

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



Garrett T. Arthur, *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 30, 2025

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

RE: **IN THE MATTER OF THE APPLICATION BY JC WATER RESOURCE
RECOVERY FACILITY, LLC FOR TPDES PERMIT NO.
WQ0016386001
TCEQ DOCKET NO. 2025-0699-MWD**

Dear Ms. Gharis:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Sheldon P. Wayne".

Sheldon P. Wayne, Attorney
Assistant Public Interest Counsel

cc: Mailing List

DOCKET NO. 2025-0699-MWD

APPLICATION BY JC WATER	§	BEFORE THE
RESOURCE RECOVERY	§	
FACILITY, LLC FOR TPDES	§	TEXAS COMMISSION ON
PERMIT NO. WQ0016386001	§	
	§	ENVIRONMENTAL QUALITY

**THE OFFICE OF PUBLIC INTEREST COUNSEL’S RESPONSE
TO REQUESTS FOR HEARING AND REQUEST FOR RECONSIDERATION**

To the Members of the Texas Commission on Environmental Quality:

The Office of Public Interest Counsel (OPIC) at the Texas Commission on Environmental Quality (TCEQ) files this Response to Requests for Hearing and Request for Reconsideration on the application in the above-captioned matter and respectfully submits the following.

I. INTRODUCTION

A. Summary of Position

Before the Commission is an application by JC Water Resource Recovery Facility, LLC (JC Water or Applicant) for new Texas Pollutant Discharge Elimination System (TPDES) permit No. WQ0016386001. The Commission received timely hearing requests from Dana Collier, Gary Dempsey, C.W. Howell, Jr., Wileta D. Kretzschmar, Tony Neal, Curry Reagan, Lyle Reagan, Briggette G. Townsend, and Derek and Rebecca Townsend. The Commission also received a request for reconsideration from Lyle Reagan. For the reasons stated herein, OPIC respectfully recommends that the Commission find that C.W. Howell, Jr. and Lyle Reagan are affected persons, grant their hearing requests, and refer this application for a 180-day hearing at the State Office of Administrative Hearings

(SOAH) on Issue nos. 1-3 contained in §III.B. Additionally, OPIC recommends denial of the request for reconsideration.

B. Description of Application and Facility

JC Water Resource Recovery Facility, LLC applied to TCEQ for a new TPDES permit to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 108,000 gallons per day. The Applicant seeks to operate JC Water Resource Recovery Wastewater Treatment Plant.

The plant would be an activated sludge with nitrification process plant operated in the conventional mode. The treatment units in the Interim I phase will include two aeration basins, two secondary clarifiers, a chlorine contact chamber, and an aerated sludge storage tank. The treatment units in the Final phase will include three aeration basins, three secondary clarifiers, a chlorine contact chamber, and an aerated sludge storage tank.

If the draft permit is issued, the treated effluent will be discharged to an unnamed tributary, then to Robinson Branch, then to Lake Pat Cleburne in Segment No. 1228 of the Brazos River Basin. The designated uses for Segment No. 1228 are primary contact recreation, public water supply, and high aquatic life use.

C. Procedural Background

The application was received on August 7, 2023, and declared administratively complete on September 13, 2023. The Notice of Receipt and Intent to Obtain a Water Quality Permit was published in the *Cleburne Times Review* on September 26, 2023. The Combined Notice of Public Meeting and

Notice of Application and Preliminary Decision was published in the *Cleburne Times Review* on March 16, 2024. A public meeting was held on April 22, 2024, at the Cleburne Conference Center located at 1501 W. Henderson Street in Cleburne. The public comment period ended at the close of the public meeting on April 22, 2024. The Executive Director's (ED) Response to Comments (RTC) was mailed on March 11, 2025. The deadline for filing requests for a contested case hearing and requests for reconsideration of the ED's decision was April 10, 2025.

II. APPLICABLE LAW

A. Hearing Requests

The Application was filed after September 1, 2015, and is therefore subject to the procedural rules adopted pursuant to Senate Bill 709. Tex. S.B. 709, 84th Leg., R.S. (2015). Under 30 Texas Administrative Code (TAC) § 55.201(c), a hearing request by an affected person must be in writing, must be timely filed, may not be based on an issue raised solely in a public comment which has been withdrawn, and, for applications filed on or after September 1, 2015, must be based only on the affected person's timely comments.

Section 55.201(d) states that 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;
- (2) identify the requestor'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) 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 ED'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.

30 TAC § 55.20(d).

Under 30 TAC § 55.203(a), 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. An interest common to members of the general public does not qualify as a personal justiciable interest. Relevant factors to be 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;

(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 were not withdrawn; and

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

30 TAC § 55.203(c).

Under § 55.203(d), to determine whether a person is an affected person for the purpose of granting a hearing request for an application filed on or after September 1, 2015, the Commission may also consider the following:

- (1) the merits of the underlying application and supporting documentation in the 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.

30 TAC § 55.203(d).

Under 30 TAC § 55.211(c)(2)(A)(ii), for an application filed on or after September 1, 2015, the Commission must grant a hearing request made by an affected person if the request raises disputed issues of fact that were raised by the affected person during the comment period, that were not withdrawn by filing a withdrawal letter with the Chief Clerk prior to the filing of the ED's RTC, and that are relevant and material to the Commission's decision on the application.

Under § 55.211(c)(2)(B)–(D), the hearing request, to be granted, must also be timely filed with the Chief Clerk, pursuant to a right to hearing authorized by law, and comply with the requirements of § 55.201.

B. Request for Reconsideration

Any person may file a request for reconsideration of the ED's decision under 30 TAC § 55.201(e). The request must be in writing and filed with the Chief Clerk no later than 30 days after the Chief Clerk mails the ED's decision and RTC. The request must expressly state that the person is requesting reconsideration of the ED's decision and give reasons why the decision should be reconsidered.

III. ANALYSIS OF HEARING REQUESTS

A. Whether the requestor is an affected person

C.W. Howell, Jr.

On May 22, 2024, C.W. Howell, Jr. submitted a timely hearing request. Mr. Howell also submitted timely oral comments during the public meeting held for this application. In both request and timely comment, Mr. Howell states concern regarding water pollution, including contamination of groundwater used for human consumption. According to the map provided by the ED's staff, Mr. Howell is located approximately 0.75 miles from both the Facility and its outfall. Mr. Howell's property is adjacent to the discharge route.

To be granted a contested case hearing, Mr. Howell must show that he possesses a personal justiciable interest in this matter related to a legal right, duty, privilege, power, or economic interest affected by the application. *See* 30 TAC § 55.203(a). Furthermore, the interest must be distinguished from interests common to the general public. *Id.*

A relevant factor in evaluating if a person is affected is whether a reasonable relationship exists between the interest claimed and the activity

regulated. *See* 30 TAC § 55.203(c)(3). Here, Mr. Howell's interests in protecting water quality and human health are protected by the law under which this application will be considered. *See* 30 TAC § 55.203(c)(1). Furthermore, as his property is near the Facility and lies along the discharge route, a reasonable relationship exists between his claimed interests and the Facility's regulated activity. *See* 30 TAC § 55.203(c)(3). Moreover, his location increases the likelihood that the Facility's operations could impact use of his property. *See* 30 TAC § 55.203(c)(4). Considering his stated concerns and location relative to the Facility, OPIC concludes that C.W. Howell, Jr. possesses a personal justiciable interest in this matter that is not common to the general public and has successfully demonstrated that he qualifies as an affected person. *See* 30 TAC § 55.203(a).

Lyle Reagan

On March 31, 2025, Lyle Reagan submitted a timely hearing request. Mr. Reagan also submitted timely oral comments during the public meeting held for this application. In both request and timely comment, Mr. Reagan states concern regarding odor and flooding. According to the map provided by the ED's staff, Mr. Reagan is located approximately 0.35 miles from the Facility and 0.29 miles from the outfall. His property appears to be adjacent to the discharge route.

The issue of odor raised by Mr. Reagan is protected by the law under which this application will be considered. *See* 30 TAC § 55.203(c)(1). Additionally, because his residence is near the regulated activity, a reasonable relationship exists between his concerns and the regulated activity. *See* 30 TAC § 55.203(c)(3).

Finally, his location increases the likelihood that the Facility's operations could impact his use of property. *See* 30 TAC § 55.203(c)(4).

Therefore, OPIC concludes that Mr. Reagan is likely to be affected in a way not common to members of the general public and, as such, possesses a personal justiciable interest in this matter. Therefore, OPIC finds that Lyle Reagan has demonstrated that he qualifies as an affected person.

Dana Collier

On June 3, 2024, Dana Collier submitted a timely hearing request. This request was received outside of the public comment period and Ms. Collier did not previously submit comments on the application. Ms. Collier states various concerns, including those regarding odor, Applicant's ability to operate the Facility, and location of the Facility in a flood plain and resultant flooding issues. According to the map provided by the ED's staff, Ms. Collier is located approximately 0.59 miles from the Facility and 0.75 miles from the outfall. Her property does not lie along the discharge route.

Ms. Collier's stated interests are protected by the law under which this application will be considered, and her property is near the Facility—two factors that weigh in favor of finding her to be an affected person. *See* 30 TAC § 55.203(c)(1) and (3). However, Ms. Collier did not make timely comments on this application during the public comment period. By law, for the Commission to find that a hearing requestor qualifies as an affected person, the requestor must have submitted timely comments on the application, and the request must be based only on that affected person's timely comments. TWC § 5.115(a)(a-

1)(2)(B); 30 TAC § 55.201(c). Because Dana Collier has not complied with this requirement, she cannot qualify as an affected person.

Gary Dempsey

On April 22, 2024, Gary Dempsey submitted a timely hearing request during the public comment period. The entirety of Mr. Dempsey's request is as follows: "I would like a contested hearing."

In order to be granted, a hearing request must explain how and why a requestor believes that they will be adversely affected by a facility in a manner not common to members of the general public. *See* 30 TAC § 55.201(d)(2). This request fails to include any specific statement of how or why Mr. Dempsey may be personally affected by the Facility. Because of the absence of this information, OPIC must conclude that Gary Dempsey does not qualify as an affected person.

Wileta D. Kretzschmar

On May 22, 2024, Wileta Kretzschmar submitted a timely hearing request. Ms. Kretzschmar also submitted timely oral comments during the public meeting held for this application. In both request and timely comment, Ms. Kretzschmar states concerns regarding odor, contamination of her water well, and heavy traffic. According to the map provided by the ED's staff, Ms. Kretzschmar is located approximately 0.83 miles from the Facility and 1 mile from the outfall. Ms. Kretzschmar's property is upstream of, and not adjacent to the discharge route.

OPIC notes that there are no specific distance limitations applicable to who may be considered an affected person for purposes of this application. However,

considering the requestor's location in conjunction with the relatively modest volume of the proposed discharge to be permitted, OPIC cannot find that Ms. Kretzschmar is likely to be impacted by the Facility's operations in a way that differs from the general public as required by 30 TAC § 55.203(a). Therefore, OPIC must conclude that Wileta D. Kretzschmar has not shown that she possesses a personal justiciable interest in this matter and, as such, has not demonstrated that she qualifies as an affected person.

Tony Neal

On May 24, 2024, Tony Neal submitted a timely hearing request. This request was received outside of the public comment period and Mr. Neal did not previously submit comments on the application. Mr. Neal's request raises concerns regarding odor, noise, and contamination of drinking water. According to the map provided by the ED's staff, Mr. Neal is located approximately 0.59 miles from the Facility and 0.76 miles from the outfall. His property does not lie along the discharge route.

Mr. Neal's stated interests in odor and water quality are protected by the law under which this application will be considered, and his property is near the Facility—two factors that weigh in favor of a finding of affectedness. *See* 30 TAC § 55.203(c)(1) and (3). However, Mr. Neal did not make timely comments on this application during the public comment period. By law, for the Commission to find that a hearing requestor qualifies as an affected person, the requestor must have submitted timely comments on the application, and the request must be based only on that affected person's timely comments. TWC § 5.115(a)(a-1)(2)(B);

30 TAC § 55.201(c). Because Tony Neal has not complied with this requirement, OPIC must find that he cannot qualify as an affected person.

Curry Reagan

On April 8, 2025, Curry Reagan submitted a timely hearing request. This request was received outside of the public comment period, and Mr. Reagan did not previously submit any substantive comments on the application, including when he spoke at the public meeting held for this application. Mr. Reagan's request raises concerns, including those regarding increase in algal growth, and effects on fish, wildlife, and human health. According to the map provided by the ED's staff, Mr. Reagan is located approximately 0.35 miles from the Facility and 0.29 miles from the outfall. His property appears to be adjacent to the discharge route.

Mr. Reagan's stated interest in algal growth and how it may impact water quality, and his interest in protecting fish, wildlife, and human health are interests that are protected by the law under which this application will be considered. Furthermore, his property is near the Facility. These are two factors that weigh in favor of a finding of affectedness. *See* 30 TAC § 55.203(c)(1) and (3). However, Mr. Reagan did not substantively comment on this application during the public comment period.

By law, for the Commission to find that a hearing requestor qualifies as an affected person, the requestor must have submitted timely comments on the application, and the request must be based only on that affected person's timely comments. TWC § 5.115(a)(a-1)(2)(B); 30 TAC § 55.201(c). Because Curry Reagan

has not complied with this requirement, OPIC must find that he cannot qualify as an affected person.

Derek and Rebecca Townsend

On May 13, 2024, Derek and Rebecca Townsend jointly submitted a timely hearing request. They also submitted timely oral and written comments during the public meeting held for this application. In both request and timely comment, the Townsends state concerns regarding odor, noise, and flooding. According to the map provided by the ED's staff, their property is located approximately 0.97 miles from the Facility and 1.13 miles from the outfall. It is also upstream of, and not adjacent to the discharge route.

OPIC notes that there are no specific distance limitations applicable to who may be considered an affected person for purposes of this application. However, considering the Townsends' location and the issue they raise about odor, in conjunction with the relatively modest volume of the proposed discharge to be permitted, OPIC cannot find that they are likely to be impacted by the Facility's operations in a way that differs from the general public as required by 30 TAC § 55.203(a). Therefore, OPIC must conclude that Derek and Rebecca Townsend have not shown that they possess a personal justiciable interest in this matter and, as such, have not demonstrated that they qualify as affected persons.

Brigette G. Townsend

On April 22, 2024, Brigette Townsend submitted a timely hearing request during the public comment period. Ms. Townsend's request simply reads: "I want a contested case hearing."

In order to be granted, a hearing request must explain how and why a requestor believes that they will be adversely affected by a facility in a manner not common to members of the general public. *See* 30 TAC § 55.201(d)(2). This request fails to include any specific statement of how or why Ms. Townsend may be personally affected by the Facility. Because of the absence of this information, OPIC must conclude that Briggette Townsend does not qualify as an affected person.

B. Which Issues Raised in the Hearing Requests Are Disputed

The affected persons' hearing requests raise the following disputed issues:

1. Whether the Facility and draft permit comply with the Texas Surface Water Quality Standards and are adequately protective of water quality, including both surface water and groundwater.

Raised by: C.W. Howell, Jr.

2. Whether the Facility and draft permit are adequately protective of human health.

Raised by: C.W. Howell, Jr.

3. Whether the draft permit contains sufficient provisions to prevent the creation of nuisance odor conditions.

Raised by: Lyle Reagan

C. Whether the Dispute Involves Questions of Fact or of Law

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). The issues listed above are issues of fact.

D. Whether the Issues Were Raised During the Public Comment Period

Issue nos. 1–3 raised in the hearing requests were raised in the comment period by the requestors. *See* 30 TAC §§ 55.201(c) & (d)(4)(B), 55.211(c)(2)(A).

E. Whether the Hearing Requests are Based on Issues Raised Solely in a Withdrawn Public Comment

No public comments were withdrawn in this matter. Therefore, the hearing requests are not based on issues raised in withdrawn comments.

F. Whether the Issues are Relevant and Material to the Decision on the Application

The affected persons in this matter have raised issues that are relevant and material to the Commission’s decision under the requirements of 30 TAC §§ 55.201(d)(4) and 55.211(c)(2)(A). 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. The Commission can only consider issues within its jurisdiction. Therefore, relevant and material issues include those governed by the substantive law of the permit at issue. *Anderson v. Liberty Mutual, Inc.*, 477 U.S. 242, 248-51 (1986).

Water Quality and Human Health

C.W. Howell, Jr. is concerned with adverse effects to water quality—including well water—and its impacts on human health and safety. The Commission is responsible for the protection of water quality under TWC Chapter 26 and 30 TAC Chapter 307. The Texas Surface Water Quality Standards (Standards) in Chapter 307 require that the proposed permit “maintain the quality of water in the state consistent with public health and enjoyment,

propagation and protection of terrestrial and aquatic life, operation of existing industries, and economic development of the state.” 30 TAC § 307.1. Additionally, “[s]urface waters must not be toxic to man from ingestion of water, consumption of aquatic organisms, or contact with the skin, or to terrestrial or aquatic life.” 30 TAC § 307.4(d).

Also, Section 309.10(b) states, in part, that “[t]he purpose of this chapter is to condition issuance of a permit and/or approval of construction plans and specifications for new domestic wastewater treatment facilities...on selection of a site that minimizes possible contamination of ground and surface waters...” *See also* 30 TAC § 309.12. Therefore, Issue nos. 1 and 2 are relevant and material to the Commission’s decision regarding this application and are appropriate for referral to SOAH.

Nuisance Odor

Lyle Reagan has raised the concern that the Facility will cause odor issues. Odor is specifically addressed by 30 TAC § 309.13(e), which requires that nuisance odor be abated and controlled. Further, § 307.4 delineates general criteria that surface waters must meet, including aesthetic parameters which work, in part, to prevent nuisance conditions attributable to the Facility. Finally, one of the purposes of Chapter 309 is “to minimize the possibility of exposing the public to nuisance conditions.” 30 TAC § 309.10. Therefore, Issue no. 3 is relevant and material to the Commission’s decision regarding this application and is appropriate for referral to SOAH.

G. Maximum Expected Duration for the Contested Case 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, for applications filed on or after September 1, 2015, the administrative law judge must conclude the hearing and provide a proposal for decision by the 180th day after the first day of the preliminary hearing, or a date specified by the Commission, whichever is earlier. 30 TAC § 50.115(d)(2). To assist the Commission in setting a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC § 55.209(e)(7), OPIC estimates that the maximum expected duration of a hearing on this application would be 180 days from the first date of the preliminary hearing until the proposal for decision is issued.

IV. REQUEST FOR RECONSIDERATION

The Commission received one timely filed request for reconsideration of the ED's decision from Lyle Reagan. The request raises issues about odor, PFAS that could be in the effluent, and flooding.

With respect to the issue of odor, while this concern is relevant and material to the decision on this application, an evidentiary record would be necessary for OPIC to make a recommendation to the Commission as to whether the ED's decision should be reconsidered. OPIC is recommending that a contested case hearing be granted for this application and that the hearing include the issue of odor, however, OPIC cannot recommend reconsideration on the basis of this

issue without the benefit of such a record. Regarding PFAS, TCEQ currently has not promulgated any rules addressing PFAS in the context of municipal waste discharges such as the one at issue here. Finally, regarding flooding, while TCEQ rules require that the Facility itself must be protected from inundation from a flood if it is located in a floodplain, general concerns about flooding are not relevant and material to the Commission's decision on this permit application. Therefore, OPIC respectfully recommends that the Commission deny the request for reconsideration filed in this matter.

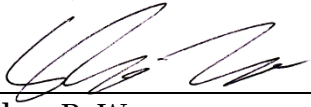
IV. CONCLUSION

For the reasons discussed above, OPIC finds that C.W. Howell, Jr. and Lyle Reagan have demonstrated that they qualify as affected persons. Therefore, OPIC respectfully recommends that the Commission grant their hearing requests and refer Issue nos. 1-3 specified in Section III.B for a contested case hearing at SOAH with a maximum duration of 180 days. Finally, OPIC recommends the Commission deny the pending request for reconsideration.

Respectfully submitted,


[Signature on Next Page]

Garrett T. Arthur
Public Interest Counsel

By: 
Sheldon P. Wayne
Assistant Public Interest Counsel
State Bar No. 24098581
P.O. Box 13087, MC 103
Austin, Texas 78711-3087
(512) 239-3144

CERTIFICATE OF SERVICE

I hereby certify that June 30, 2025, the Office of Public Interest Counsel's Response to Requests for Hearing and Request for Reconsideration was filed with the Chief Clerk of the TCEQ and a copy was served on all persons listed on the attached mailing list via electronic mail, and/or by deposit in the U.S. Mail.


Sheldon P. Wayne

MAILING LIST
JC WATER RESOURCE RECOVERY FACILITY, LLC
TCEQ DOCKET NO. 2025-0699-MWD

FOR THE APPLICANT
via electronic mail:

Helen S. Gilbert
Barton Benson Jones, PLLC
7000 North MoPac Expressway, Suite 200
Austin, Texas 78731
hgilbert@bartonbensonjones.com

Jason Tuberville, General Partner
JC Water Resource Recovery Facility, LLC
525 South Loop 288, Suite 105
Denton, Texas 76205
jtuberville@orisonholdings.com

Heather Goins, Project Manager
Mead & Hunt
6001 West Interstate 20, Suite 219
Arlington, Texas 76017
heather.goins@meadhunt.com

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

Fernando Salazar Martinez, Staff
Attorney
Texas Commission on Environmental
Quality
Environmental Law Division MC-173
P.O. Box 13087
Austin, Texas 78711-3087
Tel: 512/239-0600 Fax: 512/239-0606
fernando.martinez@tceq.texas.gov

Kimberly Kendall, Technical Staff
Texas Commission on Environmental
Quality
Water Quality Division MC-148
P.O. Box 13087
Austin, Texas 78711-3087
Tel: 512/239-4540 Fax: 512/239-4430
kimberly.kendall@tceq.texas.gov

Ryan Vise, Director
Texas Commission on Environmental
Quality
External Relations Division
Public Education Program MC-108
P.O. Box 13087
Austin, Texas 78711-3087
Tel: 512/239-4000 Fax: 512/239-5678
pep@tceq.texas.gov

FOR ALTERNATIVE DISPUTE
RESOLUTION
via electronic mail:

Kyle Lucas, Attorney
Texas Commission on Environmental
Quality
Alternative Dispute Resolution MC-222
P.O. Box 13087
Austin, Texas 78711-3087
Tel: 512/239-0687 Fax: 512/239-4015
kyle.lucas@tceq.texas.gov

FOR THE CHIEF CLERK
via eFiling:

Docket Clerk
Texas Commission on Environmental
Quality
Office of Chief Clerk MC-105
P.O. Box 13087
Austin, Texas 78711-3087
Tel: 512/239-3300 Fax: 512/239-3311
<https://www14.tceq.texas.gov/epic/eFiling/>

REQUESTER(S):

See attached list.

REQUESTER(S)

Dana Collier
509 N County Road 1226
Godley, TX 76044

Gary Dempsey
1025 N County Road 1226
Godley, TX 76044

Mr C W & Mrs C W Howell Jr
200 Fm 2331
Cleburne, TX 76033

Wileta D Kretzschmar
857 N County Road 1226
Godley, TX 76044

Tony Neal
601 N County Road 1226
Godley, TX 76044

Curry Reagan
Po Box 1314
Cleburne, TX 76033

Lyle Reagan
Po Box 1931
Cleburne, TX 76033

Brigitte G Townsend
Po Box 733
Cleburne, TX 76033

Derek & Rebecca Townsend
Po Box 733
Cleburne, TX 76033