

SOAH DOCKET NO. 582-22-02856  
TCEQ DOCKET NO. 2022-0326-MWD

APPLICATION OF RESTORE § BEFORE THE  
THE GRASSLANDS LLC §  
AND HARRINGTON/TURNER § TEXAS COMMISSION ON  
ENTERPRISES, LP §  
(TPDES PERMIT NO. WQ0016003001) § ENVIRONMENTAL QUALITY

INDIVIDUAL PROTESTANT CARROLYN J MOEBIUS' MOTION FOR 5 MINUTES OF  
TIME FOR ORAL PRESENTATION BEFORE THE COMMISSION

TO THE HONORAL CHAIRMAN NIERMAN, COMMISSIONERS LINDLEY, JANECKA  
AND THE GENERAL COUNSEL:

COMES NOW CARROLYN J MOEBIUS, and presents to the Texas Commission on  
Environmental Quality ("TCEQ" or "Commission") this filing of Motions for the Application  
by Restore the Grasslands, LLC and Harrington/Turner Enterprises, LP ("Applicants") for a  
TPDES Permit in Collin County in the above-referenced docket.:

I. Oral Presentations

In the letter dated June 28, 2023 from the Chief Clerk notified the Parties that the Protestants  
receive five (5) minutes collectively as decided by the General Counsel. There are not less than  
ten (10) Protestants. That is insufficient time for the Protestants to present their arguments and  
positions and allowed due process. Accordingly, Moebius who is the designated speaker for six  
(6) Individual Protestants, namely, Hemmig, Hernandez, Cloud, Harvey, Loncar and  
Malcziewski, ("Moebius Group") respectfully requests five (5) minutes total of time for her to  
present the position and arguments for the Moebius Group to the Commission at the August 16,  
2023 docketed hearing in this matter and for the other Protestants to be granted an additional  
five (5) minutes of time bringing the total time for Protestants to the total of ten (10) minutes

Respectfully submitted,

/s/ Carrolyn J. Moebius

Carrolyn J. Moebius  
Individual Protestant Pro Se  
1412 Parkview Lane  
Murphy, Texas 75094  
Telephone: (972)333-9432  
Email: carrmoe@gmail.com

CERTIFICATE OF SERVICE

I certify that on August 15, 2023, a true and correct copy of the foregoing motions was filed with TCEQ and SOAH and sent to the below-listed parties of record Via Email as shown below.

/s/ Carrolyn J. Moebius

Carrolyn J Moebius  
INDIVIDUAL PROTESTANT, Pro Se

**MAILING LIST**

**Restore the Grasslands LLC and Harrington/Turner Enterprises, LP** SOAH Docket No. **582-22-02856**; TCEQ Docket No. **2022-0326-MWD**

REPRESENTING THE APPLICANT

*via electronic mail:*

Natalie Scott, Attorney  
Alan J. Harlan, Attorney  
Coats Rose, P.C.

[nscott@coatsrose.com](mailto:nscott@coatsrose.com)

[aharlan@coatsrose.com](mailto:aharlan@coatsrose.com)

REPRESENTING THE CITY OF MURPHY

*via electronic mail:*

Stephen C. Dickman, Attorney  
Law Office of Stephen C. Dickman

[sdickmanlaw@att.net](mailto:sdickmanlaw@att.net)

REPRESENTING THE CITY OF PARKER

*via electronic mail:*

Arturo D. Rodriguez, Jr., Attorney  
Messer, Fort, and McDonald

[art@txmunicipallaw.com](mailto:art@txmunicipallaw.com)

REPRESENTING NORTH TEXAS MUNICIPAL

WATER DISTRICT

*via electronic mail:*

Lauren Kalisek, Attorney  
Lora Naismith, Attorney  
Lloyd Gosselink Rochelle & Townsend, P.C.

[lkalisek@lglawfirm.com](mailto:lkalisek@lglawfirm.com)

[lnaismith@lglawfirm.com](mailto:lnaismith@lglawfirm.com)

REPRESENTING THE EXECUTIVE DIRECTOR

*via electronic mail:*

Kathy Humphreys, Staff Attorney  
Office of Legal Services

[kathy.humphreys@tceq.texas.gov](mailto:kathy.humphreys@tceq.texas.gov)

REPRESENTING THE OFFICE OF PUBLIC INTEREST COUNSEL *via electronic mail:*

Sheldon Wayne, Attorney  
Office of Public Interest Counsel

[sheldon.wayne@tceq.texas.gov](mailto:sheldon.wayne@tceq.texas.gov)

FOR THE STATE OFFICE OF AMINISTRATIVE HEARINGS

*via eFile Texas:*

The Honorable Rebecca Smith  
Administrative Law Judge <https://www.soah.texas.gov/e-filing-soah>

**Interested Person(s):**

*via electronic mail:*

Don "Wade" Cloud, Jr.

[smcbyses@verizon.net](mailto:smcbyses@verizon.net)

Kathy Harvey

[kathycalabria@me.com](mailto:kathycalabria@me.com)

Ray and Ruth Hemmig

[ray@rrgc.us](mailto:ray@rrgc.us)

Laura and Tony Hernandez

[lauraghernandez@gmail.com](mailto:lauraghernandez@gmail.com)

Angelique Loncar

[angeliqueloncar@tx.rr.com](mailto:angeliqueloncar@tx.rr.com)

Andrew Malczewski

[a.malczewski2010@gmail.com](mailto:a.malczewski2010@gmail.com)

Linda M. (Buddy) Pilgrim

[Btraveler54@gmail.com](mailto:Btraveler54@gmail.com)

Emily Plummer

[ceplummer@hotmail.com](mailto:ceplummer@hotmail.com)