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December 3, 2025

COMMENTS SUBMITTED VIA TCEQ
ECOMMENTS SYSTEM:

<https://tceq.commentinput.com/comment/search>

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

Re: Comments Pursuant to Rulemaking regarding Senate Bill 616 and Aquifer Storage
and Recovery (ASR) Projects in Certain Areas of Williamson County: TCEQ Rule
Project No. 2025-033-331-WS

Dear Ms. Rico:

On behalf of the Brazos River Authority, thank you for the opportunity to provide comments on the proposed rules to implement Senate Bill 616, 89th Texas Legislature, Regular Session, 2025 (SB 616), relating to aquifer storage and recovery (ASR) projects that transect a portion of the Edwards Aquifer. The diligent and prompt work that the Texas Commission on Environmental Quality (TCEQ) and its staff have put into the rulemaking effort is greatly appreciated.

Our comments are limited solely to the rulemaking amendments implementing SB 616 as it applies to the authorization for TCEQ to approve ASR projects with injection wells that transect the Edwards Aquifer in the area of Williamson County east of Interstate Highway 35.

As you know, ASR is a key piece of the puzzle in helping to provide much-needed water supply solutions in many areas of the state, including areas in the Brazos River basin. SB 616 and the proposed rules amendments will allow ASR to be utilized as a key water management strategy tool in an area experiencing some of the highest growth rates in the state and nation but also experiencing critical water supply challenges—Williamson County, Texas. The Brazos River Authority plans to utilize this new tool by seeking authorization from TCEQ to inject treated surface water into geologic formations underlying the Edwards Aquifer in eastern Williamson County for later recovery and use during periods of drought or high demand to help accommodate that growth and resiliency of the region's water supply.



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We believe that TCEQ's proposed rules amendment set forth in Title 30, Texas Administrative Code, Section 331.19(a)(5) is consistent with both the plain language and the intent of SB 616 and support its adoption by the commission.

Lastly, we also want to thank TCEQ's UIC and legal staff for working with the Brazos River Authority's team over the last two regular sessions of the legislature to help bring this legislation to fruition in a way that will allow us to achieve our water supply objectives while also addressing TCEQ's concerns related to aquifer protection.

Thank you again for the opportunity to be part of the rulemaking process. We believe that these proposed amendments will benefit Central Texas in the years ahead as water supply challenges continue to escalate in importance for continued economic growth.

Respectfully Submitted,

David Collinsworth
General Manager/ CEO