

TCEQ DOCKET NO. 2024-1821-IWD

APPLICATION BY	§	BEFORE THE TEXAS COMMISSION
SPACE EXPLORATION	§	
TECHNOLOGIES CORPORATION	§	ON
FOR TPDES PERMIT	§	
NO. WQ0005462000	§	ENVIRONMENTAL QUALITY

**SPACE EXPLORATION TECHNOLOGY CORPORATION'S
RESPONSE TO REQUESTS FOR CONTESTED CASE HEARING
AND REQUESTS FOR RECONSIDERATION**

TO THE HONORABLE COMMISSIONERS OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY:

Applicant Space Exploration Technologies Corporation (“SpaceX” or “Applicant”) files this response to the requests for contested case hearing and requests for reconsideration on its application (“Application”) for a new Texas Pollutant Discharge Elimination System (“TPDES”) Permit No. WQ0005462000 (the “Permit”), which would authorize the discharge of deluge water, facility washdown water, and stormwater on an intermittent basis from SpaceX’s Starbase launch facility (“Starbase”).

Three associations and 12 individuals filed requests for contested case hearing on the Application. The hearing requests filed by the associations (the South Texas Environmental Justice Network (“STEJN”), the Carrizo/Comecrudo Nation of Texas, Inc., and Save RGV) fail to identify any individual member who would have standing to participate in a contested case hearing in their own right. The associations fail to provide addresses for the members they identify. No requesting association claims that a member lives or has a property interest near Starbase or on the proposed discharge route – their members’ recreational interests at or beyond the mouth of the Rio Grande River are shared with the general public. As a result, the associations have no personal justiciable interest in the Application and are not “affected associations.” Similarly, the individual hearing

requestors are not “affected persons.” No individual requestor identifies an address or property interest near Starbase or on the proposed discharge route. No association or individual who filed a hearing request has an interest in the Application that is not common to members of the general public. Because no organization has met the requirements of associational standing, and no individual has met the requirements of affected person status, the Commissioners should deny the requests for contested case hearing.

Two of the above associations and two individuals filed requests for reconsideration of the Application. None of the reconsideration requests raise a material new factual issue or identify a basis for reconsideration of the Executive Director’s decision. The requests reflect disagreement with the procedural and technical decisions made by the Executive Director in preparing and issuing the draft permit, and generally restate comments that were made by the requestors in their comments on the Application and draft permit and that were addressed by the Executive Director in its Response to Public Comment (“RTC”). For those reasons, the Commissioners should also deny the requests for reconsideration.

I. Introduction

Since its founding in 2002, SpaceX has substantially reduced the cost of access to space, primarily by developing innovative, reusable, and extremely reliable launch vehicles. These innovations have made SpaceX the world’s leading commercial space transportation company and an essential part of the U.S. space program. As a result of its launch reliability, SpaceX now handles about two-thirds of NASA’s launches, is the only American entity able to reliably transport humans to orbit and return them safely, including to the International Space Station, and is responsible for delivering thousands of critical commercial, scientific, and national-security payloads to orbit.

A. The Starbase launch site and the Starship-Super Heavy launch program.

In 2014, after extensive, multiyear review under the National Environmental Policy Act and other environmental laws, the Federal Aviation Administration (“FAA”) licensed SpaceX to build and operate a private spaceport in Boca Chica, Texas, where SpaceX is developing its Starship-Super Heavy launch system. SpaceX has since invested more than \$7.5 billion into building its Starbase facility in Boca Chica and developing Starship-Super Heavy.

Starship-Super Heavy is a fully reusable, super-heavy-lift launch system that comprises the Super Heavy first stage, or booster, and the Starship second stage, or spacecraft. Starship-Super Heavy represents a monumental advancement in space exploration. First, it is the most powerful launch vehicle ever developed, with the ability to carry to low Earth orbit payloads with a volume up to 100 cubic meters and a mass of around 100 metric tons. The large payload capacity enables Starship to deploy more satellites than any other spacecraft and transport larger and more sophisticated telescopes and other cargo than presently exist. Second, Starship will be able to refuel in space and take these payloads to other destinations in the solar system. Starship can also then serve as a human habitat on the Moon and other planets. Third, Starship-Super Heavy is entirely reusable, which significantly reduces waste and enables sustainable, cost-effective access to space. Fourth, Starship and Super Heavy are powered by Raptor engines, the most advanced rocket engines in history. Raptor uses liquid methane and liquid oxygen as propellants. Liquid methane offers significant benefits over other fuels because it burns more cleanly, can possibly be produced on the Moon and Mars, and can be stored in propellant depots in space for months at a time.

By increasing lift capacity, reducing costs an order of magnitude or more, and using liquid methane for fuel, Starship-Super Heavy will enable groundbreaking achievements, including

enabling humanity to return to the Moon, travel to Mars, and become a multiplanetary species, while also substantially benefiting life on Earth. To name just two examples, NASA selected Starship to land the first astronauts on the Moon since the Apollo program ended in 1972. And the U.S. Air Force awarded SpaceX a contract as part of its “Rocket Cargo” program to support development of Starship’s point-to-point transportation capabilities, allowing the United States to deploy Starship cargo rapidly across the globe.

B. Development and use of the deluge system to ensure flight safety.

SpaceX conducted the first orbital test launch of Starship-Super Heavy on April 20, 2023. The launch vehicle successfully cleared the launch pad and flew for several minutes before breaking up over the Gulf of Mexico. The powerful rocket engines damaged the concrete launch pad.

Following the test flight, SpaceX installed the water deluge system, among other measures. The deluge system sprays water during launches to protect the launch site and surrounding areas by suppressing fire and helping prevent the dispersal of dust and debris caused by the thrust and heat of the Raptor engines. The system also reduces environmental impacts by dampening vibrations.

The system uses potable water purchased from the Brownsville Public Utilities Board. The water is stored in clean, dedicated tanks and pumped to the system via clean, dedicated pipes installed for that purpose. No chemicals or substances are added to the water at any point. Because the rocket engine exhaust contains only water vapor and gaseous carbon dioxide there is no change to the chemical makeup of the deluge water after contact with the exhaust.

While the rocket engines vaporize most of the deluge system water, about 20% of the liquid water may leave the launch pad. Water that leaves the pad is confined to an area located on SpaceX

property, approximately 20 to 30 feet away from the pad. To reduce Starbase's consumption of fresh water, Starbase plans to reuse captured deluge system water at the site. Currently, Starbase pumps excess deluge water from the containment basin at Launchpad 1 and trucks it offsite for disposal at an authorized location.

C. The Draft Permit

The Permit, if issued as drafted, would authorize SpaceX to discharge deluge water, facility washdown water, and stormwater on an intermittent and flow variable basis via Outfalls 001 and 002. Outfalls 001 and 002 authorize discharge into mudflats on SpaceX property. No water is expected to reach the Rio Grande River, and in prior uses of the deluge system SpaceX has not observed any discharged water reach the Rio Grande. Under current operations, deluge water does not leave SpaceX property. In the unanticipated event that deluge water is not evaporated or absorbed by the mudflats, such water would flow to Rio Grande Tidal in Segment 2301 of the Rio Grande Basin, over 2 miles south of the discharge, and then to the Gulf of Mexico via the Rio Grande River. After issuance of the Permit, Starbase plans to construct a retention basin at Launchpad 2 from which discharges will occur via Outfall 002.

II. Procedural Background

SpaceX filed the application for Permit No. WQ0005462000 on July 1, 2024, and the Executive Director of the TCEQ declared the Application administratively complete on July 8, 2024. The Notice of Receipt of Application and Intent to Obtain Water Quality Permit ("NORI") was published in English on July 13, 2024, in the *Brownsville Herald* and in Spanish in *El Extra* on July 12, 2024. A Combined Notice of Public Meeting, NORI, and Notice of Application and Preliminary Decision ("NAPD") was published on September 11, 2024, in the *Brownsville Herald* and on September 13, 2024, in *El Extra*. The Combined Notice of Public Meeting, NORI and NAPD contained clear and specific instructions for public participation, including how to request a

contested case hearing on the Application.

A public meeting on the Application was held on October 17, 2024. Notice of the Public Meeting was published in the *Brownsville Herald* on September 11, 2024, and in *El Extra* on September 13, 2024. The meeting was held at the Brownsville Sports Park Gymnasium at 1000 Sports Park Boulevard in Brownsville, Texas. The public comment period on the Application closed at the end of the public meeting.

The Executive Director evaluated the comments filed on the Application and draft permit and filed its RTC with the TCEQ Chief Clerk on November 20, 2024. The Chief Clerk issued a letter dated November 27, 2024, transmitting the RTC and alerting the public of the Executive Director's decision that the Application meets the requirements of applicable law for permit issuance. The Executive Director's RTC addressed the relevant and material concerns identified in the timely comments filed on the Application, including the comments filed by the associations and individuals that have filed requests for contested case hearing or reconsideration of the Executive Director's decision.

On January 3, 2025, the Chief Clerk issued a letter stating that the contested case hearing requests and requests for reconsideration will be considered by the Commissioners on February 13, 2025. SpaceX hereby provides its response to the contested case hearing requests and requests for reconsideration in accordance with Commission rules.

III. Legal Standards for Review of Requests for Contested Case Hearing

Texas law and TCEQ rules identify the legal standard for participation in a contested case hearing, along with the required elements of a valid contested case hearing request. To be granted a contested case hearing, the request must be made by an "affected person,"¹ it must "request a

¹ 30 TEX. ADMIN. CODE § 55.201(b)(4).

contested case hearing,”² and the request must be timely.³

A. The Request Must Be Made by an Affected Person

1. Affected Persons

The Texas Water Code allows only “affected persons” to participate in a contested case hearing on water quality permit applications.⁴ The Texas Legislature has defined the universe of “affected persons” who may validly demand that a contested case hearing be held by or on behalf of the Commission. Only those persons who have “a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the administrative hearing” may be granted a hearing.⁵ “An interest common to members of the general public does not qualify as a personal justiciable interest.”⁶

TCEQ rules specify the factors that must be considered in determining whether a person is an affected person. Those factors are:

- (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;
- (6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application that

² 30 TEX. ADMIN. CODE § 55.201(d)(3).

³ 30 TEX. ADMIN. CODE § 55.211(c)(2)(B). To be timely, a request for contested case hearing must be filed no later than 30 days after the TCEQ Chief Clerk mails (or otherwise transmits) the Executive Director’s decision and response to comments on an application and draft permit. *See* 30 TEX. ADMIN. CODE § 55.201(a).

⁴ *See* TEX. WATER CODE § § 5.556; 5.115.

⁵ TEX. WATER CODE § 5.115(a); *see also* 30 TEX. ADMIN. CODE § 55.203(a).

⁶ *Id.*

were not withdrawn; and

- (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.⁷

Consistent with the Senate Bill 709 changes to the Texas Water Code adopted in 2015, the Commission may consider additional factors in determining whether a person is an affected person, including:

- (1) the merits of the underlying application and supporting documentation in the commission's administrative record, including whether the application meets the requirements for permit issuance;
- (2) the analysis and opinions of the executive director; and
- (3) any other expert reports, affidavits, opinions, or data submitted by the executive director, the applicant, or hearing requestor.⁸

The Third Court of Appeals has explained that TCEQ, in assessing the above factors for a given request, “enjoys the discretion to weigh and resolve matters that may go to the merits of the underlying application, including the likely impact the regulated activity . . . will have on the health, safety, and use of property by the hearing requestor and on the use of natural resources.”⁹ TCEQ’s application of the factors described above “may include reference to the permit application, attached expert reports, the analysis and opinions of professionals on its staff, and any reports, opinions, and data it has before it” and specifically may include modeling reports that assess the impact of the proposed emission or discharge.¹⁰ In making these determinations, the court was applying the Texas Supreme Court’s 2013 decision in *Texas Commission on Environmental Quality v. City of Waco*, which affirmed TCEQ’s discretion to rely on such information in making an affected person determination.¹¹

⁷ 30 TEX. ADMIN. CODE § 55.203(c).

⁸ TEX. WATER CODE § 5.115(a-1); 30 TEX. ADMIN. CODE § 55.203(d).

⁹ *Sierra Club v. Tex. Comm’n on Env’tl. Quality*, 455 S.W.3d 214, 223 (Tex. App.—Austin 2014, pet. denied).

¹⁰ *See id.*

¹¹ *Id.*

2. Affected Group or Association

In certain limited circumstances, a group or association can qualify as an “affected person.”

But a group or association will have standing to participate in a contested case hearing only if each of the following four requirements are met:

- (1) comments on the application are timely submitted by the group or association;
- (2) the request identifies, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right;
- (3) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (4) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.¹²

A contested case hearing request filed by a group or association must identify an individual who is a member of the group or association who is an “affected person” for purposes of the application and who has a personal justiciable interest in the application that is not an interest shared with members of the general public.

B. The Request Must Be Filed Timely with the TCEQ

TCEQ rules provide that a request for contested case hearing must be filed no later than 30 days after the Chief Clerk mails (or otherwise transmits) the Executive Director’s decision and RTC and provides instructions for requesting that the Commission reconsider the decision or hold a contested case hearing.¹³ TCEQ’s rules do not provide a cure period or other opportunity to correct deficient hearing requests.

¹² 30 TEX. ADMIN. CODE § 55.205(b).

¹³ 30 TEX. ADMIN. CODE § 55.201(a)&(c).

C. The Required Elements of a Request for Contested Case Hearing

TCEQ rules at 30 TEX. ADMIN. CODE § 55.201(d) identify the requirements for a request for contested case hearing:

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 requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor 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) for applications filed: ...
- (B) on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor 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 requestor should, to the extent possible, specify any of the executive director's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, and list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.¹⁴

TCEQ rules regarding the scope of contested case hearings also provide that the Commission may not refer an issue to SOAH for a contested case hearing unless the Commission determines that the issue:

¹⁴ 30 TEX. ADMIN. CODE § 55.201(d).

- (1) involves a disputed question of fact or a mixed question of law and fact;
- (2) was raised during the public comment period, and, for applications filed on or after September 1, 2015, was raised in a comment made by an affected person whose request is granted; and
- (3) is relevant and material to the decision on the application.¹⁵

IV. Application of the Legal Standards for Review of Contested Case Hearing Requests

Three groups or associations (STEJN, the Carrizo/Comecrudo Nation of Texas, Inc., and Save RGV) and 12 individuals filed requests for hearing on the Application. Because no individual identified in any hearing request has a personal justiciable interest in the Application, none of the requestors qualify as affected persons, or affected groups or associations. The interests of the individuals identified in the hearing requests are common to members of the general public.

The following facts are instructive in the evaluation of the individual and association hearing requests filed on the Application:

- No requestor or member of a requesting association claims to live or own property adjacent to or within several miles of Starbase; the requestor who provided an address with the closest property interest is located approximately 7 miles from Starbase, on South Padre Island.
- No requestor or member of a requesting association claims to live or own property along the entire distance of the deluge water discharge from the proposed outfalls to the point at which the discharged water would enter the Rio Grande River, or from that point downstream to the mouth of the Rio Grande River where the river enters the Gulf of Mexico.
- The distance from the proposed outfalls across the mudflats to the Rio Grande River

¹⁵ 30 TEX. ADMIN. CODE § 50.115(c).

is approximately 2.3 miles. The distance from the point at which the discharged water would enter the Rio Grande River to the mouth of the river, where the discharged water would enter the Gulf of Mexico, is approximately 2 additional miles.¹⁶

- No requestor or member of a requesting association claims to recreate in the mudflats along the discharge route – the first 2.3 miles of the discharge route.
- No requestor or member of a requesting association claims to recreate in Rio Grande River Tidal Segment No. 2301 between the point at which the discharged water would enter the river and the mouth of the Rio Grande River – the full 4.3 miles of the discharge route.
- No requestor or member of a requesting association claims to live or own property at any point along the Rio Grande River upstream of the point at which the discharged water would enter the river.
- Some requestors and members of requesting associations claim recreational or other interests at the mouth of the Rio Grande River, which is approximately 4.3 miles from proposed outfalls, based on occasional visits to this public area.
- Some requestors and members of requesting associations claim recreational or other interests at Boca Chica Beach, which is a public beach located on the Gulf of Mexico that is approximately 2.5 miles north of the mouth of the Rio Grande River. Boca Chica Beach is not on the discharge route of the deluge water that is proposed to be authorized by the Application.

¹⁶ Affidavit of Carolyn Wood (attached).

- To the extent any requestors raise issues related to launches or return-to-launch events, those activities are regulated by the Federal Aviation Administration (“FAA”) and are not within the jurisdiction of the TCEQ under Chapter 26 of the Texas Water Code.¹⁷

None of the requestors – either an individual requestor or the identified member of a requesting association – claim to reside or to have a legal interest in any property adjacent to or near Starbase or along the discharge route from the Outfalls to the Gulf of Mexico, which is approximately 4.3 miles.

A. TPDES Permits and “Affected Persons”

1. Distance from the Point of Discharge

The TCEQ reasonably evaluates the distance between a requestor and the activity to be authorized in determining whether an individual or association that filed a request for contested case hearing may be affected in a manner not common to the general public. Texas courts have approved of this practice – for example, the Third Court of Appeals has upheld past Commission determinations that a requestor is not an affected person based on Commission determinations that the requestors resided more than 3 miles¹⁸ and 1.3 miles¹⁹ from proposed facilities seeking authorization under the waste program.

Specific to the TPDES program, the TCEQ’s application provides clear guidance on the proximity of persons who may claim that they are likely to be affected by the Application. The application instructions require that an applicant identify and mail notice to those persons who own property that adjoins the facility or is within one mile downstream of the discharge point on

¹⁷ See TEX. WATER CODE, § 26.027(a) (“[t]he commission may issue permits and amendments to permits for the discharge of waste or pollutants into or adjacent to water in the state.”)

¹⁸ *Sierra Club v. Tex. Comm’n on Env’tl Quality*, 455 S.W.3d 214, 224 (Tex. App.—Austin 2014, pet. denied).

¹⁹ *Collins v. Tex. Nat. Res. Conservation Comm’n*, 94 S.W.3d 876, 883 (Tex. App.—Austin 2002).

non-tidal waters or ½ mile of the discharge point if the discharge is to a tidally influenced water body.²⁰ Given that no requestor has any property interest near Starbase or along the discharge route, and the considerable downstream distance between the closest recreational activity of any requestor and Starbase, none of the requestors will be affected by issuance of the draft permit, and certainly not in a manner that is not common to the general public.

2. Recreational and Other Non-Property Interests are Not Sufficient for Affected Person Status

Some requestors and members of requesting associations claim recreational and other interests at the mouth of the Rio Grande and Boca Chica Beach. These interests are not sufficient to make the requestors “affected persons.” Under Texas law governing standing, an injury cannot simply be speculative, but instead must be “concrete, particularized, actual, or imminent.”²¹ When the claimed interest is based on recreational interests, Texas law makes clear that standing is not conferred without an interest in property that is affected by the challenged action – to distinguish the claimed injury from that experienced by the general public.²² The Third Court of Appeals has stated:

There is no Texas authority for the proposition that . . . injury to a member’s environmental, scientific, and recreational interests generally and without any interest in or connection to the real property involved – is the type of interference with a legally protected interest or injury that confers standing as a matter of state law.²³

The Commission has previously found that recreational activities that take place on public waters miles downstream from a permitted discharge are not a valid basis for affected person status. In *Application of Southwestern Electric Power Company for Renewal and Major Amendment of*

²⁰ TCEQ, Instructions for Completing the Industrial Wastewater Permit Application (Form 10411-10055inst), available at <https://www.tceq.texas.gov/downloads/permitting/wastewater/forms-tools/10411-10055inst.docx>.

²¹ *Tex. Disposal Sys. Landfill v. Tex. Comm’n on Env’tl Quality*, 259 S.W.3d 361, 363 (Tex. App.—Amarillo 2008) (citing *DaimlerChrysler Corp. v. Inman*, 252 S.W.3d 299, 304-305 (Tex. 2008)).

²² *Save Our Springs Alliance v. City of Dripping Springs*, 304 S.W. 3d 871, 880 (Tex. App.—Austin 2010).

²³ *Id.* at 882.

TPDES Permit No. WQ0002496000, the TCEQ denied two associations' hearing requests – as recommended by the State Office of Administrative Hearings (“SOAH”) – because the associations had not demonstrated standing as “affected associations.”²⁴ The associations had identified two members on which they based their party status claims, and the closest of the two engaged in occasional recreational activity in a location on a river that was approximately four miles south of the facility (a power plant) that held the TPDES permit at issue.²⁵ The Commission's Order included findings that the river was used by members of the general public for the same recreational uses as those individuals on whom the hearing request was based.²⁶ The Commission found that their recreational uses of the river were “common to members of the general public” and found that they were not affected persons – and that the associations in which they were members were not affected associations.²⁷

As discussed in further detail below, consistent with Commission precedent, none of the hearing requests meet the requirements for standing to participate in a contested case hearing on the Application, and the Commission should deny the requests for contested case hearing.

The organizations' requests for contested case hearings are addressed first, followed by the individual requests for a contested case hearing.

B. Hearing Requests filed by Groups or Associations

1. South Texas Environmental Justice Network (“STEJN”)

STEJN filed a request for hearing dated December 27, 2024, that identifies five individual members of the group or association: Rebekah Hinojosa, Christopher Basaldu, Juan Mancias,

²⁴ Order, *Application by Southwestern Electric Power Company for Renewal and Amendment to TPDES Permit No. WQ0002946000*, TCEQ Docket No. 2011-2199-IWD (2012); Proposal for Decision, *Application by Southwestern Electric Power Company for Renewal and Amendment to TPDES Permit No. WQ0002946000*, SOAH Docket No. 582-12-5301; TCEQ Docket No. 2011-2199-IWD (2012).

²⁵ *Id.*; Commission Order at Finding of Fact No. 21.

²⁶ *Id.*; Commission Order at Finding of Fact Nos. 39-45.

²⁷ *Id.*; Commission Order at Finding of Fact No. 45; Conclusion of Law No. 1.

Josette Hinojosa, and Emma Guevara. STEJN has failed to demonstrate that it meets the requirements for association standing. An affected group or association must identify, “by name and physical address, one or more members of the group or association that would otherwise have standing to participate in a hearing in their own right.”²⁸ STEJN has not provided any information on the physical address of its members on whom STEJN purports to base its associational standing. STEJN’s failure to include the address thus fails to substantially comply with the requirements for seeking a contested case hearing as an association and prejudices the Applicant and the Executive Director in responding to STEJN’s contested case hearing request and prejudices the Commission in evaluating the merits of the request. Because no STEJN member identified in the hearing request qualifies as an affected person in their own capacity, STEJN lacks affected person status as an association and its contested case hearing request should be denied.

STEJN’s hearing request identifies the following individual members of the association and describes their interests in the Application as follows:

Member #1 – Rebeka Hinojosa. Rebekah Hinojosa claims to lead tours to Boca Chica Beach, visiting approximately three to six times per year, and is concerned about reduced wildlife activity as a result of the proposed discharges under the Permit.²⁹ As stated above, Boca Chica Beach is on the Gulf of Mexico and over two miles away from the mouth of the Rio Grande River, which itself is approximately 4.3 miles from the discharges that are the subject of this proceeding. Use of Boca Chica Beach and leading members of the public on tours of the beach does not provide Ms. Hinojosa with a personal justiciable interest that is different from that of the general public. The request fails to address how the proposed discharges would reach Boca Chica Beach in a manner that

²⁸ 30 TEX. ADMIN. CODE § 55.205(b)(2).

²⁹ See STEJN Contested Case Hearing Request at 4–5 (Dec. 26, 2024) [hereinafter “STEJN Request”].

would affect wildlife.³⁰ To the extent Ms. Hinojosa is alleging that wildlife impacts are the result of launches and return-to-launch events, these are activities regulated by the Federal Aviation Administration (“FAA”) and are not before the TCEQ in this Application. Ms. Hinojosa also expresses concern about launch frequency, road closures, traffic, and reduced parking at the beach due to increased tourism to see SpaceX launch activities³¹; these activities are not before the TCEQ in its decision on its Application and further, Ms. Hinojosa’s interest in those activities are common to members of the public.

Member #2: Christopher Basaldu. Mr. Basaldu claims to visit Boca Chica Beach and the mouth of the Rio Grande River approximately eight times per year to practice the lifeways of the Carrizo/Comecrudo Nation of Texas, Inc., also known as the Esto’k Gna, and to observe plants and wildlife as part of those lifeways.³² Occasional visits to those public areas that are more than 4.3 miles from the location of the discharge do not create a personal justiciable interest in the Application that is different than the general public. Mr. Basaldu also asserts concerns with access to the beach to practice his religious services, to do his work and to continue to enjoy his recreation free from SpaceX launches. Beach access is not before the TCEQ in this proceeding.

Member #3: Juan Mancias. Mr. Mancias claims to visit the mouth of the Rio Grande River on average eight times per year, for recreational interests and spiritual fulfillment.

Member #4: Josette Hinojosa. Ms. Hinojosa claims to visit Boca Chica Beach approximately once per month, and to lead educational tours of the beach. Ms. Hinojosa

³⁰ *See id.*

³¹ *Id.* at 5.

³² *Id.* at 5–6.

also claims to visit Boca Chica Beach and the area of the mouth of the San Jacinto River for spiritual purposes. Ms. Hinojosa expresses a concern that SpaceX's discharges will degrade the quality of the environment at Boca Chica Beach the area between Boca Chico Beach and the mouth of Rio Grande River.³³ These public areas are over 4.3 miles from the discharge that is the subject of this proceeding. Ms. Hinojosa's activities do not create a personal justiciable interest and are common to the members of the public.

Member #5: Emma Guevara. Ms. Guevara claims that she visits Boca Chica Beach and the mouth of the Rio Grande River at least six times per year, but she does not express an individualized interest in the Application beyond speculative concerns that discharges from Outfalls 001 and 002 could affect the beach. Although Ms. Guevara points to her activism against SpaceX's operations, the development of Starbase, and beach closures, such effects are not before the TCEQ in its decision on this Application. The areas visited by Ms. Guevara are at least 4.3 miles from the discharge that is the subject of the Application and her visits do not create a personal justiciable interest different than the general public.

The STEJN members' concerns related to their use of the public areas at the mouth of the Rio Grande River and Boca Chica Beach (a public beach) do not have a sufficient relationship to the Application or the deluge water discharge to be authorized by the Permit to merit a contested case hearing. No STEJN member alleges that discharges from the outfalls will cause degradation or impairment of the beach aside from conclusory and speculative statements about such impacts. Because no member of STEJN has a personal, justiciable interest in this Application, STEJN lacks affected association status and the Commission should deny its request for a contested case

³³ STEJN Request, at 6.

hearing.

2. Carrizo/Comecrudo Nation of Texas, Inc. (member: Juan Mancias)

The Carrizo/Comecrudo Nation of Texas, Inc. filed a request for hearing dated December 27, 2024, that identifies Juan Mancias as a member. The hearing request states that Mr. Mancias visits the area of the mouth of the Rio Grande River at least eight times per year for recreational and spiritual purposes.³⁴ Mr. Mancias appears to be concerned by the presence of SpaceX at Boca Chica and launch activity, which actions are regulated by the FAA and are not before the Commission in this Application.³⁵

The Carrizo/Comecrudo Nation of Texas, Inc. did not provide an address for Mr. Mancias in its hearing request. The failure to include the address thus fails to substantially comply with the requirements for seeking a contested case hearing as an association and prejudices the parties and the Commission in evaluating to the Carrizo/Comecrudo Nation of Texas, Inc.'s contested case hearing request.

As previously stated, the mouth of the Rio Grande River is approximately 4.3 miles from the discharge that is the subject of this proceeding. Mr. Mancias's occasional visits to those public areas do not establish an interest in the Application that is different from members of the general public. Because Mr. Mancias lacks a personal justiciable interest in the Application, the Carrizo/Comecrudo Nation of Texas, Inc. lacks the required affected association status and the TCEQ should deny its request for a contested case hearing.

3. Save RGV (member: Mary Angela Branch)

Save RGV filed a request for contested case hearing on December 27, 2024, that identifies

³⁴ Carrizo/Comecrudo Nation of Texas, Inc., and Save RGV's Request for Reconsideration and Request for Contested Case Hearing, at 11 (Dec. 27, 2024) [hereinafter "Carrizo/Comecrudo Nation of Texas, Inc./Save RGV Request"].

³⁵ See Carrizo/Comecrudo Nation of Texas, Inc./Save RGV Request at 11.

a single member, Mary Angela Branch, as its basis for associational standing. Ms. Branch claims to visit Boca Chica Beach approximately six times per year and expresses an interest in observing wildlife from Boca Chica Beach.³⁶

Save RGV fails to provide an address for Ms. Branch in its hearing request. Save RGV's failure to include the address of its allegedly affected member fails to substantially comply with the requirements for seeking a contested case hearing as an association and prejudices the parties in responding to Save RGV's contested case hearing request and hinders the Commission's evaluation of Save RGV's claim of associational standing.

As stated previously, Boca Chica Beach is on the Gulf of Mexico and is located over six miles from the location of the discharge that is the subject of this proceeding. Over two miles of that distance are along the coast of the Gulf of Mexico. Ms. Branch's use of Boca Chica Beach to observe wildlife is not a personal justiciable interest in this Application that is different than the general public. Because no Save RGV member qualifies as an affected person in their own capacity, Save RGV lacks affected association status, and its contested case hearing request should be denied.

C. Hearing Requests filed by Individual Requestors

In addition to the above groups, 12 individuals filed requests for contested case hearing on the Application. The individual requestors are identified on the following table:

Individual Requestor	Date of RFH	Address Provided in RFH	Approximate Aerial Distance from Proposed Starbase Outfalls
Robert Christopher Basaldu	10/17/24 (x2)	651 Old Port Isabel Rd. Brownsville, TX, 78521	21 miles
Eric R. Roesch	10/17/24	3714 Trail Bend Missouri City, TX 77459	263 miles
Josue Salazar	10/13/24 (x2)	2538 Shofner Lane	37 miles

³⁶ Carrizo/Comecrudo Nation of Texas, Inc./Save RGV Request, at 12.

Individual Requestor	Date of RFH	Address Provided in RFH	Approximate Aerial Distance from Proposed Starbase Outfalls
		Harlingen, TX 78552	
Theresa de Salvo	10/10/24 and 9/9/24	200 W Sunny Isle St. South Padre Island, TX 78597	7 miles
Amanda Jasso	10/9/24 (x2)	606 Arthur Street Elgin, TX 78621	301 miles
Kim Sandoval	10/3/24 (x2)	26726 Scarlett Circle Harlingen, TX 78552	40 miles
Kalea Bridgemohan	10/3/24	1980 Horal St. San Antonio, TX 78227	253 miles
Reka Gal	10/2/24	Bahnhofstrasse 49 Munich, Bavaria 82041	5,692 miles
Claudia Michelle Serrano	9/27/24	4424 White Oak Lane Brownsville, TX 78521	19 miles
Sara Calderon	9/12/24	P.O. Box 152548 Austin, TX 78715	294 miles
Joaquin Villarreal	9/9/24	4 Texcoco Brownsville, TX 78526	21 miles
Chanhee Sung	9/9/24	2709 W. Fern Ave. Harlingen, TX 78501	70 miles

No individual requestor claims to live or own property along the entire distance of the deluge water discharge from the proposed outfalls to the point at which the discharged water would enter the Rio Grande River, or from that point downstream to the mouth of the Rio Grande River where the river enters the Gulf of Mexico. No individual requestor claims to recreate in Rio Grande River Tidal Segment No. 2301 between the point at which the discharged water would enter the river and the mouth of the Rio Grande River – the full 4.3 miles of the discharge route. The individual requestor who provides an address closest to Starbase and the proposed discharge point is Theresa do Salvo, who lives on South Padre Island approximately seven miles north of the discharge route and not on any discharge route for the proposed wastewater stream. The next closest individual requestors live in Brownsville, approximately 19-20 miles from the proposed discharges that are the subject of this proceeding.

These requestors typically followed a form letter with claims about being “directly

impacted.” Although some requestors articulate concerns about environmental impacts, no requestor articulates the required personal justiciable interest in the Application that is not common to members of the general public, and as such, these requests should be denied.

Many of the individual requestors express general concerns about the impacts of pollution or the impacts of the discharges on species or the environment, but do not express any interest in the actual location of the discharge or state an intent to visit the area.³⁷ Amanda Jasso, a former resident, describes her disagreement with the development of Boca Chica but states no personal interest in the Application or visits to the area. Josue Salazar expresses concern about impacts to locally sourced fish that he consumes, but this interest is common to the general public and Mr. Salazar does not articulate a more specific interest in the area or the proposed discharges that would be authorized under the Permit. Sara Calderon states her disagreement with SpaceX’s presence in the area where she used to live but makes no statement about a personal interest in the Application or any intent to return to the area. Eric Roesch filed a contested case hearing request but articulates no personal stake in the area or natural resources surrounding Starbase.

Robert Christopher Basaldu requested a contested case hearing in his personal capacity, on similar grounds to those described in the STEJN request (Mr. Basaldu is identified as a member of STEJN). For the same reasons discussed above regarding his membership in STEJN, Mr. Basaldu lacks a personal justiciable interest in the Application. Occasional visits to public areas such as the mouth of the Rio Grande River (more than 4.3 miles from the discharge point) or Boca Chica Beach (not on the discharge route) do not create a personal justiciable interest in the Application that is different than the general public.

The individuals who filed requests for contested case hearing on the Application are not

³⁷ See Contested Case Hearing Requests of Theresa De Salvo, Kalea Bridgemohan, Kim Sandoval, Reka Gal, Chanhee Sung, and Claudia Michelle Serrano, Joaquin Villareal.

affected persons. Because none of the individual requestors demonstrate a personal justiciable interest in the Application that is distinct from the interests of the general public, the TCEQ should deny the contested case hearing requests filed by the individual requestors.

V. Requests for Reconsideration

Texas Water Code Section 5.556 provides that a permit may request that the Commission reconsider the Executive Director's decision on a TPDES permit application. TCEQ rules require that a request for reconsideration of the Executive Director's decision must meet the following requirements:

- (1) The request must be in writing and be timely filed by United States mail, facsimile, or hand delivery with the Chief Clerk;
- (2) The request should contain the name, address, daytime telephone number, and, where possible, fax number of the person who files the request; and
- (3) The request for reconsideration must expressly state that the person is requesting reconsideration of the Executive Director's decision and give reasons why the decision should be reconsidered.³⁸

Neither the Texas Water Code nor any TCEQ rule provides a standard for determining when the Commission should grant a request for reconsideration.

The Commissioners' Integrated Database identifies requests for reconsideration that have been timely filed by two individuals (Shane Tomlinson and Jose Cepeda) and two associations (Save RGV and the Carrizo/Comecrudo Nation of Texas, Inc.). None of the reconsideration requests raises a material fact issue or identifies a basis upon which the Executive Director's decision should be reconsidered. Instead, the requests merely set differences of opinion the requestors have with the procedural and technical decisions the Executive Director made in preparing the draft permit. The requests for consideration generally restate issues that the requestors made in their

³⁸ 30 TEX. ADMIN. CODE § 55.201(e).

comments and that have been addressed by the Executive Director in the RTC. And the reconsideration requests' attempt to introduce extraneous information that is not part of the permit record is addressed by the Executive Director's longstanding permitting procedures and the monitoring and potential permit reopener requirements of Other Requirement No. 12. The requests fail to identify any issue that merits sending the Application back to the Executive Director for reconsideration and should be denied.

SpaceX responds to the requestors' claimed grounds for reconsideration in the topic headings below.

Public Participation Rights

Save RGV and the Carrizo/Comecrudo Nation of Texas, Inc. ("the Associations") request reconsideration on the grounds that TCEQ sought to clarify specific requests the Associations made to the TCEQ under the Texas Public Information Act ("TPIA") and allege that these requests prejudiced the Associations' participation in the public process. The Associations attempt to smear the TCEQ via accusations of bad faith, where instead TCEQ is attempting to follow the standard practice under the TPIA for ensuring documents are responsive and properly handled under the TPIA.

The Associations do not allege that TCEQ has failed to comply with the public participation requirements of the TPDES permitting processes. TCEQ has made the Application, the Executive Director's preliminary decision, and the draft permit available for review at the Port Isabel Public Library, the TCEQ main office in Austin, and the TCEQ website. What the Associations apparently want is extra information that goes beyond what is specified in TCEQ's rules. The Associations' request for reconsideration on this point is meritless and therefore should be denied. Further, the Associations' request for reconsideration, if granted, would establish a

harmful precedent that project opponents can wait until the last minute to file TPIA requests for a project and use the TPIA as a basis to delay the ordinary permitting procedures of state agencies.

Compliance History

The Associations allege that the Executive Director did not properly consider SpaceX's compliance history. The Executive Director evaluated SpaceX's compliance history in accordance with TCEQ rules and responded to similar allegations in RTC No. 7. The Associations' request for reconsideration should be denied on this point.

Sufficiency of the Antidegradation Review

The Associations allege in the requests for reconsideration that the Executive Director's antidegradation review is deficient. Because the Associations did not raise an issue with the antidegradation review during the comment period, the Executive Director did not specifically respond to the issue in the RTC. However, in the RTC the Executive Director refers to the antidegradation review that it conducted in accordance with and pursuant to 30 TAC Section 307.5 and the TCEQ's Procedures to Implement the Texas Surface Water Quality Standards (June 2010) in RTC Nos. 1, 5, and 14, in responding to other issues raised in the comments. The Executive Director states in each of those RTC Nos. that the antidegradation review of the receiving waters and protection of their uses and water quality was performed in accordance with 30 TAC Section 307.5 and the TCEQ's Procedures to Implement the Texas Surface Water Quality Standards (June 2010) as required. The antidegradation review was conducted according to the Executive Director's procedures and the Associations' request for reconsideration based on the antidegradation review should be denied.

Agency Compliance with Technical Review Procedures

The Associations also complain that the TCEQ did not consider sampling results that the

Associations obtained through discovery in a lawsuit that is unrelated to the Application or the proposed permit. The Associations fail to mention that the sampling data was collected and submitted to TCEQ pursuant to multi-sector general permit (“MSGP”) requirements; SpaceX’s discharges pursuant to that MSGP were routed to different outfalls with different receiving waters and are subject to other compliance requirements. The Executive Director followed its procedures in requiring samples from SpaceX that would be representative of the proposed discharges via Outfalls 001 and 002, and TCEQ is not required to consider other discharges to other outfalls under other programs as part of the TPDES permit review of the Application. Further, as is often the Executive Director’s practice when issuing new permits for intermittent sources, to ensure that the Permit is based on representative wastewater discharges and is protective of receiving waters, the Permit includes Other Requirement No. 12 which requires SpaceX to provide additional discharge samples to the Executive Director. Other Requirement No. 12 also provides that TCEQ staff may initiate a permit amendment to prescribe any additional necessary limits based on the results of those additional discharge samples required by the permit.

The Associations failed to raise their complaints about the technical review in their comments on the Application, and so the Executive Director did not respond directly to the allegation that the Executive Director should have considered discharges under a different program in this Application. However, the Executive Director does describe the exhaustive technical review of the Application in RTC Nos. 2, 3, 4, 6, 13, 17, 20, and 21. The Commissioners should deny the Associations’ request for reconsideration.

Proposed Discharge and Nature of Discharge Route

The Associations state that Executive Director’s review of the Application mischaracterizes the nature of the discharge from the deluge system because it ignores how the

deluge system can cause vapor and overspray. The Application and the Executive Director's review properly addressed the wastewater discharge route to be authorized by the Permit. The Executive Director has considered this topic and addressed it in the RTC's background description of Starbase,³⁹ in RTC No. 2 (observing that "[f]ederal regulations in 40 CFR 122.44(i)(1)(ii) only require that the volume of effluent discharged from each outfall be required to be reported in an NPDES permit") and in RTC Nos. 4, 6, 11 and 20. In RTC No. 20, the Executive Director explains that effluent monitored at Outfalls 001 and 002 will be representative of the quality of overspray. The Association's request for reconsideration should be denied on this point.

Enforceability of the Permit –Specific Terms and Conditions and Monitoring and Reporting, Including Operational Requirements

The Associations allege that the Draft Permit lacks specific terms and conditions and that sampling and monitoring requirements in the Draft Permit are unenforceable. The terms and conditions of the Draft Permit, including additional permit-specific Other Requirements, are consistent with the TCEQ and EPA rules that govern the TPDES program and TCEQ practices. The Executive Director determined that the monitoring and reporting requirements in the Draft Permit are sufficient to ensure that SpaceX demonstrates compliance with Permit requirements. The Facility Description in the Background section of the RTC describes the specific outfall locations and effluent limitations, and other requirements applicable to the containment structures are described in RTC Nos. 2, 3, 4, 6, 11 and 20; the Associations' request for reconsideration should be denied on this point.

Endangered Species

The Associations request reconsideration on the basis that the Executive Director performed the wrong analysis for endangered species that may be affected by the proposed

³⁹ See RTC at 3–4.

discharge. The Executive Director addresses these comments in RTC No. 5. The Executive Director explains that although the piping plover *Charadrius melodus* can occur in Cameron County, the discharge is not to a watershed of high priority pursuant to Appendix A of the 1998 United States Fish and Wildlife Service’s (“USFWS”) biological opinion that is part of the State of Texas authorization of the TPDES permitting program. To date, the USFWS has not elected to revise or provide further updates to the 1998 biological opinion. The 1998 biological opinion is incorporated as Appendix B (Locations of Federally Endangered and Threatened Aquatic and Aquatic-Dependent Species in Texas) into the *Procedures to Implement the Texas Surface Water Quality Standards* (RG-194) June 2010 (“IPs”). The IPs are an integral part of the Executive Director’s preparation of all TPDES permits. The Executive Director followed the IPs in its endangered species analysis of the Application, addressed these comments in the RTC, and this request for reconsideration should be denied.

Texas Coastal Management Program

The Associations request reconsideration on the grounds that the Draft Permit is allegedly not consistent with the goals and policies of the Texas Coastal Management Program (“CMP”). However, the Executive Director considered the goals of the CMP and concluded that the Draft Permit would be consistent with the CMP in accordance with the regulations issued by the Texas General Land Office.⁴⁰ The Statement of Basis is one of the documents that have been made available to the public at the Port Isabel Public Library, the TCEQ’s main office in Austin, and the TCEQ’s website. As described by the Executive Director in RTC No. 6, the Executive Director evaluated the nature of the discharge and the suitability of Rio Grande Tidal Segment No. 2301 to

⁴⁰ See TCEQ Executive Director, Statement of Basis/Technical Summary and Executive Director’s Preliminary Decision (TPDES Permit No. WQ0005462000) at 5 (Aug. 28, 2024). See also 30 Tex. Admin. Code §§ 281.43, 281.45.

receive the discharge. The Executive Director determined that the discharge is not expected to exacerbate or contribute to existing water quality concerns in the Rio Grande Tidal. As with the other requests for reconsideration, the Associations' disagreement with the Executive Director's conclusion cannot be the basis for granting a request for reconsideration.

Individual Requestors – Water Quality Concerns

Jose Cepeda and Shane Tomlinson request that the Executive Director reconsider the issuance of the Permit. Mr. Cepeda expresses water quality concerns about the discharge of water into South Bay, Boca Chica Beach, and South Padre Island. Mr. Tomlinson expresses concerns about South Bay, Lower Rio Grande Valley Wildlife Refuge, and Boca Chica Beach. Both of these requests for reconsideration focus on topics that have been thoroughly addressed by the Executive Director – see RTC Nos. 3, 5, 6, 10, 12, 13, 14, 15, 17, 18, and 20. The Executive Director in the RTC responds to concerns about whether the draft permit will be protective of the receiving waters and their uses downstream from the discharge. Moreover, both of these requests for reconsideration focus on areas that are not within the discharge route of the proposed discharge.

None of the reconsideration requests raises a material fact issue or identifies a basis upon which the Executive Director's decision should be reconsidered. As a result, all requests for reconsideration should be denied.

VI. Conclusion and Prayer

For the reasons discussed above, SpaceX respectfully requests that the Commission deny the contested case hearing requests and requests for reconsideration, adopt the Executive Director's Response to Public Comments, and issue TPDES Permit No. WQ0005462000.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Space Exploration Technologies Corporation's Response to Requests for Contested Case Hearing and Requests for Reconsideration was filed electronically with the Texas Commission on Environmental Quality on January 17, 2025. I further certify that a copy of the foregoing was sent to all persons on the attached mailing list via U.S. mail.



Whitney L. Swift

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DOCKET NO. 2024-1281-IWD; PERMIT NO. WQ0005462000

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Continued on next page

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TCEQ DOCKET NO. 2024-1821-IWD

APPLICATION BY	§	BEFORE THE TEXAS COMMISSION
SPACE EXPLORATION	§	
TECHNOLOGIES CORPORATION	§	ON
FOR TPDES PERMIT	§	
NO. WQ0005462000	§	ENVIRONMENTAL QUALITY

**SPACE EXPLORATION TECHNOLOGY CORPORATION'S
RESPONSE TO REQUESTS FOR CONTESTED CASE HEARING
AND REQUESTS FOR RECONSIDERATION**

EXHIBIT A – Affidavit of Carolyn Wood

STATE OF TEXAS	§
CAMERON COUNTY	§

Before me, the undersigned Notary Public in and for the State of Texas, on this day personally appeared Carolyn Wood, the affiant, whose identity is known to me. After I administered an oath, affiant testified as follows:

1. My name is Carolyn Wood. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am a Senior Environmental Regulatory Engineer for Space Exploration Technology Corporation (“SpaceX”) at Starbase in Boca Chica, Texas. I have been working in this role since September 2023.

3. Prior to my time at SpaceX, I worked at the Texas Commission on Environmental Quality (“TCEQ”) for over two decades, including four years as the Work Leader of the Water Section in the Harlingen Region Office (about 2016–2020). I also served the agency in a variety of other

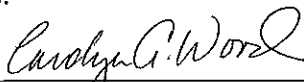
ways, including investigations and enforcement, community outreach, emergency response, training, and others.

4. In evaluating the requests for contested case hearing and requests for reconsideration on SpaceX's application for Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0005462000, I prepared the attached maps using the Google Earth application and its distance measurement tool.

5. Attachment A-1 shows the approximate distance from Outfall 001 to the Rio Grande River, which is about 2.3 miles.

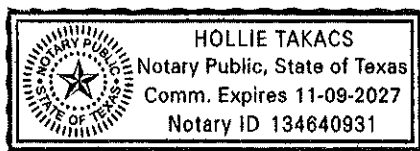
6. Attachment A-2 shows the approximate distance from Outfall 002 to the Rio Grande River, which is about 2.4 miles.

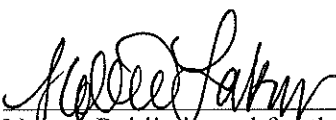
7. Attachment A-3 shows the approximate distance from the inflow point, where any discharges from Outfalls 001 and 002 could enter the Rio Grande River, to the mouth of the Rio Grande River. That distance is approximately 2 miles.



Carolyn Wood

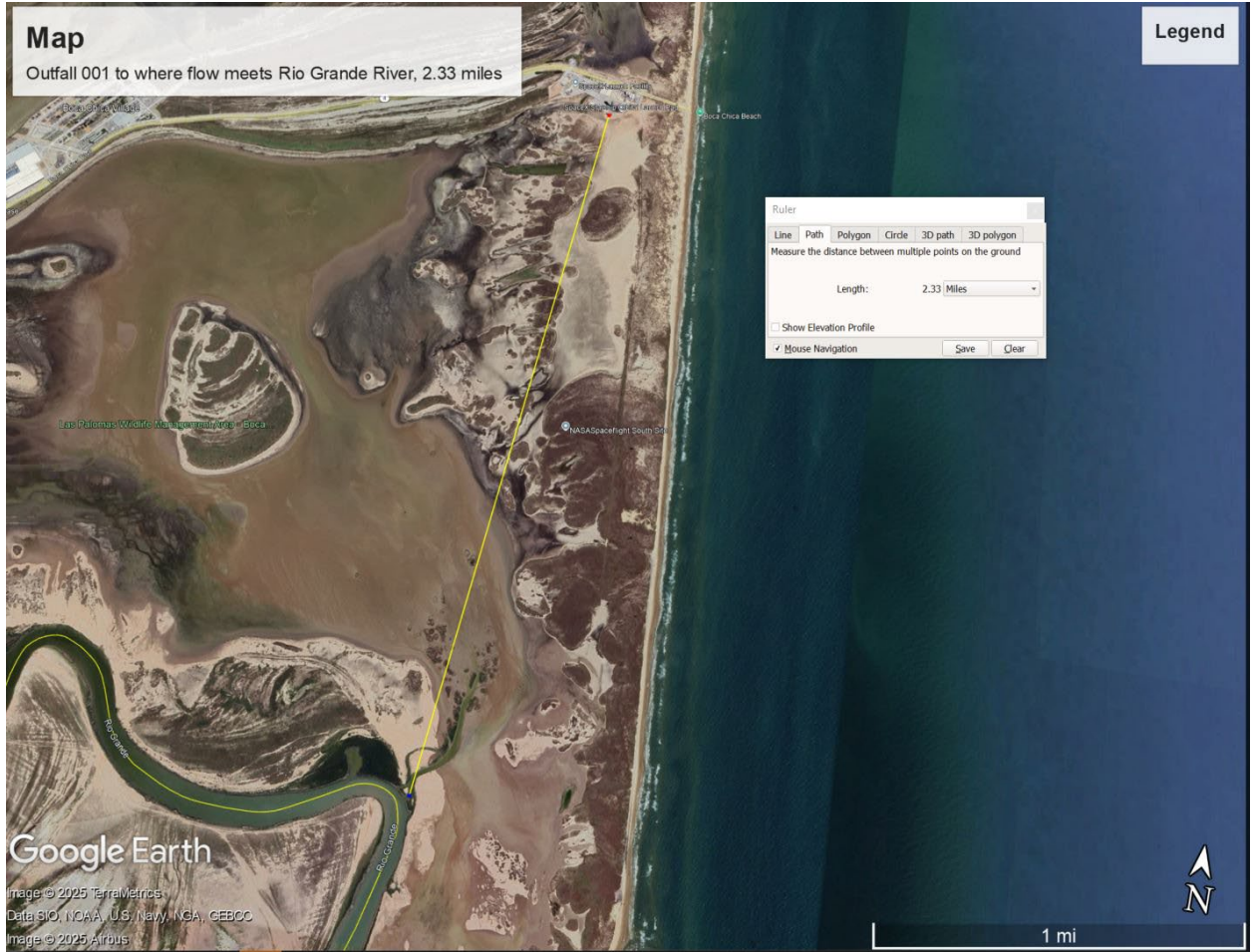
Sworn to and subscribed before me by Hollie Takacs on this 17th day of January, 2025.



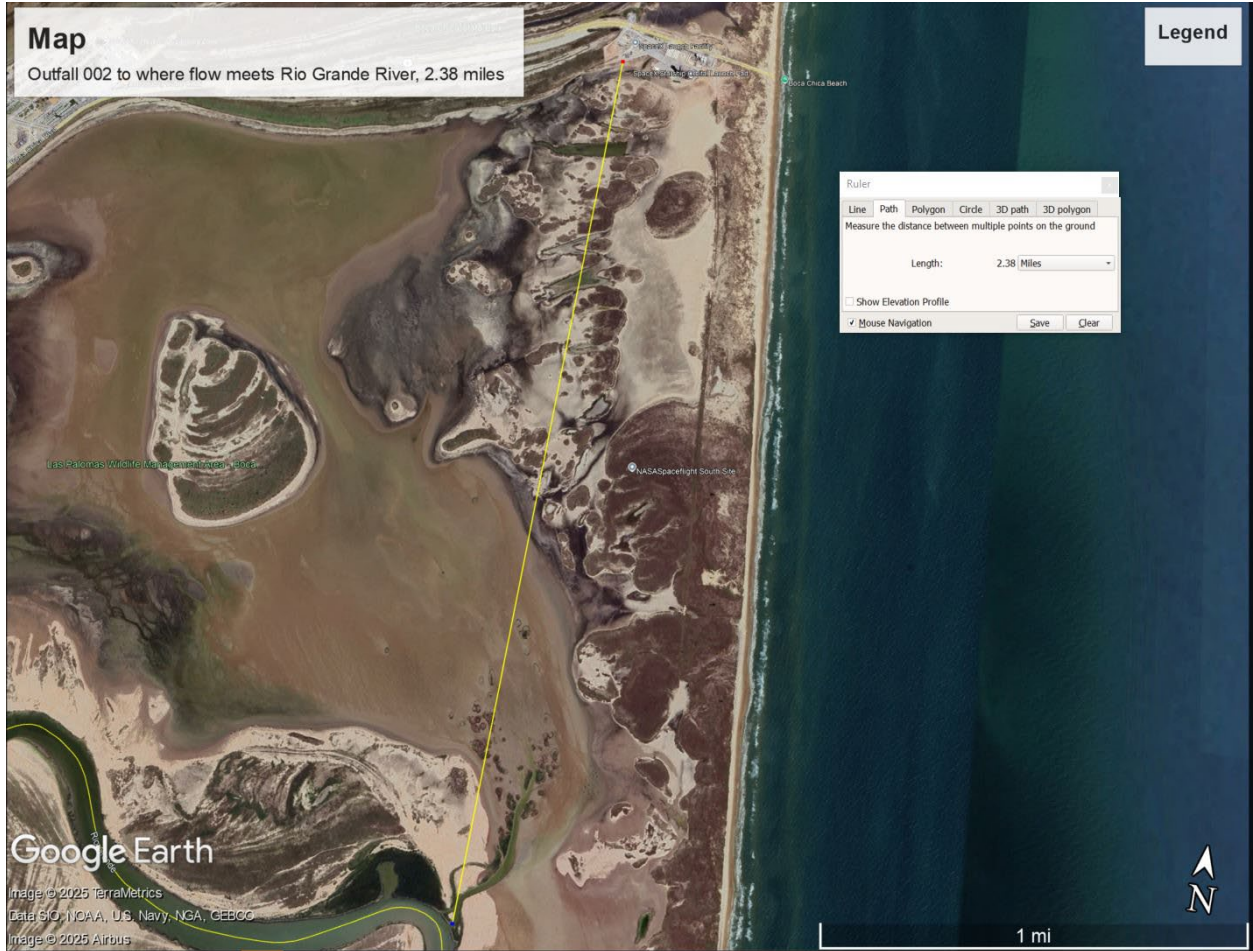


Notary Public in and for the State of Texas

Attachment A-1



Attachment A-2



Attachment A-3



From: whit.swift@bracewell.com
To: [EFiling](#)
Subject: Filing on Permit Number/Docket Number 2024-1821-IWD
Date: Friday, January 17, 2025 4:13:00 PM
Attachments: [Docket No 2024-1821-IWD - Applicant's Response to Requests for Hearing and Reconsideration - January 17 2025.pdf](#)

FILING CONFIRMATION NUMBER 701583732025017

REGULATED ENTY NAME STARBASE LAUNCH PAD SITE

RN NUMBER: RN111606745

PERMIT NUMBER: WQ0005462000

DOCKET NUMBER: 2024-1821-IWD

COUNTY: CAMERON

PRINCIPAL NAME: SPACE EXPLORATION TECHNOLOGIES CORP, CN602867657

FROM

FILED BY:

FILED FOR NAME: Whit Swift

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PHONE: 512-494-3658

DOCUMENT NAME: Docket No 2024-1821-IWD - Applicant's Response to Requests for Hearing and Reconsideration - January 17 2025.pdf

Based on 30 TAC Section 1.10(h), the TCEQ General Counsel has waived the filing requirements of Section 1.10(c) to allow the filing of documents using this online system. The General Counsel also has waived the requirements of Section 1.10(e) so that the time of filing your documents is the time this online system receives your filings. Filings are considered timely if received by close of business (usually 5:00 p.m. CST) on the deadline date unless otherwise ordered. If your document is for Commission consideration at an open meeting, General Counsel has also waived the requirement of Section 1.10(d) to file paper copies with the Office of the Chief Clerk.