

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*



Blas J. Coy, Jr., *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

September 3, 2010

LaDonna Castañuela, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

Re: **FAR HILLS UTILITY DISTRICT**
TCEQ DOCKET NO. 2009-0290-MWD

Dear Ms. Castañuela:

Enclosed for filing is the Office of Public Interest Counsel's Brief on Far Hills' Application for a Temporary Order in the above-entitled matter.

Sincerely,


Amy Swanholm, Attorney
Assistant Public Interest Counsel

cc: Mailing List

Enclosure

REPLY TO: PUBLIC INTEREST COUNSEL, MC 103 P.O. Box 13087 AUSTIN, TEXAS 78711-3087 512-239-6363

P.O. Box 13087

Austin, Texas 78711-3087

512-239-1000

Internet address: www.tceq.state.tx.us

TCEQ DOCKET NO. 2009-0290-MWD

**CONSIDERATION OF A
TEMPORARY ORDER BY
FAR HILLS UTILITY
DISTRICT TO DISCHARGE
TREATED MUNICIPAL
WASTEWATER IN
MONTGOMERY COUNTY,
TEXAS**

§
§
§
§
§
§
§
§

**BEFORE THE TEXAS
COMMISSION ON
ENVIRONMENTAL
QUALITY**

**THE OFFICE OF PUBLIC INTEREST COUNSEL'S BRIEF ON FAR HILLS'
APPLICATION FOR A TEMPORARY ORDER**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE HENRY CARD:

COMES NOW, the Office of Public Interest Counsel (OPIC) of the Texas Commission on Environmental Quality (the Commission or TCEQ) and files this brief in the matter of the *Application for a Temporary Order to Discharge Treated Wastewater in the Event that TPDEQ Permit No. WQ0014555002 is Suspended or Revoked*. For the following reasons, OPIC does not object to the temporary order, but recommends the Commission consider any hearing requests filed by affected persons.

I. BACKGROUND

Far Hills Utility District (Far Hills) has constructed and is operating a wastewater treatment plant under Permit No. WQ0014555002, issued on November 1, 2007. The wastewater treatment plant is located on the east side of Cude Cemetery Road, approximately 1,800 feet south of Farm-To-Market Road 830 in Montgomery County, Texas. The discharge route is from the plant site via a storm sewer to an existing storm sewer collection system and then to Lake Conroe.

Far Hills applied for Permit No. WQ0014555002 on April 11, 2007, after an earlier application for a wastewater treatment facility in Montgomery County was denied.¹

¹ See TCEQ Docket No. 2005-1899-MWD; SOAH Docket No. 582-06-0568.

A. Petition to Revoke Permit No. WQ0014555002

On March 3, 2009, Suzanne O’Neal, Judith Spencer, and Everett Simmons (Petitioners) petitioned the TCEQ to revoke Far Hills Utility District’s Permit No. WQ0014555002 (Far Hills’ Permit). Petitioners also requested the TCEQ initiate an enforcement action for violations of Texas Water Code (TWC) § 7.149, prohibiting the submission of knowingly or intentional misstatements to the TCEQ.

On June 26, 2009, the Commission considered the Petition and granted the hearing requests of Suzanne O’Neal, Judith Spencer and Everett Simmons. The Commission referred several issues to the State Office of Administrative Hearings (SOAH) for a contested case hearing, including whether Far Hills’ permit should be revoked or suspended.

On February 22, 2010, a hearing on the merits convened at SOAH, presided over by the Honorable Henry Card. On June 22, 2010, ALJ Card issued a Proposal for Decision recommending revocation of Far Hills’ permit.²

The PFD concluded that Far Hills failed to disclose fully all relevant facts regarding ownership and configuration of the property,³ although it could not conclude that the failure to disclose was done intentionally or knowingly.⁴ The ALJ also found that Far Hills failed to fully disclose all relevant facts, misrepresented relevant facts, and made false or misleading statements with respect to mailed notice.⁵ Far Hills further misrepresented facts regarding published notice, and intentionally or knowingly published notice in the wrong newspaper.⁶ Ultimately the ALJ concluded that the permit should be revoked because of the significant misleading statements in the application regarding ownership and configuration of property and notice to the public. Petitioners should have received mailed notice, as adjacent landowners. Because the petitioners did not receive notice, they were not able to participate in the permitting process, which was

² Proposal for Decision in SOAH Docket No. 582-09-5727; TCEQ Docket NO. 2009-0290-MWD; Petition to Revoke TCEQ Water Quality Permit No. WQ0014555002 issued to Far Hills Utility District (PFD), June 21, 2010.

³ *Id.* at 10.

⁴ *Id.* at 13.

⁵ *Id.* at 11.

⁶ *Id.* at 11-12.

uncontested. Mailing notice to other individuals could not cure the notice deficiency. Purchasing property where their facility was to be located after the permit was granted did not cure this flaw. The ALJ also found that Far Hills did not make a substantial effort to correct these fundamental violations. The only way the violations could have been corrected was for the petitioners, as affected persons, to have received timely notice.⁷

The Commission has not made a decision on the Petition to Revoke, but will take up the matter at the September 15, 2010 agenda.

II. APPLICABLE RULES

An application for a temporary order to discharge wastewater must include specific information. 30 Texas Administrative Code (TAC) § 35.302. First, it must include a statement that the order is necessary to enable action to be taken more expeditiously than is otherwise provided by Texas Water Code, Chapter 26, to effectuate the policy and purposes of that chapter. It must also include statements that the discharge is unavoidable to prevent loss of life, serious injury, or severe property damage; to make necessary and unforeseen repairs to the facility; or to ameliorate serious drought conditions to the extent consistent with the requirements of the federal Clean Water Act for authorization of the NPDES program. The application must also show that there is no feasible alternative to the proposed discharge, the discharge will not cause significant hazard to human life and health, unreasonable damage to property of persons other than the applicant, or unreasonable economic loss to persons other than the applicant, and the proposed discharge will not present a significant hazard to the uses that may be made of the receiving water after the discharge. 30 Texas Administrative Code (TAC) § 35.302.

The Commission or ED may issue a temporary order only if it is found that the order is necessary to enable action to be taken more expeditiously than is otherwise provided by Texas Water Code, Chapter 26 to effectuate the policy and purposes of that chapter. It must also find that, for discharges into waters of the state, the discharge is unavoidable to prevent loss of life, serious injury, or severe property damage or to ameliorate serious drought conditions, to the extent consistent with the requirements of the federal Clean Water Act for authorization of the

⁷ *Id.* at 15.

NPDES program. For discharges adjacent to waters in the state, the discharge must be unavoidable to prevent loss of life, serious injury, severe property damage, to ameliorate serious drought conditions, or to make necessary and unforeseen repairs to a facility. Furthermore, the Commission or ED must find that there is no feasible alternative to the proposed discharge, the discharge will not cause significant hazard to human life and health, unreasonable damage to property of persons other than the applicant, or unreasonable economic loss to persons other than the applicant; and the proposed discharge will not present a significant hazard either to the uses that may be made of the receiving water after the discharge, or the area surrounding the discharge. 30 TAC § 35.303(a)

The temporary order must also include the dates on which the proposed discharge will begin and end and the volume and quality of the proposed discharge are reasonable and attainable and the measures proposed to minimize the volume and duration of the discharge and the measures proposed to maximize the waste treatment efficiency of units not taken out of service or facilities provided for interim use are reasonable. 30 TAC § 35.303(a). Finally, the issuing authority may issue emergency orders and temporary orders to discharge waste or pollutants into water in the state under this subchapter only if the discharge is from an NPDES or Texas pollutant discharge elimination system-permitted treatment facility. 30 TAC § 35.303(b).

30 TAC 35.25(d) states that “[t]emporary orders require a hearing before the issuance of the order [and].... [t]his notice of hearing shall provide that an affected person may request an evidentiary hearing on issuance of the temporary order.” In addition, [t]he commission is not required to hold a hearing if it determines that the basis of a person's request for a hearing as an affected person is not reasonable or is not supported by competent evidence.”⁸

III. DISCUSSION

OPIC does not object to the Temporary Order proposed by the ED (TO). The TO may offer the best of several untenable options for addressing the problems created by Far Hills when it failed to comply with TCEQ’s notice rules during the permitting process. However, OPIC

⁸ 30 TAC § 35.28(b); *see also* 30 TAC § 35.29, setting out procedures for an evidentiary hearing on a temporary order.

recommends referring this matter to SOAH, should an affected person request an evidentiary hearing. Should the Commission grant the TO, OPIC recommends changing one provision.

A. The Application and Temporary Order

The application for this temporary order, submitted to the TCEQ on October 26, 2009 and supplemented on December 21, 2009, contains all information required by 30 TAC § 35.302⁹ for a temporary order to discharge, as well as general temporary order application requirements.¹⁰ In addition, the TO contains language that meets all the requirements of 30 TAC § 35.303(a), listing factors that the ED or Commission must find before a TO may be issued.¹¹

Far Hills stated that it has no feasible alternative to discharge because otherwise toilets and sewers in the district will back up if Far Hills' permit is suspended or revoked, and Far Hills discontinues the operation of its plant. It also states that these circumstances present a situation where discharge is unavoidable to prevent serious injury, severe property damage, and severe economic loss. The District also states that it has no feasible alternatives because no other nearby treatment plant has capacity to receive the waste. Also, the closest facility is prohibited from receiving any offsite waste. It also states that pumping and hauling is not a viable option because it is too expensive. Far Hills contends that the discharge will not cause harm because it will meet the requirements of Permit No. WQ0014555002's (Current Permit) Phase I stage. The ED has found these provisions to be protective during its permit review process. The application lists no time limit should be imposed, but that it should be tied to Far Hills receiving a valid permit to discharge. The TO has a duration of two years.

Therefore, Far Hills has asserted all necessary elements for an application to temporarily discharge. In addition, the ED has included all the necessary elements that must be found before a temporary order may be issued.

⁹ See Attachment A for a Copy of Far Hill's Attachment 8 to its Application for a Temporary Order.

¹⁰ 30 TAC § 35.24.

¹¹ See attachment B for a draft of "A Temporary Administrative Order Relating to the Discharge of Waste or Pollutants into or Adjacent to any Water of the State" (TO).

B. Evidentiary Hearing

30 TAC 35.25(d) states that “[t]emporary orders require a hearing before the issuance of the order [and]... [t]his notice of hearing shall provide that an affected person may request an evidentiary hearing on issuance of the temporary order.” In addition, [t]he commission is not required to hold a hearing if it determines that the basis of a person's request for a hearing as an affected person is not reasonable or is not supported by competent evidence.”¹² This section implies that, should an affected person request a hearing and if the request is reasonable and supported by competent evidence, the affected persons have a right to an evidentiary hearing on the temporary order.

Should any individuals request a hearing, the Commission may consider these requests at Agenda. However, OPIC recommends the Commission refer the matter to the State Office of Administrative Hearings (SOAH) to allow the ALJ to take up the question of whether they are affected. We further recommend that individuals found affected in the previous revocation proceeding¹³ should be found affected in this proceeding. The Commission may also direct the ALJ to conduct an evidentiary hearing on the temporary order, should the ALJ find that any individuals requesting a hearing are affected.

C. Additional Language in the Temporary Order

Should the Commission decide to approve the TO without an evidentiary hearing, OPIC suggests inserting language in the TO limiting the daily average flow to 0.23 million gallons per day (gpd). The ED's Statement of Basis/Technical Summary states that Far Hills requested this in its application. It also states in the section on Proposed Order Conditions, that the “draft order relates to the discharge of treated domestic wastewater effluent at a daily average flow not to exceed 0.23 million gpd.”¹⁴ This is also the amount of wastewater that would be permitted

¹² 30 TAC § 35.28(b); *see also* 30 TAC § 35.29, setting out procedures for an evidentiary hearing on a temporary order.

¹³ The Commission previously granted hearing requests from Suzanne O'Neal, Judith Spencer and Everett Simmons.

¹⁴ *See* Statement of Basis/Technical Summary for Far Hills Utility District by Michael Redda, Ph.D., August 31, 2010, at 1.

under the Current Permit's Interim Phase I.¹⁵ The Current Permit contains a Finding of Fact that states "Far Hills has applied for a temporary order to discharge 0.23 million gpd."¹⁶ However, the Temporary Order does not contain ordering language limiting the discharge to 0.23 million gpd. It states that Far Hills shall comply with all provisions in the Current Permit, whether or not revoked.

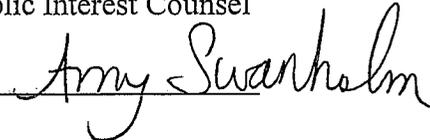
The TO implies that Far Hills is limited to discharging 0.23 million gpd, as authorized by the Current Permit's Interim Phase I. OPIC suggests inserting language in the TO Ordering Provisions to make this restriction explicit. Specifically, Ordering Provision No. 2 should include a statement that limits Far Hills to discharging 0.23 million gpd, in accordance with the Current Permit's Interim Phase I. Including this language would ensure clarity of the TO and ensure that the actions ordered by the TO are consistent with Far Hills' requests and the ED's Statement of Basis/Technical Summary.

IV. CONCLUSION

OPIC does not object to the TO. Unfortunately, the Commission is placed in a position where it has few options to act upon, and little information with which to make its decision. Should any affected persons request an evidentiary hearing, OPIC recommends that the Commission consider these requests at Agenda or by referring the matter to SOAH, and if reasonable or supported by competent evidence, hold an evidentiary hearing on whether the TO meets the requirements of 30 TAC Chapter 35. Should the Commission choose to approve the TO, OPIC suggests additional language to clarify that the Temporary Order applies to Far Hills' discharge of 0.23 million gpd only.

Respectfully submitted,

Blas J. Coy, Jr.
Public Interest Counsel

By 

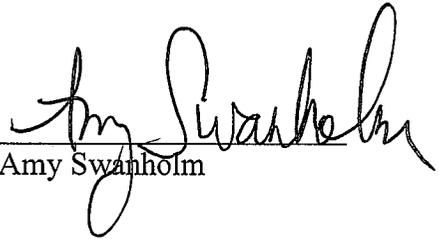
¹⁵ TPDES Permit No. WQ0014555002, issued November 1, 2007, at 2.

¹⁶ See attachment B for a draft of "A Temporary Administrative Order Relating to the Discharge of Waste or Pollutants into or Adjacent to any Water of the State" (TO).

Amy Swanholm
Assistant Public Interest Counsel
State Bar No. 24056400
(512) 239-6363 PHONE
(512) 239-6377 FAX

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2010, the original and seven true and correct copies of the Office of the Public Interest Counsel's brief were filed with the Chief Clerk of the TCEQ and a copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, Inter-Agency Mail or by deposit in the U.S. Mail.



Amy Swanholm

Attachment A

FAR HILLS UTILITY DISTRICT
APPLICATION FOR TEMPORARY ORDER TO DISCHARGE TREATED EFFLUENT
INTO STATE WATERS

Attachment 8

Response to Item No. 14

Because the District has no feasible alternative to discharge, sewers and toilets in the District will most certainly back-up if the Permit is suspended or revoked and the District's plant cannot continue to operate. Given these circumstances, a discharge is unavoidable to prevent serious injury, severe property damage, and severe economic loss.

Response to Item No. 15

The District has no feasible alternative to discharging its wastewater in accordance with the terms of the TPDES Permit WQ 0014555002 (the "Permit"). Approximately 400 units are connected to the District's wastewater treatment plant and, at present, no other nearby treatment plant has available capacity to accommodate the amount of wastewater generated by these connections. It is the District's understanding that the nearest permitted treatment facility, Montgomery County Utility District No. 2, is currently prohibited by agreement with the Commission from accepting any offsite waste (due to its existing high flow volumes). Moreover, pumping and hauling the District's wastewater to a remote treatment facility is not a viable option. The operator of the District's plant estimates the cost to haul the District's wastewater to a remote treatment plant would be approximately 8¢ per gallon. Because the

District currently generates approximately 2 million gallons of wastewater per month, the total cost of pumping and hauling the District's wastewater to a remote site would be at least \$160,000.00 per month. Simply put, the District and its residents do not have the financial means to pay for this cost.

Response to Item No. 16

The discharge proposed in the District's forthcoming Application for a Temporary Order will be the same as is currently allowed under Phase I of the Permit. The Permit's average daily flow volume (0.23 MGD) and effluent characteristics (10 mg/l CBOD, 15 mg/l TSS, and 3 mg/l NH₃-N) have already been deemed protective of the Texas Surface Water Quality Standards by the Executive Director of the TCEQ. As such, the proposed discharge will not cause a hazard, significant or otherwise, to human health nor will it damage the property of other persons or cause economic loss to other persons.

Response to Item No. 17

As previously stated, the discharge that would be the result of the Temporary Order would be the same discharge permitted under Phase I of the Permit. The Permit's average daily flow and effluent characteristics are protective of the Texas Surface Water Quality Standards. Consequently, there will be no hazard to the uses that may be made of the receiving water after the discharge or the area surrounding the discharge.

Response to Item No. 18

The dates upon which the discharge will begin and end are difficult to estimate at this time, because the District's need for a Temporary Order is contingent upon the Permit being suspended or revoked. If the Commission issues a Final Order suspending or revoking the Permit, the District requests that a Temporary Order be effective from that same date and

continue until such time as all of the administrative and hearing processes on the merits of the District's permit application can be completed.

Response to Item No. 19

The volume of the proposed discharge shall not exceed 0.23 MGD, the same as is allowed under Phase I of the Permit. In addition, the proposed discharge will comply with the Permit's Phase I effluent parameters of 10 mg/l CBOD, 15 mg/l TSS, and 3 mg/l NH₃-N. Furthermore, the District would comply with all of the other terms and conditions of the Permit during the duration of the Temporary Order. The plant's design and operational history clearly demonstrate that the requested volume and quality of this proposed discharge are reasonable and attainable.

Response to Item No. 20

In accordance with the terms of the Permit, the District has enacted and instituted a water conservation plan. Strict adherence to such plan should considerably reduce the amount of wastewater generated by the District's residents and must be discharged pursuant to a Temporary Order. Moreover, the District has recently implemented a more stringent water/sewer rate structure for its residents to further promote conservation. Concerning duration, the District is willing to have the administrative and hearing processes on the merits of its permit application expedited (as much as possible under the Commission's rules) so as to minimize the duration of a Temporary Order.

Response to Item No. 21

The District will not be taking any units out of service. Instead, the current facilities will continue to be utilized to provide a compliant and safe effluent prior to discharge.

Attachment B

A TEMPORARY ADMINISTRATIVE ORDER
RELATING TO THE DISCHARGE OF WASTE OR POLLUTANTS
INTO OR ADJACENT TO ANY WATER IN THE STATE

On _____, the Texas Commission on Environmental Quality ("TCEQ" or "Commission"), considered the application of Far Hills Utility District for a Temporary Order pursuant to Sections 5.501, 5.509, 7.002, 26.011, 26.019 and 26.0191, Texas Water Code (the "Code"). The application has satisfied the requirements of Section 5.509 of the Code and, therefore, the Executive Director finds that a temporary situation exists that justifies the issuance of a Temporary Order in the event that TPDES Permit No. WQ0014555002 is suspended or revoked. Issuance of this Order will address the temporary conditions with the goal of maximum environmental protection and maximum human health protection.

FINDINGS OF FACT

1. Far Hills Utility District Wastewater Treatment Facility is located on the east side of Cude Cemetery Road approximately 1,800 feet south of Farm-to-Market Road 830 in Montgomery County, Texas.
2. On November 2, 2009, Far Hills Utility District submitted a sworn application for a temporary order as required by Section 5.502 of the Code. Far Hills Utility District stated that such a request is justified to avoid serious injury, severe property damage, and severe economic loss. Far Hills Utility District has also stated other matters and information required by Section 5.502 and relating to the findings required by Section 5.509 of the Code.
3. Far Hills Utility District has applied for a temporary order to discharge 0.23 million gallons per day (MGD) of treated Municipal Wastewater to a storm sewer; thence to Lake Conroe in Segment No. 1012 of the San Jacinto River Basin.
4. The discharge is unavoidable to prevent loss of life, serious injury, severe property damage, or severe economic loss.
5. There are no feasible alternatives to the proposed discharge. In addition, there are no other disposal options that can be implemented to alleviate the situation if TPDES Permit No. WQ0014555002 is suspended or revoked.
6. The discharge under the proposed Order will not cause significant hazard to human life and health, unreasonable damage to property or unreasonable economic loss.
7. The discharge under the proposed Order will not present a significant hazard to the uses that may be made of the receiving waters after the discharge.
8. The proposed Order is necessary to enable action to be taken more expeditiously than otherwise provided by Chapter 26 of the Code to effectuate the policy and purposes of that chapter.

CHIEF CLERKS OFFICE
2010 AUG 27 PM 3:12

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

CONCLUSIONS OF LAW

1. Because the Texas Pollutant Discharge Elimination System (TPDES) Program requires permits for the discharge of pollutants from any point source to water in the state, under Texas Water Code Section 26.121(d), it is unlawful for any person to discharge any pollutant from a point source to water in the state except as authorized by a TPDES permit.
2. Under Texas Water Code Section 7.002, the Commission may initiate an action to enforce provisions of the Code.
3. The discharge under the proposed Order is a violation of Texas Water Code Section 26.121(d). Far Hills Utility District generally denies any alleged violation of Texas Water Code Section 26.121(d).
4. Section 26.011 of the Code sets forth that waste discharges covered by Chapter 26 provisions are subject to reasonable orders issued by the Commission in the public interest.
5. The above facts are conditions sufficient to issue this Order pursuant to Section 5.509 of the Code.
6. Sections 5.501, 5.509, 26.019 and 26.0191 of the Code authorize the Commission to issue orders and make determinations necessary to effectuate the purposes of Chapter 26 of the Code.
7. The Commission may issue a temporary order under Texas Water Code Section 5.509 and 30 TAC Section 35.12.
8. Issuance of this Order will effectuate the purposes of Chapter 26 of the Code.

NOW, THEREFORE, BE IT ORDERED BY THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY THAT FAR HILLS UTILITY DISTRICT WASTEWATER TREATMENT FACILITY TAKE THE FOLLOWING ACTION:

- (1) Notify the TCEQ's Region 12 Office, and the appropriate regional office of the Texas Department of State Health Services, at least 24 hours prior to initiating the aforementioned discharge and at the cessation of it.
- (2) The unpermitted discharge shall meet the following effluent limitations, conditions, and reporting requirements:

The Applicant shall comply with all the provisions in TPDES Permit No. WQ0014555002 issued on November 1, 2007, whether or not revoked and attached to this Order as Exhibit 1 and incorporated herein by reference as if fully set forth.

- (3) Far Hills Utility District shall submit monthly status reports to the TCEQ Regional Office (MC Region 12) and the Applications Review and Processing Team (MC 148) of the Water Quality Division, summarizing the progress of the project and including any analytical sampling conducted relating to Provision (2) of this order. The monthly status reports shall also include

status of the District's efforts to obtain a TPDES permit to discharge from the wastewater treatment plant.

(4) The term of this order is two years from issuance. Far Hills Utility District shall cease discharges within two years of issuance or apply to the Commission for a renewal for an additional reasonable period of time not to exceed 180 days in sufficient time to evaluate the application and set the matter on Commission agenda prior to expiration of this order.

(5) The Executive Director will withhold any enforcement action for discharges occurring at Far Hills Utility District Wastewater Treatment Facility that are compliant with the terms and conditions of this Order.

(6) The issuance of this Order does not represent a REINSTATEMENT of TPDES Permit No. WQ0014555002 under Texas Water Code Section 26.027 if the permit is suspended or revoked.

(7) Far Hills is hereby ordered to apply for a new permit by filing a complete application for a new permit with the TCEQ for the existing facility within 30 days from the date of issuance of this temporary order. In connection with the new application, Far Hills shall comply with all applicable application and notice requirements under the Texas Water Code and the TCEQ rules. Additionally, Far Hills shall give notice of filing of the new application to Suzanne O'Neal and Judith Spencer, petitioners in the Petition to Revoke TPDES Permit No. WQ0014555002 issued to Far Hills Utility District; TCEQ Docket No. 2009-0290-MWD; SOAH Docket No. 582-09-5727.

(8) The issuance of this Order does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations; nor does it obviate the necessity of obtaining any federal or local assent that may be required by law for the discharge.

(9) If any part of this Order is for any reason held to be invalid, the invalidity of that part shall not affect the validity of the remainder of this Order.

(10) The issuance of this order shall not be considered a component of compliance history under Texas Water Code Section 5.753 and 30 TAC Section 60.1.

(11) The Office of the Chief Clerk is directed to forward a copy of this Order to Far Hills Utility District and all other parties and to issue said Order and cause the same to be recorded in the files of the Commission.

Issued date:

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

For the Commission

MAILING LIST
FAR HILLS UTILITY DISTRICT
TCEQ DOCKET NO. 2009-0290-MWD

FOR FAR HILLS UTILITY DISTRICT:

Matthew B. Kutac
Lance T. Lackey
Barrett & Smith, P.L.L.C.
206 East 9th Street, Suite 1750
Austin, Texas 78701
Tel: (512) 600-3800
Fax: (512) 600-3899

Timothy B. Hardin, P.E.
Langford Engineering, Inc.
1080 W. Sam Houston Pkwy N. Ste. 200
Houston, Texas 77043-5021
Tel: (713) 461-3530
Fax: (713) 932-7505

Jim Haymon
Far Hills Utility District
1001 McKinney Street Ste. 1000
Houston, Texas 77002-6424

Jim Haymon
Far Hills Utility District
9528 Escondido Dr.
Willis, Texas 77318-6618

Alan P. Petrov
Johnson Radcliffe Petrov & Bobbitt, P.L.L.C.
1001 McKinney Street Ste. 1000
Houston, Texas 77002-6424
Tel: (713) 237-1221
Fax: (713) 237-1313

FOR SUZANNE O'NEAL &
JUDITH SPENCER:

Eric Allmon
Marisa Perales
Lowerre, Frederick, Perales, Allmon &
Rockwell
707 Rio Grande, Suite 200
Austin, Texas 78701
Tel: (512) 469-6000
Fax: (512) 482-9346

Suzanne O'Neal
11280 Cude Cemetery Road
Willis, Texas 77318

Judith Spencer
11298 Cude Cemetery Road
Willis, Texas 77318

FOR THE EXECUTIVE DIRECTOR:

John Williams, Staff Attorney
Texas Commission on Environmental Quality
Legal Division, MC-173
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-0600
Fax: (512) 239-0606

Daniel Ingersoll, Staff Attorney
Texas Commission on Environmental Quality
Legal Division, MC-173
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-0600
Fax: (512) 239-0606

Michael Redda, Technical Staff
Texas Commission on Environmental Quality
Water Quality Division, MC-148
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-4631
Fax: (512) 239-4430

FOR THE OFFICE OF PUBLIC
ASSISTANCE:

Bridget Bohac, Director
Texas Commission on Environmental Quality
Office of Public Assistance, MC-108
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-4000
Fax: (512) 239-4007

FOR ALTERNATIVE DISPUTE
RESOLUTION:

Kyle Lucas
Texas Commission on Environmental Quality
Alternative Dispute Resolution, MC-222
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-4010
Fax: (512) 239-4015

FOR STATE OFFICE OF ADMINISTRATIVE
HEARINGS:

Henry D. Card, Administrative Law Judge
State Office of Administrative Hearings
300 W. 15th Street, Ste. 502
Austin, Texas 78701
Tel: (512) 475-4993
Fax: (512) 475-4994

FOR THE OFFICE OF CHIEF CLERK:

Docket Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-3300
Fax: (512) 239-3311

*See attached list of City Officials, State
Legislators, County Officials, Landowners,
Protestants and Interested Persons.*

CITY OFFICIALS

CITY OF WILLIS
MAYOR
200 BELL ST
WILLIS TX 77378-9072

CITY OF WILLIS
HEALTH OFFICIAL
200 BELL ST
WILLIS TX 77378-9072

STATE LEGISLATORS

THE HONORABLE ROBERT NICHOLS
TEXAS SENATE
DISTRICT 03 ROOM E1.708
TEXAS STATE CAPITOL

THE HONORABLE THOMAS WILLIAMS
TEXAS SENATE
DISTRICT 04 ROOM GE.7
TEXAS STATE CAPITOL

THE HONORABLE ROB ESSLER
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT 015 ROOM E1.414
TEXAS STATE CAPITOL

THE HONORABLE C BRANDON
CREIGHTON JR
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT 016 ROOM E1.424
TEXAS STATE CAPITOL

THE HONORABLE JOHN C OTTO
TEXAS HOUSE OF REPRESENTATIVES
DISTRICT 018 ROOM E2.906
TEXAS STATE CAPITOL

COUNTY OFFICIALS

COASTAL WATER AUTHORITY
2 ALLEN CENTER
500 DALLAS ST STE 28001
HOUSTON TX 77002-4800

EXECUTIVE DIRECTOR
HOUSTON-GALVESTON AREA COUNCIL
PO BOX 22777
HOUSTON TX 77227-2777

MONTGOMERY COUNTY HEALTH
AUTHORITY
701 E DAVIS ST STE A
CONROE TX 77301-3102

MONTGOMERY COUNTY JUDGE
501 N THOMPSON ST STE 401
CONROE TX 77301-2500

SAN JACINTO RIVER AUTHORITY
PO BOX 329
CONROE TX 77305-0329

PUBLIC HEALTH REGION 6/5
TEXAS DEPARTMENT OF STATE HEALTH
5425 POLK ST STE J420
HOUSTON TX 77023-1444

US ARMY CORPS OF ENGINEERS
ENVIRO REG BRANCH PE-R GALVESTON
PO BOX 1229
GALVESTON TX 77553-1229

FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
17629 EL CAMINO REAL STE 211
HOUSTON TX 77058-3051

PATRICK H BUZBEE DIRECTOR
MONTGOMERY CO ENVIRONMENTAL
HEALTH DEPARTMENT
301 N THOMPSON ST STE 206
CONROE TX 77301-2893

WATER QUALITY STANDARD LIST

LONG NEWS SERVICE
P O BOX 12368
AUSTIN TX 78711

NATIONAL WILDLIFE FEDERATION
ATTN: MYRON J HESS
44 EAST AVE, STE 200
AUSTIN TX 78701

TX WATER DEVELOPMENT BOARD
ATTN SHEILA KUSCHKE
INTERAGENCY MAIL

TEXAS LEGISLATIVE SERVICE
P O BOX 100
AUSTIN TX 78767

TX PARKS & WILDLIFE DEPT
ATTN: PATRICIA L. RADLOFF
COASTAL FISHERIES DIVISION - FPP
4200 SMITH SCHOOL RD
AUSTIN TX 78744
INTERAGENCY MAIL

TX DEPT OF AGRICULTURE
ATTN RICHARD EYSTER
OFFICE OF RISK ASSESSMENT &
TOXICOLOGY
INTERAGENCY MAIL

ENVIRONMENTAL PROTECTION
AGENCY
ATTN: JACK FERGUSON
CHIEF, PERMIT SECTION
1445 ROSS AVE
DALLAS TX 75202-2733

RAILROAD COMM OF TEXAS
ENVIRONMENTAL SERVICES
ATTN LELSEY L. SAVAGE DIRECTOR
INTERAGENCY MAIL

TEXAS DEPT OF HEALTH
ATTN DR. JOHN VILLANACCI
INTERAGENCY MAIL (WQ, MSW,
IHW)

US ENVIRONMENTAL PROTECTION
AGENCY
REGION 6
ATTENTION: EVELYN ROSBOROUGH
(6WQ-CA)
1445 ROSS AVENUE
DALLAS TX 75202

TX HISTORICAL COMM
ATTN STATE HISTORICAL
PRESERVATION
OFFICER AND STATE ARCHEOLOGIST
INTERAGENCY MAIL

LYNETTE MARTINEZ, COUNCIL
SECRETARY
COASTAL COORDINATION COUNCIL
GENERAL LAND OFFICE
1700 N CONGRESS AVE ROOM 617
AUSTIN TX 78701-1495
INTERAGENCY MAIL

CYRUS REED
LONE STAR CHAPTER, SIERRA CLUB
PO BOX 1931
AUSTIN TX 78767-1931

PROTESTANTS/INTERESTED PERSONS

THE HONORABLE BRANDON CREIGHTON
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE ROBERT L NICHOLS
TEXAS STATE SENATE
PO BOX 12068
AUSTIN TX 78711-2068

ERIC ALLMON
LOWERRE FREDERICK PERALES
STE 200
707 RIO GRANDE ST
AUSTIN TX 78701-2719

BOB BAGLEY
15730 DEWBERRY LN
GRANGERLAND TX 77302-7514

ESPERANZA BECERRA
LA PRENSA DE HOUSTON
STE 217
7100 REGENCY SQUARE BLVD
HOUSTON TX 77036

NANCY BLACKWELL
AEI ENGINEERING INC
616 FM 1960 RD W STE 250
HOUSTON TX 77090-3037

RAY A CAMPBELL JR
BIOTOX INC
9130 WURZBACH RD
SAN ANTONIO TX 78240-1070

WILLIAM J CARMICHAEL
4676 GREENWOOD DR
CLEVELAND TX 77328-9400

JENISE & PHILLIP CEMINO
6442 PINE SHADOWS RD
CLEVELAND TX 77328-5703

BRANDON CHANCEY
15780 FM 3083 RD
CONROE TX 77302-5132

CONCERNED CITIZEN
16671 FM 1485 RD
CONROE TX 77306-8955

DOUG & TAMARA COUEY
7950 FOREST HILLS DR
MONTGOMERY TX 77316-9288

BUCHANAN EASLEY
4020 SUMMIT CT
FAIRVIEW TX 75069-1183

RICHARD W FENDLEY
5945 PINE SHADOWS RD
CLEVELAND TX 77328-5711

SHEILA FREEMAN
18604 CARROT ST
SPRING TX 77379-4941

LARA GAREY
1401 RIMSTONE DR
CEDAR PARK TX 78613-7691

TAMI J GIBBONS
27119 SANDY CRK
MAGNOLIA TX 77355-8244

WENDY GUTIERREZ
FM MEDIA
STE 425
9896 BISSONNET ST
HOUSTON TX 77036-8104

BRUCE & SUZANNE HANSEN
62 SHADOW LN
WHISPERING PINES NC 28327-9359

SHIRLEY HOAGLAND
12290 FM 3083 RD
CONROE TX 77301-6106

CLAUDIA HUBBARD
15412 JODY LN
CONROE TX 77303-3922

KATHY TURNER JONES GENERAL
LONE STAR GROUNDWATER
PO BOX 2467
CONROE TX 77305-2467

MARILYN KENNEDY
1625 ACORN PL
CLEVELAND TX 77328-2305

LEE & TINA LEAL
18788 OAKRIDGE DR
CLEVELAND TX 77328-2669

CHRISTINE LUDWIG
18085 OLD HIGHWAY 105
CLEVELAND TX 77328-6295

ROBERT MORGAN
2325 COBBLECREEK DR
CONROE TX 77384-3703

FRANCES MORUA
3007 MEADWAY DR
HOUSTON TX 77082-2234

JONELL NIXON & MR ROY ZBOYAN
10677 JOANN ST
WILLIS TX 77318-6428

GLYN OBRIANT
13808 LYRIC RD
CONROE TX 77302-5746

KIMBERLY PAGGIOLI
13254 SUMMER ROSE LN
CONROE TX 77302-3539

S PETRIE-RAY
PO BOX 106
CHANDLER TX 75758-0106

LARRY POWELL OWNER
ARTESIAN WATER COMPANY
PO BOX 699
CANTON TX 75103-0699

KENNETH QUINN
11586 PADDOCKS RD
CONROE TX 77306-7556

W R SMITH
170 BEDIAS DR
CLEVELAND TX 77328-5945

KYTINNA SOTO OWNER
EL PERICO SPANISH NEWSPAPER
PO BOX 276
PORT NECHES TX 77651-0276

JAN & RONALD STALLWORTH
20393 MEADOW LAKE RD
CLEVELAND TX 77328-2665

LINDA K STEGENGA
CAML
6541 HIDDEN ACRES DR
CLEVELAND TX 77328-2627

DAVID TATE
15378 JODY LN
CONROE TX 77303-3920

DEBRA TEEKAMP
3925 WOODPECKERS GRV
CLEVELAND TX 77328-2678

MARK TRIPLETT PE REGIONAL
STERICYCLE
1792 BRENTCO RD
CANTONMENT FL 32533-8540

KARIN VOLLERT
MONTGOMERY TRACE CONCERNED
STE 148
6606 FM 1488 RD
MAGNOLIA TX 77354-2544

ANDREW WARD
ADVANCED WASTE SOLUTIONS
PO BOX 19696
HOUSTON TX 77224-9696

KAREN J WELCH
2791 N WALKER RD
CLEVELAND TX 77328-2344

DALE WELCH
2791 N WALKER RD
CLEVELAND TX 77328-2344

CLARICE WOMACK
MONTGOMERY TRACE CONCERNED
100 FOREST WIND CT
MONTGOMERY TX 77316-6849

RAY YOUNG
21710 ARLENE DR
MAGNOLIA TX 77355-5312

HERB YOUNG ENVIRO MGR
SMITH & COMPANY
PO BOX 691
CONROE TX 77305-0691

JONELL NIXON & MR ROY ZBOYAN
10677 JOANN ST
WILLIS TX 77318-6428

GENE ZETKA
18848 HARBOR SIDE BLVD
MONTGOMERY TX 77356-3222

LANDOWNERS

JO ANN-ESTATE OF WALKER
10498 WALKER HILL LN
WILLIS TX 77318

BROUSSARD-CHRISTIE LP
10883 BOURBON ST
WILLIS TX 77318

DOUG AND DIANE OWENS
212 BEL AIR DR
SCOTTS VALLEY CA 95066

TODD AND WIFE KATHY RUTHERFORD
12106 OAK PARK DR
HOUSTON TX 77070

ASHLEY F AND SHARON C FIELDS
404 TIMBER GROVE PLACE
FRIENDSWOOD TX 77546

CRAIG C AND MARCIE L WATERWALL
WILTFANG
10788 BOURBON ST
WILLIS TX 77318

SHELIA M JOHNSON
6879 S DOVER WAY
LITTLETON CO 80128

TURNKEY INC
58 PARKER RD
HOUSTON TX 77076

MARTIN H AND KATHLEEN SMITH
436 ROYAL NAVIGATOR RD
MONTGOMERY TX 77316

DANIEL M FERRAZ
3622 SIERRA PINES
HOUSTON TX 77068

RONNIE A AND SARA FRINGS
15 SPLITROCK COURT
THE WOODLANDS TX 77381

WILBERTO G CORTES
10812 BOURBON ST
WILLIS TX 77318

STEPHEN M AND MARY E JACKMAN
21119 BEGONIA CREEK CT
CYPRESS TX 77433

DOUGLAS W AND JOANNE PIERCE
4710 GLADYS
BEAUMONT TX 77706

TERRY L AND DENISE J COBLE
PO BOX 4569
HOUSTON TX 77210

JAMES C AND CAROL T BRAME
39 N COCHRAN'S GREEN CIRCLE
SPRING TX 77381

LAWRENCE W AND SHARON R SANDER
1735 RYAN DR
CRESTON IA 50801

LINDSEY ELAINE HEDDON
6767 KINGSTON COVE LN
WILLIS TX 77318

JOHN R CHRISTIE
10883 BOURGON ST
WILLIS TX 77318

DANNY R AND GLENDA S THORNHILL
20119 WYNDHAM ROSE LN
SPRING TX 77379

SAM M AND MARSHSA A GEPHART
5108 SADDLERIDGE CV
AUSTIN TX 78759

RICHARD M AND KAY E VOSBURGH
7233 MISSION HILLS DR
LAS VEGAS NV 89113

NATALIE MARIE NIESNER
18126 E ALLEN SHORE DR
CYPRESS TX 77433

THOMAS GREEN LUXURY HOMES LTD
4747 RESEARCH FOREST DR
THE WOODLANDS TX 77381

DOUG AND RENE DENHAM
5008 COMETA CT NE
ALBUQUERQUE NM 87111

ROCK N AND PATRICIA B HOUSTOUN
6018 STONES THROW RD
HOUSTON TX 77057-1445

VU T AND DR VIET T TRAN
17307 ROTHKOLANE
SPRING TX 77379

TIMOTHY P AND CHE D HERRON
2201 TIMBERLOCH PL
THE WOODLANDS TX 77380

ROBERT H & SUSAN M MCGARRY
FLETCHER
20731 MISTY CROSSING LN
SPRING TX 77379

JACK E BOTELER
1003 GRUENWALD AVE
SEABROOK TX 77586

RAYMOND L AND LINDA M NOEL
14 LEAF TRACE CT
SPRING TX 77381

FELIX JR AND NORMA T LOPEZ
12570 SAINT PETER COURT
WILLIS TX 77318

BLAIN BURFIELD
12574 ST PETER CT
WILLIS TX 77318

ANTHONY J AND TONYA R RANDIO
12578 ST PETER CT
WILLIS TX 77318

JAMES L AND PATRICIA G LEWIS
16767 CALUMET TRAIL
COLLEGE STATION TX 77840

RODERICK L BROUSSARD
10878 BOURBON ST
WILLIS TX 77318

WARREN AND STEPHENIE TILLERSON
12590 ST PETER COURT
WILLIS TX 77318

MARK S & DIANA MARROW SANTOS
7823 GLENN CLIFF DR
HOUSTON TX 77064

MICHAEL M MANORE
180 TIMBER MILL STREET
SPRING TX 77380

EDWARD L & SANDRA S STANLEY
LOSACK
2910 HIGHLAND LAKES DR
MISSOURI CITY TX 77459

JOSEPH D GRIM SR
3203 LAUREL FORK DR
KINGWOOD TX 77339

CHAD BROWN
2047 WINROCK BLVD
HOUSTON TX 77057

DONALD A SANBERG
8019 SPRING VILLAGE DR
SPRING TX 77389

GLENN AND MARTHA SHEARER
4050 FIR FOREST DR
SPRING TX 77388

INDYMAC VENTURE LLC
460 SIERRA MADRE VILLA AVE STE #101
PASADENA CA 91107

TOM X CHEN
C/O HAO JIANG
4102 LAUREL WOODS CIRCLE
MISSOURI CITY TX 77469

NORRIS W AND MARY P MCCAULEY
12559 ST ANN CT
WILLIS TX 77318

JOHN M AND LESLEY M BULLARD
19402 BREMERTON LN
SPRING TX 77388

W B WOOD INVESTMENTS LTD
PO BOX 449
CONROE TX 77305

MARK C AND JANICE M ROBINSON
8131 TEAKWOOD FOREST DR
SPRING TX 77379

MICHAEL S AND KIMBERLY A
MCDONOUGH
12546 ST ANN CT
WILLIS TX 77318

MICHAEL F & JOYCE M ALLMANDINGER
27200 BARKES WAY
TEHACHAPI CA 93561

MICHAEL C & TERESA S JASSO
DISHONGH
15711 STONEY FORK
HOUSTON TX 77084

FIRST HORIZON HOME LOANS
4000 HORIZON WAY
IRVING TX 75063

OMAR BASSA
207 PALMER ST
BERWICK LA 70342

MICHAEL R AND CHERY VINCENT
102 DUBONNET ST
LAFAYETTE LA 70503

JOSEPH W - REVOCABLE DECLARATION
OF TRUST WILLARD
1754 TEAGUE LANE
KERNERSVILLE NC 27284

JOSE E AND MEGAN M GARCIA
137 MILTON AVENUE
YOUNGSTOWN OH 44509

U & U INTERNATIONAL INC
22506 CORAL CHASE COURT
KATY TX 77494

KEVIN B SMITH
2313 TARRYTOWN CROSSING DR
CONROE TX 77304

RONALD G AND CAROL L HARDY
22034 PINE TREE LANE
HOCKLEY TX 77447

JENNIFER F AND PEDRO R BUHIGAS
3718 LINKWOOD DRIVE
HOUSTON TX 77025

VOLKER E AND ALICE P SCHMIDT
4113 PEBBLE BEACH DR
LEAGUE CITY TX 77573

LINH C & PHUONG XUAN TA DINH
4741 MOON CHASE DRIVE
BUFORD GA 30519

JIAN Q & QUEEN Q YU XU
10883 BOURBON ST
WILLIS TX 77318

ZHIHUA & JINLINA CHENG YANG
827 PINE VALLEY DR
COLLEGE STATION TX 77845

JAMIE AND NANCY WANGERIN
4904 BRISTOL HILL DR
O'FALLON IL 62269

OGUZ AND LAUREL V YALCIN
2010 CLAIRE COURT
SUGARLAND TX 77478

RONALD W MCKNIGHT
6 E MATISSE MEADOW CT
THE WOODLANDS TX 77382

JASON T RICHARDS & STEPHEN C
WEIGHTMAN RICHARDS
939 COLORADO ST UNIT 2
HOUSTON TX 77007

ANTHONY P AND SANDRA B MARRIOTT
13253 AUTUMN ASH
CONROE TX 77302

MICHAEL MCKINLEY AND AMANDA
JANE CORNELL
13911 SPRINGMINT DR
CYPRESS TX 77429

SPENCER R AND CYNTHIA V ELLIS
10998 BLUE BELL
WILLIS TX 77318

JERRY G JR AND CHERYL H WINTER
6314 MYSTIC BRIDGE DR
HOUSTON TX 77021

LEROY & JOAN N THOU HERBERT
8618 OCEE STREET
HOUSTON TX 77063

JOHN R AND INA MAE REIMER
3706 PORTSIDE DR
SPRING TX 77388

WILLIAM R AND KAREN G FISHER
1218 WIDWOOD
DEER PARK TX 77536

MICHAEL JERRY HEBERT
12098 FM 1940
FRNKLIN TX 77856

JEFFREY C HERDRICH
10709 S LAKE MIST LN
WILLIS TX 77318

JOHNNY W AND PAULETTE M FISHER
10705 S LAKE MIST LN
WILLIS TX 77318

CRISPEN A AND DIOSCORA A ENGUTAN
109 EMERALD DR
HARVEST AL 85749

FREDERICK L EBERS
P O BOX 7765
SPRING TX 77387

RANDALL D AND DEBRA A RENFRO
30918 IMPERIAL WALK LN
SPRING TX 77386

DONALD AND JANE A NUNES
42 JUNIPER GROVE PL
SPRING TX 77382

THUAN TAN & NANCY V HUYNH
9918 BROOK MEADOW LN
HOUSTON TX 77098

TIMOTHY KYLE REED
15211 CIRCLING HAWK CT
HOUSTON TX 77095

DONALD L AND JUDY MAGNUSON
3803 E PEACH HOLLOW CIR
PEARLAND TX 77584

MARTIN E AND CATHERINE M
LANSANGAN
135 WIMBERLY WAY
CONROE TX 77385

THE CONROE MANOR LTD
2404 COMMONWEALTH ST
HOUSTON TX 77006

JAMES W HARTMAN
P O BOX 1747
SPRING TX 77383

DOUGLAS C MILWARD
11008 HILLSIDE DR
WILLIS TX 77378

BOBBY GRANGER
30211 HIGHLAND BLVD
MAGNOLIA TX 77354

ELIZABETH D SCALLAN
2010 GRANDBY TER
SPRING TX 77373

RISHAD & NATALIE ALIKHAN
12411 DONNA DR
HOUSTON TX 77067

DAVID AND DIANA SCRUTON
11126 STARK ST
WILLIS TX 77318

HERB AND MARY BETH TUTTLE
11156 STARK ST
WILLIS TX 77318

TIMOTHY & DENISE FONTAINE HACKETT
11172 STARK ST
WILLIS TX 77318

KEVIN O AND JEAN M STARK
11190 STARK ST
WILLIS TX 77318

DOYLE J AND SHIRLEY W BLEVINS
14944 LAKE PAULA DR
WILLIS TX 77318

WILBUR W JR AND CHERYL MARTIN
11280 HILLSIDE DR
WILLIS TX 77378

JOSEPH V AND PEGGY J TURNER
P O BOX 7856
SPRING TX 77387

JOSE FONSECA
11338 HILLSIDE DR
WILLIS TX 77378

VERNON B MILLER
SHORELINE STORAGE
12435 FM 830 RD
WILLIS TX 77318

SHORELINE SERVICES INC
C/O VERNON MILLER
12435 FM 830 RD
WILLIS TX 77318

PARK ON THE LAKE
C/O CATHY BROOKS
12351 FM 830 RD
WILLIS TX 77318

MARTHA DERRICK
12 MISTY HBR E
MONTGOMERY TX 77356

CLYDE D HICKHAM
2801 LOUISIANA AVE
DEER PARK TX 77536

PRMCO
3118 RICHMOND AVE STE.#205
HOUSTON TX 77098

RICKY AND KAYLA BISHOP
11025 WINDSWEPT DR
WILLIS TX 77318

STEPHEN F AND SALLY J SCHMIDT
P O BOX 495
WILLIS TX 77318

YI LEE YONHUI
50 VILLAGE HILL DR
CONROE TX 77304

JAMES SCHILLER
11140 WINDSWEPT DR
WILLIS TX 77378

GARY L AND CORENE A FINLEY
10985 BLUE BELL DR
WILLIS TX 77318

WILLIAM & JOANNE R HARWELL
10961 BLUE BELL DR
WILLIS TX 77318

GERALD P JONES - ESTATE
C/O LINDA D JONES
3421 MOUNT VERNON
HOUSTON TX 77006

BOARDMAN LEE & DENISE MARIE
MUNSON
11261 MEADOR RD
CONROE TX 77303

WALTER R AND SUSAN ROSEMUND
12259 WREN CV
WILLIS TX 77318

MAURINE BLAIR
1112 KILLARNEY AVE
FRIENDSWOOD TX 77545-5322

EDWARD A AND MICHELLE R HOLLER
12187 WREN CV
WILLIS TX 77318

BEN G AND DONNA WORLEY
26738 CONROE HUFSMITH RD
MAGNOLIA TX 77354

EMIT AND CHERYL PEAVY
10751 BLUE BELL RD
WILLIS TX 77318

BRADLEY J AND PAULA BURCH
12239 GABLE DR
WILLIS TX 77318

GARLAND G AND SANDRA S BRAUN
12243 GABLES DR
WILLIS TX 77318

TRAVIS KNIGHT
10651 BLUE BELL DR
WILLIS TX 77318

PARROTT FAMILY TRUST
C/O RANDAL J & MARSHA D PARROTT
10621 BLUE BELL DR
WILLIS TX 77318

KEVIN & CALVIN C BEAULIER
10585 BLUE BELL DR
WILLIS TX 77318

RANDALL S GROSS
P O BOX 7344
CONROE TX 77306

DAVID V AND ROBERTA SIEGFRIED
7811 TERRA COTTA DR
HOUSTON TX 77040

BLUE BELL EST PROPERTY OWNERS
ASSOC INC
10664 BLUE BELL DR
WILLIS TX 77318

LARRY R & VICTORIA KNUTSON KLOTZ
2439 LIGUSTRUM FLOWER DR
SPRING TX 77388

MELBA C CHAMPION
10561 BLUE BELL DR
WILLIS TX 77318

WILLIAM M REID
10551 BLUE BELL DR
WILLIS TX 77318

RAYMOND D AND PATRICIA OLBRICH
C/O PATRICIA ANN CARBERRY
202 TANAGER
CONROE TX 77385

ROY W & JONELL A NIXON ZBOYAN
10677 JOANN ST
WILLIS TX 77318

EVERETT SIMMONS
11071 HILLSIDE DR
WILLIS TX 77318-6542