

**Conversion of Base Irrigation Groundwater Application Summary
Conversion Based on Change in Land Use or No Longer Practicable to Farm
KO Water Land, LLC, a Texas limited liability company**

Permit Number: P100-308 (BE00101)
Purpose of Use: Irrigation
Place of Use: Bexar County
Currently Permitted Amount: 157.500 acre-feet
Irrigation Base Amount: 70.452 acre-feet
Irrigation Unrestricted Amount: 87.048 acre-feet
Date Board Issued Regular Permit: February 10, 2015

Number of acre-feet applicant requested to be converted from base irrigation to unrestricted irrigation groundwater:

25.011 acre-feet (on 22.734 HIL)

Number of acre-feet staff recommends be converted from base irrigation to unrestricted irrigation groundwater:

25.011 acre-feet (on 22.734 HIL)

Place of Use for Permit:

64.038 acres HIL

The tract(s) of land more fully described in Special Warranty Deed dated 12/22/2014 as recorded with Clerk as Document # 20140219532, Volume 17015, Pages 2323 - 2331, Official Public Records, Bexar County, Texas.

Current Physical Description of Place of Use:

The place of use consists of 64.038 acre tract with 70.452 appurtenant BIG, located on New Laredo Hwy, in Southwest Bexar County. The well previously used to irrigate the HIL (W100-207) is not located on the acres that are the subject of the application.

Description of Change in Land Use:

On July 10, 2025, EAA staff conducted a site visit and determined that the described 22.734 HIL were developed into a Battery Energy Storage System ("BESS") as evidenced by the construction of the facility foundation, conduit system, utilities, and detention pond (Exhibits B, C, D, E).

Staff Calculations:

In accordance with Section 1.34 of the EAA Act and Sections 711.342(c)(6)(A) of the EAA rules, 22.734 HIL have become developed land. EAA staff calculates the amount of BIG eligible for conversion at 25.011 acre-feet of BIG.

Staff Recommendation:

EAA Staff recommends an approval of the Application to Convert Base Irrigation Groundwater, converting the 25.011 acre-feet of BIG appurtenant to the 22.734 HIL.