

TCEQ DOCKET NO. 2025-0830-MWD

APPLICATION BY	§	BEFORE THE
BUFFALO HILLS DEVELOPMENT, LLC	§	
FOR TPDES PERMIT NO.	§	TEXAS COMMISSION ON
WQ0016216001	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR’S RESPONSE TO HEARING REQUESTS

I. INTRODUCTION

The Executive Director (ED) of the Texas Commission on Environmental Quality (Commission or TCEQ) files this Response to Hearing Requests on an application by Buffalo Hills Development, LLC (Applicant) for a new TPDES Permit No. WQ0016216001. The Office of the Chief Clerk received timely contested case hearing requests from the following individuals: Ellis County, Hayden Farrell, Maliya Farrell, Phillip Farrell Jr., Phillip Farrell Sr., Robyn Farrell, Gabriel Griffin, Jacob Griffin, Nick Griffin, Rene Griffin, Carolyn Taylor, and Martha Johnson.

The ED recommends that the Commission grant the hearing request of Ellis County. The ED recommends that the Commission deny the remaining hearing and reconsideration requests.

Attached for Commission consideration is a satellite map of the area showing the locations of the facility, discharge route, and requestors.

II. FACILITY DESCRIPTION

The Applicant has submitted an application to the TCEQ for a new permit, TPDES Permit No. WQ0016216001, to authorize the discharge of treated domestic wastewater at a daily average volume not to exceed 850,000 gallons per day. The Applicant proposes to operate The Buffalo Hills wastewater treatment facility (WWTF, Facility) as an activated sludge process plant operated in the complex mode. Treatment units in the Interim I phase will include a bar screen, two aeration basins, a final clarifier, an aerobic sludge digester, and a chlorine contact chamber. Treatment units in the Interim II phase will include a bar screen, three aeration basins, two final clarifiers, three aerobic sludge digesters, and two chlorine contact chambers. Treatment units in the Final phase will include a bar screen, four aeration basins, three final clarifiers, five aerobic sludge digesters, three chlorine contact chambers, and a dechlorination chamber.

The facility has not been constructed. If this permit is issued, the facility would be located approximately 0.4 miles north of the intersection of County Road 213 and Farm-to-Market Road 2258, in Ellis and Johnson Counties, Texas 76084. If the draft permit is issued, the treated effluent will be discharged to an unnamed tributary, thence to Boggy Branch, thence to Armstrong Creek, thence to Cottonwood Creek, thence to North Fork Chambers Creek, thence to Chambers Creek Above Richland-Chambers Reservoir which are all in Segment No. 0814 of the Trinity River Basin. The

unclassified receiving water uses are minimal aquatic life use for the unnamed tributary and limited aquatic life use for both the Boggy Branch and Armstrong Creek. The designated uses for Segment No. 0814 are primary contact recreation, public water supply, and high aquatic life use.

In accordance with 30 Texas Administrative Code § 307.5 and TCEQ's Procedures to Implement the Texas Surface Water Quality Standards (June 2010), an antidegradation review of the receiving waters was performed. A Tier 1 antidegradation review has preliminarily determined that existing water quality uses will not be impaired by this permit action. Numerical and narrative criteria to protect existing uses will be maintained. This review has preliminarily determined that no water bodies with exceptional, high, or intermediate aquatic life uses are present within the stream reach assessed; therefore, no Tier 2 degradation determination is required. No significant degradation of water quality is expected in water bodies with exceptional, high, or intermediate aquatic life uses downstream, and existing uses will be maintained and protected.

The draft permit authorizes a discharge of treated domestic wastewater at a daily average flow not to exceed 0.15 million gallons per day (MGD) in the Interim I phase, a daily average flow not to exceed 0.50 MGD in the Interim II phase, and a daily average flow not to exceed 0.85 MGD in the Final phase.

The effluent limitations in all phases of the draft permit, based on a 30-day average, are 10 mg/l CBOD₅, 15 mg/l total suspended solids (TSS), 3 mg/l NH₃-N, 126 CFU or MPN of *E. coli* per 100 ml, and 4.0 mg/l minimum dissolved oxygen (DO). For the Interim I phase, the effluent shall contain a total chlorine residual of at least 1.0 mg/l and shall not exceed a total chlorine residual of 4.0 mg/l after a detention time of at least 20 minutes based on peak flow. For the Interim II and Final phase, the effluent shall contain a total chlorine residual of at least 1.0 mg/l after a detention time of at least 20 minutes (based on peak flow). The permittee shall dechlorinate the chlorinated effluent to less than 0.1 mg/l total chlorine residual.

The draft permit includes a requirement for the permittee to provide nuisance odor prevention for all sides of the buffer zone encroaching residential lots according to 30 TAC § 309.13(e)(2).

The draft permit includes Sludge Provisions according to the requirements of 30 TAC Chapter 312, Sludge Use, Disposal, and Transportation. The draft permit authorizes the disposal of sludge at a TCEQ-authorized land application site, co-disposal landfill, wastewater treatment facility, or facility that further processes sludge.

III. PROCEDURAL BACKGROUND

TCEQ received the application for the proposed new permit on September 6, 2022, and declared it administratively complete on September 29, 2022. The Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) was published in English in the *Cleburne Times Review* on October 20, 2022. The Notice of Application and Preliminary Decision (NAPD) was published in English in the *Waxahachie Daily Light* on September 7, 2024.

A public meeting was held on October 8, 2024 pursuant to 30 TAC 55.154(c). The comment period for this application closed on October 8, 2024. The hearing request

period closed on April 23, 2025. This application was filed after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill (HB) 801, 76th Legislature (1999), and Senate Bill (SB) 709, 84th Legislature (2015), both implemented by the Commission in its rules in 30 TAC Chapter 39, 50, and 55.

IV. THE EVALUATION PROCESS FOR HEARING REQUESTS

HB 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment and the Commission's consideration of hearing requests. SB 709 revised the requirements for submitting public comment and the Commission's consideration of hearing requests. The evaluation process for hearing requests is as follows:

A. Response to Requests

The ED, the Public Interest Counsel, and the Applicant may each submit written responses to a hearing request.¹

Responses to hearing requests must specifically address:

- (1) whether the requestor is an affected person;
- (2) which issues raised in the hearing request are disputed;
- (3) whether the dispute involves questions of fact or of law;
- (4) whether the issues were raised during the public comment period;
- (5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment;
- (6) whether the issues are relevant and material to the decision on the application; and
- (7) a maximum expected duration for the contested case hearing.²

B. Hearing Request Requirements

For the Commission to consider a hearing request, the Commission must first determine whether the request meets certain requirements:

Affected persons may request a contested case hearing. The request must be made in writing and timely filed with the chief clerk. The request must be based only on the requestor's timely comments and may not be based on an issue that was raised solely in a public comment that was withdrawn by the requestor prior to the filing of the ED's Response to Comment.³

A hearing request must substantially comply with the following:

- (1) give the time, 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

¹ 30 Texas Administrative Code (TAC) Section (§) 55.209(d).

² 30 TAC § 55.209(e).

³ 30 TAC § 55.201(c).

- 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) list all relevant and material disputed issues of fact that were raised 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 comments that the requestor disputes and 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.⁴

C. Requirement that Requestor be an Affected Person/"Affected Person" Status

To grant a contested case hearing, the Commission must determine that a requestor is an "affected" person by conducting the following analysis:

- (a) For any application, 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.
- (b) Except as provided by § 55.103 of this title (relating to Definitions), governmental entities, including local governments and public agencies, with authority under state law over issues raised by the application may be considered affected persons.
- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
 - (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

⁴ 30 TAC § 55.201(d).

- (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.
- (d) In determining 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 commission's administrative record, including whether the application meets the requirements for permit issuance;
 - (2) the analysis and opinions of the ED; and
 - (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.
- (e) In determining whether a person is an affected person for the purpose of granting a hearing request for an application filed before September 1, 2015, the commission may also consider the factors in subsection (d) of this section to the extent consistent with case law.

D. Referral to the State Office of Administrative Hearings

“When the commission grants a request for a contested case hearing, the commission shall issue an order specifying the number and scope of the issues to be referred to SOAH for a hearing.”⁵ The Commission may not refer an issue to the State Office of Administrative Hearings (SOAH) for a contested case hearing unless the Commission determines that the issue:

- (1) involves a disputed question of fact or a mixed question of law and fact;
- (2) was raised during the public comment period by an affected person whose hearing request is granted; and
- (3) is relevant and material to the decision on the application.⁶

V. ANALYSIS OF THE REQUESTS

The ED has analyzed the hearing requests to determine whether they comply with Commission rules, if the requestors qualify as affected persons, what issues may be referred for a contested case hearing, and what is the appropriate length of the hearing.

A. Whether the Requestors Complied With 30 TAC §§ 55.201(c) and (d) and 55.203

1. Parties the Executive Director recommends the Commission find Affected Persons

Ellis County

- Ellis County submitted timely comments and hearing requests which contained the City’s attorney’s name, address, and phone number pursuant to 30 TAC § 55.201(d).

⁵ 30 TAC § 50.115(b).

⁶ 30 TAC § 50.115(c).

Under 30 TAC § 55.203(c), the Commission shall consider multiple factors to determine whether an individual or entity is an affected person. For governmental entities such as Counties, the Commission shall specifically consider statutory authority over or interest in the issues relevant to the application when evaluating hearing request, pursuant to 30 TAC § 55.203(c)(7).

In the hearing request, the County states that it has authority over various functions such as transportation, emergency services, health and safety, and water quality, which may be affected by the application. The County cites to Section 26.171 of the Texas Water Code, which grants it the authority to inspect public water within its jurisdiction to assess compliance with TCEQ-issued permits.

The County articulated how it may be affected by raising concerns regarding the impairment of water quality and existing uses of the relevant portion of the discharge route.

The County also raised the issue of regionalization. The County emphasized that the applicant may not be utilizing larger, more experienced regional facilities. By allowing the applicant to construct its own WWTF that will serve the proposed community, the County may see an increase in small WWTFs. This would be contrary to the state's regionalization policy, according to the County. The ED notes that the County did not identify any County owned wastewater treatment facility that could provide wastewater service to the applicant.

Based on the issues raised in the request and the articulation of how its interests would be affected, Ellis County has substantively complied with the requirements of 30 TAC §§ 55.201 & 203.

Therefore, the ED recommends that the Commission grant the County's hearing request.

2. Persons the Executive Director recommends the Commission find are not Affected Persons

Hayden Farrell, Maliya Farrell, Phillip Farrell Jr., Phillip Farrell Sr., Robyn Farrell, Gabriel Griffin, Jacob Griffin, Nick Griffin, and Rene Griffin ("the Farrells and the Griffins")

- The members of the Farrells and the Griffins each submitted individual comments and identical hearing requests, all of which were timely. The requests contained their names, addresses, and phone numbers pursuant to 30 TAC 55.201(d). The location of the address provided by the Farrells and the Griffins is 1.79 miles from the proposed facility. The property address is listed as property No. 41 on the affected landowner list. Robyn and Phillip Farrell Sr. are listed as owners of the property on the affected landowner list. Hayden, Maliya, and Phillip Farrell Jr. commented that they are heirs to the same property. Hayden, Maliya, and Phillip Farrell Jr. all provided an additional address in a second hearing request that is located approximately 76.12 miles from the facility.

In their requests, several issues were raised concerning application completeness, surface water quality, contamination of groundwater, PFAS, recreational uses of the receiving waters, human health, aquatic life including

fish, endangered species and ecosystems, wildlife including migratory birds, odor, flooding and the proposed facility's location in a floodplain, erosion, and economic damages.

Under 30 TAC § 55.203(c), the Commission shall consider several factors to determine whether someone is an affected person. These include likely impacts on personal interests and whether a reasonable relationship exists between the interest claimed and the activity regulated. Most of the properties in question are almost two miles away from the proposed facility.⁷ Given the distance, it is unlikely that a reasonable relationship exists between the requestors' concerns and the proposed facility, nor is it likely that the effluent would impact either the Farrells or the Griffins.

The ED therefore recommends that the Commission find that Hayden Farrell, Maliya Farrell, Phillip Farrell Jr., Phillip Farrell Sr., Robyn Farrell, Gabriel Griffin, Jacob Griffin, Nick Griffin, and Rene Griffin are not affected persons as their hearing requests have not sufficiently demonstrated they have personal justiciable interests affected by the application under 30 TAC § 55.203(c).

Carolyn Taylor

- Carolyn Taylor submitted a timely hearing request which contained her name, address, and phone number pursuant to 30 TAC 55.201(d). According to the address Ms. Taylor provided, her property is 31.5 miles from the proposed facility. Carolyn Taylor is not listed on the adjacent landowners list that was provided by the applicant.

The hearing request that Cameron Taylor filed failed to raise any issues. Under 30 TAC § 55.201(d), a hearing request must identify the person's personal justiciable interest affected by the application. Since her hearing request did not raise any issues, Cameron Taylor failed to comply with the requirements of 30 TAC § 55.201(d).

The ED therefore recommends that the Commission find that Cameron Taylor is not an affected person as her hearing request has not substantially complied with the requirements of 30 TAC § 55.201(d).

Martha Johnson

- Martha Johnson submitted a timely hearing request which contained her name, address, and phone number pursuant to 30 TAC 55.201(d). According to the address Ms. Johnson provided, her property is 29.15 miles from the proposed facility. Ms. Johnson is not listed on the adjacent landowners list that was provided by the applicant.

In her request, Ms. Johnson described her concerns about potential flooding caused by the proposed WWTF. Specifically, Ms. Johnson is concerned about the effects that potential flooding could have on her livestock.

Under 30 TAC § 55.203(c), the Commission shall consider several factors to determine whether someone is an affected person. These include likely impacts on personal interests and whether a reasonable relationship exists between the interest claimed and the activity regulated. Because TCEQ does not have jurisdiction to consider flooding in the context of a TPDES application, this

⁷ The second property listed by Hayden, Maliya and Phillip Farrell Jr. is 76.12 miles away.

interest does not establish that Ms. Johnson is an affected person. In addition, the property in question is located nearly 30 miles away from the proposed facility. Given this distance, Ms. Johnson has not shown that she has a personal justiciable interest that may be affected by the proposed facility.

The ED therefore recommends that the Commission find that Martha Johnson is not an affected person as her hearing request has not sufficiently demonstrated she has a personal justiciable interest affected by the application under 30 TAC § 55.203(c).

B. Whether the Issues Ellis County Raised are Referable to the State Office of Administrative Hearings (SOAH).

1. Whether the draft permit is adequately protective of water quality, including aquatic life and the existing uses of the receiving waters in accordance with applicable regulations including the Texas Surface Water Quality Standards. (RTC Response Nos. 1-3)

The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, is relevant and material to the issuance of the draft permit and was raised by an individual who the ED recommends the Commission find affected. If it can be shown the draft permit does not provide sufficient controls to protect water quality, aquatic life, and the existing uses of the receiving waters that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

2. Whether the draft permit is protective of human health and the environment in the immediate vicinity of the facility and the immediate discharge route. (RTC Response Nos. 4, 14-15)

The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, is relevant and material to the issuance of the draft permit and was raised by an individual who the ED recommends the Commission find affected. If it can be shown the draft permit does not provide sufficient controls to protect human health and the environment in the immediate vicinity of the facility and the immediate discharge route, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

3. Whether the application is complete and accurate. (RTC Response No. 10)

The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, is relevant and material to the issuance of the draft permit and was raised by an individual who the ED recommends the Commission find affected. If it can be shown the application is not complete and accurate, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

4. Whether the Commission should deny or alter the terms and conditions of the Draft Permit based on consideration of need under TWC § 26.0282. (RTC Response No. 9)

The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, is relevant and material to the issuance of the draft permit and was raised by an individual who the ED recommends the Commission find affected. If it can be shown the draft permit does not comply with the regionalization policy, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

5. Whether the application was properly noticed.

The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, is relevant and material to the issuance of the draft permit and was raised by an individual who the ED recommends the Commission find affected. If it can be shown the application was not properly noticed, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

6. Whether the application met the state's policy on regionalization.

The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, is relevant and material to the issuance of the draft permit and was raised by an individual who the ED recommends the Commission find affected. If it can be shown the application did not follow the state's regionalization policy, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

VI. REQUESTS FOR RECONSIDERATION

TCEQ's rules provide that a Request for Reconsideration (RFR) must expressly state that the person is requesting reconsideration of the executive director's decision and provide reasons why the decision should be reconsidered. 30 TAC § 55.201(e). The Commission received timely RFRs from Karen Anderson, Hayden Farrell, Maliya Farrell, Phillip Farrell Jr., Phillip Farrell Sr., Robyn Farrell, Gabriel Griffin, Jacob Griffin, Nick Griffin, Rene Griffin, and Martha Johnson.

The issues raised by Martha Johnson included flooding (RTC Response Nos. 6-7), livestock (RTC Response No. 2), impacts to her livelihood including hay production and harvesting equipment (RTC Response No. 6), public notice, and application completeness (RTC Response No. 10).

The issues raised by the Farrells and the Griffins included public notice and application completeness (RTC Response No. 10). The issue raised by Karen Anderson included public notice (RTC Response No. 10).

These issues, to the extent they are within the Commission's jurisdiction to consider on a TPDES application, were considered during the ED's review of the application. The RFRs did not provide any new information that would lead the ED to

change her recommendation on the application; therefore, the ED recommends denial of the RFRs.

VII. CONCLUSION

The Executive Director recommends the following actions by the Commission:

1. The Executive Director recommends that the Commission find Ellis County an affected person and deny all other hearing requests.
2. If referred to SOAH, set the duration of the hearing as 180 days from the preliminary hearing to the presentation of a proposal for decision to the Commission.
3. If referred to SOAH, concurrently refer the matter to Alternative Dispute Resolution.
4. If referred to SOAH, refer the following issues as raised by the affected persons as identified by the Executive Director:
 - **Issue A) Whether the draft permit is adequately protective of water quality, including aquatic life and the existing uses of the receiving waters in accordance with applicable regulations including the Texas Surface Water Quality Standards.**
 - **Issue B) Whether the draft permit is protective of human health and the environment in the immediate vicinity of the facility and the immediate discharge route.**
 - **Issue C) Whether the application is complete and accurate.**
 - **Issue D) Whether the Commission should deny or alter the terms and conditions of the Draft Permit based on consideration of need under TWC § 26.0282.**
 - **Issue E) Whether the application was properly noticed.**
 - **Issue F) Whether the application met the state's policy on regionalization.**


Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel,
Executive Director

Phillip Ledbetter, Director
Office of Legal Services

Charmaine Backens, Deputy Director
Environmental Law Division

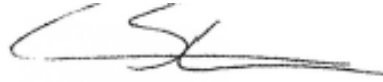


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REPRESENTING THE EXECUTIVE DIRECTOR OF
THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on August 29, 2025, the “Executive Director’s Response to Hearing Request” for TPDES Permit WQ0016216001 for Buffalo Hills Development, LLC was filed with the TCEQ’s Office of the Chief Clerk, and a copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.



Caleb Shook
Staff Attorney
Environmental Law Division

Attachment A

Buffalo Hills Development, LLC

WQ0016216001








Map Requested by TCEQ Office of Legal Services
for Commissioners' Agenda



Protecting Texas by
Reducing and
Preventing Pollution

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087

Date: 5/19/2025
CRF 0122159
Cartographer: RKukushk

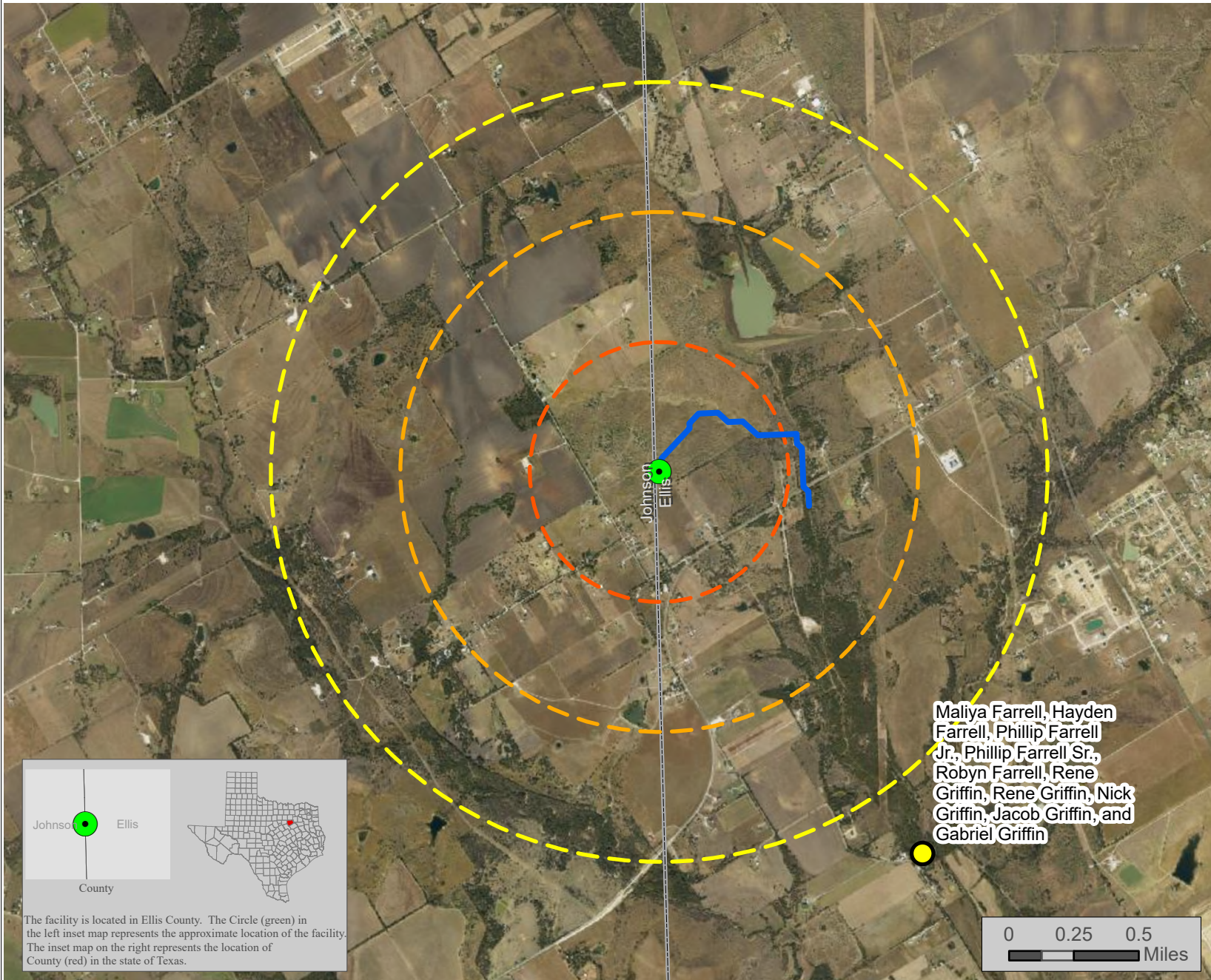
-  Requestors
-  Facility Point
-  County Boundary
-  0.5 Mile Radius
-  1 Mile Radius
-  1.5 Mile Radius
-  1 Mile Discharge Route

Outfall 001 is in the same
location as Facility Point

Maliya Farrell, Hayden
Farrell, Phillip Farrell
Jr., Phillip Farrell Sr.,
Robyn Farrell, Rene
Griffin, Rene Griffin, Nick
Griffin, Jacob Griffin, and
Gabriel Griffin

Source: This map was requested by the Office of Legal Services (OLS) and is based on information provided in the application and hearing requests. The applicant provided site location information, and the hearing requestors provided physical addresses. The map is a visual representation and approximation.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.



0 0.25 0.5
Miles

The facility is located in Ellis County. The Circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of County (red) in the state of Texas.

Buffalo Hills Development, LLC

WQ0016216001




Map Requested by TCEQ Office of Legal Services
for Commissioners' Agenda



Protecting Texas by
Reducing and
Preventing Pollution

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087

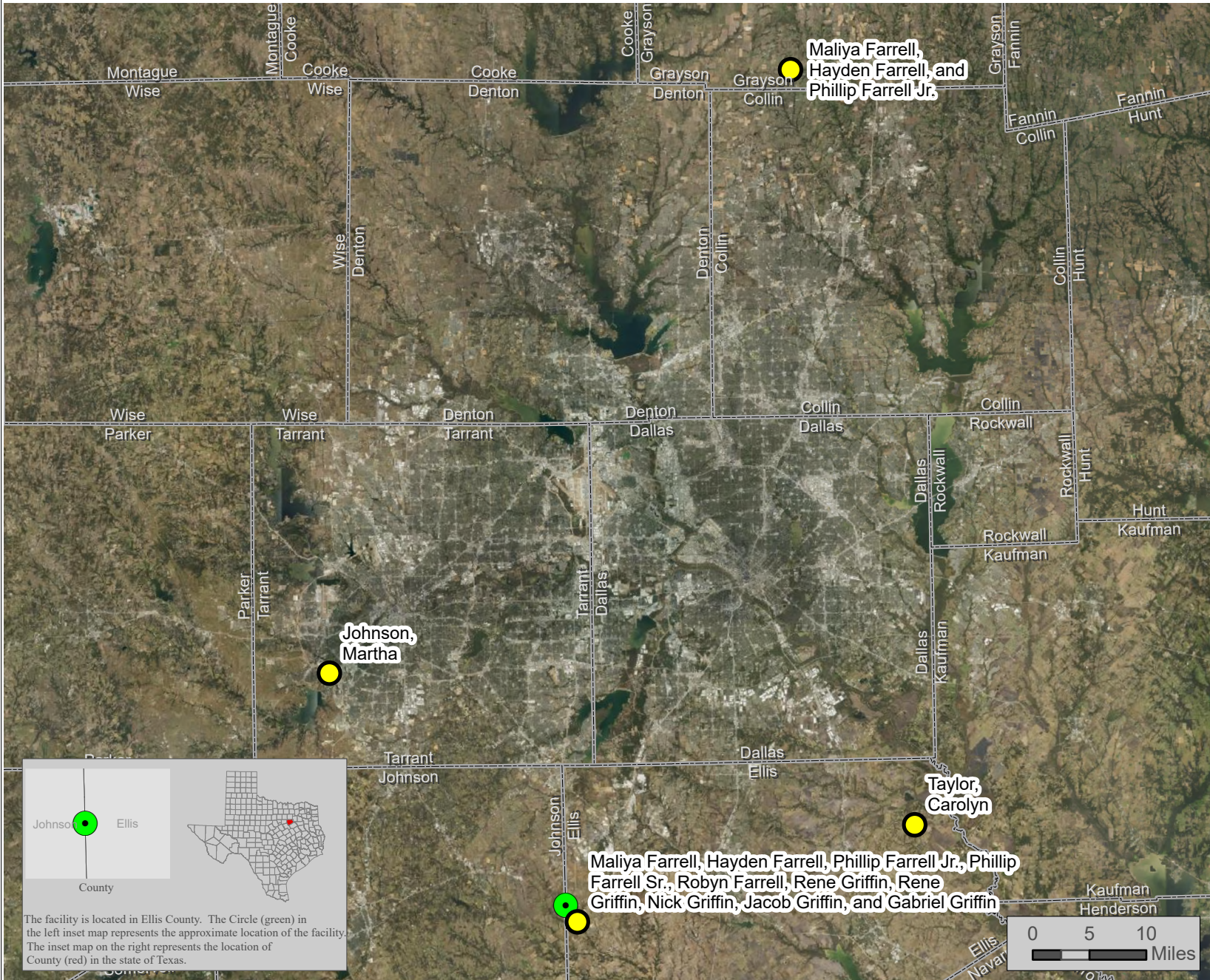
Date: 5/19/2025
CRF 0122159
Cartographer: RKukushk

-  Requestors
-  Facility Point
-  County Boundary

Outfall 001 is in the same
location as Facility Point

Source: This map was requested by the Office of Legal Services (OLS) and is based on information provided in the application and hearing requests. The applicant provided site location information, and the hearing requestors provided physical addresses. The map is a visual representation and approximation.

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The facility is located in Ellis County. The Circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of County (red) in the state of Texas.

NAME	Latitude	Longitude	STATE	Distance to WWTP	Distance to Outfall
ELLIS COUNTY			TX	0	0
FARRELL, HAYDEN	32.349621	-97.069961	TX	1.79	1.79
FARRELL, HAYDEN	33.427776	-96.710684	TX	76.12	76.12
FARRELL, MALIYA	32.349621	-97.069961	TX	1.79	1.79
FARRELL, MALIYA	33.427776	-96.710684	TX	76.12	76.12
FARRELL, PHILLIP JR	32.349621	-97.069961	TX	1.79	1.79
FARRELL, PHILLIP JR	33.427776	-96.710684	TX	76.12	76.12
FARRELL, PHILLIP SR	32.349621	-97.069961	TX	1.79	1.79
FARRELL, ROBYN	32.349621	-97.069961	TX	1.79	1.79
GRIFFIN, GABRIEL	32.349621	-97.069961	TX	1.79	1.79
GRIFFIN, JACOB	32.349621	-97.069961	TX	1.79	1.79
GRIFFIN, NICK	32.349621	-97.069961	TX	1.79	1.79
GRIFFIN, RENE	32.349621	-97.069961	TX	1.79	1.79
JOHNSON, MARTHA	32.674289	-97.435002	TX	29.15	29.15
TAYLOR, CAROLYN	32.460933	-96.557208	TX	31.5	31.5

MAILING LIST
Buffalo Hills Development, LLC
TCEQ Docket No./TCEQ Expediente N.º 2025-0830-MWD;
Permit No./ Permiso N.º WQ0016216001

FOR THE APPLICANT/PARA EL SOLICITANTE

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Lane, Oklahoma 74555

Erin K. Banks, P.E.
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FOR THE EXECUTIVE DIRECTOR/PARA LA DIRECTOR EJECUTIVA

via electronic mail/vía correo electrónico:

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Ryan Vise, Deputy Director
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External Relations Division
Public Education Program, MC-108
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Austin, Texas 78711

FOR PUBLIC INTEREST COUNSEL/PARA ABOGADOS DE INTERÉS PÚBLICO
via electronic mail/vía correo electrónico:

Garrett T. Arthur, Attorney
Texas Commission on
Environmental Quality
Public Interest Counsel, MC-103
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Austin, Texas 78711

FOR ALTERNATIVE DISPUTE RESOLUTION/PARA LA RESOLUCIÓN ALTERNATIVA DE DISPUTAS

via electronic mail/vía correo electrónico:

Kyle Lucas
Texas Commission on Environmental
Quality Alternative Dispute Resolution,
MC-222
P.O. Box 13087
Austin, Texas 78711

FOR THE CHIEF CLERK/PARA LA SECRETARIA OFICIAL

via eFilings:

Docket Clerk
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See attached list/Ver listado adjunto.

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