

**RESOLUTION OF CITY OF CROCKETT COUNCIL CONCERNING
GROUNDWATER WITHDRAWAL APPLICATIONS BY REDTOWN
RANCH HOLDINGS LLC AND PINE BLISS LLC**

WHEREAS, the City of Crockett, with a population of approximately 6,500 residents, owning its own public water system comprised of groundwater and surface water which provides water to industrial, commercial, and residential households that depend on reliable groundwater from the Carrizo and Wilcox Aquifers; and

WHEREAS, the City of Crockett is in close proximity to the jurisdiction of the Neches and Trinity Valleys Groundwater Conservation District (NTVGCD), which is charged under Chapter 36 of the Texas Water Code with regulating groundwater withdrawal to preserve aquifer conditions, ensure equitable use, and protect public resources; and

WHEREAS, Redtown Ranch Holdings LLC and Pine Bliss LLC have submitted applications to the Neches and Trinity Valleys Groundwater Conservation District (NTVGCD) to withdraw a combined 48,972 acre-feet per year, approximately 15.96 billion gallons, from the Upper and Middle Wilcox, Carrizo and/or Queen City Aquifers; and

WHEREAS, the applications reference approximately 54 wells, including

- 21 wells in Anderson County (Redtown Ranch LLC),
- 11 wells in Houston County (Redtown Ranch LLC, outside NTVGCD jurisdiction but located within the same contiguous project area and aquifer system),
- 22 wells in Henderson County (Pine Bliss LLC); and

WHEREAS, the stated use of water in the applications is “for all beneficial purposes,” which fails to meet the specificity required by Texas Water Code and NTVGCD rules, introducing uncertainty regarding the project’s public benefit, environmental impact, and compliance with groundwater conservation standards; and

WHEREAS, the requested withdrawal volume significantly exceeds the Modeled Available Groundwater (MAG) for Anderson County, exceeds the MAG for Henderson County, and approaches the total MAG for the entire three-county jurisdiction of NTVGCD, thereby undermining the District’s ability to meet its Desired Future Conditions (DFC) as adopted through Groundwater Management Area 11;

WHEREAS, the requested volume, geographic scope, and absence of detailed conservation, mitigation, or aquifer impact studies raise significant concerns for long-term groundwater availability, landowner equity, and compliance with NTVGCD’s own rules on administrative completeness, hydrogeological documentation, cumulative impacts, and protection of existing users; and

WHEREAS, excessive drawdown from this scale of groundwater could pose risks to existing water users in Houston County, the City of Crockett’s own public water supply system, and other public water supply systems, domestic well owners, and agricultural operations, and may negatively impact the Trinity River, which forms a large portion of Houston County’s boundary and depends on groundwater baseflow to support aquatic ecosystems and surface water users, and may negatively impact the Little Elkhart Creek

Resolution R-06-25

which is the primary tributary to the Houston County Lake from which the City of Crockett derives its surface water from; and

WHEREAS, the size, ambiguity, and potential regional impact of the proposed project warrants full and transparent scrutiny on behalf of current and future City of Crockett residents;

WHEREAS, the City of Crockett has interconnects with Consolidated Water Supply Corporation, which is a Water User Group (WUG) recognized in the NTVGCD's Management Plan, and the unmitigated scale of the proposed withdrawals may pose significant adverse impacts to this user; and

WHEREAS, the size, ambiguity, and potential regional impacts of this application merit a full and transparent public review, not just for the City of Crockett, but for Houston County, and for neighboring counties that may experience impacts due to regional aquifer drawdown, including Henderson, Cherokee, Anderson, and Leon Counties;

NOW, THEREFORE, BE IT RESOLVED THAT:

1. The City of Crockett formally requests a contested case hearing on the applications submitted by Redtown Ranch Holdings LLC and Pine Bliss LLC and to be granted standing as a party in opposition to the applications as an adversely affected party under Chapter 36 of the Texas Water Code;
2. The City of Crockett finds that the referenced applications:
 - Fail to adequately define the proposed use and destination of water;
 - Propose withdrawals which exceed the Modeled Available Groundwater for the region and directly threaten the ability of the Neches and Trinity Valleys GCD to meet the Desired Future Conditions of the aquifers, as mandated by the Texas Water Code and the District's Management Plan;
 - Fragment the project scope by omitting cumulative analysis across at least 54 wells;
 - Risk adverse effects on existing users and the natural hydrologic systems within Houston, Anderson, Henderson, Cherokee and Leon Counties.
3. The City Administrator is authorized to submit written comments, testify at hearings, and represent the City of Crockett in any administrative or legal proceedings related to these applications;
4. The City Administrator will continue working with Houston County, nearby counties, water suppliers, environmental groups, and elected officials to protect the city's natural resources. The City may also seek legal counsel, consult with engineering and hydrology experts, and pursue legal, regulatory, or legislative actions to ensure long-term environmental protection and water security for our city.

PASSED AND ADOPTED this 16 day of June, 2025.

Resolution R-06-25

Dr. Ianthia Fisher, Mayor

City of Crockett

ATTEST:

Mitzi Stefka, City Secretary