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February 25, 2026

Ms. Vanessa Onyskow-Lang  
MC 205  
Office of Legal Services  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087



**Re: Rule Project Number 2026-001-293-OW  
Comments in Support of Proposed Rules Implementing HB 2080 (89R)**

Dear Ms. Onyskow-Lang:

On behalf of the Prairielands Groundwater Conservation District (PGCD), I respectfully submit the following comments in support of the Texas Commission on Environmental Quality's (TCEQ) proposed rules to implement House Bill 2080 (89R), relating to the petition for inquiry process for groundwater conservation districts.

PGCD appreciates the Commission's measured approach in developing these proposed rules. The rule language reflects a clear understanding of both the statutory intent of HB 2080 (89R) and the operational realities of groundwater conservation districts across the state.

In particular, the proposed framework appropriately balances:

- The Legislature's direction to provide a structured and transparent petition process
- The Commission's oversight responsibilities; and
- The statutory authority and local expertise vested in groundwater conservation districts under Chapter 36 of the Texas Water Code.

The proposed rules provide clarity regarding procedural timelines, evidentiary standards, and the scope of Commission review. This approach promotes consistency, predictability, and fairness in the petition for inquiry process, without compromising the local groundwater management structure established by the Texas Legislature.

From a District perspective, the proposed rules provide sufficient procedural safeguards to ensure that petitions are reviewed in a structured and objective manner. At the same time, the Commission has appropriately avoided creating a duplicative or overly burdensome process that could disrupt local groundwater management efforts or introduce unnecessary uncertainty.

Kathy Turner Jones – General Manager  
Charles Beseda – President  
Paul Tischler – Vice President

Maurice Osborn – Secretary/Treasurer  
Marty McPherson – Director  
John Curtis – Director

Brad Daniels – Director  
Barney McClure – Director  
Gary Farmer – Director

TCEQ

Attn: Vanessa Onyskow-Lang

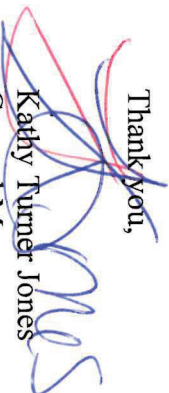
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We thank the Commission and staff for implementing HB 2080 (89R) in a manner that respects both state oversight and local governance. In our view, the proposed rules appropriately reflect the legislative intent embodied in the bill and provide a workable path forward for all stakeholders.

Thank you for the opportunity to provide comments on Rule Project Number 2026-001-293-OW. PGCD supports adoption of the proposed rules as published.

Thank you,



Kathy Turner Jones  
General Manager

KTJ