

**SOAH DOCKET NO. 582-25-18697**  
**TCEQ DOCKET NO. 2025-0116-MWD**

<b>APPLICATION OF</b>	§	<b>BEFORE THE STATE OFFICE</b>
<b>HARRIS COUNTY MUNICIPAL</b>	§	
<b>UTILITY DISTRICT NO. 531</b>	§	<b>OF</b>
<b>FOR NEW TPDES PERMIT NO.</b>	§	
<b>WQ0016334001</b>	§	<b>ADMINISTRATIVE HEARINGS</b>

---

**APPLICANT HARRIS COUNTY MUNICIPAL UTILITY DISTRICT NO. 531’S  
EXCEPTIONS TO THE PROPOSAL FOR DECISION**

---

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

Applicant Harris County Municipal Utility District No. 531 (the “District” or “Applicant”) respectfully files these Exceptions to the Proposal for Decision (“PFD”) recommended by the Administrative Law Judge (“ALJ”) in the above-referenced case. The District agrees with the ALJ’s recommendation that the Texas Commission on Environmental Quality (“TCEQ” or the “Commission”) approve the application for Texas Pollutant Discharge Elimination System (“TPDES”) Permit No. WQ0016334001 (the “Application”) and issue the Executive Director’s draft permit (“Draft Permit”).

To support this recommendation, the ALJ properly presents findings of fact and conclusions of law in the proposed order for the Commission (the “Proposed Order”). The District offers two items for consideration in the review of the ALJ’s Proposed Order:

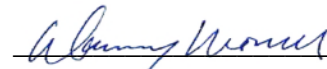
1. Finding of Fact No. 3: Change the date of administrative completeness to June ~~April~~ 21, 2023, consistent with page 2 of the PFD and the record in this case (*See* App. Ex. C, Tab C at 0060).

2. After Finding of Fact No. 22: Add the following finding of fact number 23 to note that the Applicant properly noticed the preliminary hearing convened by ALJ Stoebner on July 7, 2025, consistent with the record in this case (*See* App. Ex. C, Tab B at 00001-00004):

23. On May 30, 2025, notice of the preliminary hearing was published in English in the *Houston Chronicle*. The notice included the time, date, and place of the hearing, as well as the matters asserted, in accordance with the applicable statutes and rules.

The District appreciates the ALJ's careful consideration of the record evidence in this matter. The District respectfully requests that the Commission grant the Proposed Order recommended by the ALJ with the modifications described above.

Respectfully submitted,



Danny Worrell

Texas Bar No. 22002000

Katie Jeffress

Texas Bar No. 24126527

401 South 1<sup>st</sup> St., Suite 1300

Austin, Texas 78704

Tel: 512.322.2500

Fax: 512.322.2501

danny.worrell@bakerbotts.com

katie.jeffress@bakerbotts.com

***ATTORNEYS FOR APPLICANT  
HARRIS COUNTY MUD NO. 531***

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Applicant Harris County Municipal Utility District No. 531's Exceptions to the Proposal for Decision has been e-filed and served on the following counsel/persons by electronic mail on this 24th day of October, 2025.

#### **FOR THE EXECUTIVE DIRECTOR**

Via electronic mail:

Michael Parr, Staff Attorney  
Texas Commission on Environmental Quality  
Environmental Law Division, MC-173  
Austin, Texas 78711-3087  
E-mail: michael.parr@tceq.texas.gov

#### **FOR PUBLIC INTEREST COUNSEL**

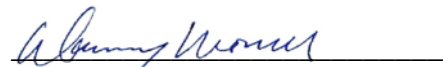
Via electronic mail:

Jessica Anderson, Assistant Public Interest Counsel  
Texas Commission on Environmental Quality  
Public Interest Counsel, MC-103  
P.O. Box 13087  
Austin, Texas 78711  
Email: jessica.anderson@tceq.texas.gov

#### **FOR DARRIN E. WHATLEY AND JAY GUSLER**

Via electronic mail:

Madhu Sekharan  
Attorney at Law  
15201 Mason Road,  
Suite 1000 #338  
Cypress, Texas 77433  
Email: texaspatriotattorney@protonmail.com

  
\_\_\_\_\_  
Danny Worrell