

Buddy Garcia, *Chairman*
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Blas J. Coy, Jr., *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 30, 2009

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

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2009 JAN 30 PM 4:04
CHIEF CLERKS OFFICE

Re: **URANIUM ENERGY CORP.**
TCEQ DOCKET NO. 2008-1888-UIC

Dear Ms. Castañuela:

Enclosed for filing is the Public Interest Counsel's Response to Requests for Contested Case Hearing in the above-entitled matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Garrett Arthur".

Garrett Arthur, 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. 2008-1888-UIC

APPLICATION BY
URANIUM ENERGY CORP.
FOR UNDERGROUND INJECTION
CONTROL PERMIT NO. UR03075

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BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

2009 JAN 30 PM 4:04

CHIEF CLERKS OFFICE

**OFFICE OF PUBLIC INTEREST COUNSEL'S
RESPONSE TO REQUESTS FOR CONTESTED CASE HEARING**

To the Members of the Texas Commission on Environmental Quality:

The Office of Public Interest Counsel (OPIC) of the Texas Commission on Environmental Quality (TCEQ or the "Commission") files this response to requests for a contested case hearing in the above-referenced matter.

I. Introduction

Uranium Energy Corp. (UEC or the "Applicant") has applied to the TCEQ for a new Class III underground injection control area permit to authorize an in situ uranium mining operation. The application also includes a request for an aquifer exemption. The proposed site is located approximately 13 miles north of the city of Goliad, about 0.9 miles east of the intersection of State Highway 183 and Farm-to-Market Road 1961 in Goliad County. The permit would authorize UEC to construct and operate Class III injection and production wells for recovery of uranium from a certain portion of the Goliad Formation within the permit area. The area within the proposed permit boundary is approximately 1,139.4 contiguous acres. The requested aquifer exemption would apply from a depth of 45 to 404 feet and would extend over a 423.8 acre area within the proposed permit area. The aquifer exemption is required before UEC can operate the proposed injection wells.

On August 7, 2007, TCEQ received UEC's application, and the application was declared administratively complete August 29, 2007. The first notice was published September 19 and 26, 2007, in *The Texan Express* and the *Victoria Advocate*. On January 24, 2008, the TCEQ held a public meeting in Goliad. The second notice was published June 20 and 25, 2008, in the same newspapers. The notice for the proposed aquifer exemption was provided with the second notice. The public comment period closed July 25, 2008, and the TCEQ Chief Clerk mailed the Executive Director's (ED) Response to Comments (RTC) on November 6, 2008. The deadline for hearing requests was December 8, 2008, and the TCEQ received approximately 102 timely hearing requests.¹ The following people submitted hearing requests:

¹ Some hearing requestors submitted multiple hearing requests, and where appropriate, separate hearing requests from husbands and wives have been combined.

Emmett Albrecht
Kathy and Ray Albrecht
Ander-Weser Volunteer Fire Department
Mary and Thomas Anklam
Raymond and Karon Arnold
Aldon and Brenda Bade
Elizabeth and Mickey Beard
Gary and Carolyn Blanton
Charles Bluntzer
Otto and Ruth Bluntzer
Matt and Erika Bochat
Anne Bode
Charles Bode
Jenny Bode
Judy Bode
Gladys Boehm
Harvey and Karen Brewer
Gene and Reta Brown
Kirby and Debby Brumby
Cathy Brunicardi and Raymond Decker
Larrie, Brenda, and Rosalyn Brysch
John and Pearl Caldwell
Lawrence and Maggie Christ
Lamar and Christine Collins
Lynn and Ginger Cook
Bill Corey
Florine Davis
John and Margie Dreier
Ashley Duderstadt
LuAnn and Craig Duderstadt
Wilburn and Doris Duderstadt
Megan Duderstadt
Joan Folks
Diana and Don Ford
Douglas and Wanda Franke
JoAnne and Kenneth Georgie
Bettie Giraudin
Goliad County
Goliad County Farm Bureau
Goliad County Groundwater Conservation
District
Joel and Joyce Grieser
Gerald and Eva Nell Griffith
Mack and Sue Guthrie
Mr. and Mrs. G.A. Gutmann
Annie Hardt

Brenda Hardt
Elmo and Lorraine Hartman
Ernest and Frances Hausman
Dan and Marilyn Herncerling
Wayne and Cleo Henderson
Perry and Denise Hiebner
William and Doris Hill
Robert and Michele Hinman
Donna Hoffman
Charlotte Hughes
Raulie and Georgia Irwin
Carl and Donna Jenkins
Henry and Peggy Karnowski
Marilyn and W. Wayne Key
Gaylon and Barbara Kornfuehrer
Mark Krueger
Aubrey, Judy, and J. Aubrey Lenamon
Maureen Lule
Jan Manning
Patti McCraney
Melvin and Belitha McKinney
Ricki McKinney
Robert Meyer
Mr. and Mrs. Jason Mikeska
Louis and Sharon Montgomery
Dorothy Mosley
Susan and Weldon Orr
Mary Ann Overlander
Sam Rhotenberry
Roland and Gail Riedesel
Klaus and Tammy Ritenour
LaFern Roessler
Margaret Rutherford
Wilbert Sauermilch
Elizabeth Schoenherr
Kenneth Schustereit
Robin Sherwood
Betty Sievers
Barbara Smith
Wayne and Margie Smith
Shirley Smith
Mike and Donna Spann
St. Peter's Lutheran Church of Ander
Robert and Rosemary Stacy
Robert and Pam Stryker
Merrill and Rebecca Swanson

Georgia Lee Swickheimer
Patricia and Roland Thieme
Carol and Dorian Thurk
Sandra Vaughn
Roman and Mackey Vogel
Roy and Martha Ward

David and Carol Warren
Water is Life (Petition)
Catherine West
Thomas and Gloria Wunsch
Trace and Leslie Wunsch

For the reasons stated herein, OPIC recommends that the hearing requests from Goliad County and Goliad County Groundwater Conservation District (GCGCD) be granted and 54 other individual hearing requests be granted.

II. Applicable Law

This application was declared administratively complete after September 1, 1999, and is therefore subject to the procedural requirements adopted pursuant to House Bill 801 (76th Leg., 1999).

Under 30 Texas Administrative Code (TAC) § 55.201(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;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor 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 requestor should, to the extent possible, specify any of the executive director's responses to comments that the requestor 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.

Under 30 TAC § 55.203(a), 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. Subsection (b) states that governmental entities, including local governments and public agencies, with authority under state law over issues raised by the application may be considered affected persons. Subsection (c) provides relevant factors to be considered in determining whether a person is affected. These factors include:

- (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, safety, and 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.

As provided by 30 TAC § 55.205(a), a group or association may request a contested case hearing only if the group or association meets all of the following requirements:

- (1) one or more members of the group or association would otherwise have standing to request a hearing in their own right;
- (2) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (3) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

Under 30 TAC § 55.211(c)(2), a hearing request made by an affected person shall be granted if the request:

- (A) raises disputed issues of fact that were raised during the comment period, that were not withdrawn by the commenter by filing a withdrawal letter with the chief clerk prior to the filing of the executive director's response to comment, and that are relevant and material to the commission's decision on the application;
- (B) is timely filed with the chief clerk;
- (C) is pursuant to a right to hearing authorized by law; and
- (D) complies with the requirements of § 55.201.

Section 55.209(e) states that a response to hearing requests must specifically address:

- (1) whether the requestor is an affected person;
- (2) which issues raised in the hearing request are disputed;
- (3) whether the dispute involves questions of fact or of law;
- (4) whether the issues were raised during the public comment period;
- (5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director's Response to Comment;
- (6) whether the issues are relevant and material to the decision on the application; and
- (7) a maximum expected duration for the contested case hearing.

III. Analysis of Hearing Requests

A. Whether the requestors are affected persons

Goliad County Groundwater Conservation District

According to the Goliad County Groundwater Conservation District's hearing request, GCGCD voted in November 2007 to participate in this matter. Under 30 TAC § 55.203(b), a governmental entity with authority under state law over issues raised by this application may be considered an affected person. As provided by Texas Water Code Chapter 36, GCGCD is a

governmental entity with authority over groundwater issues in Goliad County. UEC's application raises groundwater issues. Therefore, GCGCD should be considered an affected person in this matter.

County of Goliad

According to Goliad County's hearing request, the Goliad County Commissioners Court voted in August 2007 to participate in this matter. Under 30 TAC § 55.203(b), a governmental entity with authority under state law over issues raised by this application may be considered an affected person. Goliad County has the authority to protect public health under Health and Safety Code § 121.003(a), which provides that "the commissioners court of a county may enforce any law that is reasonably necessary to protect the public health." In addition, Texas Water Code Chapter 26, Subchapter E details the statutory authority a local government has over water quality issues. UEC's application raises public health and water quality issues. As a governmental entity with authority under state law over public health and water quality issues, Goliad County should be considered an affected person in this matter.

Individual Hearing Requestors

According to their respective hearing requests or the map prepared by the ED, the 54 hearing requestors listed below either reside or own property less than 10 miles from the proposed site. At a minimum, each of these hearing requestors has indicated an interest in groundwater quality. The requestors' interest in groundwater quality is an interest protected by the laws applicable to UEC's application. When combined with proximity to the proposed mining operation, this interest in groundwater quality qualifies as a personal justiciable interest that is not common to members of the general public. Given the Applicant's request for an aquifer exemption and the extensive reliance on private water wells among these hearing

requestors, there is also a reasonable relationship between the Applicant's proposed mining activities and the requestors' interest in groundwater quality. Therefore, OPIC finds that the following hearing requestors qualify as affected persons in this matter:

| | |
|---------------------------------------|--------------------------------------|
| Ander-Weser Volunteer Fire Department | Dan and Marilyn Herncerling |
| Kathy and Ray Albrecht | Wayne and Cleo Henderson |
| Mary and Thomas Anklam | William and Doris Hill |
| Raymond and Karon Arnold | Charlotte Hughes |
| Aldon and Brenda Bade | Raulie and Georgia Irwin |
| Elizabeth and Mickey Beard | Carl and Donna Jenkins |
| Gary and Carolyn Blanton | Marilyn and W. Wayne Key |
| Otto and Ruth Bluntzer | Gaylon and Barbara Kornfuehrer |
| Matt and Erika Bochat | Mark Krueger |
| Harvey and Karen Brewer | Mr. and Mrs. Jason Mikeska |
| Gene and Reta Brown | Dorothy Mosley |
| Cathy Brunicardi and Raymond Decker | Susan and Weldon Orr |
| Larrie, Brenda, and Rosalyn Brysch | Roland and Gail Riedesel |
| John and Pearl Caldwell | Klaus and Tammy Ritenour |
| Lawrence and Maggie Christ | Margaret Rutherford |
| Lynn and Ginger Cook | Betty Sievers |
| John and Margie Dreier | Wayne and Margie Smith |
| LuAnn and Craig Duderstadt | Shirley Smith |
| Wilburn and Doris Duderstadt | Mike and Donna Spann |
| Joan Folks | St. Peter's Lutheran Church of Ander |
| Diana and Don Ford | Robert and Rosemary Stacy |
| Douglas and Wanda Franke | Merrill and Rebecca Swanson |
| JoAnne and Kenneth Georgie | Carol and Dorian Thurk |
| Joel and Joyce Grieser | Roy and Martha Ward |
| Mack and Sue Guthrie | David and Carol Warren |
| Annie Hardt | Thomas and Gloria Wunsch |
| Brenda Hardt | Trace and Leslie Wunsch |

If a hearing requestor is not specifically listed above, OPIC did not find that hearing requestor to be an affected person.

Goliad County Farm Bureau

The Goliad County Farm Bureau's hearing request states that the request is on behalf of affected members. However, the Farm Bureau's hearing request does not state a member who would otherwise have standing to request a hearing in his or her own right, as required for

associational standing under 30 TAC § 55.205(a). At this time, OPIC cannot find that the Goliad County Farm Bureau qualifies as an affected person.

B. Which issues raised in the hearing requests are disputed

All issues being recommended for referral to the State Office of Administrative Hearings (SOAH) are disputed.

C. Whether the dispute involves questions of fact or of law

All issues being recommended for referral to SOAH involve questions of fact.

D. Whether the issues were raised during the public comment period

All issues being recommended for referral were raised during the public comment period.

E. Whether the hearing request is based on issues raised solely in a public comment which has been withdrawn

None of the hearing requests are based on issues raised solely in a public comment which has been withdrawn.

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

Is the Applicant's use or installation of injection wells in the public interest?

This issue concerns Texas Water Code § 27.051 and is therefore relevant and material to the Commission's decision on this application.

Will the Applicant's proposed activities negatively impact Goliad County's economy?

This issue concerns Texas Water Code § 27.003 and § 27.051 and is therefore relevant and material to the Commission's decision on this application.

Does the Applicant's compliance history support issuance of the proposed permit?

This issue concerns the classification and use of compliance history under Texas Water Code § 5.754 and is therefore relevant and material to the Commission's decision on this application.

Will the Applicant's proposed activities negatively impact livestock and wildlife, including endangered species?

This issue concerns 30 TAC § 331.5 and Texas Water Code § 27.003 and § 27.051, and is therefore relevant and material to the Commission's decision on this application.

Has the Applicant assured the resources necessary to close, plug, or abandon its wells?

This issue concerns the 30 TAC Chapter 37, Subchapter Q requirements for financial assurance for underground injection control wells and is therefore relevant and material to the Commission's decision on this application.

Has baseline water quality been properly determined?

This issue concerns the establishment of baseline and restoration values under 30 TAC § 331.104 and is therefore relevant and material to the Commission's decision on this application.

Has the Applicant provided accurate projections of water use?

This issue concerns 30 TAC § 331.122 and is therefore relevant and material to the Commission's decision on this application.

Will the Applicant's use of groundwater ultimately reduce the quantity of groundwater in Goliad County?

This issue concerns Texas Water Code § 27.051 and is therefore relevant and material to the Commission's decision on this application.

Has the Applicant adequately demonstrated that its mining activities will contain any injected mining fluids to the zones being mined?

This issue concerns the 30 TAC § 331.102 requirements for confinement of mining solutions and is therefore relevant and material to the Commission's decision on this application.

Has the Applicant demonstrated that the groundwater quality within the mined zones will be restored to pre-mining levels?

This issue concerns restoration requirements under 30 TAC § 331.107 and is therefore relevant and material to the Commission's decision on this application.

Does the requested aquifer meet the requirements necessary for an exemption?

This issue concerns 30 TAC § 331.13 and is therefore relevant and material to the Commission's decision on this application.

Do the baseline aquifer conditions identified by UEC accurately describe the groundwater?

This issue concerns the establishment of baseline and restoration values under 30 TAC § 331.104 and is therefore relevant and material to the Commission's decision on this application.

Can the Applicant meet the applicable financial assurance requirements?

This issue concerns financial responsibility under Texas Water Code § 27.073 and financial assurance under 30 TAC § 331.15, and is therefore relevant and material to the Commission's decision on this application.

Will the Applicant's proposed activities negatively impact the use of property?

This issue concerns Texas Water Code § 27.003 and is therefore relevant and material to the Commission's decision on this application.

Will the Applicant's proposed activities adversely affect public health and welfare?

This issue concerns Texas Water Code § 27.003 and is therefore relevant and material to the Commission's decision on this application.

Will the Applicant's proposed activities adversely affect the economic interests of the hearing requestors?

This issue concerns Texas Water Code § 27.003 and is therefore relevant and material to the Commission's decision on this application.

G. Maximum expected duration for the contested case hearing

For the contested case hearing, OPIC estimates a maximum duration of one year from the first day of the preliminary hearing to issuance of the proposal for decision.

IV. Conclusion

Having found that the Goliad County Groundwater Conservation District and Goliad County qualify as affected persons, OPIC recommends the Commission grant these two hearing requests. OPIC also found that 54 individual hearing requestors previously listed qualify as affected persons, and we recommend the Commission grant each of their hearing requests.

Without further information regarding the Goliad County Farm Bureau's associational standing, OPIC cannot at this time recommend granting the Bureau's hearing request.

OPIC further recommends that the following issues be referred to the State Office of Administrative Hearings for a contested case hearing:

1. Is the Applicant's use or installation of injection wells in the public interest?
2. Will the Applicant's proposed activities negatively impact Goliad County's economy?
3. Does the Applicant's compliance history support issuance of the proposed permit?
4. Will the Applicant's proposed activities negatively impact livestock and wildlife, including endangered species?
5. Has the Applicant assured the resources necessary to close, plug, or abandon its wells?
6. Has baseline water quality been properly determined?
7. Has the Applicant provided accurate projections of water use?
8. Will the Applicant's use of groundwater ultimately reduce the quantity of groundwater in Goliad County?
9. Has the Applicant adequately demonstrated that its mining activities will contain any injected mining fluids to the zones being mined?
10. Has the Applicant demonstrated that the groundwater quality within the mined zones will be restored to pre-mining levels?
11. Does the requested aquifer meet the requirements necessary for an exemption?

12. Do the baseline aquifer conditions identified by UEC accurately describe the groundwater?
13. Can the Applicant meet the applicable financial assurance requirements?
14. Will the Applicant's proposed activities negatively impact the use of property?
15. Will the Applicant's proposed activities adversely affect public health and welfare?
16. Will the Applicant's proposed activities adversely affect the economic interests of the hearing requestors?

Goliad County and GCGCD assert that the various authorizations required for UEC's proposed operation should be consolidated into a single hearing. As a matter of policy, OPIC supports consolidation of this matter. In addition to the injection permit and aquifer exemption, TCEQ rules require UEC to obtain a Production Area Authorization (PAA) for each production area within the production zone. UEC submitted an application for PAA No. 1 on September 3, 2008, and according to the ED's RTC, that application is currently under review by the ED's staff. Also, UEC proposes to dispose of wastewater in a Class I waste disposal well. UEC filed an application for a Class I waste disposal well on September 23, 2008, and that application is under review by the ED's staff. Finally, UEC proposes to locate a processing facility at the site, which will require a radioactive materials license (RML). If there will be air emissions from the processing facility, it may also require a separate TCEQ air permit.

At a minimum, UEC will require three more authorizations from TCEQ, and two of the three necessary authorizations are already being processed by the ED. Given the opposition to the current application, each of these coming authorizations will likely face similar opposition. Consolidation of all required TCEQ authorizations into a single SOAH docket would promote a thorough and efficient examination of the issues raised by UEC's proposed operations. Further,

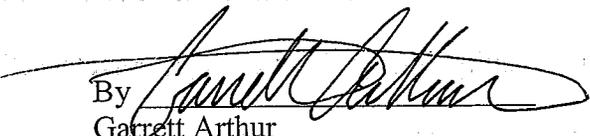
the TCEQ's hearing rules specifically allow consolidation of related cases if consolidation will not prejudice any party and may save time and expense or otherwise benefit the public interest and welfare. 30 TAC § 80.13(a). The same rule authorizes the Commission, when referring matters to SOAH, to direct that cases be consolidated for hearing. *Id.*

OPIC believes the Commission has at least two different options for consolidation of UEC's applications. First, the Commission could continue this matter. Consideration of the current hearing requests could be postponed until such time as all hearing requests for all UEC's required authorizations are before the Commission. Second, when referring this case to SOAH, the Commission could order that this application be consolidated with the two applications currently being processed by the ED, if and when those two applications are referred to SOAH. This option could be expedited by direct referral. After issuing his preliminary decisions for the UEC applications currently under review, the ED could request direct referral.

For the contested case hearing, OPIC recommends a duration of one year from the first day of the preliminary hearing to issuance of the proposal for decision.

Respectfully submitted,

Blas J. Coy, Jr.
Public Interest Counsel

By 
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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2009, the original and seven true and correct copies of the foregoing document were filed with the TCEQ Chief Clerk, and copies were served to all parties listed on the attached mailing list via hand delivery, facsimile transmission, inter-agency mail, or by deposit in the U.S. Mail.


Garrett Arthur

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2009 JAN 30 PM 4: 04
CHIEF CLERKS OFFICE

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CONCERNED CITIZENS
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DIANA & DON G FORD
5287 FM 884
YORKTOWN TX 78164-2094

ELMO & LORRAINE HARTMAN
248 OLD GOLIAD RD
GOLIAD TX 77963-3330

DOUGLAS W & WANDA E FRANKE
1603 W FM 884
YORKTOWN TX 78164-5167

ERNEST P & FRANCES M HAUSMAN
103 OXFORD DR
SAN ANTONIO TX 78213-4062

ASHLEY DUDERSTADT
3703A BILLY DR
VICTORIA TX 77901

JO ANNE & KENNETH GEORGIE
PO BOX 305
NURSERY TX 77976-0305

CRAIG & LUANN DUDERSTADT
722 DUDERSTADT RD
YORKTOWN TX 78164-5459

BETTIE GIRAUDIN
914 FM 1351
GOLIAD TX 77963-3706

DAN & MARILYN HENCERLING
2148 HENCERLING RD
GOLIAD TX 77963-3449

CLEO & WAYNE HENDERSON
6064 E FM 1961
GOLIAD TX 77963-3443

ROBERT W MEYER
305 SIMPSON RD
VICTORIA TX 77904-1476

DENISE & PERRY HIEBNER
1385 SEILER RD
YORKTOWN TX 78164-5278

BARBARA & GAYLON KORNFUEHRER
12922 GOLDEN RAINBOW DR
CYPRESS TX 77429-3804

MR JASON & MRS JASON MIKESKA
14870 US HWY 183N
YORKTOWN TX 78164

DORIS A & WILLIAM V HILL
3208 BENT BOW DR
SAN ANTONIO TX 78209-3518

MARK KRUEGER
939 NOLL RD
MEYERSVILLE TX 77974-3953

LOUIS W & SHARON MONTGOMERY
1431 LEMKE RD
GOLIAD TX 77963

MICHELE & ROBERT HINMAN
PO BOX 354
GOLIAD TX 77963

AUBREY & J AUBREY LENAMON
237 SANDY LN
VICTORIA TX 77905-3036

DOROTHY J MOSLEY
2150 HENCERLING RD
GOLIAD TX 77963-3449

DONNA HOFFMAN
1500 GREGORY ST
AUSTIN TX 78702

JUDY LENAMON
237 SANDY LN
VICTORIA TX 77905-3036

CHARLOTTE HUGHES
526 NOLL RD
MEYERSVILLE TX 77974-3965

MAUREEN LULE
4748 STATE HIGHWAY 119
GOLIAD TX 77963-3326

SUSAN ORR
1742 E FM 1961
GOLIAD TX 77963

GEORGIA ANNE & RAULIE L IRWIN, JR
3148 W FM 884
YORKTOWN TX 78164-5306

JAN MANNING
4791 STATE HIGHWAY 239 W
GOLIAD TX 77963-3850

WELDON SCOTT ORR
1742 E FM 1961
GOLIAD TX 77963

CARL E & DONNA L JENKINS
580 WHEELER LN
GOLIAD TX 77963-3640

PATTI MCCRANEY
PO BOX 148
GOLIAD TX 77963-0148

MARY ANN OVERLANDER
3744 OLD GOLIAD RD
GOLIAD TX 77963-3315

HENRY & PEGGY KARNOWSKI
205 CANTERBURY LN
VICTORIA TX 77904-1781

BELITHA B & MELVIN H MCKINNEY
962 LEE ALVES RD
YORKTOWN TX 78164-5246

MARILYN A & W WAYNE KEY
1737 ALBRECHT RD
GOLIAD TX 77963-3432

RICKI MCKINNEY
107 TAMPA DR
VICTORIA TX 77904-1654

SAM RHOTENBERRY
104 W REUSS BLVD
CUERO TX 77954

BARBARA SMITH
GOLIAD COUNTY GROUNDWATER CONS DIST
376 GOLIAD N
GOLIAD TX 77963-3446

CAROL & DORIAN THURK
959 DOBSKYVILLE RD
YORKTOWN TX 78164-1957

GAIL & ROLAND G RIEDESEL
312 STATE HIGHWAY 119 S
YORKTOWN TX 78164

MARGIE & WAYNE SMITH
4 LOS ROBLES RD
YORKTOWN TX 78164-5184

SANDRA VAUGHN
120 BEECHWOOD DR
VICTORIA TX 77901-4717

KLAUS & TAMMY RITENOUR
27 NOLL RD
MEYERSVILLE TX 77974-3970

SHIRLEY D SMITH
4167 POST OAK RD
GOLIAD TX 77963-3324

MACKEY L & ROMAN E VOGEL
2750 AFFLERBACH RD
YORKTOWN TX 78164-2103

LAFERN ROESSLER
56 KATHY ST
VICTORIA TX 77905-3641

WAYNE SMITH
4 LOS ROBLES RD
YORKTOWN TX 78164-5184

MARTHA G & ROY A WARD
PO BOX 1101
YORKTOWN TX 78164

MARGARET A RUTHERFORD
1256 BLUNTZER RD
GOLIAD TX 77963-3403

DONNA & MIKE SPANN
1750 NOLL RD
MEYERSVILLE TX 77974-3940

CAROL C & DAVID P WARREN
1235 HALLEMANN RD
GOLIAD TX 77963-3309

WILBERT SAUERMILCH
PO BOX 826
YORKTOWN TX 78164-0826

ROBERT C & ROSEMARY STACY
1214 JANK LN
GOLIAD TX 77963-3417

CATHERINE WEST
PO BOX 371
GOLIAD TX 77963-0371

ELIZABETH SCHOENHERR
PO BOX 796
GOLIAD TX 77963

PAM & ROBERT STRYKER
661 ABRAMEIT RD
GOLIAD TX 77963

GLORIA & THOMAS WUNSCH
1302 FM 622
VICTORIA TX 77905-3106

KENNETH D SCHUSTEREIT
275 BAASS LN
VICTORIA TX 77905-3606

MERRILL C & REBECCA N SWANSON
2204 HUTCHINS LN
EL CAMPO TX 77437-2110

LESLIE & TRACE WUNSCH
301 E SOUTH RAILROAD ST
CUERO TX 77954-3031

ROBIN SHERWOOD
PO BOX 39
FANNIN TX 77960-0039

GEORGIA LEE SWICKHEIMER
PO BOX 217
FANNIN TX 77960-0217

BETTY SIEVERS
670 NOLL RD
MEYERSVILLE TX 77974-3954

PATRICIA & ROLAND THIEME
118 WEARDEN DR
VICTORIA TX 77904-9630