

**TCEQ AIR QUALITY PERMIT NUMBERS 104840, PSDTX1302, AND N170
TCEQ DOCKET NUMBER 2014-0692-AIR**

APPLICATION BY	§	BEFORE THE
FREEPORT LNG	§	
DEVELOPMENT, L.P.	§	TEXAS COMMISSION ON
PRETREATMENT FACILITY	§	
FREEPORT, BRAZORIA COUNTY	§	ENVIRONMENTAL QUALITY

**EXECUTIVE DIRECTOR'S RESPONSE TO REQUESTS FOR RECONSIDERATION
AND HEARING REQUESTS**

The Executive Director (ED) of the Texas Commission on Environmental Quality (commission or TCEQ) files this response (Response) to the requests for reconsideration and the requests for a contested case hearing submitted by persons listed herein. The Texas Clean Air Act (TCAA), Texas Health & Safety Code (THSC) § 382.056(n), requires the commission to consider hearing requests in accordance with the procedures provided in Tex. Water Code (TWC) § 5.556.¹ 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 proposed facility 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 as backup material for the commissioners' agenda. Finally, the ED's 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

Freeport LNG Development, L.P. (Freeport or Applicant) has applied to the TCEQ for two New Source Review Authorizations under THSC § 382.0518. These permits will authorize the construction of new facilities that may emit air contaminants. For this project, Freeport LNG submitted applications for a pretreatment facility, permit number 104840, and a liquefaction plant, permit number 100114, at the same time. The TCEQ treated the applications for Permit Numbers 100114 and 104840 as a single application for purposes of air dispersion modeling analysis. The Notices of Application and Preliminary Decision for an Air Quality Permit (NAPDs) were jointly published for the two permits, a public meeting was held for both permits together, and the RTC addressed the concerns of comments submitted for both permit applications. There was an earlier application submitted for the pretreatment facility at a different location. The Applicant later withdrew that application and submitted a new application for the pretreatment plant at a different location. This Response to Hearing Requests specifically addresses the requests for a contested case hearing that were received for the pretreatment facility, draft permit number 104840.

This application will authorize the Applicant to construct a pretreatment facility to produce liquefied natural gas. The pretreatment facility is located on County Road 690 approximately

¹ Statutes cited in this response may be viewed online at www.statutes.legis.state.tx.us. Relevant statutes are found primarily in the THSC and the TWC. The rules in the TAC may be viewed online at www.sos.state.tx.us/tac/index.shtml, or follow the "Rules" link on the TCEQ website at www.tceq.texas.gov.

**Executive Director's Response to Requests for Reconsideration and Hearing Requests
Freeport LNG, Permit Nos. 104840, PSDTX1302, and N170
Page 2 of 13**

0.25 miles north of the intersection of County Road 690 and County Road 891, Freeport, Brazoria County, Texas 77541. Contaminants authorized under this permit include nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO), sulfuric acid (H₂SO₄), ammonia (NH₃), particulate matter (PM), including PM with diameters of 10 micrometers or less (PM₁₀) and 2.5 micrometers or less (PM_{2.5}), volatile organic compounds (VOCs), and hazardous air pollutants, including, but not limited to, hydrogen sulfide (H₂S). 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.

Before work begins on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain authorization from the commission. This permit application is for initial issuance of Air Quality Permit Numbers 104840, PSDTX1302, and N170.

The permit application for Air Quality Permit Numbers 104840, PSDTX1302, and N170 was received on July 20, 2012, and declared administratively complete on August 6, 2012. The Notice of Receipt and Intent to Obtain an Air Quality Permit (public notice) for this permit application was published in English on August 20, 2012, in the *The Facts*.² The Notice of Application and Preliminary Decision for an Air Quality Permit was published on February 10, 2014 in English in *The Facts*, and in Spanish on February 11, 2014 in *La Voz*.

A public meeting was held on March 4, 2014 in Lake Jackson. The notice of public meeting was mailed to interested parties on February 19, 2014. The public comment period was extended until March 26, 2014 for Air Quality Permit Numbers 104840, PSDTX1302, and N170. The ED's RTC was mailed on April 11, 2014 to all interested persons, including those who asked to be placed on the mailing list for this application and those who submitted comments or requests for a contested case hearing. The cover letter attached to the RTC included information about making requests for a contested case hearing or for reconsideration of the ED's decision.³ The letter also explained that 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 hearing requests ended May 12, 2014. The TCEQ received a timely request for reconsideration from Robert Pratt. The TCEQ received timely hearing requests during the public comment period that were not withdrawn from the following persons: Harold Doty, Laura Jones, Melanie Oldham, and Diana Stokes. The TCEQ also received a timely hearing request from the organization Save Our Subdivision.

² The Applicant was unable to publish a Spanish language version of the notice for these permits because of a lack of suitable Spanish language newspapers distributed in Brazoria County at the time the permits went to first notice. The Applicant submitted the required affidavit to the commission to verify this lack of a suitable venue for publication of a separate Spanish language notice at the time. The Applicant did, however, publish a Spanish language version of the required notice in the same paper in which it published the English language notice.

³ See TCEQ rules at 30 TAC Ch. 55 subch. F. Procedural rules for public input to the permit process are found primarily in Chapters 39, 50, 55, and 80 of Title 30 of the TAC.

II. Applicable Law for Requests for Reconsideration

The commission must assess the timeliness and form of the requests for reconsideration, as discussed in Section I above. The form requirements are set forth in 30 TAC § 55.209(f) which states: "Responses to requests for reconsideration should address the issues raised in the request."

III. Response to Requests for Reconsideration

The ED received one request for reconsideration for Air Quality Permit Numbers 104840, PSDTX1302, and N170 and provides the following response to that request.

REQUEST FOR RECONSIDERATION OF RESPONSE 12:

The request for reconsideration addresses a response in the ED's RTC filed on April 4, 2014. Robert Pratt included his address in his request but not a telephone number. Mr. Pratt did not specify a response found in the ED's RTC; however, based on the content of his request, the ED's staff determined that his request for reconsideration addresses Response 12. In his request, Mr. Pratt stated that normal scientific protocol as well as established emission reporting methodology indicates that when defined in appropriate significant figures, the trigger value has been reached to require nonattainment permitting for VOCs. Reporting should be done in a minimum of 2 significant figures and no more than 3 significant figures. A value of 6 in the fourth significant figure clearly increases the value of the third significant figure. Therefore, 24.96 expressed in the proper significant figures is 25 tons per year and requires nonattainment permitting for VOC. Mr. Pratt included an EPA guidance document with his request.

TCEQ RESPONSE:

The TCEQ has reviewed the permit and determined that it is in compliance with all applicable federal and state regulatory requirements. The TCEQ Air Permits Division evaluated the permit application submitted by Freeport LNG for the proposed pretreatment facility. Based on the information submitted by the Applicant, the ED's staff determined that the proper emissions calculation of potential VOCs is 24.96 tpy, which is below the 25 tpy required for VOC PSD permitting.

The EPA guidance document submitted with Mr. Pratt's request for reconsideration discusses comparing measured values to EPA standards where uncertainty existed on how many significant figures an EPA standard should have. The memo explicitly states it is for use in calculating and reporting compliance with the standards. Significant figures are used when an actual measurement occurs to maintain precision in scientific reporting of measurements.

In contrast, the Maximum Allowable Emission Rate Tables (MAERTs) for Air Quality Permit Numbers 100114, PSDTX1282, N150 and 104840, PSDTX1302, N170 contain emission limits, not measured values. Allowables were calculated based on a count of fugitive components, fixed emission factors, and/or manufacturer guarantees and estimates using maximum fuel flow and other data. Many values were based on engineering design and counting. The precision of measurements that are performed during compliance demonstrations will determine how many significant figures should be used in calculating compliance with the MAERTs. Different measurement techniques will have different precision. Regardless, the Applicant is limited to what the MAERT allows. For these permits the sum total is below 25 tons per year of VOC

emissions, and the Applicant must show compliance on a rolling 12-month basis. The ED respectfully disagrees with the requestor's assertion and recommends no change to the permit.

IV. 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 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 TWC § 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 can 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;

**Executive Director's Response to Requests for Reconsideration and Hearing Requests
Freeport LNG, Permit Nos. 104840, PSDTX1302, and N170
Page 5 of 13**

- (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.

In addition to the requirements noted above regarding affected person status, in accordance with 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.⁴

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.⁵ Permit conditions of general applicability must be in rules adopted by the commission.⁶ 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 air pollution.⁷ 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.⁸ The materials accompanying this response list and reference permit conditions and operational requirements and limitations applicable to this proposed facility.

⁴ 30 TAC § 55.205(a)

⁵ THSC § 382.0518

⁶ THSC § 382.0513

⁷ THSC § 382.085

⁸ THSC § 382.0513

V. Analysis of Hearing Requests

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

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 attached to the RTC states that requesters should, to the extent possible, specify any of the ED's responses in the RTC that the requesters dispute and the factual basis of the dispute, and list any disputed issues of law or policy.⁹ In the absence of any response by the hearing requesters within the thirty-day period after the RTC was mailed, the ED cannot determine or speculate whether the hearing requesters continue to dispute issues of fact, or whether there are any outstanding issues of law or policy. The ED nevertheless has evaluated the merits of the requests before action is taken regarding this application.

The following persons submitted timely hearing requests that were not withdrawn: Harold Doty, Laura Jones, Melanie Oldham, and Diana Stokes. Timely hearing requests were also submitted by Laura Jones, as a representative of the organization, Save Our Subdivision (SOS).

1. Harold Doty

Harold Doty timely submitted a request for a contested case hearing on March 4, 2014 in a written comment he submitted to the agency during the public meeting held on March 4, 2014. He provided his name, telephone number, and a residential address. Mr. Doty gave his proximity to the liquefaction plant but not to the pretreatment facility. He stated why he believes he will be adversely affected by the liquefaction plant but not by the proposed pretreatment facility.

Based on the address provided by Mr. Doty and the plot plan submitted by the Applicant, the ED's staff determined that his residence is more than two miles from the proposed pretreatment facility location.

Mr. Doty requested a contested case hearing in the subject line of his comment. The ED finds that the issue raised in his request relates only to the proposed liquefaction plant and not to the proposed pretreatment facility.

Based on the foregoing, the ED finds that Mr. Doty did not substantially comply with all of the requirements to request a contested case hearing required by 30 TAC § 55.201(d) because he failed to identify a personal justiciable interest or how he will be adversely affected by the pretreatment facility application.

2. Laura Jones

Laura Jones timely submitted three requests for a contested case hearing in comments she submitted to the agency during the relevant comment period. She submitted requests on March 12, 2014, March 13, 2014, and March 18, 2014; the requests are identical documents and reference the applications for the liquefaction plant and the pretreatment facility. She provided her name, telephone number, and a residential

⁹ See 30 TAC § 55.201(d)(4).

address. She believes she will be adversely affected by the pretreatment facility application in the following ways:

- Her residence is in the “fall out zone” of the facility;
- The emissions will exacerbate her respiratory and auto-immune issues;
- She has a family history of heart disease and heart attacks, and the emissions will increase the likelihood she will develop the same issues;
- The prevailing winds will carry toxins, impurities, contaminants, and particulates directly to her residence;
- Air quality monitors need to be installed;
- The emissions will adversely affect visitors because the location of the plant will be adjacent to visitors to the area;
- Construction activities will create dust and traffic;
- The emissions, especially PM, will exacerbate the respiratory issues and illnesses of the retired community members;
- The emissions will affect her ability to enjoy the wildlife and will adversely impact the wildlife – birds, fish, animals of all kinds, vegetation and water;
- The emissions will threaten the ground water;
- The proposed facility will cause light pollution;
- The proposed facility will cause noise pollution;
- An incident at the facility could potentially prevent rescue or escape of residents because there is only one way into and out of the subdivisions; and
- Some residents will not be able to move or sell their houses because they are on limited incomes and are below the poverty line.

Based on the address provided by Ms. Jones and the plot plan submitted by the Applicant, the ED's staff determined that her residence is more than one mile from the proposed pretreatment facility's location.

Ms. Jones requested a contested case hearing in the first sentence of her comment. Based on the foregoing, the ED finds that Ms. Jones substantially complied with all of the requirements to request a contested case hearing required by 30 TAC § 55.201(d) regarding the application for the pretreatment facility. Therefore, the ED can determine whether it is likely that the requester will be impacted differently than any other member of the general public or if the regulated activity will likely impact her interest, which will be discussed in detail in subsection B below.

3. Melanie Oldham

Melanie Oldham timely submitted requests for a contested case hearing on March 12, 2014 and March 17, 2014. The requests are identical. She provided her name, telephone number, and residential address. She did not indicate the proximity of her residence to the proposed pretreatment facility. She believes she will be adversely impacted by the proposed pretreatment facility because she is near and downwind of the facility, which will emit nitrogen oxides, PM₁₀, PM_{2.5} (which can cause premature heart attacks and respiratory problems), ammonia, sulfur dioxide, carbon monoxide, and sulfuric acid. Additionally, she requested proper air monitors for all non-GHGs with an automatic alarm system for local residents to know there is a problem at the facility.

**Executive Director's Response to Requests for Reconsideration and Hearing Requests
Freeport LNG, Permit Nos. 104840, PSDTX1302, and N170
Page 8 of 13**

Based on the address provided by Ms. Oldham and the plot plan submitted by the Applicant, the ED's staff determined that her residence is more than two miles from the proposed facility location.

Ms. Oldham requested a contested case hearing in the first sentence of her comment. Based on the foregoing, the ED finds that Ms. Oldham did not substantially comply with all of the requirements to request a contested case hearing required by 30 TAC § 55.201(d) because she failed to identify a personal justiciable interest or how she will be adversely affected by the pretreatment facility application in a way not common to the general public.

4. Diana Stokes

Diana Stokes timely submitted a request for a contested case hearing on February 14, 2012 in a comment she made to the agency during the relevant comment period. She provided her name but did not provide a telephone number or a residential address. She provided a post office box in Freeport. She did not indicate her residence's proximity to the proposed plant. She believes she will be adversely affected by the pretreatment facility application in the following ways:

- The proposed facility will create new or exacerbate existing respiratory conditions, auto-immune diseases, and premature heart attacks in the young and healthy residents as well as the elderly residents, like her husband and herself;
- The proposed facility will emit nitrogen oxides, particulate matter, carbon monoxide, sulfuric acid, ammonia, organic compounds, and hazardous air pollutants;
- The proposed facility will cause higher emissions due to plant construction, including dust;
- Prevailing winds will carry the emissions in her direction, opposite of any present monitor locations;
- The proposed facility will cause light pollution;
- The proposed facility will cause noise pollution; and
- No safety plan exists in the event of an accident or fire.

The ED's staff identified a property record with Ms. Stokes as the listed owner on the Brazoria County Appraisal District website. Based on this address and the plot plan submitted by the Applicant, the ED's staff determined that her property is more than one mile from the proposed facility location.

Ms. Stokes requested a hearing in the first sentence of her comment. Based on the foregoing, the ED finds that Ms. Stokes did not substantially comply with all of the requirements to request a contested case hearing required by 30 TAC § 55.201(d) because she failed to identify an address and her location's distance relative to the proposed facility. However, if the property record identified by the ED's staff is the residence of Ms. Stokes, then her residence is more than one mile from the facility. She also identified a personal justiciable interest. Therefore, the ED can determine whether it is likely that the requester will be impacted differently than any other member of the general public or if the regulated activity will likely impact her interest, which will be discussed in detail in subsection B below.

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

The law applicable to this permit application is outlined above in Section IV. The following hearing requesters reside more than two miles from the proposed facility and failed to identify any personal justiciable interest or why the requestor believes he or she will be adversely affected by the proposed pretreatment facility in a manner not common to members of the general public as required by 30 TAC § 55.201(d)(2): Harold Doty and Melanie Oldham.

Because Laura Jones and Diana Stokes have stated personal justiciable interests, the commission must next consider the non-exhaustive list of factors for determining whether a person is an affected person contained in 30 TAC § 55.203(c).

First, the commission must consider whether the interest claimed is one protected by the law under which the application will be considered.

1. Laura Jones

The interests claimed by Laura Jones are:

- Her residence is in the “fall out zone” of the facility;
- The emissions will exacerbate her respiratory and auto-immune issues;
- She has a family history of heart disease and heart attacks, and the emissions will increase the likelihood she will develop the same issues;
- The prevailing winds will carry toxins, impurities, contaminants, and particulates directly to her residence;
- Air quality monitors need to be installed;
- The emissions will adversely affect visitors because the location of the plant will be adjacent to visitors to the area;
- Construction activities will create dust and traffic;
- The emissions, especially PM, will exacerbate the respiratory issues and illnesses of the retired community members;
- The emissions will affect her ability to enjoy the wildlife and will adversely impact the wildlife – birds, fish, animals of all kinds, vegetation and water;
- The emissions will threaten the ground water;
- The proposed facility will cause light pollution;
- The proposed facility will cause noise pollution;
- An incident at the facility could potentially prevent rescue or escape of residents because there is only one way into and out of the subdivisions; and
- Some residents will not be able to move or sell their houses because they are on limited incomes and are below the poverty line.

Of the interests claimed by Ms. Jones, the ones which are protected by the law under which the application will be issued are:

- The emissions will exacerbate her respiratory and auto-immune issues;
- She has a family history of heart disease and heart attacks, and the emissions will increase the likelihood she will develop the same issues;
- The prevailing winds will carry toxins, impurities, contaminants, and particulates directly to her residence;

***Executive Director's Response to Requests for Reconsideration and Hearing Requests
Freeport LNG, Permit Nos. 104840, PSDTX1302, and N170
Page 10 of 13***

- The emissions will adversely affect visitors because the location of the plant will be adjacent to visitors to the area;
- Construction activities will create dust and traffic;
- The emissions, especially PM, will exacerbate the respiratory issues and illnesses of the retired community members; and
- The emissions will affect her ability to enjoy the wildlife and will adversely impact the wildlife – birds, fish, and animals of all kinds, vegetation and water.

2. Diana Stokes

The interests claimed by Diana Stokes are:

- The proposed facility will create new or exacerbate existing respiratory conditions, auto-immune diseases, and premature heart attacks in the young and healthy residents as well as the elderly residents, like her husband and herself;
- The proposed facility will emit nitrogen oxides, particulate matter, carbon monoxide, sulfuric acid, ammonia, organic compounds, and hazardous air pollutants;
- The proposed facility will cause higher emissions due to plant construction, including dust;
- Prevailing winds will carry the emissions in her direction, opposite of any present monitor locations;
- The proposed facility will cause light pollution;
- The proposed facility will cause noise pollution; and
- No safety plan exists in the event of an accident or fire.

Of the interests claimed by Ms. Stokes, the ones which are protected by the law under which the application will be issued are:

- The proposed facility will create new or exacerbate existing respiratory conditions, auto-immune diseases, and premature heart attacks in the young and healthy residents as well as the elderly residents, like her husband and herself;
- The proposed facility will emit nitrogen oxides, particulate matter, carbon monoxide, sulfuric acid, ammonia, organic compounds, and hazardous air pollutants;
- The proposed facility will cause higher emissions due to plant construction, including dust; and
- Prevailing winds will carry the emissions in her direction, opposite of any present monitor locations.

The commission must consider whether a reasonable relationship exists between the interest claimed and the activity regulated. The activity the commission regulates is the authorized emissions into the air of contaminants by a person who owns or operates a facility or facilities. Those persons who own or operate a facility or facilities are prohibited from emitting air contaminants or performing any activities that contravene the TCAA or any other commission rule or order, or that causes or contributes to air pollution.

The interests claimed by Laura Jones and Diana Stokes are within the scope of an air quality authorization because they focus on the potential adverse effects of potential air contaminants

***Executive Director's Response to Requests for Reconsideration and Hearing Requests
Freeport LNG, Permit Nos. 104840, PSDTX1302, and N170
Page 11 of 13***

from the facility. Therefore, the ED finds that a reasonable relationship exists between the interests claimed and the activity the commission regulates.

Next, the commission must consider distance restrictions or other limitations imposed by law on the affected interest, the likely impact of the regulated activity on the health and safety of the person, and on the use of the property of the person, and the likely impact of the regulated activity on the use or the impact on the natural resource by the person. For air authorizations, distance from the proposed facility is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. Laura Jones and Diana Stokes reside more than one mile from the footprint of the plant, which is the subject of this permit application. The natural resource that is the subject of this permit is the ambient air that they breathe, and they have indicated a manner in which emissions from the plant could impact it. However, because the requesters live more than one mile from the proposed pretreatment facility, the ED finds that it is not likely to impact the health and safety of these requesters or the use of their property in a manner different from the general public. Therefore, they are not affected persons under 30 TAC § 55.203.

C. Do those groups who requested a hearing meet the group or associational standing requirements?

A hearing request was submitted on behalf of Save Our Subdivision (SOS) by Laura Jones. The purpose of the organization was not stated in its request, and as stated previously, Ms. Jones lives more than one mile from the proposed facility. The hearing request from Ms. Jones meets the requirements for form but did not meet the requirements for affected person status. Therefore, SOS did not meet the requirements for associational standing found in 30 TAC § 55.205(a), since it has not identified one or more members that would have standing to request a hearing in their own right.

D. 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 IV 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. However, because Ms. Jones and Ms. Stokes live more than a mile from the proposed pretreatment facility, their interests are not likely to be impacted in a manner different from the general public. Thus, these hearing requests should not be referred to SOAH for a contested case hearing. However, if the commission determines that one or more of the hearing requesters are affected parties, then those hearing requests should be referred to SOAH.

VI. Executive Director's Recommendation

The Executive Director respectfully recommends that the commission deny the requests for a contested case hearing and the request for reconsideration.

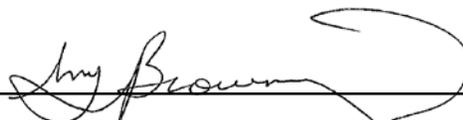
Respectfully submitted,

Texas Commission on Environmental Quality

Richard A. Hyde, P.E., Executive Director

Caroline Sweeney, Deputy Director
Office of Legal Services

Robert Martinez, Division Director
Environmental Law Division

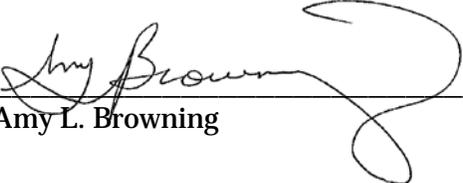


Ms. Amy Lynn Browning, Staff Attorney
Environmental Law Division
State Bar Number 24059503
PO Box 13087, MC 173
Austin, Texas 78711-3087
(512) 239-0891
Ms. Sierra Redding
State Bar Number 24083710
(512) 239-2496
PO Box 13087, MC 173
Austin, Texas 78711-3087

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

On the 9th day of June 2014, a true and correct copy of the foregoing instrument was 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, or hand delivery.



Amy L. Browning

Response to Requests for Contested Case Hearing

Freeport LNG Development, L.P. Pretreatment Facility

Map Requested by TCEQ Office of Legal Services
for Commissioners' Agenda



Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087

May 19, 2014

Projection: Texas Centric Mapping System
Albers (meters)
Scale 1:66,000



Facility Boundary

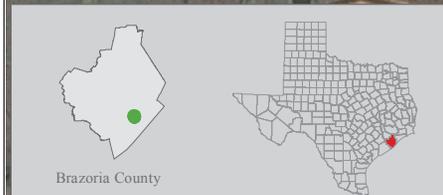
Requestors

No	Name
1	H.Doty
2	L.Jones
3	J.Kall
4	D.Stokes
5	A.Zuma
6	R.Rio
7	D.Callahan
8	M.Oldham
9	K.Davis



Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor. The background imagery of this map is from the current Environmental Systems Research Institute (ESRI) map service, as of the date of this map.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.



The facility is located in Brazoria County. The circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Brazoria County (red) in the state of Texas;

MAILING LIST
FREEPORT LNG DEVELOPMENT, L.P.
DOCKET NO. 2014-0692-AIR; PERMIT NO. 104840

FOR THE APPLICANT:

Mark W. Mallett, P.E., Vice President
Freeport LNG Development, LP
333 Clay Street, Suite 5050
Houston, Texas 77002
Tel: (713) 980-2888
Fax: (713) 980-2903

Michael S. Johns
Freeport LNG Development, LP
1500 Lamar Street
Quintana, Texas 77541
Tel: (979) 415-8720
Fax: (979) 415-8733

Ruben Velasquez, P.E.
Atkins North America, Inc.
6504 Bridge Point Parkway, Suite 200
Austin, Texas 78730
Tel: (512) 342-3395
Fax: (512) 327-2453

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

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

Sean O'Brien, Technical Staff
Texas Commission on Environmental
Quality
Air Permits Division, MC-163
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-1137
Fax: (512) 239-1300
Tel: (512) 239-1137
Fax: (512) 239-1300

Brian Christian, Director
Texas Commission on Environmental
Quality
Small Business and Environmental
Assistance Division
Public Education Program, MC-108
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-4000
Fax: (512) 239-5678

FOR PUBLIC INTEREST COUNSEL
via electronic mail:

Mr. Blas J. Coy, Jr., Attorney
Texas Commission on Environmental
Quality
Public Interest Counsel, MC-103
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-6363
Fax: (512) 239-6377

**FOR ALTERNATIVE DISPUTE
RESOLUTION**

via electronic mail:

Mr. 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 THE CHIEF CLERK:

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

REQUESTER(S)

HAROLD DOTY
111 S LAKE DR
QUINTANA TX 77541-9792

MRS LAURA S JONES
190 SKY SAIL RD
FREEPORT TX 77541-7911

MELANIE OLDHAM
CITIZENS FOR CLEAN AIR & WATER IN BRAZORIA CO
603 W 7TH ST
FREEPORT TX 77541-5627

MR ROBERT PRATT, JR
705 CENTER WAY ST
LAKE JACKSON TX 77566-5416

DIANA STOKES
PO BOX 98
LAKE JACKSON TX 77566-0098

PUBLIC OFFICIALS - INTERESTED PERSON(S)

THE HONORABLE DENNIS BONNEN
TX HOUSE OF REPRESENTATIVES DISTRICT 25
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE JACK BROWN
309 PLANTATION DR
LAKE JACKSON TX 77566-6142

THE HONORABLE DREW DARBY
TEXAS HOUSE OF REPRESENTATIVE DISTRICT 72
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE GLENN HEGAR
SENATOR, THE SENATE OF TEXAS DISTRICT 18
PO BOX 12068
AUSTIN TX 78711-2068

THE HONORABLE JIM KEFFER
HOUSE OF REPRESENTATIVES 60
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE E J KING
111 E LOCUST ST STE 102A
ANGLETON TX 77515-4642

THE HONORABLE PHIL KING
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE CHRIS D PADDIE
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE JERRY PATTERSON
PO BOX 12873
AUSTIN TX 78711-2873

THE HONORABLE DONALD PAYNE
PO BOX 998
CLUTE TX 77531-0998

THE HONORABLE JOE RINEHART
25 OAK DR
LAKE JACKSON TX 77566-5231

THE HONORABLE JOE STRAUS
SPEAKER, TEXAS HOUSE OF REPRESENTATIVES
DISTRICT 121
PO BOX 2910
AUSTIN TX 78768-2910

THE HONORABLE RANDY K WEBER
MEMBER OF CONGRESS
510 CANNON HOUSE OFFICE BLDG
WASHINGTON DC 20515-0001

THE HONORABLE GENE WU
STATE REPRESENTATIVE, DISTRICT 137P
PO BOX 2910
AUSTIN TX 78768-2910

INTERESTED PERSON(S)

JERRY ADKINS
213 WAYNE DR
CLUTE TX 77531-4131

JASON ALEXANDER
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

R O ARCHEN, JR
190 SKY SAIL RD
FREEPORT TX 77541-7911

JACQUELINE AYLNER
190 SKY SAIL RD
FREEPORT TX 77541-7911

BARRETT BLACKWELL
2532 DEEP SEA DR
QUINTANA TX 77541-9102

JAMIE BLACKWELL
2532 DEEP SEA DR
QUINTANA TX 77541-9102

MEGAN BLACKWELL
2532 DEEP SEA DR
QUINTANA TX 77541-9102

ANITA BONTEKOE
190 SKY SAIL RD
FREEPORT TX 77541-7911

ANITA & LARRY BONTEKOE
203 TUNA RUN RD
FREEPORT TX 77541-6003

LARRY BONTEKOE
203 TUNA RUN RD
FREEPORT TX 77541-6003

BRENT K BOWLES
107 W WAY ST STE 16
LAKE JACKSON TX 77566-5237

TIM BRADBERRY
3210 FM 523 RD
OYSTER CREEK TX 77541-6613

PATTY BRINKMEYER
330 5TH ST
QUINTANA TX 77541-9747

THURE CANNON
604 W 14TH ST
AUSTIN TX 78701-1726

LONNIE CAR
333 CLAY ST STE 5050
HOUSTON TX 77002-4173

GLENN A CARLSON
200 W 2ND ST FL 3
FREEPORT TX 77541-5773

TEDDY CARTER
TIPRO
919 CONGRESS AVE STE 1000
AUSTIN TX 78701-2157

BOB CASALE
135 SNAPPER LN
FREEPORT TX 77541-9622

DONALD CENTANNI
2559 COMPASS CT
QUINTANA TX 77541-9101

LORENA CENTANNI
2559 COMPASS CT
QUINTANA TX 77541-9101

DAVID N COLE
155 FOUR MASTER RD
FREEPORT TX 77541-9680

DAVID J COLLINS
PO BOX 330130
HOUSTON TX 77233-0130

MICHELE COLLINS
2727 W HOLCOMBE BLVD
HOUSTON TX 77025-1669

CONCERNED CITIZEN
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

CHRIS CONNOR
190 SKY SAIL RD
FREEPORT TX 77541-7911

LINDA COOK
2523 DEEP SEA DR
QUINTANA TX 77541-9102

WADE COOK
2523 DEEP SEA DR
QUINTANA TX 77541-9102

ROGER CORNELISON
506 KASTL ST
QUINTANA TX 77541-8737

TERESA CORNELISON
506 KASTL ST
QUINTANA TX 77541-8737

MARY K CORNETT
129 SANDDOLLAR ST
QUINTANA TX 77541-9103

SHARON CORNETT
2603 FM 1495 RD
QUINTANA TX 77541-9114

MARY COULTER
2538 DEEP SEA DR
QUINTANA TX 77541-9102

HAROLD COX
202 THIS WAY ST
LAKE JACKSON TX 77566-5255

MS CHRISTI LEIGH CRADDICK
RAILROAD COMMISSION OF TEXAS
PO BOX 12967
AUSTIN TX 78711-2967

GEORGE T & LINDA CRESSMAN
1551 BLUE WATER DR
FREEPORT TX 77541-9654

MRS JANA DALTON
118 CROWS NEST RD
FREEPORT TX 77541-9676

JAMES P DAVIS
110 SAND SHOALS RD
FREEPORT TX 77541-7909

MARTHA P DAVIS
110 SAND SHOALS RD
FREEPORT TX 77541-7909

ANNE DEL PRADO
190 SKY SAIL RD
FREEPORT TX 77541-7911

DEE KINDRED & HAROLD DOTY
111 S LAKE DR
QUINTANA TX 77541-9792

ASHLEY FARRIS
2927 COUNTY ROAD 723
QUINTANA TX 77541-9100

GREG C FLANIKEN
1101 N BRAZOSPORT BLVD
FREEPORT TX 77541-3503

CHRIS GASKILL
2535 COMPASS CT
QUINTANA TX 77541-9101

ORREN GASPARD
400 COLLEGE DR
CLUTE TX 77531-4778

ETHAN GRIFFIN
16209 SUNNY PINES CT
CONROE TX 77302-5568

HUNTER GRIFFIN
16209 SUNNY PINES CT
CONROE TX 77302-5568

GLORIA D & ROBERT S GUENTER
122 ANDERSON LOOP
OYSTER CREEK TX 77541-9649

AL GUEVARA, JR
100 MEDICAL DR
LAKE JACKSON TX 77566-5674

LOUIS GUIDRY
333 CLAY ST STE 5050
HOUSTON TX 77002-4173

KENNY HALL
16209 SUNNY PINES CT
CONROE TX 77302-5568

RODERICK M HALL
215 W HWY 332
LAKE JACKSON TX 77566

SARAH HALL
16209 SUNNY PINES CT
CONROE TX 77302-5568

BILL HAMMOND
1209 NUECES ST
AUSTIN TX 78701-1719

FELICIA HARRIS
3112 SUMAC DR
PEARLAND TX 77584-8071

JOE HARRISON
606 N BRAZOSPORT BLVD
FREEPORT TX 77541-3806

W M HARTMAN
PO BOX 1760
ALVIN TX 77512-1760

DOUGLAS HARWELL
2927 COUNTY ROAD 723
QUINTANA TX 77541-9100

DEBBRA MAMULA HASTINGS
304 W 13TH ST
AUSTIN TX 78701-1823

JAMES B HEATH
304 N GULF BLVD
FREEPORT TX 77541-4308

DANNY HICKEY
PO BOX 2436
FREEPORT TX 77542-2436

JERRY HINOJOSA
126 LILY ST
LAKE JACKSON TX 77566-4647

JAVIER INFANTE
1744 W 4TH ST STE 211
FREEPORT TX 77541-5052

TERRY JEFFERS
7207 STEPHEN F AUSTIN RD
FREEPORT TX 77541-8323

LARRY JONES
190 SKY SAIL RD
FREEPORT TX 77541-7911

BETH JOURNEY
445 E MULBERRY ST
ANGLETON TX 77515-4735

CHRISTOPHER KALL
2550 DEEP SEA DR
QUINTANA TX 77541-9102

JEFF KAPALA
2577 DEEP SEA DR
QUINTANA TX 77541-9102

MARY D KAPALA
2577 DEEP SEA DR
QUINTANA TX 77541-9102

DEE KINDRED
111 S LAKE DR
QUINTANA TX 77541-9792

NANCY LAURIE
140 CREEK DR
FREEPORT TX 77541-9675

PATRICK LAURIE
140 CREEK DR
FREEPORT TX 77541-9675

SUSAN Q LAWS
2525 COMPASS CT
QUINTANA TX 77541-9101

TED LAWS
2525 COMPASS CT
QUINTANA TX 77541-9101

JAMES A LEEPER
PO BOX 2308
FREEPORT TX 77542-2308

DIANNA LINN
2093 CLEMSON DR
KATY TX 77493-1515

RICHARD D LINN
2093 CLEMSON DR
KATY TX 77493-1515

ROBERT S LOCKETT, III
1001 FM 2004 RD
LAKE JACKSON TX 77566-4012

JUAN LONGORIA, III
105 LILY ST
LAKE JACKSON TX 77566-4646

ROBERT MADDISON
151 SAND SHOALS RD
FREEPORT TX 77541-7909

TANA MADDOX
PO BOX 67
CLUTE TX 77531-0067

ROY MARSH
1675 BLUE WATER DR
FREEPORT TX 77541-9450

JIM MARTIN
910 DEWEY ST
FREEPORT TX 77541-9756

LINDA MARTIN
910 DEWEY ST
FREEPORT TX 77541-9756

ANTHONY MASCHET
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

BILL & SUSAN MASSEY
127 KINGS DR OYSTER CREEK ESTATES
FREEPORT TX 77541-8938

BILL MASSEY
127 KINGS DR OYSTER CREEK ESTATES
FREEPORT TX 77541-8938

SUSAN MASSEY
127 KINGS DR OYSTER CREEK ESTATES
FREEPORT TX 77541-8938

ROBERT MASTERS
602 LAMAR ST
QUINTANA TX 77541-9127

NATHAN MATTHEWS
SIERRA CLUB
85 2ND ST 2ND FLOOR
SAN FRANCISCO CA 94105-3459

HENRY GENE & MAGDALENE MCCLENDON
626 JEFFERS RD
FREEPORT TX 77541-8658

MAGDALENE MCCLENDON
626 JEFFERS RD
FREEPORT TX 77541-8658

ARCHIE L MCKINNEY
404 ALLEN RD
OYSTER CREEK TX 77541-9647

BRIAN MELASS
209 PLANTATION DR
LAKE JACKSON TX 77566-6140

AMANDA MILES
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

TERRY MILLER
127 SANDDOLLAR ST
QUINTANA TX 77541-9103

REBECCA MIMS
118 FOUR MASTER RD
FREEPORT TX 77541-9680

EVELYN MOORE
651 W MILLER ST
ANGLETON TX 77515-5522

JUANITA MORENO
138 SAND SHOALS RD
FREEPORT TX 77541-7909

BRUCE A MORGAN
2563 COMPASS CT
QUINTANA TX 77541-9101

KEVIN MORIARTY
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

JOHNNY MORRISON
137 S LAKE DR
QUINTANA TX 77541-9792

WILMA MORRISON
137 S LAKE DR
QUINTANA TX 77541-9792

MIKE J MUELLER
190 SKY SAIL RD
FREEPORT TX 77541-7911

L G MURRELL, JR
117 FROSTWOOD DR
LAKE JACKSON TX 77566-4437

MARINELL MUSIC
333 CLAY ST STE 5050
HOUSTON TX 77002-4173

SHAYNA NAQUIN
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

ANGELA NICHOLS
2927 COUNTY ROAD 723
QUINTANA TX 77541-9100

BRADY ODOM
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

PATRICIA PALMER
702 BURNET ST
QUINTANA TX 77541-9112

TERENCE PALMER
702 BURNET ST
QUINTANA TX 77541-9112

CONNIE PERLANDEN
715 BURNET ST
QUINTANA TX 77541-8103

HOWARD PERRYMAN
5650 E HIGHWAY 332
FREEPORT TX 77541-3113

ROBERT A PERRYMAN
PO BOX 577
CLUTE TX 77531-0577

LINDA L PIRTLE
133 ARROWWOOD ST
LAKE JACKSON TX 77566-4303

SHANE W PIRTLE
133 ARROWWOOD ST
LAKE JACKSON TX 77566-4303

RONALD V POGGEMOELLER
1671 BLUE WATER DR
FREEPORT TX 77541-9450

DAVID J PORTER
TEXAS RAILROAD COMMISSIONER
PO BOX 12967
AUSTIN TX 78711-2967

MR DON PRAEGER
106 MARINER RD
FREEPORT TX 77541-9696

MRS JEANNIE PRAEGER
106 MARINER RD
FREEPORT TX 77541-9696

BOB PRATT
705 CENTER WAY ST
LAKE JACKSON TX 77566-5416

JEFF PYNES
200 W 2ND ST
FREEPORT TX 77541-5773

TRAVIS QUINN
508 RILEY RD
CLUTE TX 77531-3328

A J REIXACH, JR
110 SCARLET OAK ST
LAKE JACKSON TX 77566-4352

LIN V RICHEY
119 POOP DECK LN
FREEPORT TX 77541-7905

JOE K RIPPLE
512 OAK DR
LAKE JACKSON TX 77566-4219

DENISE ROBINO
615 JEFFERS RD
FREEPORT TX 77541-8666

SHARON ROGERS
220 HUCKLEBERRY DR
LAKE JACKSON TX 77566-4415

DREW RYDER
919 W 2ND ST
FREEPORT TX 77541-5250

COURTNEY SANFORD
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

MIKE SCARBOROUGH
PO BOX 69
CLUTE TX 77531-0069

DANIEL A SCHAEFER
PO BOX Z
FREEPORT TX 77542-1926

THOMAS M SCHNEIDER
190 SKY SAIL RD
FREEPORT TX 77541-7911

LM MATT SEBESTA
BRAZORIA COUNTY COMMISSIONER, PRECINCT 2
21017 COUNTY ROAD 171 DEPT 3
ANGLETON TX 77515-8903

JACK SEGALL
2540 DEEP SEA DR
QUINTANA TX 77541-9102

KRISTEN SINON
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

ROBERT H SIPPLE
227B PARKING WAY ST
LAKE JACKSON TX 77566-5226

GREG SMITH
190 SKY SAIL RD
FREEPORT TX 77541-7911

BARRY T SMITHERMAN
RAILROAD COMMISSION OF TEXAS
1701 CONGRESS AVE 12TH FLOOR
AUSTIN TX 78701-1402

LORI SORRELL
PO BOX 2049
FREEPORT TX 77542-2049

LORI & MIKE SORRELL
PO BOX 2049
FREEPORT TX 77542-2049

NATALIE SPIEGEL
SIERRA CLUB
85 2ND ST 2ND FLOOR
SAN FRANCISCO CA 94105-3459

LARRY STANLEY
123 ROSEWOOD ST
LAKE JACKSON TX 77566-4936

JAMES STOKES
PO BOX 98
LAKE JACKSON TX 77566-0098

MIGUEL M SUAREZ
700 BURNET ST
QUINTANA TX 77541-9112

KAREN A SUMMERS
1402 LAMAR ST
QUINTANA TX 77541-8037

JOE TALBOT
PO BOX 638
LAKE JACKSON TX 77566-0638

DAVID W TERRY
618 E 2ND ST
FREEPORT TX 77541-5959

MR FREDERICK L TOWNEND
18602 GLENN HAVEN ESTATES DR
SPRING TX 77379-2737

KAREEN P TOWNEND
18602 GLENN HAVEN ESTATES DR
SPRING TX 77379-2737

MARK TROYER
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

JOHN TRUER
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

MILLICENT M VALEK
500 COLLEGE DR
LAKE JACKSON TX 77566-3136

RANDALL VALK
13410 ELMSGROVE LN
HOUSTON TX 77070-2889

R C VANAVERBEKE
2515 COMPASS CT
QUINTANA TX 77541-9101

S A VANAVERBEKE
2515 COMPASS CT
QUINTANA TX 77541-9101

J ARTHUR VANDAVEER
120 STRAWBERRY DR
LAKE JACKSON TX 77566-4905

EDDIE VENNE
333 CLAY ST STE 5050
HOUSTON TX 77002-4173

C LYNN WATERS
131 SAND SHOALS RD
FREEPORT TX 77541-7909

RICHARD M WATERS, JR
131 SAND SHOALS RD
FREEPORT TX 77541-7909

CHIBEA WIL
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

DUANE WILLIAMS
2112 BRAZOSPORT BLVD N
RICHWOOD TX 77531-2306

GARY WILSON
814 LAMAR ST
QUINTANA TX 77541-9109

GARY WILSON
2503 COMPASS CT
QUINTANA TX 77541-9101

MR FLOYD W WINKLER, JR
127 POOP DECK LN
FREEPORT TX 77541-7905

PEGGY SUE WINKLER
127 POOP DECK LN
FREEPORT TX 77541-7905

NANCY WOLLAM
300 ABNER JACKSON PKWY
LAKE JACKSON TX 77566-5153

NATH WOMACK
2927 COUNTY ROAD 723
QUINTANA TX 77541-9100

ROBERT M WORLEY
4005 TECHNOLOGY RD STE 1010
ANGLETON TX 77515-2536

JENNIFER WORTHEY
127 SANDDOLLAR ST
QUINTANA TX 77541-9103

BRYAN WORTHY
127 SANDDOLLAR ST
QUINTANA TX 77541-9103

RANDY WRIGHT
129 SANDDOLLAR ST
QUINTANA TX 77541-9103

SHARI WRIGHT
2603 FM 1495 RD
QUINTANA TX 77541-9114

SHELA WRIGHT
129 SANDDOLLAR ST
QUINTANA TX 77541-9103

THOMAS YANDRE
PO BOX 2487
FREEPORT TX 77542-2487

PEGGY S & ROY E YATES
314 MYSTERY HARBOR LN
FREEPORT TX 77541-3886

ROY E YATES
PO BOX 2076
FREEPORT TX 77542-2076

A PAUL & STARLET C ZUMA
107 DRIFTWOOD RD
FREEPORT TX 77541-9677