

October 29, 2015

Texas Water Development Board
P.O. Box 1323
Austin, TX 78711-3231
ATTN: Dr. Sanjeev Kalaswad, Director of Conservation & Innovative Water Technologies

RE: Public Input on Brackish Groundwater Production Zones

Dear Dr. Kalaswad,

The Schertz/Seguin Local Government Corporation (SSLGC) is a public, non-profit corporation created by the Cities of Schertz and Seguin. SSLGC produces groundwater from the Carrizo Aquifer in Gonzales County that is provided to Schertz, Seguin, Universal City, Selma, Converse, SAWS and Springs Hill WSC.

SSLGC has several concerns regarding the production of brackish groundwater in areas that would affect its current wellfield including future planned projects.

There are several basic principles that should be considered:

1. Brackish groundwater should be defined as water ranging from 3,000 - 10,000 TDS.
2. Production of brackish groundwater should not diminish or degrade fresh to slightly saline water (<1,000 - 3,000 TDS).
3. Brackish ground water is not separate nor isolated from other groundwater of better or poorer water quality contained within the aquifer.
4. Brackish water is subject to the same hydrologic laws and science, with regard to stress (pumpage), movement, and water-level declines, as the water in the rest of the aquifer.
5. Special brackish groundwater management areas should not be created that allows for rules to be developed which provides for special treatment and over production of brackish groundwater **at the expense of fresh water.**

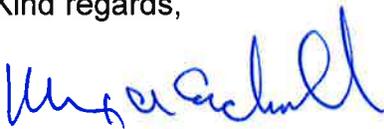
The artesian aquifers in the central part of Texas (Carrizo-Wilcox, etc.) have the following general characteristics:

- A number of the aquifers have limited to small recharge areas (outcrops) compared to the total aerial extent of the aquifers.
- They are aerially extensive.
- Many dip to the southeast.
- Groundwater in the outcrop is usually fresh and becomes more saline with depth and in the down dip direction.
- The outcrop and down dip areas are hydrologically connected.
- They (artesian aquifers) contain large quantities of brackish and saline groundwater in the down dip areas.

Given the characteristics of the Carrizo-Wilcox Aquifer, large scale production of brackish groundwater in the down dip areas will have a severe negative impact the aquifer. The lowering of water levels in the aquifer will accelerate, encroachment of fresh water into brackish water areas will take place, dewatering of the outcrop will occur and in some cases it will cause up-coning of saline groundwater into the well field.

Thank you for the opportunity to submit comments. Please contact me if you have any questions or concerns.

Kind regards,



R. Alan Cockerell
SSLGC General Manager
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