

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

July 28, 2025

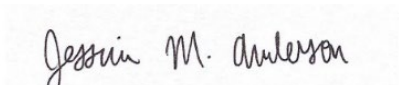
Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

RE: **IN THE MATTER OF THE APPLICATION BY URANIUM ENERGY
CORP. FOR RENEWAL AND AMENDMENT OF CLASS III
INJECTION WELL AREA PERMIT NO. UR03075
TCEQ DOCKET NO. 2025-0700-UIC**

Dear Ms. Gharis:

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

Sincerely,


Jessica M. Anderson, Attorney
Assistant Public Interest Counsel


Josiah T. Mercer, Attorney
Assistant Public Interest Counsel

cc: Mailing List

DOCKET NO. 2025-0700-UIC

APPLICATION BY URANIUM	§	BEFORE THE
ENERGY CORP. FOR RENEWAL	§	
AND AMENDMENT OF CLASS	§	TEXAS COMMISSION ON
III INJECTION WELL AREA	§	
PERMIT NO. UR03075	§	ENVIRONMENTAL QUALITY

THE OFFICE OF PUBLIC INTEREST COUNSEL'S RESPONSE
TO REQUESTS FOR HEARING AND REQUESTS 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 Requests 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 Uranium Energy Corp. (Applicant or UEC) for a Class III injection well area permit renewal and amendment to authorize *in situ* uranium mining. The Commission received timely comments and hearing requests from: Goliad County Groundwater Conservation District (GCGCD), the Carrizo/Comecrudo Nation of Texas, Inc. (the Tribe), Debra and Gregory Chapman, David Michaelson and Linda Pinsker, William Christopher, Kenneth Klanika, and Jesse Ortega. The Commission received requests for reconsideration from GCGCD, the Tribe, Debra Chapman, Kenneth Klanika, Sarah Maslen and Chancellor Havlik, Randal and Beverly Havlik, and Debra Primrose. For the reasons stated herein, OPIC respectfully

recommends that the Commission find that GCGCD, Debra and Gregory Chapman, and David Michaelson and Linda Pinsker are affected persons, and further recommends that the Commission grant their hearing requests. OPIC recommends denial of all requests for reconsideration.

B. Description of Application and Facility

UEC applied to the TCEQ for renewal and amendment of a Class III underground injection control area permit to authorize an *in situ* uranium mining operation. TCEQ originally issued permit no. UR03075 to UEC on April 29, 2011. The permit authorizes UEC to operate Class III injection and production wells for recovery of uranium from a certain portion of the Goliad Formation within the permit area. The permit was amended on September 17, 2017, to add the permit range table of pre-mining water quality values in accordance with Texas Water Code § 27.0513(a), to reduce the permit area from 1139.4 acres to 994.9 acres, and to incorporate a reference to the United States Environmental Protection Agency's final approval of the aquifer exception. UEC has not yet operated injection wells for the recovery of uranium at the Goliad Project.

UEC proposes to mine uranium deposits in the sands of the Goliad Formation using the *in situ* leach recovery method. *In situ* mining is accomplished by use of Class III underground injection control wells operating for both the injection and production of fluids. Class III wells inject fluids (lixiviant) from the surface into underground deposits of uranium ore. The lixiviant oxidizes the uranium and makes it mobile. Class III wells functioning in a production mode lift the solution bearing the uranium to the surface where resin beads remove

the uranium from the solution. Reverse osmosis treatment then reconditions the water for reuse as lixiviant for continued mining. Reverse osmosis treatment will also be used to restore water in the mine area after the mining operation ends.

The facility is located at 14869 North United States Highway 183, Yorktown, which is approximately 13 miles north of the city of Goliad, about 0.9 miles east of the intersection of State Highway 183 and Farm-to-Market Road 1961 in Goliad County. The area within the proposed permit boundary is approximately 994.9 contiguous acres, including a 100-foot buffer zone.

C. Procedural Background

The application was received on December 22, 2020, and declared administratively complete on April 12, 2021. The Notice of Receipt of Application and Intent to Obtain a Class III Injection Well Aea Permit Renewal was published on April 29, 2021, in the *Goliad Advance-Guard*. The TCEQ held a public meeting on the application on August 5, 2024, at Goliad Memorial Auditorium. Notice of the public meeting was issued on June 27, 2024, and published on August 1, 2024, in the *Goliad Advance-Guard*.

On August 12, 2024, UEC revised its application to request amendment of the permit range table by including water quality data from all baseline and monitor wells completed in the production zones within the mine area. UEC also requested that total dissolved solids (TDS) be removed from the permit as an excursion control parameter and replaced with alkalinity, while also listing sulfate and uranium as additional control parameters to be used as needed. The

Executive Director (ED) completed the technical review of the application on October 17, 2024. The Combined Revised Notice of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision for Class III Injection Well Area Permit Renewal and Amendment was issued on October 17, 2024, and published on November 4, 2024, in the *Goliad Advance-Guard*. The public comment period ended on December 16, 2024. The ED's Response to Comments (RTC) was mailed on March 1, 2025. The deadline for filing requests for a contested case hearing and requests for reconsideration of the ED's decision was April 18, 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. As provided by § 55.203(b), governmental entities, including local governments and public agencies, with authority under state law over issues raised by the application may be considered affected persons. 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).

For applications filed on or after September 1, 2015, § 55.205(b) states that a hearing request by a group or association may not be granted unless all of the following 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.

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. Requests 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

Goliad County Groundwater Conservation District

Goliad County Groundwater Conservation District (GCGCD) submitted multiple timely comments and hearing requests through several representatives. According to 30 TAC § 55.203(c)(7), a government entity can be considered an affected person if they have statutory authority over or interest in the issues relevant to the application. In their comments, GCGCD claims to be a governmental body created by the Legislature of Texas to protect and preserve the groundwater of Goliad County. GCGCD raises extensive concerns in their comments, including that the injection well uranium mining authorized by the draft permit will lead to groundwater drawdown and contamination. They also raise concerns about UEC's alleged lack of technical expertise and potential incorrect hydrologic assumptions. As the local county groundwater conservation district, GCGCD has an interest in the issues it raises, especially the draft permit's potential to affect groundwater supply and quality. OPIC therefore finds that GCGCD does qualify as an affected person.

Debra and Gregory Chapman

Debra and Gregory Chapman submitted multiple timely comments and hearing requests related to this matter. According to the map created by ED staff, the Chapmans reside 1.02 miles from the facility boundary. The Chapmans expressed concerns about water quality, human health, animal life, groundwater,

application accuracy, compliance history, and property values. These interests, other than property value, are protected by the law under which this application will be considered. *See* 30 TAC § 55.203(c)(1). Because of the Chapmans' proximity to the facility, a reasonable relationship exists between the interests they seek to protect and the Applicant's regulated activity—a relevant factor under 30 TAC § 55.201(c)(3). Further, the requestors' proximity increases the likelihood that the regulated activity will impact their health, safety, use of property, and use of the impacted natural resource. *See* 30 TAC § 55.203(c)(4)-(5). Given their relevant concerns and proximity, OPIC finds that the Chapmans would be affected by the application in a way not common to members of the general public as required by 30 TAC § 55.203(a). Therefore, OPIC recommends that the Commission find that Debra and Gregory Chapman are affected persons.

David Michaelson and Linda Pinsker

David Michaelson and Linda Pinsker submitted timely comments and a hearing request related to this matter. According to the map created by ED staff, Mr. Michaelson and Ms. Pinsker reside 0.59 miles from the facility boundary. They expressed concerns about groundwater, monitoring, notice, and application accuracy. These interests are protected by the law under which this application will be considered. *See* 30 TAC § 55.203(c)(1). Because of Mr. Michaelson and Ms. Pinsker's proximity to the facility, a reasonable relationship exists between the interests they seek to protect and the Applicant's regulated activity—a relevant factor under 30 TAC § 55.201(c)(3). Further, the requestors' proximity increases the likelihood that the regulated activity will impact their health, safety, use of

property, and use of the impacted natural resource. *See* 30 TAC § 55.203(c)(4)-(5). Given their relevant concerns and proximity, OPIC finds that David Michaelson and Linda Pinsker would be affected by the application in a way not common to members of the general public as required by 30 TAC § 55.203(a). Therefore, OPIC recommends that the Commission find David Michaelson and Linda Pinsker are affected persons.

The Carrizo/Comecrudo Nation of Texas, Inc.

Marisa Perales submitted timely comments and a hearing request on behalf of the Carrizo/Comecrudo Nation of Texas. In order for an association's hearing request to be granted, the request must identify one or more members, by name and physical address, that would otherwise have standing to request a hearing in their own right. 30 TAC § 55.205(b)(2). This request identified Jesse Manciaz as an affected member of the Tribe and gave his address as 449 FM 2043, Goliad, which, according to the map created by ED staff, is 15 miles from the facility boundary. The Tribe raised concerns related to groundwater contamination, plant and animal life, application accuracy, water quality, and financial assurance adequacy. Further, the Tribe states that it is a non-profit membership organization created with the purpose of serving the cultural, social, educational, spiritual, linguistic, economic, health, and traditional needs of its members and descendants of the Carrizo/Comecrudo Nation of Texas and other Indigenous groups. The Tribe seeks to protect ancestral lands and serve as a steward for plants and animal in their habitats. OPIC finds that the Tribe's stated purpose is germane to the interests it seeks to protect.

While the concerns raised on behalf of the Tribe include those that are protected by the law under which this application will be considered, a reasonable relationship must exist between those interests and the regulation of contaminants under the proposed permit. *See* 30 TAC § 55.203(c)(3). Because of the intervening distance between Mr. Manciaz's property and the facility, OPIC cannot find that its operations are likely to affect Mr. Manciaz in a way that is not common to members of the general public. *See* 30 TAC § 55.203(a). Therefore, OPIC concludes that the Tribe has not offered a member who would have standing in their own right to request a hearing. *See* 30 TAC § 55.205(b)(2). Consequently, OPIC finds that the Tribe does not meet the requirements for group standing and does not qualify as an affected person.

Kenneth Klanika

Kenneth Klanika submitted timely comments and a hearing request. Mr. Klanika gave his address as 2078 County Road 460, Coupland, which, according to the map created by ED staff, is 106.78 miles from the facility boundary. Mr. Klanika articulated concerns about groundwater contamination and application accuracy. While Mr. Klanika articulated relevant and material concerns, given his lack of proximity to the proposed facility, OPIC cannot find that he would be affected in a manner not common to the general public.

Individual Requestors Who Failed to Demonstrate a Personal Justiciable Interest

William Christopher and Jesse Ortega each submitted timely hearing requests that failed to articulate any personal justiciable interests. While their

submissions contained requests for hearings on this matter, neither of these individuals provided any description of how they might be personally affected by the issuance of this permit. Given these requestors' failure to describe a personal justiciable interest in this matter, OPIC cannot find that William Christopher and Jesse Ortega would be affected in a manner not common to the general public.

B. Which issues raised in the hearing requests are disputed

The affected requestors raised the following disputed issues:

1. Whether the draft permit is adequately protective of groundwater.
2. Whether the Applicant has the relevant technical expertise.
3. Whether the draft permit is adequately protective of water quality.
4. Whether the draft permit is adequately protective of animal life.
5. Whether the draft permit is adequately protective of human health.
6. Whether the application was accurate.
7. Whether the Applicant's compliance history has been adequately considered.
8. Whether the draft permit contains adequate monitoring requirements.
9. Whether notice of the application was adequate.
10. Whether the draft permit adequately considered property values.

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. The issues raised here are issues of fact.

D. Whether the issues were raised during the public comment period

Issues No. 1-10 in Section III.B. were specifically raised by affected requestors during the public comment period.

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 public comments.

F. Whether the issues are relevant and material to the decision on the application

The hearing requests raised issues that are relevant and material to the Commission's decision under the requirements of 30 TAC §§ 55.201(d)(4)(B) and 55.211(c)(2)(A)(ii). To refer an issue to the State Office of Administrative Hearings (SOAH), the Commission must find that the issue is relevant and material to the Commission's decision to issue or deny the permit. Relevant and material issues are those governed by the substantive law under which the permit is to be issued. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248-51 (1986).

Groundwater, Water Quality, Human Health, and Animal Life

Affected requestors raised concerns about impacts on water quality, specifically groundwater, and the subsequent effects a decrease in water quality would have on human health and animal life. Under Texas Water Code (TWC) § 27.051(a)(3), when granting injection well permits of this nature, TCEQ must examine whether “with proper safeguards, both ground and surface fresh water can be adequately protected from pollution.” Additionally, TCEQ rules state that the permit “shall include terms and conditions reasonably necessary to protect

fresh water from pollution.” 30 TAC § 331.5(a). Therefore, Issues No. 1, 3, 4, and 5 are relevant and material to the Commission’s decision on this application.

Technical Expertise and Operation

Affected requestors raised concerns related to the Applicant’s technical expertise. In 30 TAC Chapter 331, Subchapter E provides Standards for Class III wells, including construction, operating, monitoring, and reporting requirements. Further, in accordance with 30 TAC § 331.122, the Commission shall consider proposed operating data submitted as part of the application. Therefore, Issue No. 2 is relevant and material to the Commission’s decision.

Application Accuracy

TCEQ rules require that if an applicant becomes aware that it failed to submit relevant facts or submitted incorrect information in a permit application, the applicant is required to promptly submit such facts and information. 30 TAC § 305.125(19). Therefore, Issue No. 6 is relevant and material to the Commission’s decision regarding this application and is appropriate for referral to SOAH.

Compliance History

Affected requestors raised concerns regarding the Applicant’s compliance history. When making a decision on the issuance of a permit, the Commission is required to consider an entity’s past compliance with applicable environmental rules and statutes through an evaluation of that entity’s compliance history. 30 TAC § 60.1(a)(1)(A); 30 TAC § 60.3(a)(1)(A). Additionally, to address concerns with compliance history, the TCEQ may impose certain permit conditions or

provisions. 30 TAC § 60.3(a)(2). Because compliance history must be considered in the decision to issue a permit and whether special conditions should be included in the permit, Issue No. 7 is relevant and material to the Commission's decision regarding this application.

Monitoring

Applicant must meet the monitoring requirements of 30 TAC § 331.84 and comply with the specific production area monitoring requirements of 30 TAC §§ 331.103 and 331.105, which include requirements for monitoring the confinement of mining solution to the production area. Therefore Issue No. 8 is relevant and material to the Commission's decision and appropriate for referral to SOAH.

Notice

Chapter 39 contains requirements relating to notice publication, alternative language publication, mailing of notice, and posting of the application in a public place within the county. The issue of whether the Applicant complied with all applicable notice requirements is relevant and material to the Commission's decision on this application. Therefore, Issue No. 9 is appropriate for referral to SOAH.

Property Values

Requestors raised concerns regarding the proposed facility's impact on property value. The TCEQ does not have jurisdiction to address or consider property values or the marketability of adjacent property in its determination of

whether to issue an injection well permit. Accordingly, Issue No. 10 is not relevant or material to the Commission's decision on this application.

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. REQUESTS FOR RECONSIDERATION

The Commission received requests for reconsideration of the ED's decision from GCGCD, the Tribe, Debra Chapman, Kenneth Klanika, Sarah Maslen and Chancellor Havlik, Randal and Beverly Havlik, and Debra Primrose. These requests for reconsideration reiterated many of the same issues raised in the hearing requests. While OPIC is recommending a hearing and referral of the issues encompassing these requestors' concerns as expressed in their requests for reconsideration, a record establishing the evidentiary basis for reconsidering the

ED's decision based on those issues would need to exist in order to recommend that any of the requests for reconsideration be granted. As no such record currently exists, OPIC cannot recommend the requests be granted at this time.

V. CONCLUSION

Having found that GCGCD, Debra and Gregory Chapman, and David Michaelson and Linda Pinsker qualify as affected persons in this matter, OPIC respectfully recommends the Commission grant their hearing requests and refer Issues No. 1-9 specified in Section III.B for a contested case hearing at SOAH with a maximum duration of 180 days. OPIC further recommends the Commission deny the pending requests for reconsideration.

Respectfully submitted,


Garrett T. Arthur
Public Interest Counsel

By: Josiah Mercer
Josiah T. Mercer
Assistant Public Interest Counsel
State Bar No. 24131506
P.O. Box No. 1308, MC 103
Austin, Texas 7871-3087
(512) 239-3144

By: Jessica M. Anderson
Jessica M. Anderson
Assistant Public Interest Counsel
State Bar No. 24131226
P.O. Box 13087, MC 103
Austin, Texas 78711-3087
(512) 239-6823

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2025, the Office of Public Interest Counsel's Response to Requests for Hearing and Requests for Reconsideration was filed with the Chief Clerk of the TCEQ and a copy was served to all persons listed on the attached mailing list via Inter-Agency Mail, electronic mail, or by deposit in the U.S. Mail.

A handwritten signature in cursive script that reads "Jessica M. Anderson". The signature is written in black ink on a light-colored background.

Jessica M. Anderson

**MAILING LIST
URANIUM ENERGY CORP.
TCEQ DOCKET NO. 2025-0700-UIC**

FOR THE APPLICANT
via electronic mail:

David J. Tuckfield
The AL Law Group PLLC
12400 West Highway 71, Suite 350-150
Austin, Texas 78738
david@allawgrp.com

Bill Cobb
Cobb & Johns
13341 West US Highway 20, Building 2
Austin, Texas 78737
bill@cobbjohns.com

Andrew N. Barrett
Andy Barrett & Associates, PLLC
P.O. Box 12603
Dallas, Texas 75225
andy@thebarrettfirm.com

Craig Wall, V.P., EH&S
Uranium Energy Corp
500 North Shoreline Boulevard
Suite 800N
Corpus Christi, Texas 78401
cwall@uraniumenergy.com

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

Don Redmond, Staff Attorney
Thomas Hopkins, 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
don.redmond@tceq.texas.gov
thomas.hopkins@tceq.texas.gov

Dan Hannah, Technical Staff
Texas Commission on Environmental
Quality
Radioactive Materials Division MC-233
P.O. Box 13087
Austin, Texas 78711-3087
Tel: 512/239-2161 Fax: 512/239-6464
dan.hannah@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)

Tate Bammert
Director, Goliad County Groundwater
Conservation District
Po Box 562
Goliad, TX 77963

Debra Chapman
792 W Fm 1961
Yorktown, TX 78164

Gregory C Chapman
792 W Fm 1961
Yorktown, TX 78164

Gregory C Chapman
792 Fm 1964
Yorktown, TX 78164

William Christopher
Christopher Land & Livestock Co
5300 Old Goliad Rd
Goliad, TX 77963

Art Dohmann
Director, Goliad County Groundwater
Conservation District
Po Box 562
Goliad, TX 77963

Terrell Graham
Vice President, Goliad County Groundwater
Conservation District
Po Box 562
Goliad, TX 77963

CHANCELOR HAVLIK & SARAH MASLEN
3265 Danforth Rd
Goliad, TX 77963

Beverly & Randall Havlik
3265 Danforth Rd
Goliad, TX 77963

Kenneth Klanika
Kupac Llc
2078 County Road 460
Coupland, TX 78615

Wilfred Korth
President, Goliad County Groundwater
Conservation District
Po Box 562
Goliad, TX 77963

DAVID MICHAELSEN & LINDA PINSKER
247 Aberdeen Ave
Corpus Christi, TX 78411

Jesse Ortega
1938 Fox Rd
Goliad, TX 77963

Marisa Perales
Attorney, Perales Allmon & Ice Pc
1206 San Antonio St
Austin, TX 78701

Debra Sue Primrose
880000008844
500 Atzenhoffer Rd
Yorktown, TX 78164

Reagan Sahadi
Director, Goliad County Groundwater
Conservation District
Po Box 562
Goliad, TX 77963

Ms Barbara Smith
Director, Goliad County Groundwater
Conservation District
Po Box 562
Goliad, TX 77963

Heather Sumpter
Goliad County Groundwater Conservation
District
118 S Market St
Goliad, TX 77963

Heather Sumpter
Goliad County Groundwater Conservation
District
Po Box 562
Goliad, TX 77963

Colt Williams
Secretary, Goliad County Groundwater
Conservation District
Po Box 562
Goliad, TX 77963