

of Law as follows:

FINDINGS OF FACT

1. On January 31, 2001, San Antonio Water System was issued Initial Regular Permit (“IRP”) P101-744 (UV00461)) by the EAA in the amount of 916.000 acre-feet/year (“AF/yr”) (456.000 acre-feet of unrestricted irrigation groundwater rights (“UIG”) and 460.000 acre-feet of base irrigation groundwater rights (“BIG”)) based on the ownership and irrigation of historically irrigated land (“HIL”) during the historical period (June 1, 1972 - May 31, 1993).

2. On September 8, 2015, pursuant to Deed without Warranty from San Antonio Water System to Ruth Ranch 2, LLC dated July 14, 2015, and recorded as Document # 2015002347, Ruth Ranch 2, LLC was issued Regular Permit (“RP”) P101-744 (UV00461)), due to the purchase of 648.895 acres of HIL, containing 357.525 acre-feet BIG.

3. On June 11, 2024, due to the sale of land and water rights from Ruth Ranch 2, LLC to Gaylon Trees and Debra Trees, et al., including 648.895 acres of HIL, pursuant to the deeds identified in Exhibit B, the EAA issued Gaylon Trees and Debra Trees, et al. Regular Permit P200-281 (UV00461) containing 357.525 acre-feet of BIG.

4. On October 8, 2024, the EAA approved an Application to Convert BIG for P200-481 (UV00461) in the amount of 317.735 acre-feet based on a change in land use and issued Regular Permit P201-497 (UV00461) in the amount of 317.735 AF/yr UIG to the Applicants.

5. On February 11, 2026, Applicants filed a Conversion Application with the EAA at the EAA’s official business offices located at 900 E. Quincy, San Antonio, Texas. Applicants seek issuance of an order granting the Conversion Application to convert 39.790 AF/yr of BIG to UIG.

6. After receipt of the Conversion Application, the General Manager of the EAA conducted an initial review of the Application for administrative completeness.

7. By letter dated February 23, 2026, the General Manager notified Applicants that he had determined that the Application was administratively complete.

8. After determining that the Conversion Application was administratively complete, the General Manager conducted a technical review of the Application for the purpose of determining if the Application should be granted or denied, in whole or in part.

9. After completing the technical review of the Conversion Application, the General Manager concluded that he would recommend to the Board that the Application be granted in full, and a regular permit be issued to Applicants converting 39.790 acre-feet BIG to UIG based on the physical development of 72.803 acres of HIL.

10. In conjunction with the proposed action, the General Manager prepared a Technical Summary.

11. On April 10, 2026, the General Manager provided written notice to Applicants by United States mail that the technical review of the Application was complete, provided the proposed action and Technical Summary in support thereof, and informed Applicants that Applicants' Conversion Application was scheduled for consideration at the regular meeting of the Board on May 12, 2026, at the official offices of the Edwards Aquifer Authority, 900 E. Quincy, San Antonio, Texas.

12. The Docket Clerk of the EAA scheduled before the Board a presentation by the General Manager on the Conversion Application, his proposed action, and the proposed issuance of a Regular Permit in accordance therewith. The presentation occurred at the regular meeting of the Board held on May 12, 2026, at the official offices of the Edwards Aquifer Authority, 900 E. Quincy, San Antonio, Texas. Notice of public meeting for this meeting was duly and properly posted in accordance with Chapter 551, Texas Government Code. Additionally, an agenda item

that is the subject of this Final Order was duly and properly listed in the notice of public meeting.

13. On April 1, 2, and 5, 2026, pursuant to EAA Rule § 707.525, Applicants published a Notice of Proposed Action on Application for Conversion of Base Irrigation Groundwater to Unrestricted Irrigation Groundwater in five (5) newspapers within the EAA's jurisdiction, outlining the General Manager's proposed action.

14. On April 10, 2026, pursuant to § 1.34 of the EAA Act and § 711.342(c) of the EAA's Rules, the EAA provided permit holders, by United States mail, a copy of the Notice of Proposed Action on Application for Conversion of Base Irrigation Groundwater to Unrestricted Irrigation Groundwater, outlining the General Manager's proposed action.

15. In accordance with §§ 707.525 and 707.603, the April 10, 2026, written letter to Applicants, the April 1, 2, and 5, 2026 newspaper publications, and the April 10, 2026 letter to permit holders provided notice of the right for any permit holder to request a contested case hearing on the Application and the General Manager's proposed action. The deadline to request a contested case hearing was May 11, 2026. No requests were received.

16. The Conversion Application was, contemporaneous with its receipt, affixed with a "date stamp" by the EAA to the front page of the Application indicating its date of receipt by the EAA.

17. Applicants paid the application fee of \$25 at the time the Conversion Application was filed with the EAA.

18. Applicants are not delinquent in the payment of any fee due and owing to the EAA, including but not limited to aquifer management fees.

19. Applicants have filed with the EAA all applicable reports.

20. The place of use set out in Regular Permit P200-281 (UV00461) includes irrigated

land during the historical period. A description of the lands is as follows:

The tract(s) of land more fully described in the deeds of conveyance : # 2017002453, # 2017001544, # 2017002454; # 2017003639; # 2017003617, # 2017002692, # 2017003653, # 2018000091, # 2018001263, # 2018001280, # 2018001452, # 2018001432, # 2018002454, # 2018003589, # 2019001804, # 2019001800, # 2019001806, # 2019001802, # 2019003992, # 2020005100, # 2020005424, # 2020006263, # 2020007152, # 2020007186, # 2020007231, # 2020007732, # 2021008606, # 2021009485, # 2021010546, # 2021011994, # 2021012687, # 2022013248, # 2022015210, # 2022014209, # 2022016888, # 2021012283, # 2023019211, # 2020004421, # 2023018305, # 2021012368, # 2022014457, Official Public Records, Uvalde County, Texas.

21. A change in land use has occurred relative to the HIL constituting the place of use set out in Regular Permit P200-281 (UV00461) such that, in accordance with EAA Rules § 711.342(c)(6)(A), 72.803 acres of HIL, containing 39.790 acre-feet of BIG, have been developed into a ranchette-style home subdivision.

22. A map showing the location of the HIL is attached as Exhibit A.

23. Applicants are not required to submit a groundwater conservation plan to the EAA.

24. Applicants are in compliance with the Act, the EAA's rules, other permits, and orders of the Board.

25. Applicants are the owners of the land to which the BIG that is the subject of the Conversion Application is appurtenant.

26. Applicants were not required to submit a new survey of the historically irrigated acres constituting the place of use set out in Regular Permit P200-281 (UV00461).

27. Applicants have requested that any permit issued as a result of the Application be issued without a place of use or point of withdrawal pursuant to § 711.342(g) of the EAA Rules.

CONCLUSIONS OF LAW

1. Because the Conversion Application seeks to convert BIG in the IRP to UIG associated with a groundwater withdrawal permit issued by the EAA, the Board of Directors of the EAA has jurisdiction over the Application.

2. The Conversion Application meets the requirements of Sections § 711.342(c)(6)(A) of the EAA Rules and, therefore, a change in land use has occurred relative to the historically irrigated lands constituting the place of use set out in Regular Permit P200-281 (UV00461) such that these lands have been developed.

3. The Conversion Application otherwise complies with the Act and the EAA's Rules.

4. Accordingly, the Conversion Application should be granted in accordance with this Final Order, hereby converting 39.790 AF/yr of BIG to UIG associated with Regular Permit P200-281 (UV00461) and the historically irrigated lands constituting the place of use for this Permit.

ORDERING PROVISION

IT IS THEREFORE ADJUDGED, ORDERED, AND DECREED that the above-styled and numbered Conversion Application is hereby **GRANTED** as follows:

1. the General Manager is directed to advise Applicants in writing of the issuance and effect of this Final Order;

2. when appropriate as determined by the General Manager, the General Manager is directed to prepare an amended Regular Permit to Applicants in the form of the approved Regular Permit form without a place of use or point of withdrawal pursuant to § 711.324(g) of the EAA Rules, subject to the Conditions for Regular Permits as may be in effect at the time, for presentation to the Chairman of the Board of Directors of the EAA for execution; and

3. the General Manager is directed to make appropriate adjustments, changes, or

modifications to the EAA's permits and water accounting database consistent with the issuance and effect of this Final Order.

PASSED AND APPROVED BY THE BOARD OF DIRECTORS OF THE EDWARDS
AQUIFER AUTHORITY THIS 12TH DAY OF MAY 2026.

ENRIQUE VALDIVIA
Chairman, Board of Directors
Edwards Aquifer Authority

ATTEST:

RACHEL SANBORN
Secretary, Board of Directors
Edwards Aquifer Authority

APPROVED AS TO FORM:



DEBORAH TREJO
Legal Counsel

EXHIBIT B

Name of Owner(s) in Deed	Document #
Gaylon Trees and Debra Trees	2017002453
Uvalde Mennonite Church	2017001544
Candy Flores	2017002454
Rolando Garza	2017003639
Christopher J & Valeria Suarez	2017003617
Eddy Pete Beza and Melinda S. Beza	2017002692
Eddy Pete Beza and Melinda S. Beza	2017002692
John Brett Jacobs	2017003653
Francisco & Dora E. Marines	2018000091
John Brett Jacobs	2018001263
Rolando Garza	2018001280
John Mark Jacobs	2018001452
Jorge Tijerina and Diana Tijerina	2018001432
Kathy Rice and Patrick and Katy Rice	2018002454
Jorge L. Tijerina	2018003589
Richard Williams	2019001804
Richard Williams	2019001800
Richard Williams	2019001806
Richard Williams	2019001802
Carlin Lee Unruh	2019003992
Sergio Ramos and Vannesa Gutierrez	2020005100
Leroy F. Nikkel and Carol M. Nikkel	2020005424
Juan Hinojosa Martinez III	2020006263
Juan Hinojosa Martinez III	2020006263
Juan Hinojosa Martinez III	2020006263
Rolando Garza	2020007152
Charles L. Nichols	2020007186
Britton J Sieckenius and Lauren Sieckenius	2020007231
Emilio Benavides and Mayra Benavides	2020007732
Rusty Dean Routh	2021008606
Rusty Dean Routh	2021008606
Rusty Dean Routh	2021008606
Dusty Ray Routh and Sarah Jane Routh	2021009485
Dusty Ray Routh and Sarah Jane Routh	2021009485
Albert Tijerina	2021010546
Manuel R. Hurtado and Liza Hurtado	2021011994
David Taylor Jacobs	2021012687
David Taylor Jacobs	2024021052
Emmanuel Guerrero and Beatriz Guerrero	2022013248
Carlos Hernandez and Jessica Ann Esquivel	2022015210
Juan Ortega and Veronica Ortega	2022014209
Humberto DeLeon and Marisol DeLeon	2022016888
Arturo Perry and Haydee Marcela Salinas	2021012283
Leo Limon and Virginia Rose Limon	2025024305
Jorge L. Tijerina	2020004421
Eloy Garza and Veronica Cruz Garza	2023018305
Kathy Rice	2021012368
William Dawson	2022014457
Boone Slough Investments, LLC	2024021537

*All deeds were recorded with the Uvalde County Clerk's Office, Official Public Records, Uvalde County, Texas