

In response to the recent [CCA Texas Statement on Synergen Green Energy](#), we appreciate the opportunity to clarify the project's plans and to respond directly to each of the questions/concerns raised by CCA. Synergen shares CCA Texas' commitment to protecting coastal resources, fisheries, oyster habitats, and the long-term health of Texas bays and estuaries and welcome continued dialogue with CCA, local leaders and the scientific community.

Important Clarification: Synergen does **not** plan to discharge into Carancahua Bay and an evaporation pond is not the project's approach. Of the options evaluated during planning, the preferred discharge route is through the Port of Calhoun into Lavaca Bay, which is a larger receiving water body with greater flow and dilution capacity, subject to TCEQ permitting and environmental review. We note this specifically because CCA's concern for its \$1 million Carancahua Reef restoration near Port Alto, undertaken with the Matagorda Bay Foundation, is understandable; that investment is not impacted by Synergen's preferred plan, and we would not pursue a discharge option that placed it at risk.

We address CCA's specific questions below.

Discharge and estuary protection

Any surface-water discharge will be permitted under TCEQ's TPDES program and must comply with the Texas Surface Water Quality Standards (30 TAC §307). Before any discharge, the effluent will be fully characterized, and dispersion and mixing-zone modeling will be conducted by an independent third party and made available through the permitting process. Synergen has begun engagement with local bay experts to ground these decisions in local data and independent expertise. We also recognize CCA's recommendation to return treated effluent to deep subsurface storage. That option remains under evaluation alongside surface discharge; each carries its own regulatory, feasibility, and environmental-protection considerations, and we are committed to selecting the approach that is most protective of the receiving environment.

Stormwater runoff

The project is being designed so that stormwater from operational areas is contained and managed, not released untreated toward Keller Creek. A Stormwater Pollution Prevention Plan (SWPPP) will be filed with TCEQ, and the site's drainage design is intended to preserve existing drainage patterns rather than redirect flows. Protecting Keller Creek, Keller Bay, and the surrounding oyster mariculture operations is a specific design objective, and stormwater controls will be documented and available for review through the permitting process.

Hydrogeologic integrity and monitoring

Baseline conditions for both the shallow freshwater and the deeper brackish zones are being characterized as part of the project's hydrogeologic program. This work is led by independent hydrogeology consultant, Intera, who is not part of the construction or operations team and whose data and modeling can be independently reviewed. Monitoring wells screened in both the fresh and brackish zones will collect water-level and water-quality data for the full operational life of the facility, with results reported to the Groundwater Conservation District (GCD) on a regular basis under its rules. Monitoring, and reporting will be established through the GCD permitting framework.

Hydraulic impacts and drawdown

A site-specific groundwater model, informed by test-well data, is being developed to predict the potential for a cone of depression, radius of influence, and drawdown in the vicinity over time. Synergen has committed to contribute its hydrological model and test-well data to strengthen the GCD's own models for Calhoun and surrounding counties — improving the district's ability to manage the resource region-wide, not just for this project. The brackish production zone is separated from freshwater by a confining clay layer; a central purpose of the modeling is to confirm that pumping does not alter that separation or create new hydraulic connections, and the results will be available through the GCD process.

Salinity migration and freshwater protection

Well construction will follow applicable casing and completion standards designed to isolate the production zone and prevent cross-connection between zones. Trigger levels and defined response protocols will be established so that, if monitoring indicates a change in water levels or quality, action is taken early. The site-specific model is intended to address foreseeable scenarios, including well-integrity concerns, and changes in source-water quality over time will be tracked through ongoing monitoring.

Contaminant mobilization

Baseline testing of source water is part of the hydrogeologic program, including naturally occurring constituents. Before any surface discharge, the treated effluent will be characterized against, and required to meet, the limits set through TCEQ's TPDES permit and the Texas Surface Water Quality Standards. We are not asking the community to take conclusions on faith, and the characterization data and treatment approach will be developed and disclosed through the permitting record.

Community and public health impacts

As part of the modeling and GCD process, wells within the projected area of influence will be identified, and notification and coordination with affected landowners will be handled through the district's framework. Synergen intends to engage directly with neighboring landowners rather than rely solely on regulatory notice.

Long-term stewardship and cumulative impact

Monitoring is designed to run for the life of the facility, not only during permitting, with enforceable conditions carried in the GCD permit and other applicable authorizations. Cumulative effects, the project alongside other regional withdrawals and discharges, are assessed within the GCD's regulatory framework, which is designed to require that analysis rather than treat it as optional.

Emergency preparedness

Ammonia is not stored at the production site; the refrigerated, double-walled storage is located at the port and engineered to contain its full volume. The facility is designed with several redundant and automated sensors to preempt and control any possible exposure. It will also have an on-site, 24/7 hazmat team trained and equipped for ammonia response as the first line of response — meaning response capability is not dependent on TX-172 remaining open or on outside crews arriving first should an incident occur. Emergency planning will be developed in close coordination with Calhoun and Jackson County fire, EMS, and the Local Emergency Planning Committees, and community notification methods will be designed to reach even residents without a cell signal. Because the facility is still in early design, the final emergency plan will be completed as detection systems, dispersion modeling, and site layout are finalized; we would rather commit to developing that plan properly and transparently with local responders than publish a premature version.

Synergen recognizes that these are serious questions that deserve substantive, verifiable answers, and that many of them will be answered definitively through independent studies, monitoring programs, engineering design, and the permitting record as the project advances. We would welcome the opportunity to meet with CCA Texas, walk through the technical work in detail, and continue an open dialogue through planning, environmental review, and permitting.