

TCEQ DOCKET NO. 2014-1662-IWD

**APPLICATION BY NORTH TEXAS § BEFORE THE TEXAS COMMISSION
MUNICIPAL UTILITY DISTRICT FOR § ON
TPDES PERMIT NO. WQ0004996000 § ENVIRONMENTAL QUALITY**

SECOND MOTION FOR CONTINUANCE

TO THE HONORABLE COMMISSIONERS:

The North Texas Municipal Water District (herein referenced as the "District") hereby moves to continue the above-referenced matter currently set to be heard at the April 29, 2015 Commissioners' Agenda to the August 19, 2015 Commissioners' Agenda, as well as the corresponding dates for the responses and replies to the hearing requests.

By this continuance, the District desires to continue to facilitate negotiation through the Commission's Alternative Dispute Resolution ("ADR") program in an attempt to resolve the concerns raised by the designated hearing requesters. In order to do so, a continuance is necessary. The District has contacted Kyle Lucas at the Commission's ADR program and Mr. Lucas is available and willing to assist in this regard.

The District and Mr. Lucas have spoken with the ED and OPIC and both are unopposed to the continuance. Mr. Lucas has represented to the District that he contacted the designated hearing requesters and none of the designated hearing requesters are opposed to the motion. Mr. Lucas has represented that he did not contact Mr. Gibbs as Mr. Gibbs did not provide a telephone number with his hearing request and, further, that his hearing request was filed by Mr. McCraw who was not opposed to the continuance.

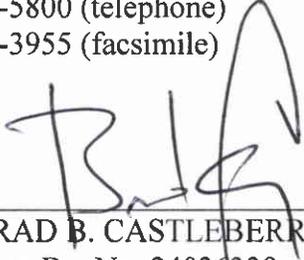
Therefore, the District respectfully requests that the matter be continued to the August 19, 2015 Commissioners' Agenda and that the dates for the deadlines to file the responses to hearing requests and replies to the responses be adjusted accordingly. Moreover, the District seeks to continue to engage the services of Mr. Kyle Lucas to facilitate resolution of this matter.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800 (telephone)
(512) 874-3955 (facsimile)

By: _____

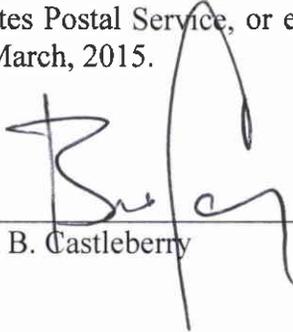


BRAD B. CASTLEBERRY
State Bar No. 24036339
ASHLEY D. THOMAS
State Bar No. 24090430

**ATTORNEYS FOR APPLICANT
NORTH TEXAS MUNICIPAL WATER
DISTRICT**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Response to Requests for Contested Case Hearing was sent by hand delivery, United States Postal Service, or electronic mail to the individuals identified below on this, the 13th day of March, 2015.



Brad B. Castleberry

For the Executive Director
via Electronic Mail:

Michael Parr, 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

For the Office of Public Interest Counsel
via Electronic Mail:

Aaron Tucker
Office of Public Interest Counsel, MC-103
P.O. Box 13087
Austin, Texas 78711-3087

For the Alternative Dispute Resolution
Program via Electronic Mail:

Kyle Lucas
Alternative Dispute Resolution
Program, MC-222
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

For the Office of General Counsel:

Todd Burkey, Staff Attorney
Texas Commission on
Environmental Quality
Environmental Law Division MC-173
P.O. Box 13087
Austin, Texas 78711-3087
Tel: (512) 239-2941
Fax: (512) 239-0606

Hearing Requestors of Record

Jack D Bradshaw
Bradshaw Land & Livestock LLC
1761 N 4258 Rd
Grant, OK 74738-5003

Julia Trigg Crawford
Red 'Arc Farm
690 CR 37500
Sumner, TX 75486

Duane Gibbs
6170 FM 2554
Ivanhoe, TX 75447-3038

Hearing Requestors of Record

Mayfield McCraw
Hope Plantation Turf
3765 CR 2135
Telephone, TX 75488-3009

Brenda and Curtis L. Schulz
2840 E 2158 Rd
Grant, OK 74738-2510

Harold Dean Witcher, Jr.
972 CR 2705
Telephone, TX 75488-6066