

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY CHIEF CLERKS OFFICE

*Protecting Texas by Reducing and Preventing Pollution*

February 13, 2009

Ms. LaDonna Castañuela  
Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Post Office Box 13087, MC-105  
Austin, Texas 78711-3087

Re: Executive Director's Response to Hearing Requests regarding Madison Bell Partners, LP Permit No. 83378 and PSD-TX-1105; Docket No Docket No 2008-1786-AIR.

Dear Ms. Castañuela:

Enclosed for filing is the original and seven copies of the Executive Director's Response to Hearing Requests regarding Madison Bell Partners, LP Permit No. 83378 and PSD-TX-1105.

If you have any questions or comments, please call me at (512) 239-6033.

Sincerely,

A handwritten signature in cursive script that reads "Erin Selvera".

Erin Selvera  
Staff Attorney  
Environmental Law Division

Enclosures

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 13, 2009

To: Persons on the Attached Mailing List

Re: Executive Director's Response to Hearing Requests regarding Madison Bell Partners, LP Permit No. 83378 and PSD-TX-1105; Docket No Docket No 2008-1786-AIR.

Enclosed is a copy of the Executive Director's Response to Hearing Requests regarding Madison Bell Partners, LP Permit No. 83378 and PSD-TX-1105 as filed with the Office of the Chief Clerk on February 13, 2009.

If you have any questions or comments, please call me at (512) 239-6033.

Sincerely,

A handwritten signature in cursive script that reads "Erin Selvera".

Erin Selvera  
Staff Attorney  
Environmental Law Division

Enclosures

**TCEQ AIR QUALITY PERMIT NO 83378 AND  
PREVENTION OF SIGNIFICANT DETERIORATION PERMIT NO PSD-TX-1105**

<b>APPLICATION BY</b>	<b>§</b>	<b>BEFORE THE</b>
<b>MADISON BELL PARTNERS, LP</b>	<b>§</b>	
<b>CENTRAL PLANT</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>MADISONVILLE,</b>	<b>§</b>	
<b>MADISON COUNTY</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>

**EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS**

The Executive Director (ED) of the Texas Commission on Environmental Quality (Commission or TCEQ) files this response (Response) to the requests for a contested case hearing submitted by persons listed herein. The Texas Clean Air Act (TCAA) §382.056(n) requires the commission to consider hearing requests in accordance with the procedures provided in Tex. Water Code §5.556.<sup>1</sup> This statute is implemented through the rules in 30 Texas Administrative Code (TAC) Chapter 55, Subchapter F.

A map showing the location of the site for the Madison Bell Partners, LP Central Plant and the distance in relation to the Protestants is included with this response and has been provided to all persons on the attached mailing list. In addition, a current compliance history report, technical review summary, modeling audit, and draft permit prepared by the ED's staff have been filed with the TCEQ's Office of Chief Clerk for the commission's consideration. Finally, the ED's Response to Public Comments (RTC), which was mailed by the chief clerk to all persons on the mailing list, is on file with the chief clerk for the commission's consideration.

**I. Application Request and Background Information**

Madison Bell Partners, LP applied for a New Source Review pre-construction permit and issuance of a Prevention of Significant Deterioration (PSD) permit under Texas Clean Air Act (TCAA) §382.0518. These actions will authorize equipment that will emit the following air contaminants in a significant amount: nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOC), carbon monoxide (CO), and particulate matter less than ten microns in diameter (PM<sub>10</sub>). Other contaminants to be authorized under this permit application include lead (Pb), ammonia (H<sub>2</sub>S), sulfur dioxide (SO<sub>2</sub>), sulfuric acid (H<sub>2</sub>SO<sub>4</sub>), and organic compounds including, but not limited to, formaldehyde, hexane, toluene, and xylene. This permit application will authorize the applicant to install four gas turbines, fired heat recovery steam generators with provisions for duct firing, and other equipment which will generate electricity and provide heating and cooling to surrounding buildings. The facility is located at the Madison Bell Energy Center (MBEC)

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<sup>1</sup> Statutes cited in this response may be viewed online at [www.capitol.state.tx.us/statutes/statutes.html](http://www.capitol.state.tx.us/statutes/statutes.html). Relevant statutes are found primarily in the Texas Health and Safety Code and the Texas Water Code. The rules in the Texas Administrative Code may be viewed online at [www.sos.state.tx.us/tac/index.shtml](http://www.sos.state.tx.us/tac/index.shtml), or follow the "Rules, Policy & Legislation" link on the TCEQ website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

approximately six miles southwest of Madisonville via U.S. Highway 190 West, Madisonville, Madison County.

It appears the Applicant is not delinquent on any administrative penalty payments to the TCEQ. The TCEQ Enforcement Database was searched and no enforcement activities were found that are inconsistent with the compliance history.

The permit application was received on October 31, 2007, and declared administratively complete on November 30, 2007. The Notice of Receipt and Intent to Obtain an Air Quality Permit (public notice) for this permit application was published on December 19, 2007, in the *Madisonville Meteor*. The Notice of Application and Preliminary Decision (second public notice) for this permit application was published on May 21, 2008, in the *Madisonville Meteor*. The TCEQ held a public meeting in Madisonville on August 12, 2008 at the request of Representative Jim Dunnam. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999. The comment period for this application closed on August 12, 2008 in accordance with 30 TAC § 55.152(b).

The ED's RTC was filed with the Chief Clerk on October 10, 2008 and mailed on October 16, 2008 to all interested persons, including those who asked to be placed on the mailing list for this application and those who submitted comment or requests for contested case hearing. The cover letter attached to the RTC included information about making requests for contested case hearing or for reconsideration of the ED's decision.<sup>2</sup> The letter also explained hearing requesters should specify any of the ED's responses to comments they dispute and the factual basis of the dispute, in addition to listing any disputed issues of law or policy.

The time for requests for reconsideration and additional hearing requests ended on November 15, 2008. The TCEQ received timely hearing requests during the public comment period from the following persons: Angela Farris Fannin and Charles and Patsy Strawther.

## II. Applicable Law for Hearing Requests

The commission must assess the timeliness and form of the hearing requests, as discussed above. The form requirements are set forth in 30 TAC § 55.201(d):

- (d) A hearing request must substantially comply with the following:
  - (1) Give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request. If the request is made by a group or

<sup>2</sup> See TCEQ rules at Chapter 55, Subchapter F of Title 30 of the Texas Administrative Code. Procedural rules for public input to the permit process are found primarily in Chapters 39, 50, 55 and 80 of Title 30 of the Code.

association, the request must identify one person by name, address, daytime telephone number, and, where possible, fax number, who shall be responsible for receiving all official communications and documents for the group;

- (2) Identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requester's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requester believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- (3) Request a contested case hearing;
- (4) List all relevant and material disputed issues of fact that were raised during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requester should, to the extent possible, specify any of the executive director's responses to comments that the requester disputes and the factual basis of the dispute and list any disputed issues of law or policy; and
- (5) Provide any other information specified in the public notice of application.

The next necessary determination is whether the requests were filed by "affected persons" as defined by Tex. Water Code § 5.115, implemented in commission rule 30 TAC § 55.203. Under 30 TAC § 55.203, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest. Local governments with authority under state law over issues raised by the application receive affected person status under 30 TAC § 55.203(b).

In determining whether a person is affected, 30 TAC § 55.203(c) requires all factors be considered, including, but not limited to, the following:

- (1) Whether the interest claimed is one protected by the law under which the application will be considered;
- (2) Distance restrictions or other limitations imposed by law on the affected interest;
- (3) Whether a reasonable relationship exists between the interest claimed and the activity regulated;
- (4) Likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
- (5) Likely impact of the regulated activity on use of the impacted natural resource by the person; and
- (6) For governmental entities, their statutory authority over or interest in the issues relevant to the application.

If the commission determines a hearing request is timely and fulfills the requirements for proper form and the hearing requester is an affected person, the commission must apply a three-part test to the issues raised in the matter to determine if any of the issues should be referred to the State Office of Administrative Hearings (SOAH) for a contested case hearing. The three-part test in 30 TAC § 50.115(c) is as follows:

- (1) The issue must involve a disputed question of fact;
- (2) The issue must have been raised during the public comment period; and
- (3) The issue must be relevant and material to the decision on the application.

The law applicable to the proposed facility may generally be summarized as follows. A person who owns or operates a facility or facilities that will emit air contaminants is required to obtain authorization from the commission prior to the construction and operation of the facility or facilities.<sup>3</sup> Thus, the location and operation of the proposed facility requires authorization under the TCAA. Permit conditions of general applicability must be in rules adopted by the commission.<sup>4</sup> Those rules are found in 30 TAC Chapter 116. In addition, a person is prohibited from emitting air contaminants or performing any activity that violates the TCAA or any commission rule or order, or that causes or contributes to a condition of air pollution.<sup>5</sup> The relevant rules regarding air emissions are found in 30 TAC Chapters 101 and 111-118. In addition, the commission has the authority to establish and enforce permit conditions consistent with this chapter.<sup>6</sup> The materials accompanying this response list and reference permit conditions and operational requirements and limitations applicable to this proposed facility.

### III. Analysis of Hearing Requests

A. Were the requests for a contested case hearing in this matter timely and in proper form?

#### Requests of Patsy and Charles Strawther

Mr. and Mrs. Strawther's hearing requests were submitted during the public comment period and include their mailing address and phone number.<sup>7</sup> ED's staff contacted the Strawthers to get additional information regarding the specific location of their property. Mr. Strawther indicated that the property described in his hearing request is located one mile south of Highway 21 on Strawther road. He described the property as being 82 acres that adjoins the proposed site on two sides. He indicated that there are horses on the property, barns and a mobile home for camping.

<sup>3</sup> TEXAS HEALTH & SAFETY CODE § 382.0518

<sup>4</sup> TEXAS HEALTH & SAFETY CODE § 382.0513

<sup>5</sup> TEXAS HEALTH & SAFETY CODE § 382.085

<sup>6</sup> TEXAS HEALTH & SAFETY CODE § 382.0513

<sup>7</sup> The address provided is a post office box. Mr. Strawther also confirmed that his residence is at 725 Shady Creek Lane in Madisonville, approximately six miles from the proposed site.

In their requests, the Strawthers list their specific concerns which include effects of the proposed facility on their family, animals, crops, traffic, and air quality due to the proximity of a nearby sour gas plant. The Strawthers also express concern about the potential soil contamination by the prior owner of the subject property. No requests for reconsideration were received in response to the Executive Director's Response to Comments and thus it is unknown whether any of the issues raised by the Strawther's initial request for a hearing are still disputed. Notwithstanding this, the ED asserts that the Strawther's requests substantially comply with the requirements set forth in 30 TAC § 55.201(d) regarding timeliness and form.

#### Request of Angela Farris Fannin

Ms. Fannin's hearing request was submitted during the public comment period. It provides her mailing and physical addresses and phone number. She also states that she is located less than two miles from the proposed site and that her acreage indirectly adjoins the proposed site. Ms. Fannin lists her specific concerns, which include effects of the proposed facility on her family, animals, crops, traffic, and air quality due to the proximity of a nearby sour gas plant. Ms. Fannin also expresses concern about the potential soil contamination by the prior owner of the subject property. No requests for reconsideration were received in response to the Executive Director's Response to Comments and thus it is unknown whether any of the issues raised by Ms Fannin's initial request for a hearing are still disputed. Notwithstanding this, the ED asserts that Ms Fannin's request substantially complies with the requirements set forth in 30 TAC § 55.201(d) regarding timeliness and form.

B. Are those who requested a contested case hearing in this matter affected persons?

The TCEQ rules regarding affected person status requires all factors to be considered. Therefore analysis of each of the six factors listed in 30 TAC § 55.203(c) is provided below. Because the concerns raised by the Strawthers and Ms. Fannin are almost identical, their affected person status will be analyzed in concert.

The first factor addresses whether the interest claimed is one protected by law under which the application will be considered. The requesters' concerns regarding the addition of air contaminants, welfare of family, hay production and animals, including wild turkeys, ducks, deer, cattle, livestock are protected by law under the policy and purpose provisions of the TCAA section 382.002 through the definition of air pollution found in TCAA section 382.003(3)(A)and(B). However, the requester's concerns regarding traffic congestion are beyond the TCEQ's jurisdiction and thus not an interest protected by law under which this application will be considered. Additionally, although the issue must be addressed by the Applicant for other purposes, requester's concerns about soil contamination due to the prior owner's pesticide/herbicide operation are beyond the interests protected by law under which this application will be considered.

The second factor considers any distance restrictions or limitations imposed by law. There appear to be no specific distance restrictions applicable to the proposed facility. According to the technical review prepared by ED's staff, there are no schools within 3000' of the proposed facility.

The third factor considers whether a reasonable relationship exists between the interest claimed and the activity regulated. Requester's concerns regarding the addition of air contaminants, welfare of family, hay production and animals, including wild turkeys, ducks, deer, cattle, livestock are all reasonably related to the potential effects of air emissions from the proposed power plant.

The fourth factor considers the likely impact of the regulated activity on the health and safety of the requesters, and on the use of the property of the requesters. Based on the ED's modeling evaluation and state effects evaluation, the proposed project will not violate the NAAQS or have any adverse impacts on soils or vegetation and thus the public health and welfare are protected.

The fifth and sixth factors are not applicable because the requesters did not raise any issues regarding impacts on a natural resource nor are they governmental entities.

In conclusion, the ED asserts the requesters filed timely hearing requests that substantially comply with the requirements for form and have claimed interests protected by law that are reasonably related to the regulated activity. Although the ED asserts that based on the staff's impacts analysis and air toxics review, the regulated activity is not likely to impact the health and safety of the requesters or the use of their property; it is acknowledged that this is a question of fact appropriate for final determination by the commission. Therefore, the ED asserts that the Strawthers and Ms. Fannin qualify as affected persons under TCEQ rules.

C. Which issues in this matter should be referred to SOAH for hearing?

If the commission determines any of the hearing requests in this matter are timely and in proper form, and some or all of the hearing requesters are affected persons, the commission must apply the three-part test discussed in Section II to the issues raised in this matter to determine if any of the issues should be referred to SOAH for a contested case hearing. The three-part test asks whether the issues involve disputed questions of fact, whether the issues were raised during the public comment period, and whether the issues are relevant and material to the decision on the permit application, in order to refer them to SOAH.

The ED addressed all public comments in this matter by providing responses in the RTC. The cover letter from the Office of the Chief Clerk transmitting the RTC cites 30 TAC § 55.201(d)(4), which states that requesters should, to the extent possible, specify any of the ED's responses in the RTC the requesters dispute and the factual basis of the dispute, and list any

disputed issues of law or policy. As noted above, no requests for reconsideration were filed in this matter, therefore, the ED cannot determine or speculate if any issue of fact may continue to be disputed by the hearing requesters. However, the ED acknowledges the hearing requesters have one more opportunity to identify disputed issues of fact in their replies to the positions of the ED, Office of Public Interest Counsel, and the Applicant regarding the hearing request. Therefore, to facilitate the commission's consideration of this matter, the ED has analyzed the remaining two parts of the test, assuming that the issues noted above remain disputed.

1. Six potential issues involving a question of fact.

1. Whether the addition of contaminants from the proposed facility will adversely affect air quality;
2. Whether emissions from the proposed facility will adversely affect the Fannin's and Strawther's human health and welfare.
3. Whether emissions from the proposed facility will adversely affect wild turkeys, ducks, deer, and cattle on their property;
4. Whether emissions from the proposed facility will adversely affect hay production;
5. Whether the proposed facility will cause traffic Congestion on State Highway 21 where it intersects with Strawther Road; and
6. Whether the proposed site was the former business site for a pesticide/herbicide spraying operation and that these contaminants may have been deposited on the land.

2. Were the issues raised during the public comment period?

The public comment period is defined in 30 TAC § 55.152. The public comment period begins with the publication of the Notice of Receipt and Intent to Obtain an Air Quality Permit. The end date of the public comment period depends on the type of permit. In this case, the public comment period began on December 19, 2007, and ended on August 12, 2008. The issues listed above upon which the hearing requests in this matter are based were raised initially in comments received during the public comment period. If the commission determines that the hearing requester is an affected person, these issues may be considered by the commission.

3. Whether the issues are relevant and material to the decision on the application.

In this case, the permit would be issued under the commission's authority in Tex. Water Code § 5.013(11) (assigning the responsibilities in Chapter 382 of the Tex. Health & Safety Code) and the TCAA. The relevant sections of the TCAA are found in Subchapter C (Permits). Subchapter C requires the commission to grant a permit to construct or modify a facility if the commission finds the proposed facility will use at least the best available control technology (BACT) and the emissions from the facility will not contravene the intent of the TCAA, including the protection of the public's health and physical property. In making this permitting decision, the commission may consider the Applicant's compliance history. The commission by rule has also specified

certain requirements for permitting. Therefore, in making the determination of relevance in this case, the commission should review each issue to determine whether it is relevant to these statutory and regulatory requirements that must be satisfied by this permit application. Issues one through four above concern statutory and regulatory requirements that must be satisfied by this permit application and thus are referable issues.

#### IV. Maximum Expected Duration of the Contested Case Hearing

The ED recommends the contested case hearing, if held, should last no longer than six months from the preliminary hearing to the proposal for decision.

#### V. Executive Director's Recommendation

The Executive Director respectfully recommends the commission:

1. Find the hearing requests in this matter were timely filed;
2. Find the hearing requests in this matter substantially comply with the requirements for form under 30 TAC § 55.201(d);
3. Find Angela Farris Fannin, Charles Strawther and Patsy Strawther are affected persons in this matter;
4. If the commission determines any requester is an affected person, refer the following issues to SOAH:
  - a. Whether the addition of contaminants from the proposed facility will adversely affect air quality;
  - b. Whether emissions from the proposed facility will adversely affect the Fannin's and Strawther's human health and welfare.
  - c. Whether emissions from the proposed facility will adversely affect wild turkeys, ducks, deer, and cattle on their property;
  - d. Whether emissions from the proposed facility will adversely affect hay production; and
5. Find the maximum expected duration of the contested case hearing, if held, would be six months.

Executive Director's Response to Hearing Requests  
Madison Bell Partners, LP Permit No. 83378 and PSD-TX-1105  
Page 9 of 9

Respectfully submitted,

Texas Commission on Environmental Quality  
Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director  
Office of Legal Services

Robert Martinez, Director  
Environmental Law Division



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Erin Selvera, Staff Attorney  
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Austin, Texas 78711-3087  
(512) 239-6033

REPRESENTING THE EXECUTIVE DIRECTOR  
OF THE TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

On the 13th day of February, 2009, an original and seven true and correct copies of the foregoing instrument were filed with the Office of the Chief Clerk and served on all persons on the attached mailing list by the undersigned via deposit into the U.S. Mail, inter-agency mail, facsimile, electronic mail, and/or hand delivery.

*Erin Selvera*

Erin Selvera

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2009 FEB 13 PM 4: 21

CHIEF CLERKS OFFICE

MAILING LIST  
FLINT HILLS RESOURCES, LP  
DOCKET NO 2008-0293-AIR; PERMIT NO 8803A

FOR THE APPLICANT:

Via: Facsimile  
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FOR PUBLIC INTEREST COUNSEL:

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FOR OFFICE OF PUBLIC ASSISTANCE:

Via: Facsimile  
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FOR THE CHIEF CLERK:

Via: Hand Delivery  
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FOR ALTERNATIVE DISPUTE  
RESOLUTION:

Via: Interoffice mail  
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REQUESTERS:

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PUBLIC OFFICIALS - INTERSTED PERSON(S)

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INTERESTED PERSONS

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