

Andrews Industrial Foundation, Inc.
700 W. Broadway
Andrews, TX 79714
TEL: 432/523-4675

January 9, 2007

Mr. Bill Roberts
Texas Water Development Board
P.O. Box 13231
Austin, TX 78711-3231

Re: Comments on 2007 Draft State Water Plan

Dear Mr. Roberts:

Enclosed please find the comments of Andrews Industrial Foundation, Inc. on the 2007 Draft State Water Plan. The comments of Andrews Industrial Foundation, Inc. are supportive of the Texas Water Development Board=s proposal to adjust the boundaries of the Ogallala and Pecos Valley Aquifers.

Should you have any questions, please do not hesitate to contact me at 432/523-4675.

Very truly yours,

Lloyd Eisenrich
President

Enclosure

**COMMENTS OF ANDREWS INDUSTRIAL
FOUNDATION, INC. TO THE 2007 DRAFT STATE
WATER PLAN IN SUPPORT OF THE ADJUSTMENT OF THE
BOUNDARIES OF THE OGALLALA AND PECOS VALLEY AQUIFERS**

The Andrews Industrial Foundation, Inc. (AAIF@) is a private non-profit corporation whose mission is to promote economic diversification in Andrews County, Texas. AIF appreciates this opportunity to comment on the Texas Water Development Board=s 2007 Draft State Water Plan.

AIF supports the proposal in the 2007 Draft State Water Plan, at Chapter 7, to adjust the boundaries of the Ogallala and Pecos Valley Aquifers. The adjustment of the Ogallala and Pecos Valley Aquifers, as depicted in Figure 7.8 of Chapter 7 and as detailed in Appendix 7.1 were based on groundwater availability modeling studies, other scientific studies, and comments from the public supported by existing information. AIF believes this is meaningful and appropriate input upon which to base the adjustment of the Ogallala and Pecos Valley Aquifers.

Previous Texas Water Development Board maps of Texas aquifers have located the Ogallala Aquifer over almost the entirety of Andrews County, with the exception of a small portion of the southwest and south central portion of Andrews County. These areas were previously located within the Cenozoic Pecos Alluvium Aquifer. The Cenozoic Pecos Alluvium Aquifer is proposed to be renamed the Pecos Valley Aquifer. The boundary for the Ogallala Aquifer is proposed to be changed when the boundary of the Pecos Valley Aquifer is adjusted. AIF supports the new proposed boundary between the Ogallala Aquifer and the Pecos Valley Aquifer in Andrews County.

The aquifer boundary change in Andrews County is supported by AIF because the changes are consistent with the conclusions of hydrogeologic experts with firsthand knowledge of the region who have consulted with AIF. The proposed boundary between the Pecos Valley Aquifer in western Andrews County is logical, reasonable, and consistent with the hydraulic situation in the area for the following reasons:

- § The proposed boundary coincides with the surface water divide in southwestern Andrews County. The proposed boundary shifts the Ogallala Aquifer from covering most the southwestern part of Andrews County to the areas east and north of the surface topographic drainage divide in Andrews County. The surface water divide is also consistent with the axis of the subsurface topographic ridge on the uppermost Dockum Group, the geologic formations that underlie the Ogallala and Pecos Valley Aquifers.

- § The proposed boundary also coincides with a zone of zero to very thin saturated thickness of what was previously mapped as Ogallala Aquifer. The subsurface topographic divide in Andrews County occurs approximately where the shallow groundwater and the geologic materials overlying the Dockum Group has been mapped as a zone of zero to 20 feet of saturated thickness.
- § The Texas Water Development Board=s Groundwater Availability Model of the Southern Ogallala Aquifer used the proposed boundary as the southern boundary of the Ogallala Aquifer. The proposed boundary was modeled as a no-flow boundary in the groundwater availability model. A no-flow boundary means that groundwater flow is parallel to the boundary and that no groundwater flows across the boundary.
- § The proposed boundary logically recognizes the different flow directions in the Pecos Valley and the Ogallala Aquifers. Groundwater flow in the Ogallala Aquifer is generally to the southeast whereas groundwater flow in the Pecos Valley Aquifer is generally to the southwest.

In summary, AIF supports the above-referenced aquifer boundary changes and the rationale set forth in Appendix 7.1 of the 2007 Draft State Water Plan. AIF encourages the Texas Water Development Board to adopt these proposed changes to the boundaries of the Ogallala and Pecos Valley Aquifers in Andrews County.

Respectfully submitted,

ANDREWS INDUSTRIAL FOUNDATION, INC.
700 W. Broadway
Andrews, TX 79714
TEL: 432/523-4675

By: _____
Lloyd Eisenrich
President