



# NATIONAL WILDLIFE FEDERATION

GULF STATES NATURAL RESOURCE CENTER

(512) 476-9805

44 East Avenue, Suite 200

FAX (512) 476-9810

Austin, Texas 78701

[www.nwf.org](http://www.nwf.org)

September 12, 2005

Gary Hanlon  
DETCOG  
210 Premier Drive  
Jasper, TX 75951

Re: Supplemental Comments on Initially Prepared 2006 Regional Water Plan for the East Texas Region

Dear Mr. Hanlon and Planning Group Members:

This letter briefly supplements, on behalf of the National Wildlife Federation, the written comments previously filed by NWF, Environmental Defense, the Lone Star Chapter of the Sierra Club on the Initially Prepared Regional Water Plan for the East Texas Region (Region I). This letter addresses only one narrow issue: conservation as a water management strategy as it applies to oil refineries.

Because Jefferson and Orange Counties are important locations for refining in our state, there is significant potential for water conservation. The Region I Plan should consider any feasible water conservation opportunities refineries can implement. With respect to manufacturing water needs, water conservation -- in the form of water efficiency measures -- is a required water management strategy for those entities using surface water pursuant to a water right in excess of 1000 acre-feet. *See 31 TAC § 357.7(a)(7)(A)(i).* In addition, the plan must include consideration of additional conservation strategies. (7)(A)(ii). Information included in the Initially Prepared Plan for Region N indicates that conservation measures could feasibly cut in half the quantity of water used to refine a barrel of oil in Region I.

Region N's IPP indicates that refineries in Corpus Christi require between 35 and 46 gallons of water to refine one barrel of crude oil, whereas Houston refineries use 91 gallons and Beaumont refineries use 96 gallons.<sup>1</sup> If refineries in Beaumont and other municipalities in Jefferson (and Orange) Counties could

<sup>1</sup> Region N IPP says, at p. 4C.5-17:

"For example, Corpus Christi area petroleum refineries use 35 gallons of water per barrel of crude oil refined, while refineries in Houston use 91 gallons, and refineries in Beaumont use 96 gallons." There is further discussion about industrial water conservation with a citation to the "Pequod Survey," cited as *Texas Industrial Water Usage Survey, Pequod Associates, Inc. and TWDB, Austin, Texas, August 1993*. Region N plan then states on page 2-13 with reference to Corpus area refineries: "These refineries use 46 gallons of water per barrel of crude petroleum refined, compared to the State average of 100 gallons per barrel refined." For this statement, the plan references *Report of Water Use for Refineries and Selected Cities in Texas, 1976-1987*, South Texas Water Authority, Kingsville, Texas, 1990.

similarly reduce to 35-46 gallons of water per barrel of crude refined, this savings could greatly reduce the manufacturing demand projected in Section 2.3.2 of the Region I Draft Plan, Table 2.D and Table 2.G. Further, this reduction in water use would decrease the projected demand in Chapter 4.A. Nevertheless, the Region I Draft Plan fails to include any manufacturing conservation measures for refineries in Jefferson or Orange Counties that would serve to decrease overall demand for the region. See Chapter 4B, pp. 4B-5-4B-6 (Manufacturing Water Conservation Measures).

In accordance with legal requirements regarding conservation, we hope you will consider the reasons for the great discrepancy in water use between Corpus Christi- and Beaumont- area refineries and whether potential savings in this sector warrant more extensive manufacturing water conservation strategies.

Thank you for your considering this issue and please feel free to contact us if you have any questions. We look forward to a continuing positive dialogue with the planning group during this and future planning cycles.

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Christopher Brown  
Water Projects Attorney  
National Wildlife Federation  
44 East Avenue Suite 200  
Austin, Texas 78701  
(512) 476-9805

cc:  
Tammy Parker  
Schaumberg and Polk, Consultants

Cindy Loeffler  
Texas Parks and Wildlife Department

Bill Roberts, Region I Liaison  
Texas Water Development Board

Bill Mullican, Deputy Executive Director, Office of Planning, Texas Water Development Board

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