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October 2, 2023

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

VIA TCEQ E-FILING

Re: TCEQ Docket No. 2023-0846-DIS; Internal Control No. D-01092023-007;
Application for the Creation of Madera Municipal Utility District No. 1 of Denton
County

Dear Ms. Gharis,

Enclosed for submission, please find the City of Justin's Reply to Applicants' Response
to Hearing Requests.

Sincerely,


Lauren J. Kalisek

LJK/ncm

TCEQ DOCKET NO. 2023-0846-DIS

APPLICATION FOR THE CREATION	§	BEFORE THE TEXAS COMMISSION
OF MADERA MUNICIPAL UTILITY	§	
DISTRICT NO. 1 OF DENTON	§	ON
COUNTY	§	ENVIRONMENTAL QUALITY

**CITY OF JUSTIN’S REPLY TO APPLICANTS’
RESPONSE TO HEARING REQUESTS**

TO THE HONORABLE COMMISSIONERS:

The City of Justin (“the City”) hereby submits this Reply to Applicants TCCI Range-Mead 2021, LLC and Hines Acquisitions, LLC (“Applicants”) Response to Hearing Requests in the above-referenced matter (“Applicants’ Response”). Applicants Response provides no substantive discussion of the key issues raised in the City’s hearing request that: (1) Applicants failed to follow the process required by Texas Water Code Section 54.016 regarding municipal consent for the creation of a district in the City’s extraterritorial jurisdiction; and (2) the City has a binding contract to provide service to the area at issue in the application. As discussed in the City’s hearing request, and as recognized by the Executive Director and Office of Public Interest Counsel, both of these items make the City an affected person entitled to a contested case hearing.

Applicants’ silence on these issues indicates they do not have a response to give and clearly highlights the need to refer the application to the State Office of Administrative Hearings. The City re-urges that its request for hearing be granted.

Respectfully submitted,


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

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By: 

LAUREN J. KALISEK

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ATTORNEYS FOR THE CITY OF JUSTIN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested on all parties whose names appear on the following mailing list on this 2nd day of October, 2023.

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