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Vic McWherter, Public Interest Counsel

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 18, 2016

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

**RE: SOUTHSTAR AT VINTAGE OAKS, LLC
TCEQ DOCKET NO. 2016-0229-MWD**

Dear Ms. Bohac:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Rudy Calderon".

Rudy Calderon, Attorney
Assistant Public Interest Counsel

cc: Mailing List

Enclosure

TCEQ DOCKET NO. 2016-0229-MWD

**IN THE MATTER OF THE
APPLICATION OF SOUTHSTAR
AT VINTAGE OAKS, LLC FOR
TPDES PERMIT
NO. WQ0015241001**

**BEFORE THE TEXAS
COMMISSION ON
ENVIRONMENTAL QUALITY**

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

To the Honorable Members of the Texas Commission on Environmental Quality:

The Office of Public Interest Counsel (OPIC) of the Texas Commission on Environmental Quality (Commission or TCEQ) files this Response to Requests for Hearing in the above-referenced matter and respectfully shows the following.

I. Introduction

A. Background of Facility

SouthStar at Vintage Oaks, LLC (SouthStar or Applicant) has applied to the TCEQ for a new Texas Land Application Permit (TLAP), No. WQ0015241001, that will authorize the disposal of treated domestic wastewater via surface irrigation of 40 acres of public access open areas with trails at a daily average flow not to exceed 0.035 million gallons per day (MGD) in the Interim I phase, 0.070 MGD in the Interim II phase, and 0.130 MGD in the Final phase. The wastewater treatment facility (WWTF) and disposal site will be located in the Vintage Oaks at the Vineyard subdivision, 0.2 mile east of the intersection of Vintage Way and State Highway 46, partially within the extraterritorial jurisdiction of the City of New Braunfels, in Comal County, Texas 78132.

The WWTF will consist of an activated sludge process plant using the membrane bioreactor system (MBR). Treatment units will include a fine screen, flow equalization

tank, anoxic tank with chemical dosing for phosphorus removal, aerobic membrane unit, sludge holding tank, and UV disinfection system. Unit capacities will depend on the phase in which the facility is operating. Influent to the facility will be septic tank effluent. The facility has not been constructed.

Sludge generated from the treatment facility will be hauled by a registered transporter and disposed of at Mesquite Creek Landfill, Permit No. 66B, a TCEQ permitted landfill in Comal County. The draft permit authorizes the disposal of sludge at a TCEQ authorized land application site or co-disposal landfill.

The WWTF and disposal site will be located in the drainage basin of Dry Comal Creek in Segment No. 1811 of the Guadalupe River Basin. No discharge of pollutants into water in the state is authorized by this permit.

B. Procedural Background

TCEQ received the application on December 3, 2014 and declared it administratively complete on January 20, 2015. The Notice of Receipt of Application and Intent to Obtain Permit (NORI) was published on February 20, 2015, in the *New Braunfels Herald-Zeitung*, Comal County, Texas. The Executive Director completed the technical review of the application on June 11, 2015, and prepared a draft permit. A combined Notice of Application and Preliminary Decision (NAPD) and Notice of Public Meeting was published on August 8, 2015, in the *New Braunfels Herald-Zeitung*, Comal County, Texas. A public meeting was held September 10, 2015, at the New Braunfels Civic Center. During the ED's review of public notice documents, the ED discovered that SouthStar should have published notice in Spanish as well as in English. A combined NORI/NAPD was published in Spanish in the *La Voz* on October 2, 2015. On December

28, 2015, the ED filed his Response to Public Comment, and on January 7, 2016, the Chief Clerk mailed notice of the ED's final decision and Response to Comments. The deadline to request a contested case hearing was February 8, 2016.

TCEQ received timely comments and requests for a contested case hearing from John Blodgett , Rex Lee Brown, Michaela Cade, Thomas Chaney, James A. Chew, Thomas Crossan, Ronald Fincher, Russell Garner, David Granato, Christopher Heim, Ricki Ann Holt, Franklin Houser, Sabrina Houser Amaya, Jenny Jurica, Kevin Jurica, Sandra Langston, Rick Peyton, Sandy Peyton, Louis Rimmelin, Melissa Rimmelin, Allene Saleck, Connie Terao, Jeff Thomas, and Carl Thompson.

II. Applicable Law

The ED declared this application administratively complete on January 20, 2015. Because the application was declared administratively complete after September 1, 1999, a person may request a contested case hearing on the application pursuant to the requirements of House Bill 801, Act of May 30, 1999, 76th Leg., R.S., § 5 (codified at TEX. WATER CODE (TWC) § 5.556).

Under the applicable statutory and regulatory requirements, a hearing request must substantially comply with the following: give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request; identify the requestor's personal justiciable interest affected by the application showing why the requestor is an "affected person" who may be adversely affected by the proposed facility or activity in a manner not common to members of the general public; request a contested case hearing; list all relevant and material disputed issues of fact that were raised during the comment period that are the basis of the hearing request;

and provide any other information specified in the public notice of the application.

30 TAC § 55.201(d).

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.”

30 TAC § 55.203(a). This justiciable interest does not include an interest common to the general public. *Id.* Governmental entities with authority under state law over issues contemplated by the application may be considered affected persons. *Id.* Relevant factors considered in determining whether a person is affected 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 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.

30 TAC § 55.203(c).

A group or association may request a contested case hearing if:

- (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.

30 TAC § 55.205(a). The ED, OPIC, or applicant may request the group or association provide an explanation of how the group or association meets these requirements. *Id.*

The Commission shall grant an affected person’s timely filed hearing request if:

- (1) the request is made pursuant to a right to hearing authorized by law; and (2) the

request raises disputed issues of fact that were raised during the comment period and that are relevant and material to the Commission's decision on the application. 30 TAC § 55.211(c).

Accordingly, responses 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.

30 TAC § 55.209(e).

III. Discussion

A. Determination of Affected Person Status

Michaela Cade

According to a map provided to OPIC by the ED and the location provided in the hearing request, Ms. Cade's property is located approximately one half mile from the WWTF and application site. In her hearing request, Ms. Cade raises the issues of regionalization, odor nuisance, noise pollution, effects on flora and fauna, environmental impact, contamination of groundwater, and flooding. While the Commission does not have jurisdiction over noise pollution and flooding issues, it does have jurisdiction over the remaining issues raised in the hearing request. Because of her close proximity to the WWTF and application site. Because the close proximity of Ms. Cade to the WWTF and application site and the nature of the issues raised in her

hearing request, OPIC finds that Michaela Cade is an affected person and recommends granting her hearing request.

Thomas Chaney

According to a map provided to OPIC by the ED and the location provided in the hearing request, Mr. Chaney's property is located approximately 500 feet from the WWTF and application site. In his hearing request, Mr. Chaney raises the issues of odor nuisance, use and enjoyment of his property, light pollution, protection of the Edwards Aquifer, flooding, and the buffer zone between the WWTF and application site and a drinking water well that services his home. While the Commission does not have jurisdiction over noise pollution, light pollution, and flooding issues, it does have jurisdiction over the remaining issues raised in the hearing request. Because of the close proximity of Mr. Chaney to the WWTF and application site and the nature of the issues raised in his hearing request, OPIC finds that Thomas Chaney is an affected person and recommends granting his hearing request.

Louis and Melissa Rimmelin

According to a map provided to OPIC by the ED and the location provided in the hearing requests, the Rimmelins' property is located approximately 200 feet from the application site and 1200 feet from the WWTF. In their hearing requests, the Rimmelins raise the issues of use and enjoyment of their property, odor nuisance, protection of the Edwards Aquifer, air quality, health effects, and property value. While the Commission does not have jurisdiction over air quality as it pertains to a TLAP applications or to property values, it does have jurisdiction over the remaining issues raised in the hearing requests. Because of the very close proximity of the Rimmelins to the WWTF and application site and their expressed concerns about how they may be

personally affected by odors and contaminants, OPIC has determined that Louis and Melissa Rimmelin are affected persons and should be granted a contested case hearing.

James A. Chew, Ronald Fincher, and Jeff Thomas

According to a map provided to OPIC by the ED and the locations provided in the hearing requests, these requestors are located within one mile of the proposed WWTF and application site. The hearing requests submitted by these individuals raised the general issues of environmental impact, protection of the Edwards Aquifer, water quality, air quality, and water rates. While some of these issues are within the jurisdiction of the Commission, the requestors raised these issues as general concerns and did not state how they as individuals would be adversely impacted. Therefore, OPIC has determined that the requestors failed to assert a personal justiciable interest that is distinguishable from the general public as required by 30 TAC § 55.203(a). For this reason, OPIC recommends denial of these requests. OPIC will reconsider its position in light of any timely filed replies. OPIC further notes if other hearing requests are granted, anyone may attend any convened preliminary hearing and seek to be admitted as a party at that time.

Rex Brown, John Blodgett, David Granato, Kevin Jurica, and Sandra Langston

According to a map provided to OPIC by the ED and the locations provided in the hearing requests, these requestors are located within one mile of the proposed WWTF and application site. Each of these requestors raised the issue of protection of the Edwards Aquifer as their reason for opposing the issuance of the permit. While protection of the Edwards Aquifer is within the Commissions jurisdiction under the Texas Water Code and 30 Tex. Admin. Code Chapter 213, the requestors failed to assert how they are personally affected by this concern. Therefore, OPIC cannot find these

requestors stated a personal justiciable interest that is distinguishable from the general public as required by 30 TAC § 55.203(a). For this reason OPIC recommends denial of these requests. OPIC will reconsider its position in light of any timely filed reply. OPIC further notes if other hearing requests are granted, anyone may attend any convened preliminary hearing and seek to be admitted as a party at that time.

Thomas Crossan, Russell Garner, Christopher Heim, Ricki Ann Holt, Franklin Houser, Sabrian Houser Amaya, and Jenny Jurica

According to a map provided to OPIC by the ED and the locations provided in the hearing requests, these requestors are located within one mile of the proposed WWTF and application site. The hearing requests submitted by these individuals failed to raise any issue or in any way show why they may be affected persons. Therefore, OPIC recommends denial of these requests.

Rick Peyton, Connie Terao, and Carl Thompson

According to a map provided to OPIC by the ED and the locations provided in the hearing requests, these requestors are located at such a distance from the WWTF and application site that OPIC cannot conclude there would be a likely impact on these requestors from permitted activities. Therefore, OPIC recommends denial of these requests.

Allene Saleck

The requestor failed to comply with 30 TAC § 55.201(d) by not providing an address in the hearing request submitted to the TCEQ. OPIC cannot determine the location of the requestor's property and cannot determine that she is likely to be affected. Therefore, OPIC recommends denial of this request.

B. Issues Raised in the Hearing Request

The following issues have been raised in the hearing requests of those individuals that OPIC has determined are affected persons:

- (1) Whether the proposed permit is protective of the Edwards Aquifer.
- (2) Whether the proposed permit is protective of groundwater.
- (3) Whether the proposed WWTF and application site will be the cause of nuisance odors.
- (4) Whether the proposed WWTF and application site offer an adequate buffer zone for an existing water well.
- (5) Whether the proposed permit is protective of human health.
- (6) Whether the proposed permit is protective of flora and fauna.
- (7) Whether the proposed permit is protective of the environment.
- (8) Whether the proposed permit would violate the TCEQ's regionalization policy.
- (9) Whether the proposed WWTF and application site will impact the requestor's use and enjoyment of their property.
- (10) Whether the proposed WWTF and application site will cause light pollution.
- (11) Whether the proposed WWTF and application site will cause noise pollution.
- (12) Whether the proposed WWTF and land application will cause flooding.
- (13) Whether the proposed WWTF and land application site will effect air quality.
- (14) Whether the proposed WWTF and application site will impact property values.

C. Issues Raised in the Comment Period

All of the issues raised in the hearing request were raised in the comment period and have not been withdrawn. 30 TAC §§ 55.201(c) and (d)(4), 55.211(c)(2)(A).

D. Disputed Issues

There is no agreement between the hearing requesters and the ED on the issues raised in the hearing requests.

E. Issues of Fact

If the Commission considers an issue to be one of fact, rather than one of law or policy, it is appropriate for referral to hearing if it meets all other applicable

requirements. 30 TAC § 55.211(c)(2)(A). All of the issues presented are issues of fact appropriate for referral to SOAH.

F. Relevant and Material Issues

The hearing requests raise issues relevant and material to the Commission's decision under the requirements of 30 TAC §§ 55.201(d)(4) and 55.211(c)(2)(A). In order to refer an issue to SOAH, the Commission must find that the issue is relevant and material to the Commission's decision to issue or deny this permit. *See Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248–51 (1986) (in discussing the standards applicable to reviewing motions for summary judgment the Court stated “[a]s to materiality, the substantive law will identify which facts are material . . . it is the substantive law's identification of which facts are critical and which facts are irrelevant that governs”). Relevant and material issues are those governed by the substantive law under which this permit is to be issued. *Id.*

Groundwater Quality

Michaela Cade has raised the issue of groundwater quality. The TCEQ regulates the siting of wastewater treatment plants in relation to springs, water wells, and aquifer recharge zones. 30 TAC § 309.12. This issue is therefore relevant and material to the Commission's decision on the application and is appropriate for referral to SOAH for a contested case hearing on this matter.

Regionalization

State policy is to encourage and promote the development and use of regional and area-wide waste collection, treatment, and disposal systems to prevent pollution and maintain and enhance the quality of state water. Texas Water Code § 26.081(a). This policy was implemented to stem the proliferation of small package plants such as

the one proposed in the application. When considering the issuance of a permit to discharge waste, the TCEQ is required to consider need and the availability of existing or proposed regional waste collection, treatment, and disposal systems. Texas Water Code § 26.082. Michaela Cade has raised the issue of regionalization in her hearing request. She states that there are two additional proposed wastewater treatment facilities that are being proposed within three miles of the proposed WWTF. Therefore, OPIC finds that the issue of regionalization is relevant and material to the Commission's decision regarding this application and is appropriate for referral to SOAH for a contested case hearing on this matter.

Edwards Aquifer

Thomas Chaney and the Rimmelins raised the issue of the protection of the Edwards Aquifer in their hearing requests. The proposed facility and application site will be located within the Edwards Aquifer Recharge Zone. The proposed permit is subject to the rules in 30 TAC Chapter 213 and the Executive Director's Response to Comments contends that permitted effluent limitations are consistent with applicable requirements developed to protect the Edwards Aquifer. For these reasons, OPIC concludes the issue of whether the proposed permit is adequately protective of the Edwards Aquifer is relevant and material to the Commission's decision.

Water Well Buffer Zone Requirement

Thomas Chaney has raised the issue of protection of a public water well that provides drinking water to his home. Mr. Chaney states that the well is located approximately 500 feet from the proposed WWTF. The TCEQ regulates the siting of wastewater treatment plants in relation to springs, water wells, and aquifer recharge zones. 30 TAC § 309.13. This issue is therefore relevant and material to the

Commission's decision on the application and is appropriate for referral to SOAH for a contested case hearing on this matter.

Use and Enjoyment of Property

Thomas Chaney has stated that problems such as odors and contaminants may adversely affect his use and enjoyment of property. The Commission is required by statute and rule to maintain water quality consistent with public health and enjoyment. Texas Water Code § 26.003 and 30 TAC §307.1 Therefore, OPIC finds that the issue of whether the proposed permitted activities will adversely affect use and enjoyment of property is relevant and material to the Commission's decision.

Health Effects

The Rimmelins have raised the issue of the potential for adverse health effects on humans posed by the operation of the WWTF and application site. This issue concerns the Texas Surface Water Quality Standards. 30 TAC Chapter 307. Therefore, OPIC finds that this issue is therefore relevant and material to the Commission's decision.

Effects on Flora and Fauna

Michaela Cade has raised the issue of the effects of the operation of the WWTF and application site on flora and fauna in the area. The Commission regulates siting requirements for wastewater treatment facilities and land application of reclaimed water by surface irrigation. 30 TAC § 309.13 and 30 TAC Chapter 210 Subchapter C. Protection of flora and fauna is addressed by the Texas Surface Water Quality Standards. 30 TAC § 307.1. Therefore, OPIC finds that this issue is relevant and material to the Commission's decision.

Environmental Effects

Michaela Cade has raised the issue of the risk of adverse environmental effects posed by the operation of the proposed WWTF and application site. Protection of the environment is addressed by the Texas Surface Water Quality Standards. 30 TAC § 307.1. Therefore, OPIC finds that this issue is therefore relevant and material to the Commission's decision.

Odor

Michaela Cade, Thomas Chaney, and the Rimmelins have raised the issue of odor in their hearing requests. Odor is specifically addressed by the TCEQ in 30 TAC §309.13 concerning the siting of wastewater treatment plants. Therefore, OPIC concludes the issue of odor is relevant and material to the Commission's decision.

Noise Pollution, Light Pollution, air quality, property value, and Flooding

The TCEQ's jurisdiction in a land application permit is limited to the issues set out in Chapter 26 of the Texas Water Code. Chapter 26 does not provide the TCEQ with the authority to consider light pollution, noise pollution, air quality, property value, and flooding in its determination of whether or not to issue a land application permit. OPIC therefore concludes that these issues are not relevant and material to the Commission's decision regarding this application and, should the Commission determine that any of the requestors are affected persons, these issues are not appropriate for referral to SOAH.

G. Issues Recommended for Referral

OPIC recommends that the following disputed issues of fact are appropriate for referral to SOAH for a contested case hearing:

- (1) Whether the proposed permit is adequately protective of the Edwards Aquifer?
- (2) Whether the proposed permit is adequately protective of groundwater?
- (3) Whether the proposed WWTF and application site will cause nuisance odors?
- (4) Whether the proposed WWTF and application site offer an adequate buffer zone for an existing water well?
- (5) Whether the proposed permit is adequately protective of human health?
- (6) Whether the proposed permit is adequately protective of flora and fauna?
- (7) Whether the proposed permit is adequately protective of the environment?
- (8) Whether the proposed permit is consistent with the TCEQ's regionalization policy?
- (9) Whether activities regulated under the proposed permit will adversely affect s use and enjoyment of requestors' property?

H. Maximum Expected Duration of Hearing

Commission Rule 30 TAC § 50.115(d) requires that any Commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides that no hearing shall be longer than one year from the first day of the preliminary hearing to the date the proposal for decision is issued. To assist the Commission in stating a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC § 55.209(d)(7), OPIC estimates that the maximum expected duration of a hearing on this application would be nine months from the first date of the preliminary hearing until the proposal for decision is issued.

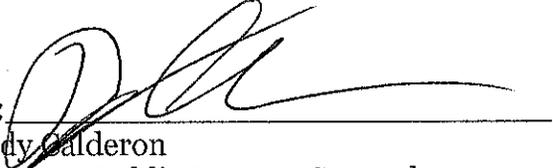
IV. Conclusion

OPIC recommends granting the hearing requests of Michaela Cade, Thomas Chaney, and Louis and Melissa Rimmelin and denying the hearing requests of John Blodgett, Rex Lee Brown, James A. Chew, Thomas Crossan, Ronald Fincher, Russell Garner, David Granato, Christopher Heim, Ricki Ann Holt, Franklin Houser, Sabrina Houser Amaya, Jenny Jurica, Kevin Jurica, Sandra Langston, Rick Peyton, Sandy Peyton, Allene Saleck, Connie Terao, Jeff Thomas, and Carl Thompson. OPIC finds the

issues referenced in Section III.G above, are appropriate for referral. OPIC further recommends a hearing duration of nine months should a contested case hearing be granted.

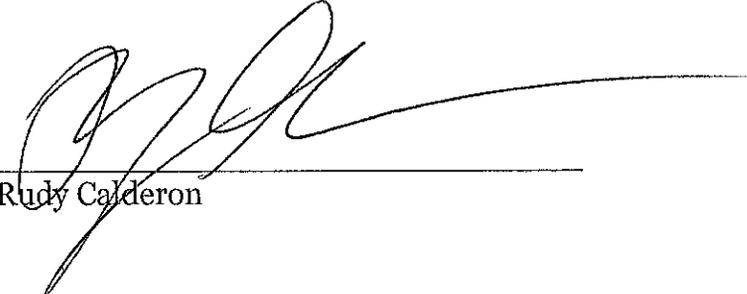
Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2016 the original and seven true and correct copies of the Office of Public Interest Counsel's Response to Requests for Hearing were filed with the Chief Clerk of the TCEQ and a copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, Inter-Agency Mail, electronic mail, or by deposit in the U.S. Mail.


Rudy Calderon

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TCEQ DOCKET NO. 2016-0229-MWD

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