of the region for future generations. The Board of Directors with the cooperation of the citizens of the District, and surrounding political subdivisions, shall implement this management plan and any necessary modifications thereof to achieve this goal.

3. Technical Research and Studies: The District, in cooperation with the Texas Water Development Board and the Texas Natural Resource Conservation Commission, and other political subdivisions, shall conduct studies to better understand the groundwater resources within the District. The District will also cooperate with governmental entities and others conducting studies to monitor the level of aquifers within the District to maximize beneficial use and to prevent overproduction.

The District will gather data, and improve data gathering methods, to ensure that all future District plans are based upon the best information available.

4. Monitoring Progress of the District's Implementation of its Groundwater Management Plan: To monitor the progress of the District's Plan and its implementation, the Board shall receive an annual report during an open and duly noticed public meeting. The report shall include an update on the status of all of the Districts Management Obligations and Performance Standards contained in the Plan, together with any other relevant information.

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#### D. PLUM CREEK CONSERVATION DISTRICT

##### 1. General Description:

(i) Creation & Powers: The District was created by the Legislature with the enactment in 1957 of the District's enabling legislation, Tex. Rev. Cit. Stat. Ann. Art. 82-80-194, as amended (the "Act") under the provisions of Section 59, Article XVI of the Texas Constitution. The enabling statute provided the District with the power to control, conserve, protect, distribute and utilize the storm and flood waters and unappropriated flow of Plum Creek and its tributaries. In 1989 the Act was amended to authorize the District, upon approval of the qualified voters of the District, to exercise the powers and duties imposed under Chapter 52 (now Chapter 36) of the Texas Water Code, for the preservation, conservation, protection, recharge, and prevention of waste and pollution of the underground water of the District, except in those areas of the District that were part of the Barton Springs-Edwards Aquifer Conservation District or the Edwards Underground Water District on January 1, 1989. The voters in the District approved the implementation of the powers granted by the Legislature.

(ii) Governing Board: The District is governed by an appointed six member Board of Directors. The current members of the Board of Directors of Plum Creek Conservation District are:

- James A. Holt, Jr. - President
- James O. Lipscomb - Vice President
- James Taylor - Director
- John Kimbro - Director
- Melvin Bain - Director
- Ben Twidwell - Director

(iii) Daily Operations: The day to day management of the District carried out by its Executive Secretary, J. Fredric Bell.

2. Location and Extent: The District is situated within parts of Caldwell and Hays Counties, but the District's boundaries are not conterminous with those of either Caldwell or Hays Counties. The specific boundaries of the District are more fully described in Section 3 of the enabling statute that first created the District. The most downstream point of the boundaries of the District is in the most southerly southeast corner of Caldwell County near the confluence of Plum Creek and the San Marcos River. The calls in the description of the boundaries of Plum Creek are, generally, along tract or survey lines. In 1999, the Legislature enacted S.B. 1911 which created, *inter alia*, the "Hays Trinity Groundwater Conservation District" (Acts 1999, 76<sup>th</sup> Tex. Leg. ch. 1331, 1999 Tex. Gen. Laws 4536). As created, the "Hays Trinity Groundwater Conservation District" overlaps a portion of the Plum Creek Conservation District. The "Hays Trinity Groundwater Conservation District" is "provisional" and subject to confirmation or "sunset" in 2001 by the 77<sup>th</sup> Legislature. Accordingly, the District is unable to determine the exact extent to which the two Districts might overlap, conflict or compliment one and other.

3. Topography: The land surface of Caldwell County ranges from nearly flat to hilly. The minimum elevation, about 295 feet, is at the southern tip of the County where Plum Creek joins the San Marcos River. The maximum elevation in Caldwell County, about 725 feet, is in the area of the so-called "Iron Mountains" peaks southeast and south of Mahan, a small community southeast of Lockhart. Regionally, the surface rises from southeast to northwest.

The portion of District located in Hays County generally exhibits the same type of terrain, although the elevation differences are more pronounced as some of the surface of the District extends into Hays County, which overlies the Balcones Escarpment, and provides drainage to a portion of Plum Creek.

Plum Creek drains about 310 square miles, or about 60% of Caldwell County. In addition, a portion of Hays County that is drained by Plum Creek is also in the boundaries of the District.

## **E. WATER RESOURCES WITH THE DISTRICT**

1. Groundwater Resources: According to Report 12 of the Texas Water Development Board, first published in 1966 and reprinted in 1975, the following formations contain aquifers in Hays and Caldwell Counties within the boundaries of Plum Creek Conservation District that produce some usable fresh water:

- (i) The Edwards Limestone;
- (ii) Midway and Navarro groups
- (iii) The Wilcox Group;
- (iv) The Carrizo Sands
- (v) The Leona Formation; and
- (vi) Recent Alluvium deposits.

2. Surface Water Resources: The District does not hold, own or otherwise control any surface water rights. The District is located within the territorial jurisdiction of the Guadalupe-Blanco River Authority ("GBRA"), which controls substantial surface water rights associated with GBRA owned or operated facilities and reservoirs, including Canyon Lake. In 1998, GBRA entered into an agreement for construction of a regional water treatment plant capable of serving areas within the District. The impact of this water service is under evaluation.

3. Estimate of Existing Total Usable Groundwater in the District: Based upon data available from the Texas Water Development Board, including Report 12 and the 1997 State Water Plan, "Water for Texas, Today and Tomorrow, TWDB 1997," the District estimates the total quantity of "usable groundwater" available within the District to be 12,500 ac-ft/year.

4. Estimate of Groundwater Use in the District (1992-1997): Based upon data available from the Texas Water Development Board and the 1997 State Water Plan, "Water for Texas, Today and Tomorrow, TWDB 1997," the District estimates the historical annual use of groundwater within the District as follows:

1992 - 2,076 ac-ft	1995 - 1,850 ac-ft
1993 - 1,779 ac-ft	1996 - 2,204 ac-ft
1994 - 1,813 ac-ft	1997 - 1,856 ac-ft

5. Estimate of Annual Recharge to Groundwater Formations in the District: Based upon data available from the Texas Water Development Board and the 1997 State Water Plan, "Water for Texas, Today and Tomorrow, TWDB 1997," the District estimates the annual recharge to the Edwards (Trinity) Limestone; Midway and Navarro groups; the Wilcox Group; and the Carrizo Sands groundwater formations within the District to be 12,500 ac-ft/year. Data are not available to estimate the recharge to either the Recent Alluvium deposits or the Leona formation.

6. Estimate of Projected Water Supply Available for Use within the District: Based upon data available from the Texas Water Development Board and the 1997 State Water Plan, the District estimates the projected water supply available for use within the District through the year 2050 as follows:

2000 - 12,500 ac-ft	2030 - 12,500 ac-ft
2010 - 12,500 ac-ft	2040 - 12,500 ac-ft
2020 - 12,500 ac-ft	2050 - 12,500 ac-ft

7. Estimate of Projected Water Demand within the District: Based upon data available from the Region L South Central S.B.1 Regional Water Planning Group and the Texas Water Development Board and the 1997 State Water Plan, the District estimates the projected demand for water within the District through the year 2050 as follows:

(i) Caldwell County:

2000 – 7111	ac-ft	2030 – 8681	ac-ft
2010 – 7612	ac-ft	2040 – 8760	ac-ft
2020 – 8075	ac-ft	2050 – 8805	ac-ft

(ii) Hays County:

2000 – 181	ac-ft	2030 – 327	ac-ft
2010 – 228	ac-ft	2040 – 390	ac-ft
2020 – 271	ac-ft	2050 – 424	ac-ft

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cont.

Water demands in the Caldwell County portion of the District include the projected demands of a number of water utilities located in the Caldwell County portion of the District that have historically relied upon the Edwards Aquifer. However, the projected water demands for these utilities were included in the District's projections because of the overlap of boundaries and the uncertainty of Edwards Aquifer supplies. Some of the utilities may purchase surface water from the City of San Marcos or from the Guadalupe Blanco River Authority (GBRA). Others may chose to develop supplies from aquifers managed by the District. Also included in the District's projections is the projected demand for the City of Luling. The City has converted to surface water and presently has contracts with GBRA for 2,800 acre-feet per year. However, the City has not abandoned its wells, but will continue to rely upon the wells for back-up supplies.

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8. Water Levels: Figure 1 through 6 display historical water levels for select wells in the Wilcox formation based upon information and data available from the Texas Water Development Board. Figure 7 reflects a summary of the six selected wells depicted in Figures 1 through 6. Based upon the data reflected in Figures 1 through 7, water levels in the Wilcox formation appear to have remained relatively constant over the last 20 years. Figure 8 is a map reflecting the locations of the selected wells.

9. Estimate of Additional Annual Natural and/or Artificial Recharge to Groundwater Formations in the District Resulting From Implementation of Feasible Methodologies: At this time the District has not conducted any studies to determine the amount, if any, of additional annual recharge to groundwater formations within the District that might be achieved by the implementation of feasible methodologies. Nor has the District identified at this time any methodology that would be feasible for facilitating additional annual recharge to groundwater formations within the District.

10. Subsidence: The District historically has not experienced any "subsidence." Accordingly, the District's Plan does not contain any "Management Objective" or related "Performance Standards" to address the issue of non-existent subsidence.

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Figure 1

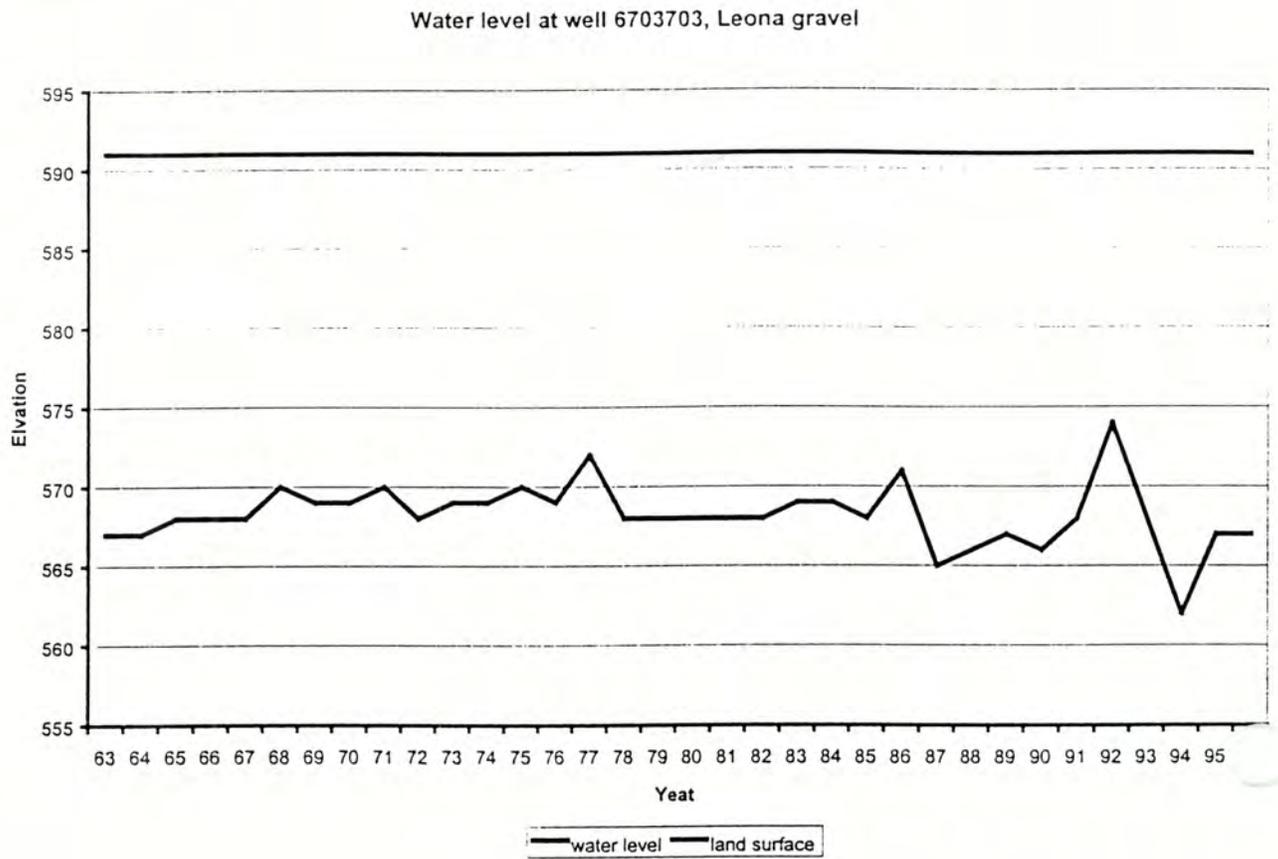


Figure 2

Water level well 6704902 Wilcox

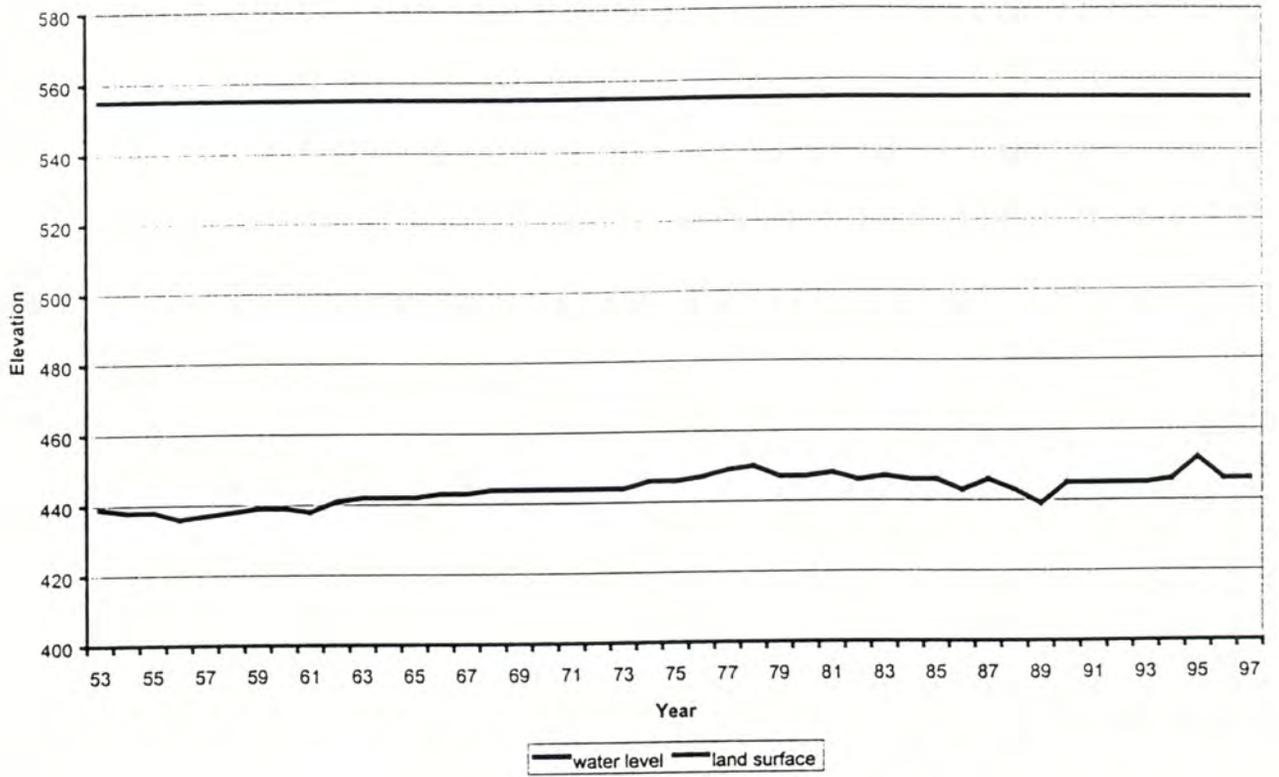


Figure 3

Water Level well 6711501 Wilcox

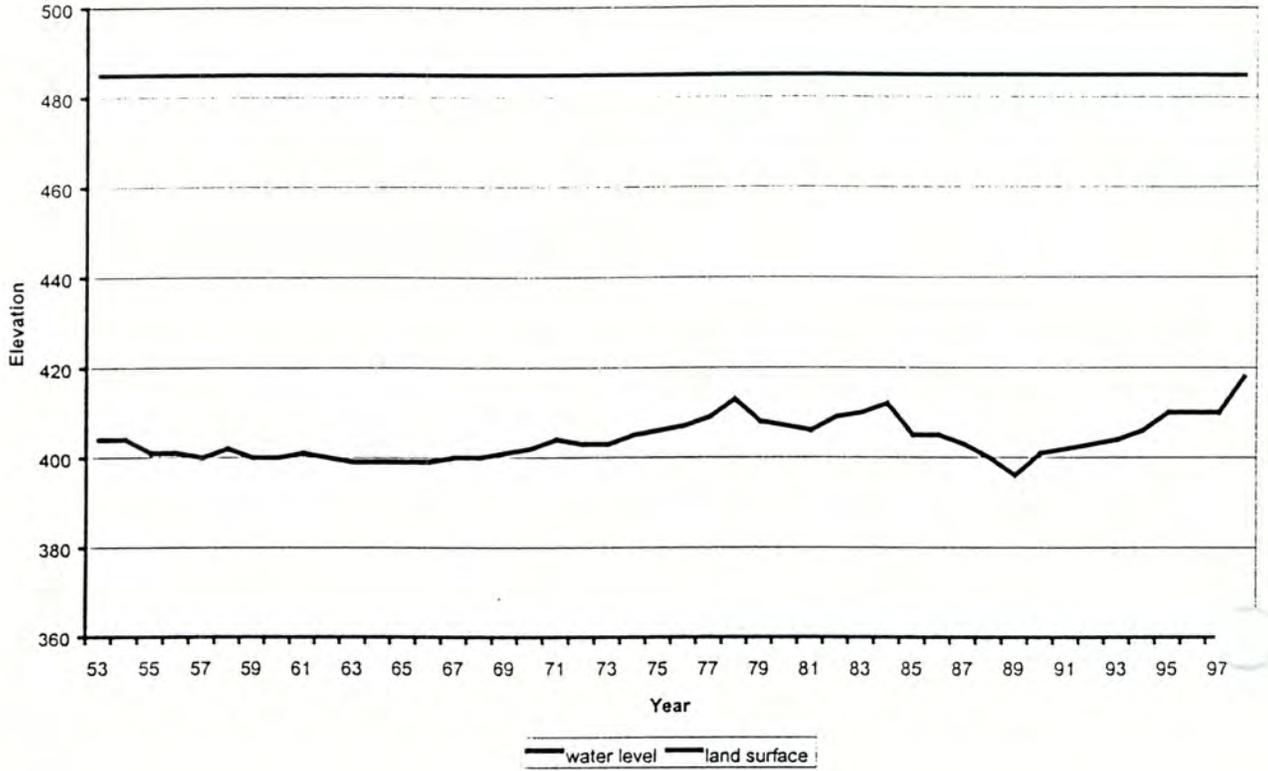


Figure 4

Water Level 6712503 Wilcox

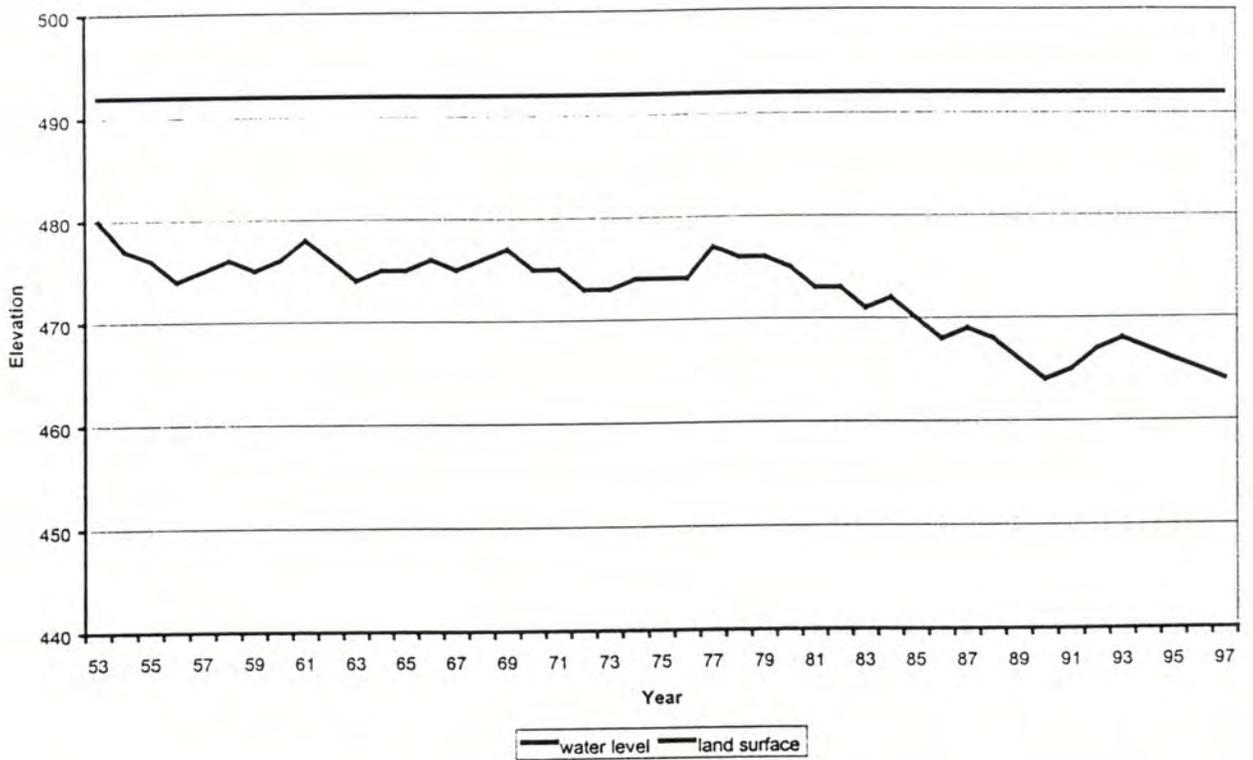


Figure 5

Water level well 6712601 Wilcox

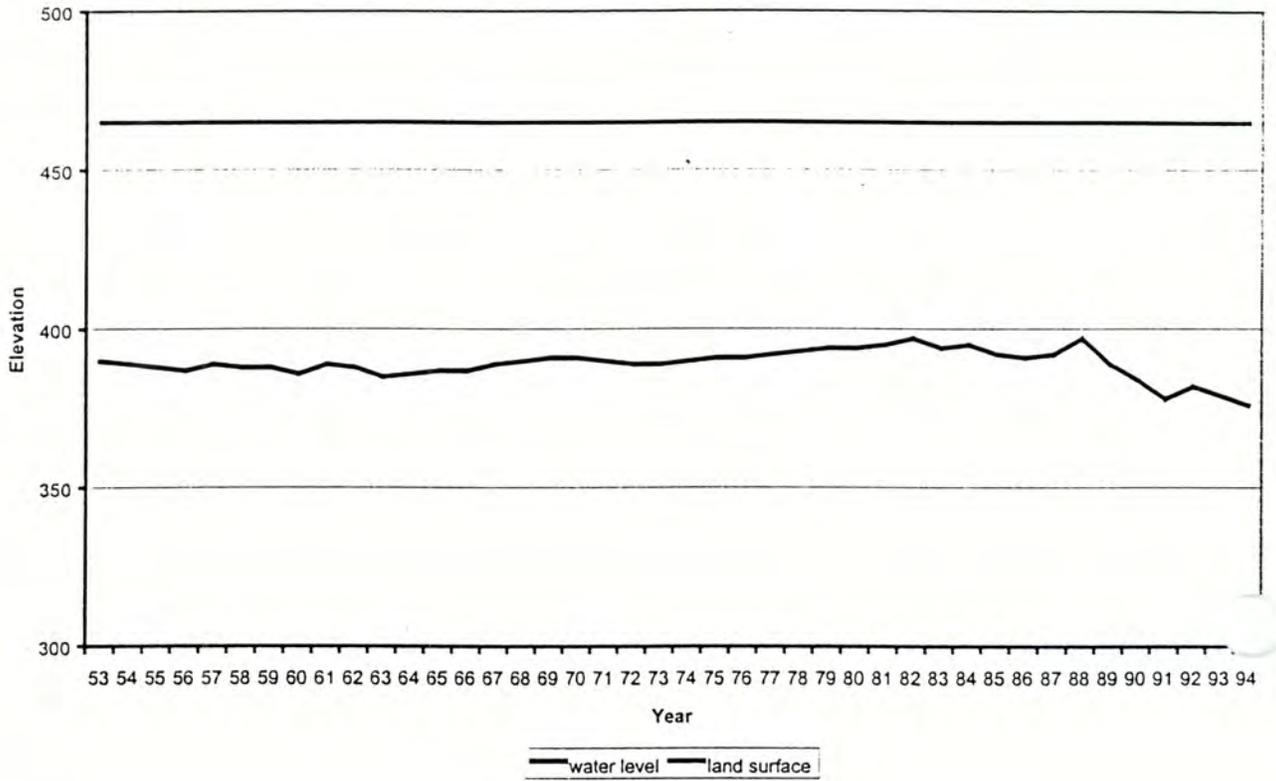


Figure 6

Water level well 671 9609 Wilcox

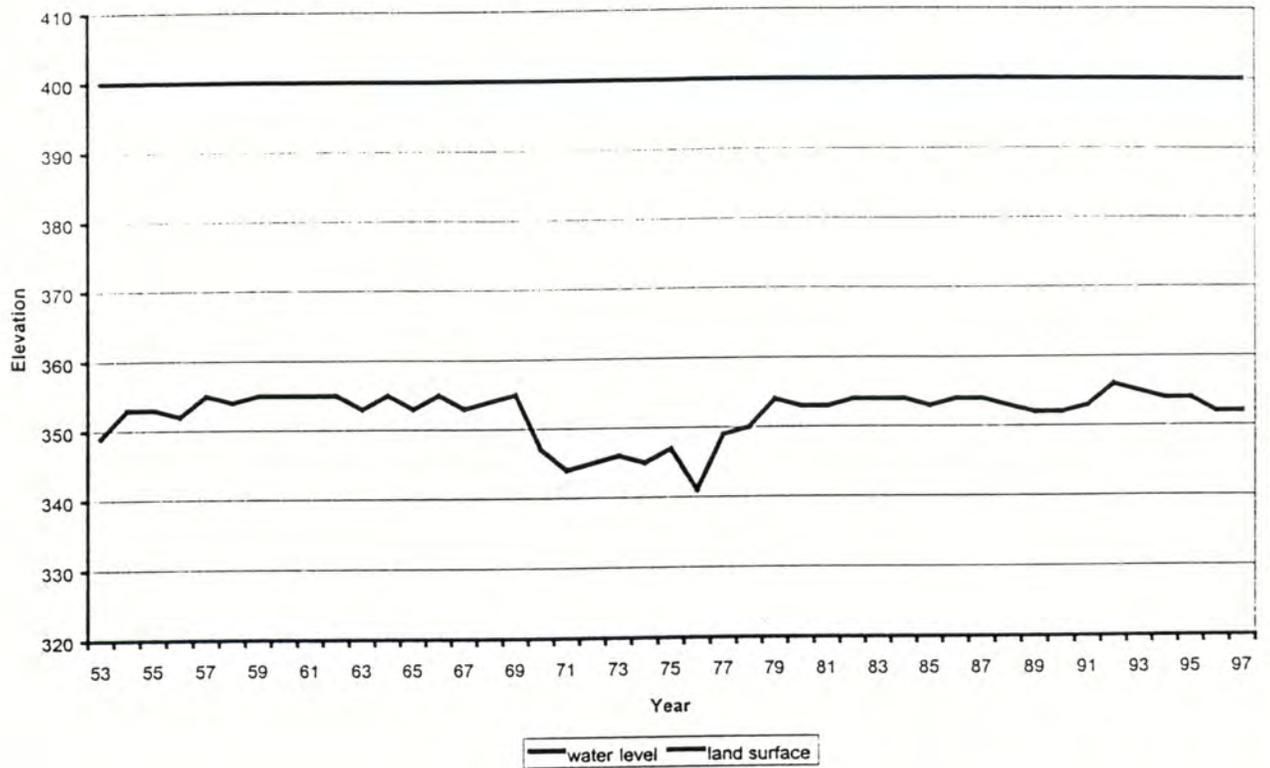
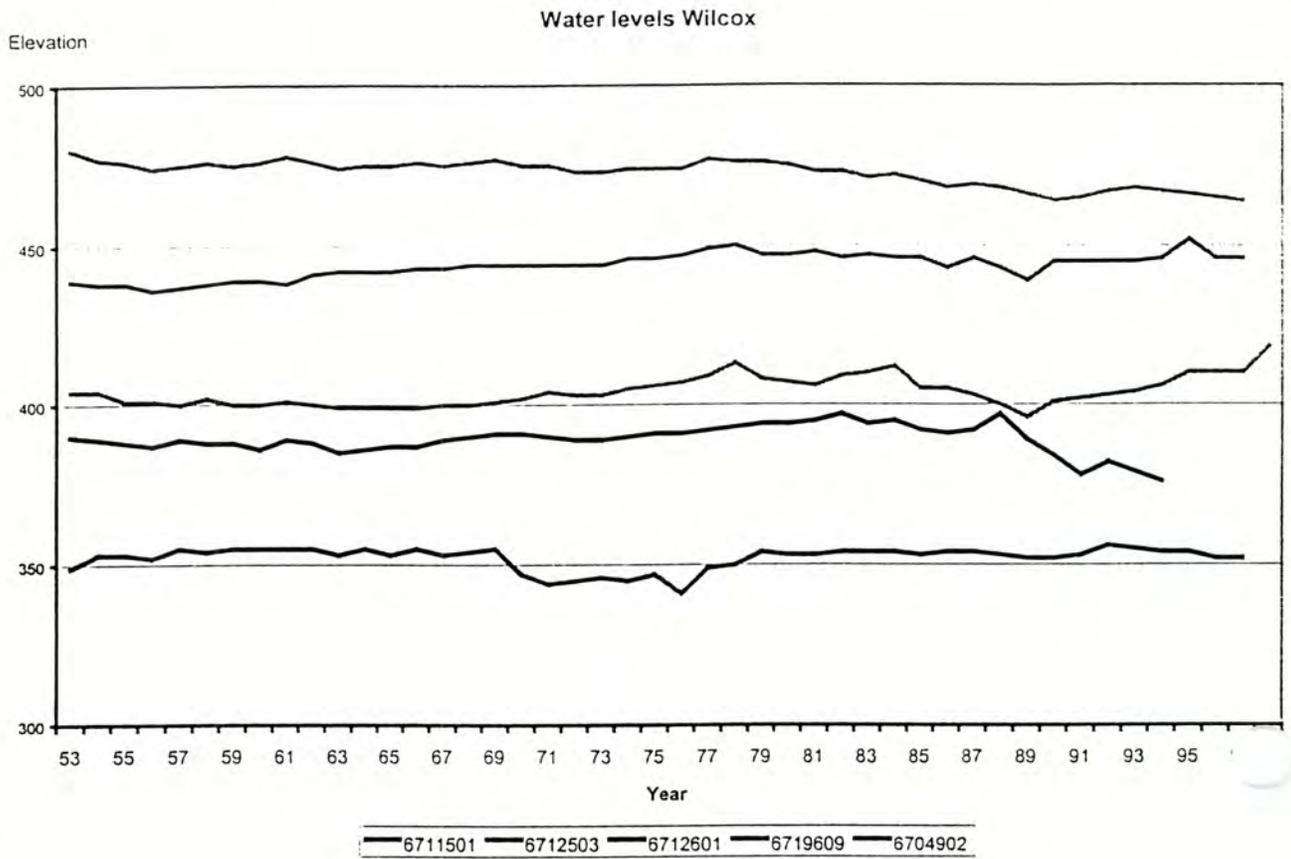


Figure 7





**MANAGEMENT GOALS, MANAGEMENT OBJECTIVES  
AND PERFORMANCE STANDARDS**

**Goal**

- 35
- 1.0 Implement a system to improve the basic understanding of groundwater conditions in the District.**

**Management Objective**

- 1.1 Develop additional information regarding groundwater resources within the District.
- A. Identify the groundwater formations within the District by December 30, 2001.
  - B. Update information regarding annual groundwater use within the District within 30 days of availability from TWDB.
  - C. Develop and maintain an inventory of existing wells located within the District by December 30, 2001.
  - D. Identify an optimal water level monitoring network of wells to determine water levels within the District.
  - E. Coordinate with TWDB to ensure that by December 30, 2001 water levels data is collected at network wells.
- 1.2 Provide information to general public on an annual basis.
- A. Maintain copies of Report 12, and updates thereto, at District's office.
  - B. Maintain map of District showing location of groundwater formations, index well locations, location of all known wells in the District, and boundaries of potable water purveyors operating, in whole or in part, water within the District.
  - C. Provide access to the District's inventory of existing wells.
  - D. Provide local newspapers and other organizations with graphics of water levels at the District's network wells.

## Performance Standards

1.1 The District will have met objective when:

- A. The groundwater formations within the District have been identified by December 30, 2001, and that information presented to the District's Board during an open public meeting and that information then made available to the public.
- B. Information regarding annual groundwater use published by the TWDB is presented annually to the District's Board during an open public meeting and that information then made available to the public.
- C. The inventory of existing wells within the District has been completed by December 30, 2001, and the inventory presented to the District's Board during an open public meeting and that information then made available to the public.
- D. A monitoring network of wells identifying the optimal water level to determine groundwater levels within the District has been established.
- E. Coordination with TWDB regarding water level data in network wells is completed prior to December 30, 2001.

1.2 The District will have met objective when:

- A. A copy of Report 12 and any updates thereto is placed on file in the District's office available for review and inspection by members of the public.
- B. A map of the District showing the location of groundwater formations, index well locations, locations of all known wells, and the boundaries of potable water purveyors operating in whole or in part, within the District is placed on file in the District's office available for review and inspection by members of the public.
- C. A copy of the inventory of existing wells within the District is placed in the District's office available for review and inspection by members of the public.
- D. Prior to December 30th of each year, the District provides graphs of groundwater levels within the District to newspapers of general circulation within the District for publication.

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Goal

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- 2.0 **Implement management strategies that will provide for the efficient use and prevention of waste of groundwater in the District.**

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**Management Objective**

- 2.1 Adopt rules and regulations for permitting and construction of new wells, and registration of existing wells, within the District.
- 2.2 Provide information on water conservation and waste prevention through public speaking appearances at schools or civic organizations at least twice a year and prepare regular press releases and/or newspaper articles for submission to papers of general circulation within the District.
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**Performance Standards**

- 2.1 Adopt rules and regulations for permitting and construction of new wells by December 30, 2001.
- 2.2 Adopt rules for registration of existing wells, and notify well owners of the same by December 30, 2001.
- 2.3 Speaking appearances made by the District representatives, at least twice each year. Periodic, at least quarterly, press releases/newspaper articles provided papers of general circulation within the District.

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Goal

- 3.0 **Implement management strategies that will protect and enhance the quantity of useable quality water through the use of conjunctive surface water management.**

**Management Objective**

- 3.1 Identify by May 30, 2000, political sub-divisions and water and sewer utilities within and proximate to the District that may be capable of providing potable surface water supplies and/or treated waste water effluent to customers within the District. Coordinate once a year with all water utilities as to their plans for using surface water and groundwater within the District.
- 3.2 Identify current quantities and sources of surface water available to or used within the District, and provide information to the utilities in the District.
- 3.3 Consider strategies for enhancement of recharge (artificial and natural) within the District.

- 3.4 Consider strategies for reuse of treated wastewater within the District.

**Performance Standards**

- 3.1 By May 30, 2000, identify water and sewer utilities that provide services in the District. Obtain location maps of utilities service area boundaries and CCN areas, and the name and the telephone number of the utility manager. By December 30th of each year, document at least one contact with each utility regarding their use of surface water and groundwater within the District. 29
- 3.2 Provide information on available surface water supplies to water utilities within the District by December 30th of each year. 38
- 3.3 The agenda of at least one of the regularly called open meetings of the Board during the year will include a discussion on strategies for the enhancement of recharge of groundwater reservoirs within the District. 39
- 3.4 The agenda of at least one of the regularly-called open meetings of the Board during the year will include a discussion on strategies for reuse of treated wastewater within the District.

**Goal**

- 4.0 Adopt rules to implement the goals of regulating the production of groundwater within the District to insure that the citizens of the District will have adequate quantities of useable water for the future.**

**Management Objective**

- 4.1 The agenda of at least one of the regularly called open meetings of the Board during the year will include a discussion and, as necessary, a vote on developing new, or amending existing rules to regulate the production of groundwater. The District will develop or amend rules, as necessary, for the regulation of production and methods to monitor production within nine months of vote to develop rules.
- 4.2 Adopt rules on management of the groundwater resources during periods of drought by January 30, 2001.

**Performance Standards**

- 4.1 At least quarterly, the agenda of a regularly called board meeting will include an item to review the need for rules on production of groundwater. If rules are needed, they will be developed and approved within nine months.
- 4.2 Drought management rules approved by January 30, 2001.

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**Goal**

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**5.0 Implement management strategies to prevent the degradation of groundwater quality within the District.**

**Management Objective**

- 5.1 The District will initiate a program to identify unplugged abandoned and/or deteriorated wells by September 30, 2000. Report unplugged abandoned oil and gas wells to the Texas Railroad Commission within sixty (60) days of discovery. Report unplugged abandoned water wells to the Board of Directors within sixty (60) days of discovery. The Board will take steps to act on all identified abandoned and deteriorated water wells within ninety (90) days of discovery.
- 5.2 Develop and implement Memorandum of Understanding (MOU), or other agreement(s), with neighboring political subdivisions and water/wastewater utilities for the protection and enhancement of both surface and groundwater quantity and quality within, and/or available for use within, the District.
- 5.3 The District, in cooperation with TNRCC, will maintain information on the wellhead protection program.
- 5.4 The District in cooperation with TWDB will develop by December 30, 2000, a database of the water quality of selective wells in the District. The District will update the database annually.

**Performance Standard**

- 5.1 Adopt abandoned well identification program by September 30, 2000. Monitor average number of days to report abandoned and/or gas wells to Railroad Commission. Monitor average number of days required for Board to act on abandoned and unplugged water wells.
- 5.2 Have MOUs signed by May 30, 2001.
- 5.3 At least semi-annually, the District will contact TNRCC to request wellhead protection information
- 5.4 Have a database of water quality of wells in the District by December 30, 2000. The database is to be updated within ninety (90) days of receiving data from TWDB.

**RESOLUTION OF THE BOARD OF DIRECTORS  
OF THE PLUM CREEK CONSERVATION DISTRICT**

WHEREAS, the Plum Creek Conservation District promulgated, and after conducting Public Hearings on the same, previously adopted and subsequently amended the "Plum Conservation District Management Plan (Including Management Goals, Objections & Performance Standards)" pursuant to Texas Water Code Section 36.1071 (the "Plan"); and

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WHEREAS Plum Creek filed said Plan and the amendments thereto with the Texas Natural Resource Conservation Commission ("TNRCC") and the Texas Water Development Board ("TWDB"); and

WHEREAS the TWDB has requested that Plum Creek modify its Plan further; and

WHEREAS Plum Creek has reviewed TWDB's request and finding the same to be consistent with Plum Creek's original intent and Plan as adopted on March 21, 2000, and amended July 18, 2000, is amenable to further amending its Plan to address TWDB's request; and

WHEREAS, the amended Plan attached hereto as Exhibit A, has been developed for purposes of conserving, preserving, protecting and recharging underground water in the District, and this action is taken under the District's statutory authority to prevent waste and protect the rights of owners of interest in groundwater; and

WHEREAS, the amended Plan meets the requirements of Senate Bill 1 set forth in Section 36.1071, Texas Water Code; and

WHEREAS, under no circumstances, and in no particular case will this Plan, or any part thereof, be construed as a limitation or restriction upon the exercise of any discretion of the Board of Directors on behalf of the District; where such exists; nor will it in any event be construed to deprive the Board of the authority to exercise any of the powers, duties or jurisdiction conferred upon the District by law, nor to limit or restrict the amount and character of data or information which may be required for the proper administration of the law; and

NOW THEREFORE, BE IT RESOLVED by the Board of Directors of the Plum Creek Conservation District as follows:

1. The amended "Plum Conservation District Management Plan (Including Management Goals, Objections & Performance Standards)" attached as Exhibit A hereto, is hereby adopted.

2. The amended Plan will take effect upon certification by the Texas Water Development Board.

3. The amended Plan will remain in effect until amended by the Board of Directors and submitted to the Texas Water Development Board for certification, or March 2010, whichever is earlier.

4. The District's General Counsel is directed to forward a copy of the adopted Plan, as amended, to the Texas Water Development Board for review and certification.

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5. The District's Executive Secretary is directed to forward a copy of the adopted Plan, as amended, to the south Central Texas Regional Water Planning Group (Regional 2) in care of its administrative coordinator, San Antonio River Authority (Attn: Mr. Steve Roche, P.E.), and to report back to the Board on any comments received.

6. The District's Executive Secretary is directed to forward a copy of the adopted Plan, as amended, to the Guadalupe Blanco River Authority and to report back to the Board on any comments received.

7. The District's Executive Secretary is directed to make the adopted Plan, as amended, available to the public.

Adopted this 17<sup>th</sup> day of July, 2001 in an open and public, and duly noticed meeting of the Board of Directors of Plum Creek Conservation District at its offices in Caldwell County, Texas on a vote of 5 ayes and 0 nays.

**PLUM CREEK CONSERVATION DISTRICT**

By: James A. Holt  
James A. Holt  
President of Board of Directors

ATTEST:

By: James Taylor  
James Taylor, Secretary of  
Board of Directors

**Goals Identified in Senate Bill 1 (Section 36.1071, Texas Water Code) Not Applicable to the District:**

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1. The goal of controlling and preventing subsidence is not applicable to the District.
2. The goal for addressing natural resources issues that impact the use and availability of groundwater or are impacted by the use of groundwater within the District is not applicable.

**Actions, Procedures, Performance and Avoidance for Plan Implementation:**

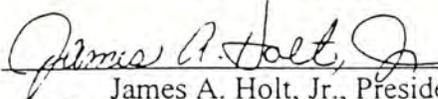
1. The District will implement the provisions of this Plan and will utilize the provisions of this Plan as a guidepost for determining the direction or priority for all District activities. All operations of the District, all agreements entered into by the District and any additional planning efforts in which the District may participate will be consistent with the provisions of this Plan.
2. The District will adopt rules relating to the permitting of wells and the production of groundwater. The rules adopted by the District shall be pursuant to Chapter 36, Texas Water Code, and the provisions of this Plan. All rules will be adhered to and enforced. The promulgation and enforcement of the rules will be based on the best technical evidence available.
3. The District shall treat all citizens with equality. Citizens may apply to the District for discretion in enforcement of the rules on grounds of adverse economic effect or unique local conditions. In granting of discretion to any rule, the Board shall consider the potential for adverse effect on adjacent landowners. The exercise of said discretion by the Board, shall not be construed as limiting the power of the Board.
4. The District will seek the cooperation in the implementation of this Plan and the management of groundwater supplies within the District. All activities of the District will be undertaken in co-operation and co-ordinated with the appropriate state, regional or local water management entity.

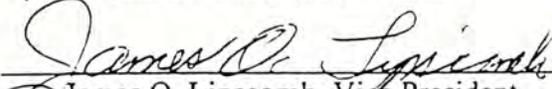
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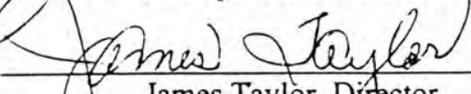
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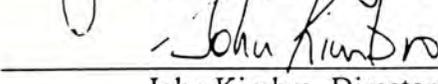
We the undersigned members of the Board of Directors do hereby certify and confirm the adoption of this Groundwater Management Plan (Including Management Goals, Objectives & Performance Standards) of the Plum Creek Conservation District on this the 17<sup>th</sup> day of July, 2001 as evidenced by our signatures below:

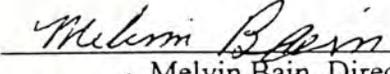
Board of Directors

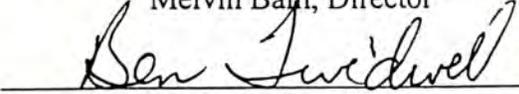
  
James A. Holt, Jr., President

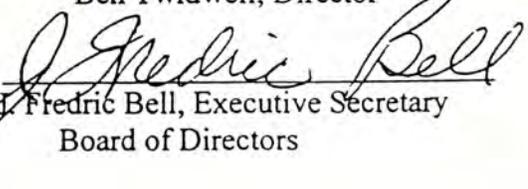
  
James O. Lipscomb, Vice President

  
James Taylor, Director

  
John Kimbro, Director

  
Melvin Bain, Director

  
Ben Twidwell, Director

Attested by:   
Fredric Bell, Executive Secretary  
Board of Directors

LAW OFFICES

McGINNIS, LOCHRIDGE & KILGORE, L.L.P.

1300 CAPITOL CENTER

919 CONGRESS AVENUE

AUSTIN, TEXAS 78701

HOUSTON, TEXAS OFFICE  
3200 ONE HOUSTON CENTER  
1221 MCKINNEY STREET  
HOUSTON, TEXAS 77010  
(713) 615-8500  
FAX (713) 615-8585

AUSTIN, TEXAS OFFICE  
(512) 495-6000  
FAX (512) 495-6093

WRITER'S DIRECT DIAL NUMBER:

July 27, 2001

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Via Certified Mail  
Return Receipt Requested

Guadalupe-Blanco River Authority  
Attn: Mr. William E. West, Jr.  
General Manager  
933 East Court Street  
Seguin, Texas 78155

Re: Plum Creek Conservation District Groundwater Management Plan (revise 7/17/01)

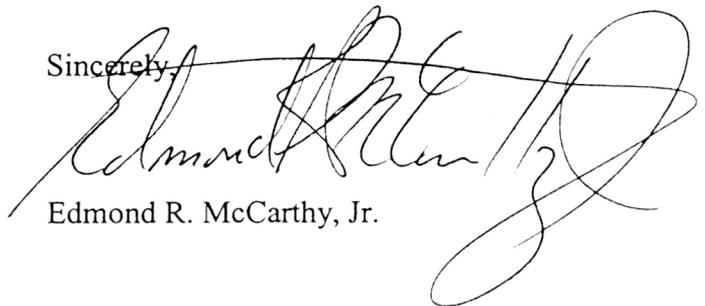
Dear Bill:

I am writing to you on behalf of the Board of Directors of the Plum Creek Conservation District in connection with the District's recent revisions to its Groundwater Management Plan, adopted pursuant to Section 36.1071, Texas Water Code. I am enclosing for your review and comment, a copy of the District's revised Plan dated July 27, 2001.

The Board now wishes to receive comments from interested parties and, although the Board has approved the Plan, it will consider all comments it may receive. Accordingly, I would request that you submit any written comments on the Plan to me at your earliest convenience.

On behalf of the Plum Creek Conservation District I want to thank you for your assistance in this regard. Should you have any questions please feel free to call me at (512) 495-6061.

Sincerely,



Edmond R. McCarthy, Jr.

Enclosure

cc: Plum Creek Board of Directors  
Attn: J. Fredrick Bell, Executive Secretary  
Randy Williams, Texas Water Development Board

Edmond R. McCarthy, Jr.  
 GINNIS, LOCHRIDGE & KILGORE, L.L.P.  
 919 Congress Avenue  
 1300 Capitol Center  
 Austin, TX 78701

4. Restricted Delivery?  Yes  
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2. Article Number  
 7155 5474 4100 0643 6033

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A. Received By: (Please Print Clearly)

LIZ Sedlacek

B. Signature: (  Addressee or  Agent )

X Liz Sedlacek

C. Date of Delivery

7/30/01

D. Addressee's Address (If Different From Address Used by Sender)

Secondary Address / Suite / Apt. / Floor (Please Print Clearly)

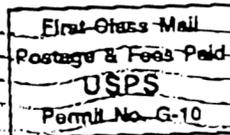
Delivery Address

City State ZIP + 4 Code

1. Article Addressed To:

Guadalupe-Blanco River Authority  
 Attn: Mr. William E. West, Jr.  
 General Manager  
 933 East Court Street  
 Seguin, TX 78155

UNITED STATES POSTAL SERVICE



RETURN TO:

Plum Creek

Edmond R. McCarthy, Jr.  
 McGinnis, Lochridge & Kilgore, L.L.P.  
 919 Congress Avenue  
 1300 Capitol Center  
 Austin, TX 78701

PS FORM 3811, JULY 1999

PS FORM 3811, JULY 1999

LAW OFFICES

McGINNIS, LOCHRIDGE & KILGORE, L.L.P.

1300 CAPITOL CENTER

919 CONGRESS AVENUE

AUSTIN, TEXAS 78701

HOUSTON, TEXAS OFFICE  
3200 ONE HOUSTON CENTER  
1221 MCKINNEY STREET  
HOUSTON, TEXAS 77010  
(713) 615-8500  
FAX (713) 615-8585

AUSTIN, TEXAS OFFICE  
(512) 495-6000  
FAX (512) 495-6093

WRITER'S DIRECT DIAL NUMBER:

July 27, 2001

SCRWPG (Region "L")  
c/o SARA  
Attn: Steve Raabe  
100 East Guenther  
San Antonio, Texas 78283-0027

Via Certified Mail  
Return Receipt Requested

Re: Plum Creek Conservation District Groundwater Management Plan (Revised 7/17/01)

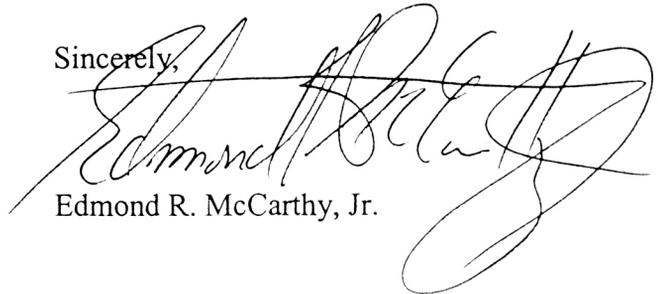
Dear Steve:

I am writing to you on behalf of the Board of Directors of the Plum Creek Conservation District in connection with the District's recent revisions to its Groundwater Management Plan, adopted pursuant to Section 36.1071, Texas Water Code. I am enclosing for your review and comment, a copy of the District's revised Plan dated July 27, 2001.

The Board now wishes to receive comments from interested parties and, although the Board has approved the Plan, it will consider all comments it may receive. Accordingly, I would request that you submit any written comments on the Plan to me at your earliest convenience.

On behalf of the Plum Creek Conservation District I want to thank you for your assistance in this regard. Should you have any questions please feel free to call me at (512) 495-6061.

Sincerely,



Edmond R. McCarthy, Jr.

Enclosure

cc: Plum Creek Board of Directors  
Attn: J. Fredrick Bell, Executive Secretary  
Randy Williams, Texas Water Development Board

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Plain Creek

Edmond R. McCarthy, Jr.  
McGinnis, Lochridge & Kilgore, L.L.P.  
919 Congress Avenue  
1300 Capitol Center  
Austin, TX 78701

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Edmond R. McCarthy, Jr.  
McGINNIS, LOCHRIDGE & KILGORE, L.L.P.  
919 Congress Avenue  
1300 Capitol Center  
Austin, TX 78701

4. Restricted Delivery? (Extra Fee)  Yes  
3. Service Type  
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A. Received By: (Please Print Clearly)  
*M. Antea*

B. Signature: (  Addressee or  Agent )  
*M. Antea*

C. Date of Delivery  
**JUL 30 2001**

D. Addressee's Address (If Different From Address Used by Sender)

Secondary Address / Suite / Apt. / Floor (Please Print Clearly)

Delivery Address

City State ZIP - 4 Code

1. Article Addressed To:  
SCRWPG (Region "L")  
c/o SARA  
Attn: Steve Raabe  
100 East Guenther  
San Antonio, TX 78283-0027