

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 18, 2023 10:32 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** amsdentx@yahoo.com <amsdentx@yahoo.com>  
**Sent:** Monday, April 17, 2023 2:31 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Carl D Amsden

**EMAIL:** [amsdentx@yahoo.com](mailto:amsdentx@yahoo.com)

**COMPANY:**

**ADDRESS:** 161 SUNSET  
INGLESIDE TX 78362-4735

**PHONE:** 9034213564

**FAX:**

**COMMENTS:** My family has lived in IOB for about 20 yrs. We moved here to take advantage of the fishing and other recreational activities available here. Over those years the quality of the fishery here has significantly deteriorated. The major variable is aggressive and unrestrained industrial development and dredging. The Enbridge operation has already destroyed one of the best fishing areas as well as crucial seagrass beds. For them or anyone to pull millions of gallons of

water out of this ecosystem will absolutely kill immeasurable quantities of organisms that form the basis of the food chain. This resource has already been harmed. This needs to stop. Please schedule a contested case hearing so that those affected can be heard.



## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, May 2, 2023 10:35 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** bennightbrody@gmail.com <bennightbrody@gmail.com>  
**Sent:** Monday, May 1, 2023 7:56 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Brody Benight

**EMAIL:** [bennightbrody@gmail.com](mailto:bennightbrody@gmail.com)

**COMPANY:**

**ADDRESS:** 400 KATE LN  
COLLEGE STATION TX 77845-7436

**PHONE:** 5124610928

**FAX:**

**COMMENTS:** Thank you for taking the time to hear public comments on this permit application. As I studied the permit application, I noticed that the permit does not limit the ways the water can be used. It seems like a classic example of "give them an inch, and they'll take a mile". If Enbridge is being truthful about their intentions, the permit should clearly

state that the ONLY use for the water would be for testing the fire system. Please hold a public hearing on this permit request. Thank you, Brody Bennight

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, April 20, 2023 3:57 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

**From:** bennightbrody@gmail.com <bennightbrody@gmail.com>  
**Sent:** Thursday, April 20, 2023 3:54 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Brody Benight

**EMAIL:** [bennightbrody@gmail.com](mailto:bennightbrody@gmail.com)

**COMPANY:**

**ADDRESS:** 400 KATE LN  
COLLEGE STATION TX 77845-7436

**PHONE:** 5124610928

**FAX:**

**COMMENTS:** Thank you for taking the time to hear public comments on this permit application. As I studied the permit application, I noticed that the permit does not limit the ways the water can be used. It seems like a classic example of "give them an inch, and they'll take a mile" . If Enbridge is being truthful about their intentions, the permit should clearly

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## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, April 5, 2023 10:30 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** bennightbrody@gmail.com <bennightbrody@gmail.com>  
**Sent:** Tuesday, April 4, 2023 8:53 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Brody Benight

**EMAIL:** [bennightbrody@gmail.com](mailto:bennightbrody@gmail.com)

**COMPANY:**

**ADDRESS:** 400 KATE LN  
COLLEGE STATION TX 77845-7436

**PHONE:** 5124610928

**FAX:**

**COMMENTS:** Thank you for taking the time to hear public comments on this permit application. As I studied the permit application, I noticed that the permit does not limit the ways the water can be used. It seems like a classic example of "give them an inch, and they'll take a mile" . If Enbridge is being truthful about their intentions, the permit should clearly

state that the ONLY use for the water would be for testing the fire system. Please hold a public hearing on this permit request. Thank you, Brody Bennight

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

PLEASE PRINT

Name:

Charles Boone

Mailing Address:

468 Sunset, Ingleside on the Bay, TX 78362

Physical Address (if different):

Same

City/State:

Ingleside on the Bay, TX

Zip:

78362

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email:

boonec@sbcglobal.net

Phone Number:

(512) 578-8260

- Are you here today representing a municipality, legislator, agency, or group?

☐ Yes

☒ No

If yes, which one? \_\_\_\_\_



Please add me to the mailing list.



I wish to provide formal ORAL COMMENTS at tonight's public meeting.



I wish to provide formal WRITTEN COMMENTS at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

FOR WRPERM 13775-

-I request a contested case hearing.

-I oppose this permit.

-I request that the application be modified to say what the representative of Emb bridge stated, that the water will only be used for fire safety.

Charles Boone

468 Sunset

Ingle Side on the Bay, Texas 78367

RECEIVED

FEB 29 2024

AT PUBLIC MEETING

11



## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 4, 2023 9:22 AM  
**To:** PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;  
PUBCOMMENT-OPIC  
**Subject:** CORRECTION: Public comment on Permit Number WRPERM 13775

PM  
H

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 29, 2023 11:28 AM  
**To:** PUBCOMMENT-OCC2 <pubcomment-occ2@tceq.texas.gov>; PUBCOMMENT-OPIC <pubcomment-opic@tceq.texas.gov>; PUBCOMMENT-ELD <pubcomment-eld@tceq.texas.gov>; PUBCOMMENT-WWW-WRAS <pubcomment-www-wras@tceq.texas.gov>  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** [boonec@sbcglobal.net](mailto:boonec@sbcglobal.net) <[boonec@sbcglobal.net](mailto:boonec@sbcglobal.net)>  
**Sent:** Tuesday, March 28, 2023 3:45 PM  
**To:** PUBCOMMENT-OCC <[PUBCOMMENT-OCC@tceq.texas.gov](mailto:PUBCOMMENT-OCC@tceq.texas.gov)>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Charles Howard Boone

**EMAIL:** [boonec@sbcglobal.net](mailto:boonec@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 468 SUNSET  
INGLESIDE TX 78362-4747

**PHONE:** 5125788260

**FAX:**

**COMMENTS:** Request for a Public Hearing and Contested Case Hearing Date: March 28, 2023 Re: WRPERM 13775 TCEQ Commissioners & Staff: I am a citizen living within view of the Corpus Christi Bay and approximately three quarters of a mile from the Enbridge Oil facility located on waters of that Bay. I reviewed the Water Use application referenced above and staff comments regarding the application. I respectfully request a Public Hearing and Contested Case Hearing on this application based on the following concerns and facts: 1. The sea grass, bay water quality and fisheries in this area have been seriously degraded during the 6 ½ years I have lived in this area. The staff comments do not address this degradation, mentioning only that the request is consistent with the instream flow requirements for the Nueces Bay and Delta. 2. The original application was filed by Moda Midstream, LLC and there is an exchange of Memos asking if the legal name has changed to "Enbridge Ingleside Oil Terminal, LLC." It is confirmed that the name has changed, but in fact the ownership has changed and the use of the property and area has expanded greatly. There have been other state and local applications by Enbridge for blue hydrogen production, carbon capture and sequestration and solar electrical generation fields. The original applicant did not initiate these uses of the area and it should be clearly demonstrated that the true use of the water is as started in the original application and that it is now safe and environmentally sound for the bay and fisheries. 3. There is a special condition included in staff recommendations that the permittee shall implement steps to reduce the impact on aquatic resources. I believe time and public disclosure is needed to demonstrate what those steps will be and that they preserve the fragile ecosystem that exists adjacent to the facility in the bay. 4. There are no plans provided or specifications regarding the capture and discharge of this water. There has been a great deal of change in the waterway since the original application was filed and evidence is required to demonstrate the impact these new changes will bring. The current traffic of large oil tankers, coming through the area and to and from the Enbridge terminal has created silt that is killing the sea grass beds. This degradation is clearly evident to the naked eye. In addition, there is a recent seagrass study by Dr. Kirk Cammarata, determining that seagrasses are impacted by silt covering seagrasses during Enbridge tanker docking operations. 5. Staff states in their recommendation that there is no feasible alternative to the stated need for this water to test fire systems. The City of Ingleside currently provides firewater to the Enbridge facility. This is not explored as an alternative in the application and there is no demonstration that this or other feasible alternatives are not available. This area has been negatively impacted and before more damage is done further review and consideration ought to be undertaken. Charles H. Boone; 468 Sunset; Ingleside on the Bay, Texas 78362; phone 512-578-8260; e-mail [boonec@sbcglobal.net](mailto:boonec@sbcglobal.net)

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 29, 2023 11:28 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-  
WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** boonec@sbcglobal.net <boonec@sbcglobal.net>  
**Sent:** Tuesday, March 28, 2023 3:45 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Charles Howard Boone

**EMAIL:** [boonec@sbcglobal.net](mailto:boonec@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 468 SUNSET  
INGLESIDE TX 78362-4747

**PHONE:** 5125788260

**FAX:**

**COMMENTS:** Request for a Public Hearing and Contested Case Hearing Date: March 28, 2023 Re: WRPERM 13775 TCEQ Commissioners & Staff: I am a citizen living within view of the Corpus Christi Bay and approximately three quarters of a mile from the Enbridge Oil facility located on waters of that Bay. I reviewed the Water Use application referenced above and staff comments regarding the application. I respectfully request a Public Hearing and Contested Case Hearing on this

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# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

**PLEASE PRINT**

Name: Payton Campbell

Mailing Address: 6214 Londonderry Dr.

Physical Address (if different): \_\_\_\_\_

City/State: Corpus Christi TX Zip: 78415

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: payton\_campbell21@yahoo.com

Phone Number: (       ) \_\_\_\_\_

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☒ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.



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FEB 29 2024

AT PUBLIC MEETING

## Comments by Payton Campbell for Water Use Permit Application #13775

I oppose this permit and request a contested case hearing. I Request the application be modified to say that this permit application will never be modified for any other uses other than firewater safety. I am concerned that they will attempt to transfer the water use to their planned ammonia plant in the future. The proposed water permit will be unenforceable due to its lack of details. 500-acre feet of water is equal to almost 163 million gallons – that is excessive. TCEQ used boilerplate language in the permit. Our community deserves more. No details on pipe sizes & pumps–Enbridge & TCEQ are guessing about impacts. This appears to be a State of Texas-sanctioned legal water grab for expansion. Enbridge can pledge not to sell its water rights and allow TCEQ to add to permit. There are no details about flow measurements and recordkeeping requirements. No details on reasonable measures to reduce impacts to aquatic environments. TCEQ needs to add/reference regulations on selling water rights in permit. Enbridge says it will be 98% water efficient – needs to be measured & regulated. Enbridge claims a 5-10% water savings over-time – need details on calculations. This water permit took a very long time to process with a missing year – why? Enbridge provided no information on mechanical integrity and leak checks. Because there are so few details in the permit-gives appearance of hiding things. Permit will allow Enbridge to use/sell ~13.5 million gallons of water a month. Enbridge must use a firewater system now from Naval Base – please describe. What is Enbridge's firefighting capability now – they should describe. Enbridge owns storage tanks and pipelines – it should firewater in tanks. The permit should have limited use for firewater testing only for the Enbridge Oil Terminal facility, and it should NOT include the statement "the purpose is for industrial use BUT NOT LIMITED TO firewater and firewater pump tests," nor should it allow for "additional pump systems for future expansion." Any use outside of this facility for any other purpose should require additional permitting. The proposed use is not being limited to testing and emergency operation of fire suppression systems. The applicant may therefore, at any time in the future, use the water for other uses as it deems appropriate, such as for cooling water. The permit allows the applicant to sell the diverted water to another entity that could use the water for cooling water purposes. In so much as the intake of cooling water is not prohibited, the water of interest should be subject to the requirements of federal regulations implementing CWA 316 (b). According to those regulations, impingement and entrainment of aquatic life must be minimized wherever an intake structure is proposed to be located. The permit is incomplete as it does not demonstrate a safe discharge plan into CC Bay. In the event of a fire, how will the applicant

guarantee that wastewater during a fire, which would most likely include a leak or spill of product, would not contaminate Corpus Christi Bay and what is the emergency plan when it does? Can Enbridge share with the community in full transparency to foster a better relationship? Proximity of intake to seagrasses increases marine mortality risks. In the map provided in the permit application, the location of the intake is within the definition of the littoral zone, near shore, within the tidal range, and adjacent to seagrass beds. Therefore, it has the highest incidences of impingement and entrainment, and thus the greatest negative impact to aquatic life in the area. Enbridge has not provided the information necessary to evaluate the impact that the impingement and entrainment resulting from the diversion of 500-acre feet per year. This portion of Corpus Christi Bay has contact recreation, boating and fishing, as well as primary recreation in the manner of swimming and beach going. Under Texas Water Quality Standards, the source waters have been characterized as used for exceptional aquatic life uses. Issuance of the draft permit fails to protect the ecology and productivity for the impacted bay and estuary system and fails to maintain existing uses of the impacted source water. The potential impingement and entrainment impacts of the intake will endanger the ecology and productivity of the source waters, and would prevent maintenance of existing uses of the source waters. The water will be withdrawn at a rate of 100,000 gallons per minute. If Enbridge installed a 48" diameter intake pipe (which is a VERY large pipe) to withdraw the water, the velocity of the water would still be 17.73 feet per second. This is more than 35 times the EPA recommended intake velocity of 0.5 feet per second in a littoral zone. Under applicable statute and rules, Enbridge is required to demonstrate that its facility will take reasonable measures to minimize impingement and entrainment. NO such measure has been thoroughly or reasonably described or undertaken as part of this permitting process. Enbridge currently has firewater provided by the City of Ingleside, and as such, it has not met the burden of proof that no feasible alternative to the appropriation exists or that the requested amount of appropriation is necessary and reasonable for the proposed use. Analysis, calculations and infrastructure details have not been provided for the fire suppression system to quantify need based upon facilities to be protected and system capabilities. Therefore, Enbridge has not adequately demonstrated a need for water. I hope the TCEQ takes these comments seriously when considering the permit approval.

Sincerely,

Payton Campbell

6214 Londonderry Dr

Corpus Christi, TX 78415

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

**PLEASE PRINT**

Name: Anne & Chris Carleton

Mailing Address: 1100 Sandpiper Ingleside TX 78362

Physical Address (if different): \_\_\_\_\_

City/State: \_\_\_\_\_ Zip: \_\_\_\_\_

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: Sandpiperx2003@yahoo.com

Phone Number: (361) 290-8458

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☒ Please add me to the mailing list.

☐ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.



## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 17, 2023 12:56 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

**From:** sandpiperx2003@yahoo.com <sandpiperx2003@yahoo.com>  
**Sent:** Sunday, April 16, 2023 12:13 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Chris Carleton

**EMAIL:** [sandpiperx2003@yahoo.com](mailto:sandpiperx2003@yahoo.com)

**COMPANY:**

**ADDRESS:** 1100 SANDPIPER  
INGLESIDE TX 78362-4953

**PHONE:** 3612908457

**FAX:**

**COMMENTS:** We live within 1000 yards of this ammonia plant. And let's call it what it is: an ammonia plant, not a water supply/fire suppression system. It's not an eco-friendly industrial development; it is proposed by a partnership with foreign companies that don't give a damn about our community. First, the application is incomplete and in error. Numerous entries are invalid or incomplete, so how can you look at a permitting process with those glaring errors?

Secondly, it is our understanding that Enbridge has water for fire suppression from the city of Ingleside, and to our knowledge, oil fires are suppressed with foam, not water, and it is our impression that there are already foam fire suppression systems in place. So why the need for all the water? Thirdly, the applicant has not explained how the large intake of water will not harm the fragile aquatic sea life environment that is exclusive and specific to a shallow bay system. 500 acre-feet/year to test a fire/water suppression system is laughable at its request. No fire system could take the pressure of such a huge amount of water inflow, almost 500,000 gallons/day. Fourthly, no mention of water discharge is included in the proposal. In our mind, intake and outflow of this kind of water volume will irrevocably harm all phases of sea life and aquatic habitat, including grass beds and all microorganisms that thrive in this system. Once the aquatic eco-system is gone, it cannot be revived. In closing, we are a retired couple, and our major past time is fishing and boating recreation in our shallow Corpus Christi Bay system. As fishermen, we smell something fishy in this proposal. We urge you to reject this permit as submitted and hold a public hearing on this or any amended application.

Chris and Anne Carleton

**Ellie Guerra**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 18, 2023 10:37 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

**From:** elida.i.castillo@gmail.com <elida.i.castillo@gmail.com>  
**Sent:** Monday, April 17, 2023 4:45 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

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**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Elida Castillo

**EMAIL:** [elida.i.castillo@gmail.com](mailto:elida.i.castillo@gmail.com)

**COMPANY:**

**ADDRESS:** 131 LERDO ST  
TAFT TX 78390-2222

**PHONE:** 2108578925

**FAX:**

**COMMENTS:** I am asking for TCEQ to deny this permit and for it to grant a contested case hearing. 500 acre feet of water is a significant amount that will harm our vulnerable estuaries in the bay, especially in an area that is experiencing heavy ship traffic and dredging. Enbridge, a Canadian company, should not have any rights to take OUR water to expand its operations. There is already increase salinity of the bay and removing 162,925,716 gallons per year will cause harm to

our aquatic life and the way of life here. Protect our bays instead of allowing these industries to leech off of our precious resources for their own benefit. We are already seeing the deaths of dolphins, endangered turtles, and decreased fish populations. TCEQ, do your job and stop this madness. Texas and her waters should be protected at all costs.

**incent Redondo**

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, March 1, 2024 4:34 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-  
WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

Jesús Bárcena  
Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Office Phone: 512-239-3319

How is our customer service? Fill out our online customer satisfaction survey at:  
[www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

**From:** Elida.i.castillo@gmail.com <Elida.i.castillo@gmail.com>  
**Sent:** Thursday, February 29, 2024 7:13 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**NAME:** Elida Castillo

**EMAIL:** [Elida.i.castillo@gmail.com](mailto:Elida.i.castillo@gmail.com)

**COMPANY:**

**ADDRESS:** PO BOX 643  
TAFT TX 78390-0643

**PHONE:** 2108578925

**FAX:**

**COMMENTS:** I strongly **urge** T **CEQ** to deny WRPERM **1** 3775 for Enbridge. First, this meeting is being held on Leap Day which only happens **every** **four** years. TCEQ should **do** something that it rarely does and DENY this permit. There are 5 desalination facilities **propose** **d** to be built that **would** take water from the same bay that Enbridge would like to withdraw 500 acre feet **per** **year**. That is a request **that** is not feasible and it would be irresponsible for TCEQ to grant it. Small businesses, **tourists**, **fishermen**, and many **others** rely on the Bay to sustain their livelihoods and ways of life. The Bay is already suffering **from** **high** salinity levels as is. **To** remove 500 acre feet per year along with the ever increasing evaporation due to **rising** **tem** **peratures** will **exacerbate** the problem. Enbridge is seeking a Federal Operating Permit which has not been **granted**. **Stop** putting the cart **before** the horse, unless there are no plans to stop Enbridge's operations. Our **communities** are being assaulted **by** **the** fossil fuel industry while regulatory agencies look away. Do the right thing for once. **This** is a **life** or death issue for **so** **many**.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:37 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** krisfb612@gmail.com <krisfb612@gmail.com>  
**Sent:** Wednesday, April 5, 2023 4:02 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Krista Clyburn

**EMAIL:** [krisfb612@gmail.com](mailto:krisfb612@gmail.com)

**COMPANY:**

**ADDRESS:** 517 BAYSHORE DR  
INGLESIDE TX 78362-4707

**PHONE:** 7178176462

**FAX:**

**COMMENTS:** I would like to request a public hearing or contested case hearing. Enbridge is not being honest and is putting our Bayside community, ecosystem, and wildlife in danger. Gas is extinguished by using foam. Why would they ever need over 400,00 gallons of water a day for fire testing? Looks like they are going full steam ahead with their plans and have no regard or integrity towards anyone or anything that gives them a stumbling block. We have the right and

the need as a community to preserve our land, the bay and all wildlife. There have been horrible accidents and leakage with other blue amonia plants. We live entirely to close to the plans they are seeking. All residents will be in danger. I bought my home here for the beauty, the outdoor life... this is being threatened. We as a community do not want this!! We demand honesty and transparency. Thank you.



# TCEQ Registration Form

February 29, 2024

10

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

**PLEASE PRINT**

Name: Lucia D. Dailey

Mailing Address: PO Box 783 Port Aransas Texas 78373

Physical Address (if different): 619 East Ave B

City/State: Port Aransas Texas Zip: 78373

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: \_\_\_\_\_

Phone Number: ( \_\_\_\_\_ ) \_\_\_\_\_

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☐ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☒ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

RECEIVED

FEB 29 2024

AT PUBLIC MEETING

February 29, 2024

Texas Commission on Environmental Quality  
WRPERM 13775/ Water Use Permit 13775

I oppose the granting of WRPERM13775/Water Use Permit 13775 to  
Enbridge Ingleside Oil Terminal, LLC, 1450 Lexington Rd, Ingleside, Tx 78362

And I request a contested case hearing for the following reasons:

1- Enbridge currently has water for firefighting provided by the City of Ingleside, so a feasible alternative to this appropriation already exists. The requested appropriation is not necessary or reasonable for the proposed use. The applicant has not provided details of their fire suppression system or demonstrated a need for the requested amount of appropriation.

2- In the original applicant's "Industrial Water Conservation Plan", Moda Ingleside Oil Terminal, LLC, stated in Section II, "Water Use and Conservation Practices" on page 3, certain items that need to be revisited, and reconsidered, in light of this application.

#1-No fresh water is recirculated at this facility.

#2-The water will be used to test the firewater pump systems for mechanical integrity and leaks.

#3- An estimated 2% of water pulled is anticipated to be lost to evaporation. 98% of water will be returned to the bay.

If the present applicant, Enbridge, is provided firefighting water from the City of Ingleside, and only 2% is estimated to be lost to evaporation during the testing process, it is only reasonable for the applicant to store water required for testing fire suppression systems and reuse it for periodic safety tests. This is being done at the neighboring facility, Flint Hills, according to reports. Any cost for water used for this purpose is an ordinary and necessary part of doing business, which should be paid for by the user. In addition, the applicant should have an available stored water source on site, at the ready, in case of emergency. This is a responsibility it holds to protect the health and safety of its employees and the public.

February 29, 2024

Texas Commission on Environmental Quality  
WRPERM 13775/ Water Use Permit 13775

3- The present application and proposed permit do not address many potential problems. These modifications should be added:

A- If the proposed permit is for testing fire suppression systems, there should be a <sup>special condition</sup> clause that it will never be modified for other industrial uses;

B- Applicant is not a regulated water provider, no applicant or successor permittee will be allowed to sell water or water rights now or in the future;

C- TCEQ will clearly determine, delineate, and regulate actual amounts needed for testing water requirements of the fire suppression system;

D- Any chemical treatments used before or during use of this seawater be described, measured, reported, and removed before being returned to the bay, per Clean Water Act 316(b);

E- Seawater will only be used for fire suppression in case of an emergency when water for firefighting is not available from the City of Ingleside, and sent to a wastewater facility after use, not released into Corpus Christi Bay.

4-In addition, the following questions need to be answered:

A- What is the actual capacity of the "firewater" safety system at Enbridge's facility?

B- What is the allocation, or typical usage, of fresh water, that Enbridge already receives from the City of Ingleside?

C- Is water really the proper substance for extinguishing oil and gas fires/explosions? What other fire suppression systems are in place at Enbridge? Is water a minor component?

D-If this permit were issued, what chemicals and processes would be used on the water taken from Corpus Christi Bay? What measures would be taken to remove these chemicals and reverse these processes before being returned to the bay?

E-What would the impingement/entrapment impacts to aquatic species and environments be from withdrawing 446,371 gallons per day from the proximity of the intake- an area of the littoral zone, near shore, within the tidal range and adjacent to seagrass beds?

I look forward to your reply,

Lucia D. Dailey  
Post Office Box 783  
Port Aransas, Texas  
78373

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 29, 2023 11:29 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

PM  
H

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**From:** tdaley@bizstx.rr.com <tdaley@bizstx.rr.com>  
**Sent:** Tuesday, March 28, 2023 4:45 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Tom Daley

**EMAIL:** [tdaley@bizstx.rr.com](mailto:tdaley@bizstx.rr.com)

**COMPANY:**

**ADDRESS:** 904 SANDPIPER  
INGLESIDE TX 78362-4840

**PHONE:** 3615374244

**FAX:**

**COMMENTS:** I would like to request a public meeting and a contested case hearing. I own property along Bayshore Drive, less than a mile from this facility, and regulary fish and crab in these waters. This permit has not shown how it will protect the rich marine life right off the shore of Ingleside on the Bay. The intake velocity of this water, said to be twice a

week, at 100,000 gpm, for several hours will decimate the larvea, small fish and shell fish that are required to keep a healthy and productive marine environment. At this day and age, when water is such a precious commodity, Enbridge should be conserving water, reusing water, not drawing thousands of gallons from a critical nursery habitat for a non-potable recurring testing needs that could easily be accomplished with captured rainwater and recycled grey water. The use is not limited to the need that they requesting the far, which in my mind, is criminal. This water could be sold, used for cooling water or other wasteful needs, all at the detriment of our community.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:37 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** Kellydietz@hotmail.com <Kellydietz@hotmail.com>  
**Sent:** Wednesday, April 5, 2023 4:13 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MRS Kelly Dietz

**EMAIL:** [Kellydietz@hotmail.com](mailto:Kellydietz@hotmail.com)

**COMPANY:**

**ADDRESS:** 269 N COUNTY ROAD 1080  
KINGSVILLE TX 78363-2623

**PHONE:** 3615220212

**FAX:**

**COMMENTS:** I'm writing into TECQ to ask that a public hearing for the local residents and for people in the area that who enjoy the bay to be held. My hope is that a public hearing with TECQ & Enbridge would help to explain & answer questions for the public.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:35 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** Kellydietz@hotmail.com <Kellydietz@hotmail.com>  
**Sent:** Wednesday, April 5, 2023 3:14 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MRS Kelly Dietz

**EMAIL:** [Kellydietz@hotmail.com](mailto:Kellydietz@hotmail.com)

**COMPANY:**

**ADDRESS:** 269 N COUNTY ROAD 1080  
KINGSVILLE TX 78363-2623

**PHONE:** 3615220212

**FAX:**

**COMMENTS:** I'm writing into TECQ to ask that a public hearing for the local residents and for people in the area that who enjoy the bay to be held. My hope is that a public hearing with TECQ & Enbridge would help to explain & answer questions for the public.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:57 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-  
WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** dolld1@msn.com <dolld1@msn.com>  
**Sent:** Thursday, April 6, 2023 3:20 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Douglas C Doll

**EMAIL:** [dolld1@msn.com](mailto:dolld1@msn.com)

**COMPANY:**

**ADDRESS:** 315 INGLEWOOD  
INGLESIDE TX 78362-4844

**PHONE:** 4045566998

**FAX:**

**COMMENTS:** There needs to be a public hearing on this. We need to know what "for industrial purposes" means in the application and the corresponding effect on water quality.



## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 3, 2023 9:09 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** pegduran1@gmail.com <pegduran1@gmail.com>  
**Sent:** Friday, March 31, 2023 4:57 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MRS Margaret A Duran

**EMAIL:** [pegduran1@gmail.com](mailto:pegduran1@gmail.com)

**COMPANY:** Retired Jose M. Duran, MD

**ADDRESS:** 4022 CONGRESSIONAL DR  
CORPUS CHRISTI TX 78413-2523

**PHONE:** 3616969366

**FAX:**

**COMMENTS:** I urge you to reject this permit. Taking this much water from an area alive with sea grasses and sealife will certainly involve entrapment and contamination. Has there been an Environmental Impact Study? Is there any mitigation plan? There are already many stressors placed on Corpus Christi Bay. You already know that it takes 1.4 years for water to circulate out to the Gulf. We have frequent droughts here and are currently still living with water

restrictions. Why does industry get priority over local people and habitat? Enbridge is asking for water for firefighting, but I thought that petrochemical fires were fought with chemicals. With water being such a scarce and necessary resource, I hope you will demand more information from this company which incidentally has a poor environmental record. I respectfully request a public hearing. This is too important to our community. Thank you.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

*PLEASE PRINT*

Name: LARAMIE FAIN

Mailing Address: 325 LOUISIANA AVE

Physical Address (if different): \_\_\_\_\_

City/State: CORPUS CHRISTI TX Zip: 78404

*\*\*This information is subject to public disclosure under the Texas Public Information Act\*\**

Email: Laramie.Fain@gmail.com

Phone Number: (254) 216 1779

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☒ Please add me to the mailing list.

☐ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☒ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

LARAMIE FAIN  
325 LOUISIANA AVE  
CORPUS CHRISTI, TX  
78404

WD PERM 13775  
COMMENT

I OPPOSE THIS PERMIT AND REQUEST A  
CONTESTED CASE HEARING. STATED PURPOSE  
OF PERMIT IS TOO VAGUE. APPLICATION MUST  
BE MODIFIED TO SAY THAT THIS PERMIT  
APPLICATION WILL NEVER BE MODIFIED TO  
INCLUDE USES OTHER THAN FIRE SAFETY. I DO  
NOT WANT THIS PERMIT TO BE ABLE TO BE  
AMMENDED AT A LATER DATE FOR A  
PROPOSED AMMONIA PLANT ON THE SAME  
PROPERTY. IT IS MY SUSPICION THAT THIS  
IS THE TRUE AIM OF THE PERMIT AS IT  
CURRENTLY EXISTS.

THE CURRENT LACK OF DETAILS  
INCLUDED IN THE PERMIT MAKE IT IMPOSSIBLE  
TO ENFORCE.

500 ACRE-FEET OF WATER IS AN  
EXCESSIVE AMOUNT, PARTICULARLY IN OUR  
COMMUNITIES THAT ARE ALREADY SACRIFICING  
OUR WATER TO INDUSTRY.

THE PERMIT INCLUDES NOTHING IN  
REGARDS TO PIPE SIZES, PUMPS, FLOW  
MEASUREMENTS OR RECORD KEEPING REQUIRE-  
MENTS. AS SUCH, ANY STATEMENTS ON  
IMPACTS TO THE ENVIRONMENT ARE GUESSWORK.

ENBRIDGE HAS OFFERED NOTHING  
IN REGARDS TO CURRENT FIRE SAFETY SYSTEM  
AND MEASURES IN PLACE. THEY MUST  
ELABORATE ON WHY THEY SO DESPERATELY  
NEED THIS WATER.

FURTHERMORE - ENBRIDGE SHOULD  
BE CONDUCTING ITS OPERATIONS IN SUCH  
A MANNER AS TO NOT NEED SUCH  
EXTREME AMOUNTS OF WATER.

WE AREN'T STUPID.

RECEIVED

FEB 29 2024

AT PUBLIC MEETING

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:56 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** tjfarley2018@gmail.com <tjfarley2018@gmail.com>  
**Sent:** Thursday, April 6, 2023 2:30 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Thomas Farley

**EMAIL:** [tjfarley2018@gmail.com](mailto:tjfarley2018@gmail.com)

**COMPANY:**

**ADDRESS:** 302 INGLEWOOD  
INGLESIDE TX 78362-4843

**PHONE:** 3613852266

**FAX:**

**COMMENTS:** We request a public hearing

Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, March 30, 2023 8:52 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Attempt to file comments on resumed Permit WR 13775  
**Attachments:** TECQ Scf Moda Enbridge Marine Fire Water Testing Permit 3-27-2023.docx; TCEQ scf Enbridge Moda WR 13775 3-29-2023.pdf

H

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**From:** CHIEFCLK <chiefclk@tceq.texas.gov>  
**Sent:** Wednesday, March 29, 2023 10:48 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** FW: Attempt to file comments on resumed Permit WR 13775

---

**From:** Sally Farris <s.farris@att.net>  
**Sent:** Wednesday, March 29, 2023 8:35 PM  
**To:** CHIEFCLK <chiefclk@tceq.texas.gov>  
**Subject:** Attempt to file comments on resumed Permit WR 13775

Dear Chief Clerk, TCEQ:

Please excuse my sending these comments directly to you.

I have been unable to get the online system's *comments on pending permits* to accept the number that I understand identifies the pending permit I am interested in. The permit is for Water Rights, an application to take marine water by Moda-Midstream Company. The site and operations actually belong to Enbridge, Inc., a Canadian Company, but the application was filed in name of Moda.

The number I have is:  
WR13775

In hopes you can accept my comments as attached, I am most grateful.

Sally Clark Farris  
13043 Hunters Breeze Street  
San Antonio, Texas 78230  
phone 210-313-7028

My name is Sally Clark Farris, residing in San Antonio, Texas. I was born and raised on North Corpus Christi Beach, where my family continues to own property on E. Causeway Blvd. in Brooklyn subdivision.

While the location of my birthplace and childhood are more than a mile distant from the location of the proposed permit application No. WR13775, it is yet within sight distance of the applicant's location. The permit site is directly abutting the waters where my family made its living in the "head-boat" fishing business from the mid 1940's until the 2000's. I am also a retired municipal environmental lawyer who served the cities of Corpus Christi and San Antonio until 2008.

**Request for Public Hearing.** Although my family's property location may not justify a standing right to request a public hearing, I am asserting such necessity **in light of the administrative inadequacies** of the draft permit. Please provide this permit a public hearing.

**Incompleteness.** Despite the permit application's treatment by TCEQ as administratively complete, I am stuck by apparent omissions.

**First, the applicant is not legally identified**, apparently, according to publicized ownership history. The Moda- Midstream Company operations, in whose name this application is made and to whom the permit is to be issued, received front page coverage in the Corpus Christi Caller-Times, and was so reported by other finance media, when in 2021 Moda-Midstream reportedly sold its interests in and operations at the site to Enbridge, Inc., a Canadian company. The business world looks to Enbridge as the owner-operator. Without a correctly defined owner / operator, how will TCEQ hold the permit holder to account? If Enbridge (apparent current owner-operator) does not comply in the future, will TCEQ look to Moda, a supposedly former owner, for redress because the permit is in Moda's name?

**If challenged, would this permit be invalid as a matter of law?** Are the permit application signatories, purportedly on behalf of Moda, in Moda's name as the applicant, accompanied by a corporate resolution from Enbridge authorizing Moda to act as agent on Enbridge's behalf? Does Moda have such showing of "authority?" Has Moda presented this authority to TCEQ?

Reuters News Service, September 7, 2021, reported the Canadian firm "Enbridge buys **N. America's biggest oil export hub** in \$3-bln [billion] Moda deal." [Moda Ingleside Energy Center] The report was followed by confirmation. [Enbridge completes Acquisition of North America's Premier Crude Export Facility | Moda Midstream](https://www.enbridge.com/projects-and-infrastructure/projects/ingleside-energy-center-projects) [Ingleside Energy Center Projects - Enbridge Inc.](https://www.enbridge.com/projects-and-infrastructure/projects/ingleside-energy-center-projects)

<https://www.enbridge.com/projects-and-infrastructure/projects/ingleside-energy-center-projects>

This is an apparent flaw, at best a legal confusion, to be corrected with a new application, or in the alternative, to be pursued by TCEQ's further due diligence resolving the principal-agent relationship question between Enbridge and Moda. On the other hand, if such a well-publicized change of ownership did not occur, a retraction and correction (not the responsibility of TCEQ) is necessary to benefit of the community, TCEQ, financial regulators, and other businesses that might rely to their detriment upon relationships with Moda- Midstream and Enbridge, Inc.

From asset and liability standpoints, assuming Enbridge is indeed the owner /operator, Enbridge's failure to reveal itself as the real permittee could reflect negatively upon TCEQ, to cause an undeserved perception of fault on TCEQ's part, having negotiated with a bogus party.

**Solution:** Require re-application by the legally responsible party, if it is not Moda-Midstream. Or, confirm identity of the legally responsible owner / operator who should make permit application.



**Second, the permit draft provides scant environmental safeguards** for impacted marine life (taken along with the marine water as entrained or impinged), nor for organisms in the littoral environment in the event of a discharge or release. No mention is made of takings impact to microscopic organisms, flora and fauna alike. These tiny organisms are building blocks, foundations to the ecosystem. In what volumes will they be consumed? It is not revealed.

Ecological stressors to Corpus Christi Bay are now well-known, made so in recent works by TMAUCC's Drs. Larry McKinney and Paul Montagna, particularly the volatile and critical salinity variations that have been documented to impact identified species. Infantile marine life, seeking sanctuary in or emanating from nursery grounds found in seagrasses and shallows adjacent the site on La Quinta Channel, are at risk, yet the permit lacks little protective mention and no assessment of impact. Littoral regions, where the site is located, are entitled to environmental protections. This permit, as it stands, enables the permittee to "take" and consume vital wildlife building blocks belonging to the State of Texas, all without compensation to the State and without accounting to the public who own the resources.

**Solution:** Require an environmental impact assessment that includes an annual accounting for the value of organic assets at risk / to be sacrificed / consumed within the 500-acre feet to be taken, as those organisms are too a "taking." Apply a similar accounting for impacts to the marine and littoral environments should oil laden firefighting water escape the site during a conflagration, such escape and release being a near certainty during an oil fire / chemical fire emergency suppression response.

**Third, water application to oil-fed fires is to be avoided under standard industrial operating procedures.** This begs the question of stated purpose. Water spreads an oil fire. The permit anticipates consumption of 500-acre feet of marine water per year for "fire water testing and emergency use." [If this were an application for fresh water, the volume would approximate the well-known calculation, that necessary to serve 1,000 households per year, a substantial diversion.] Over the years, and within my experience in service to the federally mandated Local Emergency Preparedness Committee (LEPC), understanding of refinery, oil tank / oil storage fire suppression response holds that oil-fed firefighting protocols rely on foam, not water. The good reason being, water is a safety risk to be avoided during an **oil-fed fire**. Water is to be avoided. It spreads oil and it spreads the fire rather than containing it. Thus, a need for 500-acre feet of marine water for fire water testing and emergency oil-fire fighting, seems a mis-apprehension as well as a mis-application of purpose of use. The stated use, applying marine water to an oil conflagration, runs counter industrial use safety standards.

That contradiction begs another question, what then would 500-acre feet of marine water be used for at a crude export hub of international portent? An off site use? An undisclosed purpose, justified under "including, but not limited to?"

**Consequence:** TCEQ must deny this permit on account of mis-statement of purpose that renders the permit un-necessary.

**Fourth, permit language creates unlimited opportunities.** If indeed this permit application is intended to be for a minor project, and not a major one, the use parameters for consumption (diversion) of marine waters should be appropriately tightened up, fully enunciated, and so closely defined so as not to allow for misinterpretation. The fact is, the purported use "including, but limited to," enlarges future uses limited only by the imagination. Given this crude export hub is the largest in North America, it takes little imagination to enlarge uses enabled by language "including, but not limited to." Thus, the ill-defined statement of purpose opens the permit to plausibility challenge because it is unlimited. The



additional purposes, if any, to which the diverted water might be devoted should be spelled out, not obfuscated.

**Solution:** For no other reasons than apparent mis-statement of purpose and un-necessary (industrially unsafe) use of diverted water, the application and draft permit should be rejected.

**Fifth, the question of TPDES compatibility.** A short review makes it uncertain that this site possesses an NPDES (TPDES stormwater discharge) permit and plan adequate for / **adjusted to accommodate an additional 500-acre feet of discharge** in the event of a release, especially in light of the risk water would pose to an oil fed fire under emergency circumstances. Runoff would inevitably conduct and release into the environment petroleum and / or possibly all the petro-chemicals within the site's inventory if a fire ensued, a worst-case scenario. Runoff or discharge is anticipated as SOP in any case involving fire suppression that uses water, regardless of the character of the feedstock that could ignite. If the takings / water rights permit is granted, this site will be subject to an additional 500-acre feet of water run-off, acting as a potential agent or vehicle to conduct pollutants off site.

**Solution:** This **water rights permit for taking should not be issued until** the site's accompanying **TPDES permit and its stormwater plan** are assured compliant by adjustment, amendment or otherwise, to accommodate an additional 500-acre feet of run-off, anticipated to convey / release the array of contaminants profiled within the site's inventory during a fire event. Given the hub's reputation as the largest in North America, only best available technology should be required and allowed as conditions of the TPDES permit and stormwater plan, adjusted for a 500-acre feet contingency, effectively impounding the run-off rather than allowing it to contaminate the abutting marine and littoral environments.

Thank you,  
Sally Clark Farris

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, March 30, 2023 8:52 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775  
**Attachments:** TCEQ scf Enbridge Moda WR 13775 3-29-20231.pdf

H

---

**From:** s.farris@att.net <s.farris@att.net>  
**Sent:** Wednesday, March 29, 2023 9:22 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MS Sally Clark Farris

**EMAIL:** [s.farris@att.net](mailto:s.farris@att.net)

**COMPANY:**

**ADDRESS:** 13043 HUNTERS BREEZE ST  
SAN ANTONIO TX 78230-2822

**PHONE:** 2103137028

**FAX:**

**COMMENTS:** Please see the pdf attachment.

My name is Sally Clark Farris, residing in San Antonio, Texas. I was born and raised on North Corpus Christi Beach, where my family continues to own property on E. Causeway Blvd. in Brooklyn subdivision.

While the location of my birthplace and childhood are more than a mile distant from the location of the proposed permit application No. WR13775, it is yet within sight distance of the applicant's location. The permit site is directly abutting the waters where my family made its living in the "head-boat" fishing business from the mid 1940's until the 2000's. I am also a retired municipal environmental lawyer who served the cities of Corpus Christi and San Antonio until 2008.

**Request for Public Hearing.** Although my family's property location may not justify a standing right to request a public hearing, I am asserting such necessity **in light of the administrative inadequacies** of the draft permit. Please provide this permit a public hearing.

**Incompleteness.** Despite the permit application's treatment by TCEQ as administratively complete, I am stuck by apparent omissions.

**First, the applicant is not legally identified**, apparently, according to publicized ownership history. The Moda- Midstream Company operations, in whose name this application is made and to whom the permit is to be issued, received front page coverage in the Corpus Christi Caller-Times, and was so reported by other finance media, when in 2021 Moda-Midstream reportedly sold its interests in and operations at the site to Enbridge, Inc., a Canadian company. The business world looks to Enbridge as the owner-operator. Without a correctly defined owner / operator, how will TCEQ hold the permit holder to account? If Enbridge (apparent current owner-operator) does not comply in the future, will TCEQ look to Moda, a supposedly former owner, for redress because the permit is in Moda's name?

**If challenged, would this permit be invalid as a matter of law?** Are the permit application signatories, purportedly on behalf of Moda, in Moda's name as the applicant, accompanied by a corporate resolution from Enbridge authorizing Moda to act as agent on Enbridge's behalf? Does Moda have such showing of "authority?" Has Moda presented this authority to TCEQ?

Reuters News Service, September 7, 2021, reported the Canadian firm "Enbridge buys N. America's biggest oil export hub in \$3-bln [billion] Moda deal." [Moda Ingleside Energy Center] The report was followed by confirmation. [Enbridge completes Acquisition of North America's Premier Crude Export Facility | Moda Midstream](https://www.enbridge.com/projects-and-infrastructure/projects/ingleside-energy-center-projects) [Ingleside Energy Center Projects - Enbridge Inc.](https://www.enbridge.com/projects-and-infrastructure/projects/ingleside-energy-center-projects)  
<https://www.enbridge.com/projects-and-infrastructure/projects/ingleside-energy-center-projects>

This is an apparent flaw, at best a legal confusion, to be corrected with a new application, or in the alternative, to be pursued by TCEQ's further due diligence resolving the principal-agent relationship question between Enbridge and Moda. On the other hand, if such a well-publicized change of ownership did not occur, a retraction and correction (not the responsibility of TCEQ) is necessary to benefit of the community, TCEQ, financial regulators, and other businesses that might rely to their detriment upon relationships with Moda- Midstream and Enbridge, Inc.

From asset and liability standpoints, assuming Enbridge is indeed the owner /operator, Enbridge's failure to reveal itself as the real permittee could reflect negatively upon TCEQ, to cause an undeserved perception of fault on TCEQ's part, having negotiated with a bogus party.

**Solution:** Require re-application by the legally responsible party, if it is not Moda-Midstream. Or, confirm identity of the legally responsible owner / operator who should make permit application.

**Second, the permit draft provides scant environmental safeguards** for impacted marine life (taken along with the marine water as entrained or impinged), nor for organisms in the littoral environment in the event of a discharge or release. No mention is made of takings impact to microscopic organisms, flora and fauna alike. These tiny organisms are building blocks, foundations to the ecosystem. In what volumes will they be consumed? It is not revealed.

Ecological stressors to Corpus Christi Bay are now well-known, made so in recent works by TMAUCC's Drs. Larry McKinney and Paul Montagna, particularly the volatile and critical salinity variations that have been documented to impact identified species. Infantile marine life, seeking sanctuary in or emanating from nursery grounds found in seagrasses and shallows adjacent the site on La Quinta Channel, are at risk, yet the permit lacks little protective mention and no assessment of impact. Littoral regions, where the site is located, are entitled to environmental protections. This permit, as it stands, enables the permittee to "take" and consume vital wildlife building blocks belonging to the State of Texas, all without compensation to the State and without accounting to the public who own the resources.

**Solution:** Require an environmental impact assessment that includes an annual accounting for the value of organic assets at risk / to be sacrificed / consumed within the 500-acre feet to be taken, as those organisms are too a "taking." Apply a similar accounting for impacts to the marine and littoral environments should oil laden firefighting water escape the site during a conflagration, such escape and release being a near certainty during an oil fire / chemical fire emergency suppression response.

**Third, water application to oil-fed fires is to be avoided under standard industrial operating procedures.** This begs the question of stated purpose. Water spreads an oil fire. The permit anticipates consumption of 500-acre feet of marine water per year for "fire water testing and emergency use." [If this were an application for fresh water, the volume would approximate the well-known calculation, that necessary to serve 1,000 households per year, a substantial diversion.] Over the years, and within my experience in service to the federally mandated Local Emergency Preparedness Committee (LEPC), understanding of refinery, oil tank / oil storage fire suppression response holds that oil-fed firefighting protocols rely on foam, not water. The good reason being, water is a safety risk to be avoided during an **oil-fed fire**. Water is to be avoided. It spreads oil and it spreads the fire rather than containing it. Thus, a need for 500-acre feet of marine water for fire water testing and emergency oil-fire fighting, seems a mis-apprehension as well as a mis-application of purpose of use. The stated use, applying marine water to an oil conflagration, runs counter industrial use safety standards.

That contradiction begs another question, what then would 500-acre feet of marine water be used for at a crude export hub of international portent? An off site use? An undisclosed purpose, justified under "including, but not limited to?"

**Consequence:** TCEQ must deny this permit on account of mis-statement of purpose that renders the permit un-necessary.

**Fourth, permit language creates unlimited opportunities.** If indeed this permit application is intended to be for a minor project, and not a major one, the use parameters for consumption (diversion) of marine waters should be appropriately tightened up, fully enunciated, and so closely defined so as not to allow for misinterpretation. The fact is, the purported use "including, but limited to," enlarges future uses limited only by the imagination. Given this crude export hub is the largest in North America, it takes little imagination to enlarge uses enabled by language "including, but not limited to." Thus, the ill-defined statement of purpose opens the permit to plausibility challenge because it is unlimited. The

additional purposes, if any, to which the diverted water might be devoted should be spelled out, not obfuscated.

**Solution:** For no other reasons than apparent mis-statement of purpose and un-necessary (industrially unsafe) use of diverted water, the application and draft permit should be rejected.

**Fifth, the question of TPDES compatibility.** A short review makes it uncertain that this site possesses an NPDES (TPDES stormwater discharge) permit and plan adequate for / **adjusted to accommodate an additional 500-acre feet of discharge** in the event of a release, especially in light of the risk water would pose to an oil fed fire under emergency circumstances. Runoff would inevitably conduct and release into the environment petroleum and / or possibly all the petro-chemicals within the site's inventory if a fire ensued, a worst-case scenario. Runoff or discharge is anticipated as SOP in any case involving fire suppression that uses water, regardless of the character of the feedstock that could ignite. If the takings / water rights permit is granted, this site will be subject to an additional 500-acre feet of water run-off, acting as a potential agent or vehicle to conduct pollutants off site.

**Solution:** This **water rights permit for taking should not be issued until the site's accompanying TPDES permit and its stormwater plan** are assured compliant by adjustment, amendment or otherwise, to accommodate an additional 500-acre feet of run-off, anticipated to convey / release the array of contaminants profiled within the site's inventory during a fire event. Given the hub's reputation as the largest in North America, only best available technology should be required and allowed as conditions of the TPDES permit and stormwater plan, adjusted for a 500-acre feet contingency, effectively impounding the run-off rather than allowing it to contaminate the abutting marine and littoral environments.

Thank you,  
Sally Clark Farris

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 11:24 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** debo.ferrell@gmail.com <debo.ferrell@gmail.com>  
**Sent:** Monday, April 10, 2023 9:01 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Deborah A Ferrell

**EMAIL:** [debo.ferrell@gmail.com](mailto:debo.ferrell@gmail.com)

**COMPANY:**

**ADDRESS:** 132 SUNSET  
INGLESIDE TX 78362-4739

**PHONE:** 3617798568

**FAX:**

**COMMENTS:** I am requesting a public hearing on this permit. The environmental impact would be devastating. The seagrasses have already been decimated. Your mission states, "...strives to protect our state's public health and natural resources consistent with sustainable economic development. Our goal is clean air, clean water, and safe management of waste." THIS PERMIT DOES NOT QUALIFY. Please help protect our beautiful Texas coast.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:44 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** karlag2307@gmail.com <karlag2307@gmail.com>  
**Sent:** Thursday, April 6, 2023 9:11 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Karla J Geary

**EMAIL:** [karlag2307@gmail.com](mailto:karlag2307@gmail.com)

**COMPANY:**

**ADDRESS:** 254 W FM 1355  
KINGSVILLE TX 78363-2763

**PHONE:** 3615222307

**FAX:**

**COMMENTS:** Request pubic hearing before issuing permit. Concerned about environmental impact on the bay.



## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:55 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** Sgeary57@msn.com <Sgeary57@msn.com>  
**Sent:** Thursday, April 6, 2023 2:07 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Steve A Geary

**EMAIL:** [Sgeary57@msn.com](mailto:Sgeary57@msn.com)

**COMPANY:**

**ADDRESS:** 254 W FM 1355  
KINGSVILLE TX 78363-2763

**PHONE:** 3612469112

**FAX:**

**COMMENTS:** Requesting a public hearing before issuing permit. I am concerned about environmental impact of the bay.



# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

PLEASE PRINT

Name: Jason Hale

Mailing Address: 4421 Hamlin Dr

Physical Address (if different): \_\_\_\_\_

City/State: Corpus Christi TX Zip: 78411

*\*\*This information is subject to public disclosure under the Texas Public Information Act\*\**

Email: jasonhale tx@gmail.com

Phone Number: (361) 389 4699

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

Request for Contested case

WRPERM 13775

2/29/24

I, Jason Hale am ~~requested~~  
requesting a contested case  
hearing for permit WRPERM 13775

RECEIVED

FEB 29 2024

AT PUBLIC MEETING

H - Jason Hale  
JH

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:40 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** cnelson7689@gmail.com <cnelson7689@gmail.com>  
**Sent:** Wednesday, April 5, 2023 8:39 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MS Colleen Heg

**EMAIL:** [cnelson7689@gmail.com](mailto:cnelson7689@gmail.com)

**COMPANY:**

**ADDRESS:** Henrietta Place  
Ingleside TX 78362

**PHONE:** 2624969029

**FAX:**

**COMMENTS:** To whom it may concern, I am writing as a concerned citizen regarding this matter. I would think it only fair for a public hearing on this. As tax payers we should be allowed to full hearing and transparency and have a say. Thank you.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

PLEASE PRINT

Name: Autumn Hensiek

Mailing Address: 325 Louisiana Ave

Physical Address (if different): \_\_\_\_\_

City/State: Corpus Christi TX Zip: 78404

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: autumn@texasenvironment.org

Phone Number: (361) 425-2194

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

RECEIVED

FEB 29 2024

H

AT PUBLIC MEETING

would like to state on record that

I oppose this permit and would like to request a contested case

hearing because these water rights permits can potentially be

modified, sold, and transferred. This permit should be limited to ONLY

firewater safety to prevent being amended later for any potential

industrial buildout- including ammonia plants we already KNOW

are proposed. Almost 175 million gallons of water is excessive

and shady. Enbridge should go back to the drawing board and

amend this permit to include language that states that this water

will not be used for any purposes other than firewater safety and

will NOT be transferred or sold, *If you mean what you say*

*about transparency and actively want to work to*

*rebuild trust in our communities.*

*TEER, I am requesting a site visit. I am also*

*requesting that each of you examine the*

*ways in which you fall back on the constraints*

*of the Law. You may only be required to*

*examine ~~XXXX~~ <sup>certain aspects of this permit,</sup> but this is our LIFE. our home.*

*Maybe its just the way I was raised but I*

*do more in my day job than the bare minimum*

*and that's why I sleep well at night.*

*I hope urge you all to do better.*

361-425-2194  
Autumn Hensiek  
325 Louisiana  
CCTX 78404.

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 4, 2023 1:57 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** sammileehill@gmail.com <sammileehill@gmail.com>  
**Sent:** Tuesday, April 4, 2023 12:02 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Sammi Hill

**EMAIL:** [sammileehill@gmail.com](mailto:sammileehill@gmail.com)

**COMPANY:**

**ADDRESS:** 159 FLOWER HILL RD  
SMITHVILLE TX 78957-2452

**PHONE:** 5126639637

**FAX:**

**COMMENTS:** This permit application is an egregious attempt to manipulate the TCEQ application process by claiming that the permit is for fire response. If this application is approved for "fire response", the applicant can (and likely will) use the water for other purposes. They could even SELL the water. It's overly broad. A more appropriate permit would be to request permission to use the water SOLELY for fire response. I urge you to deny the permit in its entirety or at a

minimum, include strict provisions on how the water can be used. I also have concerns about the impact on our wildlife and fisheries. How will they protect from sea life being drawn into their intake system? I am requesting a public hearing on this permit where we can get these concerns addressed. Thank you! Sammi Hill

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 4, 2023 1:58 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** travis@brush2mulch.com <travis@brush2mulch.com>  
**Sent:** Tuesday, April 4, 2023 12:13 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Travis Hill

**EMAIL:** [travis@brush2mulch.com](mailto:travis@brush2mulch.com)

**COMPANY:**

**ADDRESS:** 159 FLOWER HILL RD  
SMITHVILLE TX 78957-2452

**PHONE:** 5125575807

**FAX:**

**COMMENTS:** Hello, I am writing to request a public hearing on this permit application. The Ingleside bay area has been under assault by industry in recent years, with this being the latest example of business interests superseding natural resource conservation. Enbridge has other options for obtaining water to test their fire system. Instead of choosing an option that would not threaten our sea life, they are choosing to endanger our wildlife and fisheries. Why should our



natural resources be exploited by industry? The answer is they shouldn't. As a home owner in Ingleside on the Bay, I beg you to protect our rights to clean water. I implore you to hold a public hearing so that all concerns can be addressed.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 29, 2023 11:29 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775  
**Attachments:** IOBCWA Comments 3\_28\_2023.pdf

PM  
H

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**From:** hilliard007@gmail.com <hilliard007@gmail.com>  
**Sent:** Tuesday, March 28, 2023 4:22 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Jennifer Hilliard

**EMAIL:** [hilliard007@gmail.com](mailto:hilliard007@gmail.com)

**COMPANY:** Ingleside on the Bay Coastal Watch Association

**ADDRESS:** 904 SANDPIPER  
INGLESIDE TX 78362-4840

**PHONE:** 3612496260

**FAX:**

**COMMENTS:** See attached file

Ingleside on the Bay Coastal Watch Association  
Jennifer Hilliard, Treasurer  
904 Sandpiper  
Ingleside, Texas 78362



March 28th, 2023

Re: Enbridge Water Rights Permits 13775

Request for Denial of Permit by TCEQ  
Request for Contested Case Hearing

Dear Ms. Gharis,

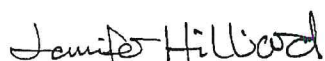
On behalf of the Ingleside on the Bay Coastal Watch Association (IOBCWA), as Treasurer and Cofounder, I am submitting this request for you to deny the Enbridge Water Rights Permit #13775 and acknowledge that IOBCWA requests a Contested Case Hearing. This water rights permit on the shores (littoral zone) of Corpus Christi Bay affects the people of the neighboring coastal community and the productivity of the waters that are so much a part of the reason we live in this community. Fishermen, shrimpers, boaters, property owners, wildlife and birding enthusiasts will pay a severe price for the loss of water quality caused by this PERMIT. This PERMIT by Enbridge is a blatant misuse of the public resources for the profit of industry. TCEQ should require that Enbridge use recycled water for firewater testing and contract with the City of Ingleside for the future needs of its emergency firewater use. The TCEQ must carefully consider the ramifications of the water rights PERMIT with an understanding of the long-term implications of the public resources being decimated by profit seeking industry. Please read our concerns below regarding this permit.

1. Under the Texas Water Quality Standards, the source waters have been characterized as used for exceptional aquatic life uses. Issuance of the draft permit fails to protect the ecology and productivity for the impacted bay and estuary system and fails to maintain existing uses of the impacted source water. The impingement and entrainment impact of the intake endangers the ecology and productivity of the source waters, and would prevent maintenance of existing uses of the source waters. The water will be withdrawn at a rate of 100,000 gallons per minute. If Enbridge installed a 48" diameter intake pipe (which is a VERY large pipe) to withdraw the water, the velocity of the water would still be 17.73 feet per second. This is more than 35 times the EPA recommended intake velocity of .5 fps in a littoral zone. Under applicable statute and rules, Enbridge is required to demonstrate that the facility will employ reasonable measures to minimize impingement and entrainment. No such measure have been described or undertaken as part of this permitting process.
2. This water rights permit will allow Enbridge to pump water from the bay, for free, every week, for testing of their fire system. Therefore, the need for the water is simply to save money at the expense of aquatic resource and to the detriment of the public, specifically the community of Ingleside on the Bay and the commercial and recreational shrimpers and anglers that regularly fish this area. As an alternative, Enbridge could recirculate, recycle and store the potable water currently provided by the City of Ingleside at each testing cycle and therefore only need the additional water from the City in the event of an emergency.

Regular testing of equipment is an scheduled event and therefore conservation and recycling efforts should be required of the system currently in place, not at the expense of the natural environment.

3. In the permit map provided, the location of the intake is within the definition of the littoral zone, near shore, within the tidal range, and adjacent to seagrass beds. Therefore it has the highest incidence on impingement and entrainment, and thus the greatest negative impact to aquatic life in the area. See attachment "A" Aerial map showing diversion locations included in permit application.
4. Enbridge does not specify the size of pipe so that the intake velocity can be determined, but at the rate of 100,000 gpm, it is most definitely going to be well above the recommended velocity to be protective of aquatic life. Enbridge did not provide adequate information regarding technique or the configuration of the screens that will be used to protect aquatic life. The permit should stipulate a velocity of the intake flow in a littoral zone to be protective of aquatic life. The location of the proposed withdrawal within an estuary triggers the consideration of specific additional criteria under the TCEQ rules. Pursuant to 30 TAC § 297.55(b), the Commission is to consider the ecology and productivity of the affected bay and estuary system in determining whether to issue a water right.
5. The permit does not appropriately limit the use of the water by the applicant. The proposed use is not limited to testing and emergency operation of fire suppression systems. The applicant may therefore at any time in the future use the water for other uses as it deems appropriate, such as for cooling water. The permit also allows the applicant to sell the diverted water to another entity that could use the water for irrigation or cooling water purposes. In so much as the intake of cooling water is not prohibited, the intake of this water is thus subject to the requirements of federal regulations implementing CWA 316 (b). Accordingly, to those regulations, impingement and entrainment must be minimized when an intake structure is proposed to be located when there are sport or commercial species of impingement and entrainment concern within the area of the proposed intake.
6. Enbridge has not provided the information necessary to evaluate the impact that the impingement and entrainment resulting from the diversion of 500-acre feet. This portion of Corpus Christi Bay has contact recreation, boating and fishing as well as primary recreation in the manner of swimming and beach going.
7. Enbridge currently has firewater provided by the City of Ingleside and as such does not meet the burden of proof that no feasible alternative to the appropriation exists and that the requested amount of appropriation is necessary and reasonable for the proposed use. Analysis and calculations are not provided of the fire suppression system to quantify need based upon facilities to be protected and system capabilities. Therefore, Enbridge has not adequately demonstrated a need for the water.
8. The conservation plan does not describe best available technology in leak detection. Visual inspection is rudimentary and does not meet conservation goal requirements #4 regarding leak detection and repair, and water-loss accounting measures to be use.

Respectfully request a public meeting and a contested case hearing on behalf of IOBCWA and it's affected members.



Jennifer Hilliard, AIA

Ingleside on the Bay Coastal Watch Association

Moda Ingleside Energy Center  
27.837529°, 97.204794°

Main St

Hayden Road Blvd

Ticonderoga Rd

Wisconsin Rd

Lexington Blvd

Coral Sea Rd

City of Ingleside on  
the Bay  
+/-2,000 ft

Seagrass  
Beds

DR-1-1  
(Upstream Limit)  
27.8214054°, -97.2095730°

DR-1-2  
(Downstream Limit)  
27.8207630°, -97.2033622°

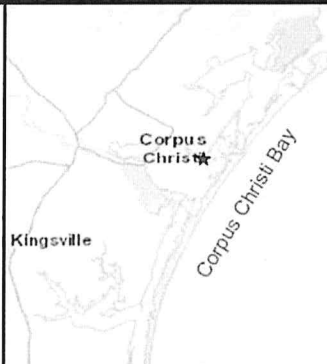
Corpus Christi Bay

0 300 600 1,200  
Feet

Service Layer Credits: World Street  
Map, Esri, HERE, Garmin, NGA,  
USGS, NPS

## Legend

- Site Boundary
- Diversion Reach
- Diversion Reach Limits



AERIAL OVERVIEW MAP  
MODA INGLESIDE ENERGY CENTER  
MODA INGLESIDE OIL TERMINAL, LLC  
NUECES COUNTY, TEXAS



20465 State Highway 249, Suite 300  
Houston, TX 77070

Drawing No.: 1

Date: 7/9/2021

Project No.: 21341.00A

Drawn By: AHasse

Revision No.: 1

Note: This is not a  
Property Boundary Survey



## Vincent Redondo

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, March 1, 2024 4:33 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775  
**Attachments:** 2024.02.29\_IOBCWA Supp Comments on WR Perm 13775.pdf

H

Jesús Bárcena  
Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Office Phone: 512-239-3319

How is our customer service? Fill out our online customer satisfaction survey at:  
[www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** lauren@txenvirolaw.com <lauren@txenvirolaw.com>  
**Sent:** Thursday, February 29, 2024 6:27 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**NAME:** Lauren Ice

**EMAIL:** [lauren@txenvirolaw.com](mailto:lauren@txenvirolaw.com)

**COMPANY:** Perales, Allmon & Ice, P.C.

**ADDRESS:** 1206 SAN ANTONIO ST  
AUSTIN TX 78701-1834

**PHONE:** 5124696000

**FAX:**

**COMMENTS:** Please see the attached supplemental comments and hearing request filed on behalf of Ingleside on the Bay Coastal Watch Association (IOBCWA).

PERALES, ALLMON & ICE, P.C.

ATTORNEYS AT LAW

1206 San Antonio Street  
Austin, Texas 78701  
(512) 469-6000 • (512) 482-9346 (facsimile)  
info@txenvirolaw.com

Of Counsel:  
David Frederick  
Richard Lowerre  
Vic McWherter

February 29, 2024

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

*Via TCEQ Online Comment Form*

**Re: Comments and Request for a Contested Case Hearing regarding the Application of Enbridge Ingleside Oil Terminal, LLC for Water Rights Permit No. 13775.**

Dear Ms. Gharis:

I am submitting the following comments and request for a contested case hearing on behalf of Ingleside on the Bay Coastal Watch Association ("IOBCWA") regarding the Application of Enbridge Ingleside Oil Terminal, LLC ("Enbridge") for Water Use Permit No. 13775 (the "Application"). These comments and this request for a contested case hearing are in addition to those already filed on behalf of IOBCWA in this matter, including, but not limited to those mentioned below.

**I. IOBCWA is an Affected Person.**

IOBCWA satisfies TCEQ's rules regarding associational standing. *See* 30 TAC § 55.252. That is, one or more members of the association would have standing to request a hearing in their own right; the interests the association seeks to protect are germane to the association's purpose; and neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

IOBCWA is a Texas non-profit organization that was formed by a group of concerned Ingleside on the Bay residents for the express purpose of taking action to mitigate negative effects on their bayfront community due to rising sea levels, larger and more frequent ship traffic, and rapid industrialization. IOBCWA is a membership organization and represents its members' interest in the decision-making processes at the local, state, and federal level.

Members of IOBCWA live and recreate in their Ingleside on the Bay community, which is adjacent to the Enbridge Ingleside Oil Terminal. The following individuals are IOBCWA members who have filed comments and requested a contested case hearing prior to April 17, 2023.



**Patrick Nye, President, IOBCWA:** On no less than two occasions (March 26, 2023 and April 12, 2023), Mr. Nye timely submitted comments and a hearing request on behalf of IOBCWA. In these letters, Mr. Nye identified himself as the President of IOBCWA and a property owner at 1018 Bayshore Dr., Ingleside, Texas 78362, which is within the city limits of Ingleside on the Bay and within what he estimates is 3,000 feet from the intake Upstream Limit and 2,300 feet from the southwestern corner of the Enbridge Site boundary. Mr. Nye expressed concern about the permit affecting the quality in life and health and safety for he, his wife, and the local communities, as well as concern for the local environment, wildlife, plants, wetlands, freshwater tables and aquatic life, which he enjoys from his property. Mr. Nye also specifically raised the issues of whether the applicant has demonstrated a need and permissible purpose (i.e., beneficial use) of the volume of water it is requesting, whether the intake or diversion velocity or structures will cause harm to aquatic life, and whether the application would endanger the ecology or productivity of the bay and estuary system.

**Susan and Steve Wilder, IOBCWA members:** On March 27, 2023, Susan Wilder submitted comments and then on April 17, 2023, Steve Wilder timely requested a contested case hearing. Mr. Wilder indicated that they live on their property about ½ mile from the Enbridge facility, and they enjoy fishing from the pier there, as well as eating and sharing the fish they catch with family and friends. Ms. Wilder comments that productivity has already declined in recent years as industrial activities have increased. Mr. Wilder raises concerns that this Application would threaten the marine resources he and his family rely on.

**Chris and Anne Carleton, IOBCWA members:** On April 16, 2023, Chris and Anne Carleton submitted comments indicating they live within 1000 yards of the Enbridge facility. Mr. and Ms. Carleton enjoy fishing and boating in the Corpus Christi Bay. They express concern as to how the intake will harm the aquatic sea life and environment of the shallow bay system and whether the water volume requested is necessary.

## **II. IOBCWA's Supplemental Comments**

### **A. The Application does not demonstrate it is not detrimental to the public welfare.**

Pursuant to Tex. Water Code § 11.134(b)(3)(c), the Commission shall not grant the application unless the Commission makes an affirmative determination that the application “is not detrimental to the public welfare.” The Application provides nothing on which to base this determination and neither do the TCEQ technical memos provide a showing that staff considered the public welfare in preparing the draft permit. Thus, the Application does not demonstrate that it is not detrimental to the public welfare. What factors has the TCEQ staff considered in analyzing this element required by Chapter 11?

### **B. IOBCWA requests that the Commission extend the time allowed for filing hearing requests to the deadline of the public meeting.**

Pursuant to 55 Tex. Admin. Code § 55.251(f)(2), the Commission may extend the time allowed for filing a hearing request. With these comments, IOBCWA requests that hearing

requests submitted by February 29, 2024 be considered timely, since it has been nearly one year since the prior notice of the Application was published, and there have been additional concerns raised in the meantime regarding the quantity of water requested by Enbridge and the proposed use of the water by the Applicant, as well as the needs of those who would be served by the Applicant, i.e., whether the water is intended for the proposed ammonia facility and whether the draft permit (described only as “for industrial purposes”) would adequately limit the use those described only in the Application.

### **III. Conclusion**

For the reasons described above, IOBCWA urges the Commission to deny Enbridge’s Application for Permit No. 13775. In the alternative, IOBCWA affirms its request for a contested case hearing with regard to the Application. Please contact us with any questions.

Respectfully submitted,

/s/ Lauren Ice

Lauren Ice

State Bar No. 24092560

[lauren@txenvirolaw.com](mailto:lauren@txenvirolaw.com)

**PERALES, ALLMON & ICE, P.C.**

1206 San Antonio St.

Austin, Texas 78701

512-469-6000 (t) | 512-482-9346 (f)

*Counsel for Ingleside on the Bay  
Coastal Watch Association*

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:44 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** juanita.johnson8641@gmail.com <juanita.johnson8641@gmail.com>  
**Sent:** Thursday, April 6, 2023 10:35 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Juanita Johnson

**EMAIL:** [juanita.johnson8641@gmail.com](mailto:juanita.johnson8641@gmail.com)

**COMPANY:**

**ADDRESS:** PO BOX 85  
ARANSAS PASS TX 78335-0085

**PHONE:** 3616609664

**FAX:**

**COMMENTS:** I request that you do a public hearing on this or a contested case hearing.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

PLEASE PRINT

Name: Janelt Taylor

Mailing Address: 316 Bay Shore Drive, Ingleside, TX

Physical Address (if different): \_\_\_\_\_

City/State: \_\_\_\_\_ Zip: \_\_\_\_\_

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: JTaylor@GMAIL.COM

Phone Number: (202) 415-1256

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☐ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

Janet Caylor  
316 Bayshore Drive  
Ingleside, TX 78362

I oppose this permit on the grounds that it is too broad as it is currently written. I understand that this permit is in perpetuity, can be modified & transferred, and Enbridge has already stated their intent to use this amount of water in their proposed Amannia Plant.

RECEIVED  
FEB 29 2024  
AT PUBLIC MEETING

A large, stylized handwritten signature in black ink, appearing to be 'J. Caylor'.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

*PLEASE PRINT*

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Physical Address (if different): \_\_\_\_\_

City/State: \_\_\_\_\_ Zip: \_\_\_\_\_

*\*\*This information is subject to public disclosure under the Texas Public Information Act\*\**

Email: \_\_\_\_\_

Phone Number: (       ) \_\_\_\_\_

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☐ No

If yes, which one? \_\_\_\_\_

☐ Please add me to the mailing list.

☐ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 11:01 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** jlaylor@gmail.com <jlaylor@gmail.com>  
**Sent:** Friday, April 7, 2023 6:29 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MS Janet Laylor

**EMAIL:** [jlaylor@gmail.com](mailto:jlaylor@gmail.com)

**COMPANY:**

**ADDRESS:** 316 BAYSHORE DR  
INGLESIDE TX 78362-4716

**PHONE:** 2024151256

**FAX:**

**COMMENTS:** I am seriously concerned about the Enbridge intent to install a blue hydrogen/Ammonia plant right next to my neighborhood. Enbridge has demonstrated already their inability to manage toxic materials with their recent oil spill, as well as a complete disregard for the environment. The area they are proposing to build on is not only a buffer between their existing oil storage and loading facility, but it contains a variety of wildlife, including at least one

endangered species (In my bike rides, I have seen a Jaguarundi five separate times, twice leaving or entering Enbridge property. Finally, the amount of water that Enbridge has already requested for "Fire suppressant testing" is outrageous. All comes from the Corpus Christi Bay, and how they process it, use it, dispose of it is never mentioned (and describing it for "Fire testing" is a joke - no industry in this entire area needs that much water on a daily basis - the reason is a LIE). I would like to request a public hearing or a contested case hearing.



## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 11:22 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** Charlawrence1944@gmail.com <Charlawrence1944@gmail.com>  
**Sent:** Sunday, April 9, 2023 4:48 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Charlotte Ellis Lawrence

**EMAIL:** [Charlawrence1944@gmail.com](mailto:Charlawrence1944@gmail.com)

**COMPANY:**

**ADDRESS:** PO BOX 535  
INGLESIDE TX 78362-0535

**PHONE:** 3613329042

**FAX:**

**COMMENTS:** Request a public hearing on this

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, March 28, 2023 9:59 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** Nancylubbock19@gmail.com <Nancylubbock19@gmail.com>  
**Sent:** Tuesday, March 28, 2023 12:50 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Nancy Lubbock

**EMAIL:** [Nancylubbock19@gmail.com](mailto:Nancylubbock19@gmail.com)

**COMPANY:**

**ADDRESS:** 155 WOODHAVEN  
INGLESIDE TX 78362-4675

**PHONE:** 3615640829

**FAX:**

**COMMENTS:** Request a public hearing

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, April 5, 2023 10:31 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** mackbuilders@gmail.com <mackbuilders@gmail.com>  
**Sent:** Wednesday, April 5, 2023 8:58 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** ESTHER DIANE MACK

**EMAIL:** [mackbuilders@gmail.com](mailto:mackbuilders@gmail.com)

**COMPANY:** N/A

**ADDRESS:** 222 BAYSHORE DR  
INGLESIDE TX 78362-4717

**PHONE:** 3612384342

**FAX:**

**COMMENTS:** MY HUSBAND AND I HAVE HAD THE PRIVELEDGE OF LIVING IN INGLESIDE ON THE BAY FOR 24 YEARS.WE HAVE ENJOYED WATCHING THE DOLPHINS PELICANS SEAGULLS SHRIMP BOATS SAILBOATS SHIPS AND RECREATIONAL FISHING BOATS.WE FISH AND SWIM IN THE BAY.OUR BIGGEST CONCERN IS PERSERVING THE ENVIROMENT AND PROTECTING THE WILDLIFE FOR FUTURE GENERATIONS TO HAVE THE SAME PRIVELEDGE WE HAVE ENJOYED.IN THE

PERMIT I CANNOT SEE ANY PROVISIONS FOR PROTECTING THE SEAGRASSES THE MARINE LIFE FROM BEING SUCKED UP AND DESTROYED.I AM CONCERNED WITH THE AMOUNT OF WATER REQUESTED AND EFFECT IT HAS ON THE BAY.MY UNDERSTANDING WAS THAT THE CITY OF INGLESIDE PROVIDED WATER FOR TESTING FIRE EQUIPMENT.PLEASE FORGIVE MY IGNORANCE BUT I WAS NOT AWARE THAT WATER WOULD EFFECTIVELY EXTINGUISH ANY TYPE OF OIL/GAS FIRE.THE BAY IS A VERY VALUABLE RESOURCE FOR TOURISM BECAUSE OF IT'S RICH MARINE LIFE.I WOULD HATE TO SEE THE BAY DESTROYED.I AM REQUESTING A PUBLIC HEARING TO ADDRESS THESE CONCERNS.I APPRECIATE THE ABILITY TO NOT ONLY COMMENT ON THESE MATTERS BUT TO ALLOW OUR COMMUNITY THE ABILITY TO HAVE A VOICE IN HELPING PROTECT THIS VERY SPECIAL AREA.THANK YOU E.DIANE MACK

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 18, 2023 10:39 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** kathrynmasten@yahoo.com <kathrynmasten@yahoo.com>  
**Sent:** Monday, April 17, 2023 4:50 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Kathryn Masten

**EMAIL:** [kathrynmasten@yahoo.com](mailto:kathrynmasten@yahoo.com)

**COMPANY:**

**ADDRESS:** PO BOX 25  
VIENNA MD 21869-0025

**PHONE:** 4695002373

**FAX:**

**COMMENTS:** It is important to hold a public hearing on this permit in the city of Ingleside or Ingleside on the Bay (IOB) so people can find out more about why Enbridge needs a water rights permit for baywater. There are legitimate citizen concerns that, once granted, water rights volumes will be increased and redirected to support a planned blue hydrogen/ammonia facility which has not been permitted (see <https://www.enbridge.com/media->

[center/news/details?id=123761&lang=en](#)). There should be an additional condition on the permit to confirm what the water is actually used for. In addition, reselling the water should be prohibited! My husband and I moved out of IOB because of all the hyper-industrialization, but we seller-financed the sale of two properties there - including one on Huisache lane immediately adjacent to the Enbridge fenceline. So we are at financial risk if Enbridge continues to be an untrustworthy neighbor to this incorporated City of about 700 people. This behemoth Canadian company only employs 29 people, but has become the largest oil exporter in North America. The Ingleside on the Bay Coastal Watch Association (IOBCWA), which I co-founded in 2019 and am still a member of, is already in a federal lawsuit against Enbridge and the U.S. Army Corps of Engineers for trying to build another pier even closer to IOB. Enbridge's effort to receive corporate welfare, in the form of a Chapter 313 agreement for a solar farm (which was suspected to power its planned blue hydrogen/ammonia facility), was turned down by the Ingleside Independent School District. These projects not only threaten IOB and surrounding aquatic life, but also the McGloin's Bluff Karankawan archeological site, deemed eligible for the National Register of Historic Places. If this permit is granted, as with all water rights permits in the productive Corpus Christi Bay estuary, one of 28 estuaries in the EPA's National Estuary Program (see <https://www.epa.gov/nep>), diversions need more than screens to protect from entrainment and impingement. This should be a standard part of TCEQ's Environmental Analysis when it comes to the Coastal Bend Bays and Estuaries system. Subsurface intakes are recommended. There has already been a tremendous amount of seagrass loss from Enbridge; this will exacerbate that. I contend that any diversion of water inside this shallow Corpus Christi Bay affects the net freshwater inflows balance. Therefore water availability analysis is required. Revisiting environmental flow standards are long overdue. There is no indication that Enbridge has evaluated recycling and reuse, use of foam instead of "firewater", or simply paying for water supplied by the City of Ingleside, since 98% of it will be returned anyway. Because modifications of existing water rights permits are much easier than getting the first one, this is why it's important to stop this permit. As TCEQ well knows, the Coastal Bend is facing serious drought, with many competing for water rights. Granting NEW water rights to ANY industries when there are readily-available alternatives is irresponsible. We have seen (and challenges) several efforts by Enbridge to deceive TCEQ. We strongly suspect this is another one. Do not let them get away with it. I would like to draw your attention to Photo 1. Note how this photo was taken in just the right angle and close to ground level so that you can't see just how close the City of Ingleside on the Bay is (about 1000 feet). In fact, all of the photos are taken to obscure this inconvenient FACT. Check it out for yourselves on Google Maps - please! and think how you would feel if your long-awaited dream home (I'm a former professor and Texas Teacher's Retirement System retiree) was encroached on in just a few years (all since 2018 when Moda bought the former Navy base) by massive oil tanks, up to 3 VLCCs parked next-door running on diesel generators, and now volatile blue hydrogen/ammonia! This water rights permit either needs to be explicitly included in the Region N Water Plan or a waiver must be granted (see <https://www.tceq.texas.gov/downloads/permitting/water-rights/forms/10214c.pdf>, item 41). It is not sufficient for Enbridge to simply state that the proposed water use "does not conflict". At the public hearing, Worskheet 3.0 drainage calculations should be shared. A one-time withdrawal for later use for firewater would be another feasible alternative to having perpetual water rights. There are new permitting forms (updated in Feb. 2022) and requirements that pertain to this application, including for public involvement. These are available at [https://www.tceq.texas.gov/permitting/water\\_rights/wr-permitting/wr\\_applications.html#permitting](https://www.tceq.texas.gov/permitting/water_rights/wr-permitting/wr_applications.html#permitting). Moda was not granted a Water Rights Permit, yet this application uses older forms (e.g., dated 8/12/20). It appears that Enbridge may be trying to avoid these new requirements. For example, with 86 comments as of this writing, I would say that this permit merits "significant public interest" (see <https://www.tceq.texas.gov/downloads/agency/decisions/hearings/environmental-equity/instructions-for-pip-form-tceq-20960.pdf>). Even though the Coastal Bend (Corpus Christi area) is not listed, "TCEQ may designate an area on a case-by-case basis". I would request that TCEQ do so for this permit. Enbridge should be required to complete the PIP form. Proactively engaging with its extremely close neighbor IOB only makes good sense. Thank you for your consideration of these and all other comments.

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 18, 2023 10:39 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

**From:** kathrynmasten@yahoo.com <kathrynmasten@yahoo.com>  
**Sent:** Monday, April 17, 2023 5:13 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Kathryn Masten

**EMAIL:** [kathrynmasten@yahoo.com](mailto:kathrynmasten@yahoo.com)

**COMPANY:**

**ADDRESS:** PO BOX 25  
VIENNA MD 21869-0025

**PHONE:** 4695002373

**FAX:**

**COMMENTS:** Correction: I mistyped on my previous comments. I meant item "4a" (p. 4 of 23), not "41", on the Technical Information Report (see <https://www.tceq.texas.gov/downloads/permitting/water-rights/forms/10214c.pdf>). Also, I request a Contested Case Hearing, since we do have a property interest adjacent to Enbridge, a vacant lot we seller-financed on the corner of Live Oak St. and Huisache Lane, Ingleside, TX 78362.

## Christina Bourque

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:42 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** staceymeany@gmail.com <staceymeany@gmail.com>  
**Sent:** Wednesday, April 5, 2023 10:07 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Stacey Meany

**EMAIL:** [staceymeany@gmail.com](mailto:staceymeany@gmail.com)

**COMPANY:**

**ADDRESS:** 306 SUNSET  
INGLESIDE TX 78362-4737

**PHONE:** 9407826495

**FAX:**

**COMMENTS:** I'm very concerned about the impact it will have on our community being so close. I request a public hearing before the permit is issued to build this blue Hydrogen Amonia plant.



## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 29, 2023 11:27 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** annrnyberg@gmail.com <annrnyberg@gmail.com>  
**Sent:** Tuesday, March 28, 2023 3:33 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Ann R Nyberg

**EMAIL:** [annrnyberg@gmail.com](mailto:annrnyberg@gmail.com)

**COMPANY:**

**ADDRESS:** 320 INGLEWOOD  
INGLESIDE TX 78362-4843

**PHONE:** 5126808989

**FAX:**

**COMMENTS:** I live very close to Enbridge and am asking you to deny this permit or at the least require a public hearing on the matter. Here in Ingleside on the Bay many depend on our coastal waters for their lively hood and at the very least recreation and enjoyment. This activity could further endanger the sea grass that is essential for all sea life. My son-in-law is a guide fisherman - to be successful he needs his clients to catch fish. I am very concerned that this activity will

severely reduce the amount of fish in our coastal waters! Please deny or give us a chance to express our opinions at a public hearing.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

*PLEASE PRINT*

Name: Julie Nye

Mailing Address: 1018 Bayshore Dr

Physical Address (if different): \_\_\_\_\_

City/State: Ingleside TX Zip: 78362

*\*\*This information is subject to public disclosure under the Texas Public Information Act\*\**

Email: julienye4@gmail.com

Phone Number: ( 361 ) 549-7650

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:23 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** julienye1@gmail.com <julienye1@gmail.com>  
**Sent:** Monday, March 27, 2023 11:27 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MRS Julie Ann Nye

**EMAIL:** [julienye1@gmail.com](mailto:julienye1@gmail.com)

**COMPANY:**

**ADDRESS:** 1018 BAYSHORE DR  
INGLESIDE TX 78362-4647

**PHONE:** 3615497650

**FAX:**

**COMMENTS:** I contest this water rights permit and request a public hearing. There are many flaws in this application originally filed by MODA, not Enbridge, who is the current land owner. There is already too much industrial pollution in our area and damage to the environment and the health of the residents in Ingleside on the Bay. There are more reports of dead marine life, specifically dolphins and turtles. I have owned this property over 30 years and have lived here

permanently over 12 years, and I have never seen a dead dolphin before all this industry moved in. Ingleside on the Bay is a beautiful tight-knit community and the increased industrial pollution is harmful to everything living here. Greed is the driving force behind this permit with little to no concern for the residents or the environment. Please deny this permit!!

# TCEQ Registration Form

February 29, 2024

5

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

**PLEASE PRINT**

Name: Patrick Nye

Mailing Address: 1018 Bayshore Dr

Physical Address (if different): \_\_\_\_\_

City/State: Ingleside, TX Zip: 78362

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: patrick@nyexp.us

Phone Number: (361) 650 1089

- Are you here today representing a municipality, legislator, agency, or group? ☒ Yes ☐ No

If yes, which one? Ingleside on the Bay Coastal Water Association

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☒ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

Ingleside on the Bay Coastal Watch Association  
Patrick A. Nye - President  
1018 Bayshore Dr.  
Ingleside, Texas 78362-4840  
[patrick@nyexp.us](mailto:patrick@nyexp.us)  
[361-658-1089](tel:361-658-1089)



RECEIVED

FEB 29 2024

AT PUBLIC MEETING

H

**WR Permit 13775** Public Meeting Comments 2/29/2024

**TCEQ**

Has a WR permit ever been denied by TCEQ? Has the TCEQ amended or modified a WR permit with conditions?

What agency is responsible for aquatic life risks and mortality for a WR Permit?

Does the TCEQ have any responsibility for seagrass protection for WR or any other event?

What agency is responsible for seagrass loss and protection of seagrasses under the Clean Water Act?

our attorney have electronically file for a CCH

**TCEQ I oppose WR Permit 13775 and request a Contested Case Hearing**

Pursuant to 30 TAC 297.55(b) the TCEQ is to consider the ecology of the proposed intake withdrawal within the littoral zone and this would trigger additional criteria. Did the TCEQ consider this? What additional criteria was imposed on this permit?

Upstream and Downstream or incorrect. CC Bay tidal direction goes from Pt Aransas towards CC Bay.

The proximity to seagrasses and especially Redfish Bay State Scientific area would risk aquatic life as the predominate tidal flow towards the proposed diversion points.

Assuming a catastrophic event occurs and millions of gallons of baywater are used? Where is the discharge portion of this permit that considers this occurrence? What ecological effects did TCEQ consider?

{Screens are not described for size that would reduce impingement and entrainment. What are the calculated velocities of the intakes? What is the mortality rate for aquatic life?

Who monitors water use and conservation efforts stated in the permit?}

## **ENBRIDGE QUESTIONS**

I appreciate your article in the Ingleside Index and your commitment to transparency. We expect no less than honesty and transparency during this Public Meeting.

Are you still pursuing and working on permits for the blue ammonia facility?

How much water use will be required for 2.8mmt of blue ammonia?

Where will the water come from and is baywater a consideration?

## **ENBRIDGE**

① Do you have or even considered plans to use this WR water for ammonia, hydrogen or other uses than firewater protection?

Would you consider removing from Purpose of Use “industrial use” and substitute fire water only. Also remove “but not limited to”

Section 3.6.1 – would you clearly define that additional pumps systems for future expansion are limited to fire protection only.

② Insert that this WR permit would not be used for ammonia or other industrial purposes other than fire protection.

Remove 100,000gpm to a realistic number. (How much foam would be needed for this amount if truly used for fire water?)

③ Where does wastewater go if you have a catastrophic event? How do you plan to protect the ecology?

{How will communities be notified if an event occurs and what are the emergency plans?

How do you plan to protect seagrasses and aquatic life during huge withdraw periods?}

{Lastly, we are aware that MODA only pursued this WR permit after negotiations with Enbridge. What other uses does Enbridge have in mind with a WR permit?}

## **Recommend conditions placed upon this permit if not denied.**

I opposed this permit as it inaccurately depicts the use and purpose of the water right and I request a CCH



Remove from Purpose of Use industrial use and substitute fire water only. Also remove "but not limited to"

Section 3.6.1 – clearly define that additional pumps systems for future expansion limited to fire protection only.

Insert that this WR permit would not be used for ammonia or other industrial purposes other than fire protection- Perpetually!

Remove 100,000gpm to a realistic number. How much foam would be needed for this amount if truly used for fire water?

✓ Where is your emergency plan for surrounding communities in the event of a catastrophic event?

Where does the wastewater go after using millions of gallons of baywater after a catastrophic event?

Live Oak Peninsula consists of highly permeable sand and freshwater pothole wetlands. Additionally, freshwater seeps are documented at the base of McGloins Bluff where freshwater marshes are evident. Wastewater could kill off protective live oak trees, groundwater and nearby freshwater wells in IOB. Has this been considered?

Determine the effects on seagrasses and how to improve aquatic protection

Reduced intake volumes and testing of velocity and screen size to reduce the potential aquatic mortality risks.

Prove volumetrically the testing amount required are sized within the fire suppression system.

Are the air emissions from foam and flames calculated and at what risks to the public? – what is the blast zone of an oil tank or tanks in your facility?

Respectfully submitted,



Patrick A. Nye

President

IOBCWA

**ENBRIDGE WATER USE PERMIT RISKS**

Enbridge Water Use Permit Risks

Legend:

- WATER RIGHTS PERMIT
- PROPOSED AMMONIA SITES
- SCHOOLS
- SCI AIR MONITORS
- CARBON CAPTURE STORAGE SITE

Locations marked on the map include:

- EXXON SABIC
- EFUELS
- TPCO (\$3M)
- CHENIERE WR Permit (\$-88M)
- VOESTALPINE
- POCC WR 101,334acft
- FLIR
- POCC AMMONIA
- OXY/CHEMOURS
- ENBRIDGE/YARA AMMONIA
- GIBSON
- ENBRIDGE WR 500acft

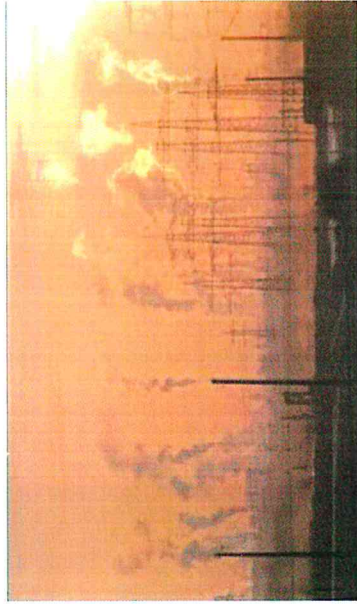
Patrick Nye - Ingleside on the Bay Coastal Watch Association

1013 Bayshore 170  
14945, de TV 78362  
3016581089  
pnticket@nyexp.v.s



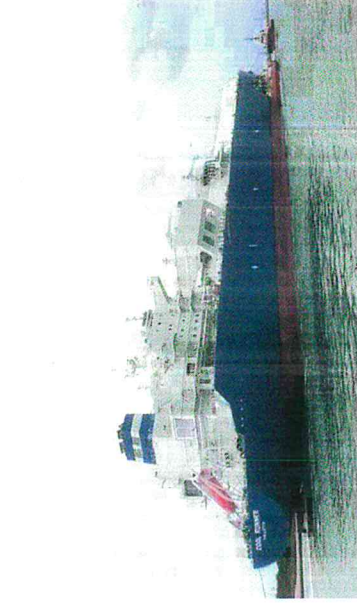


# Coastal Bend Challenges



## Health impacts faced by citizens

Breathing problems, &  
increased cancer danger &  
anxiety from increased  
industry expansion



## Industry Influence in Policy and Politics

Port of CC and industry  
giants influence state &  
local politics. TCEQ bows  
to legislative pressure

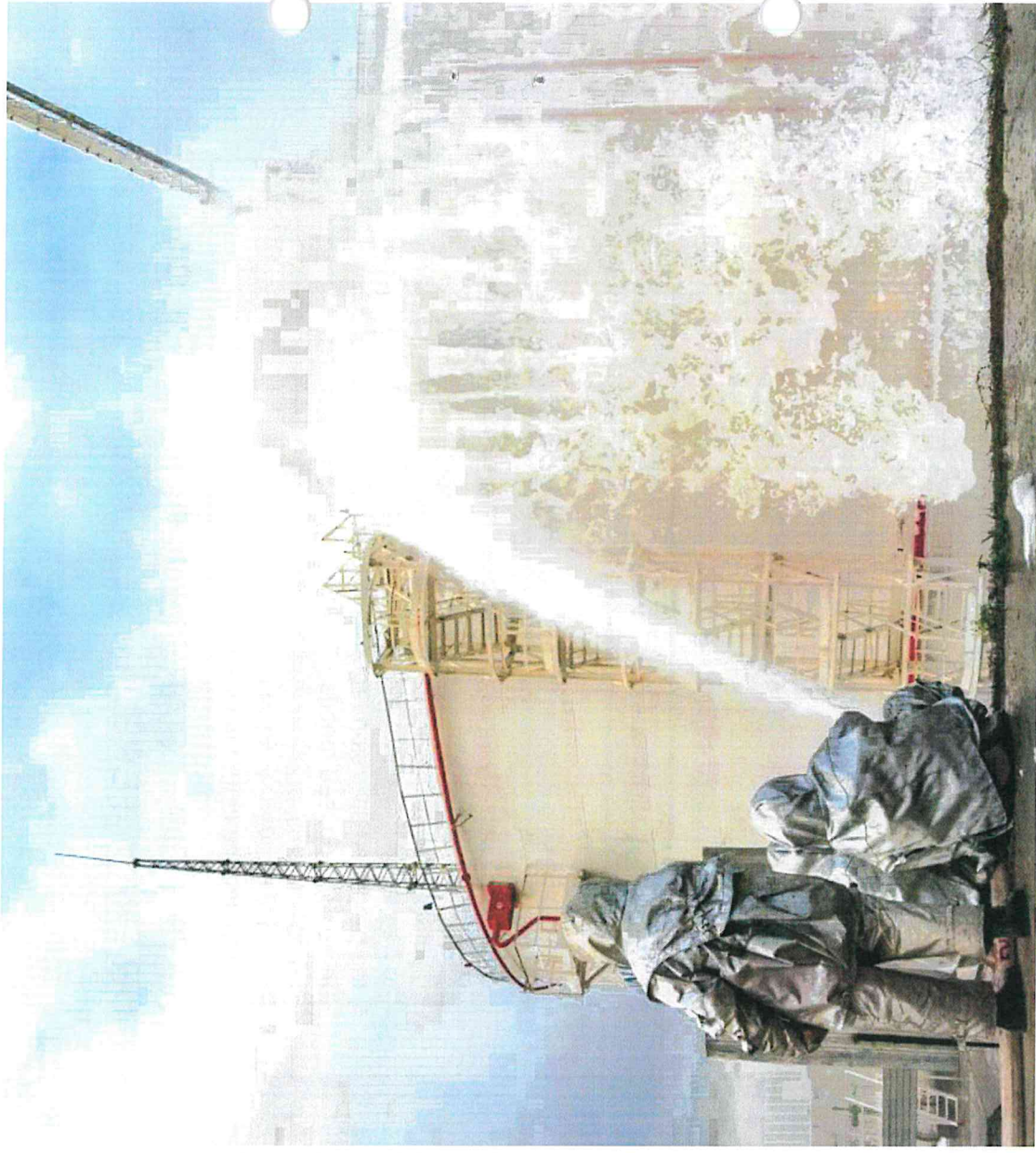


## Severe Environmental Degradation

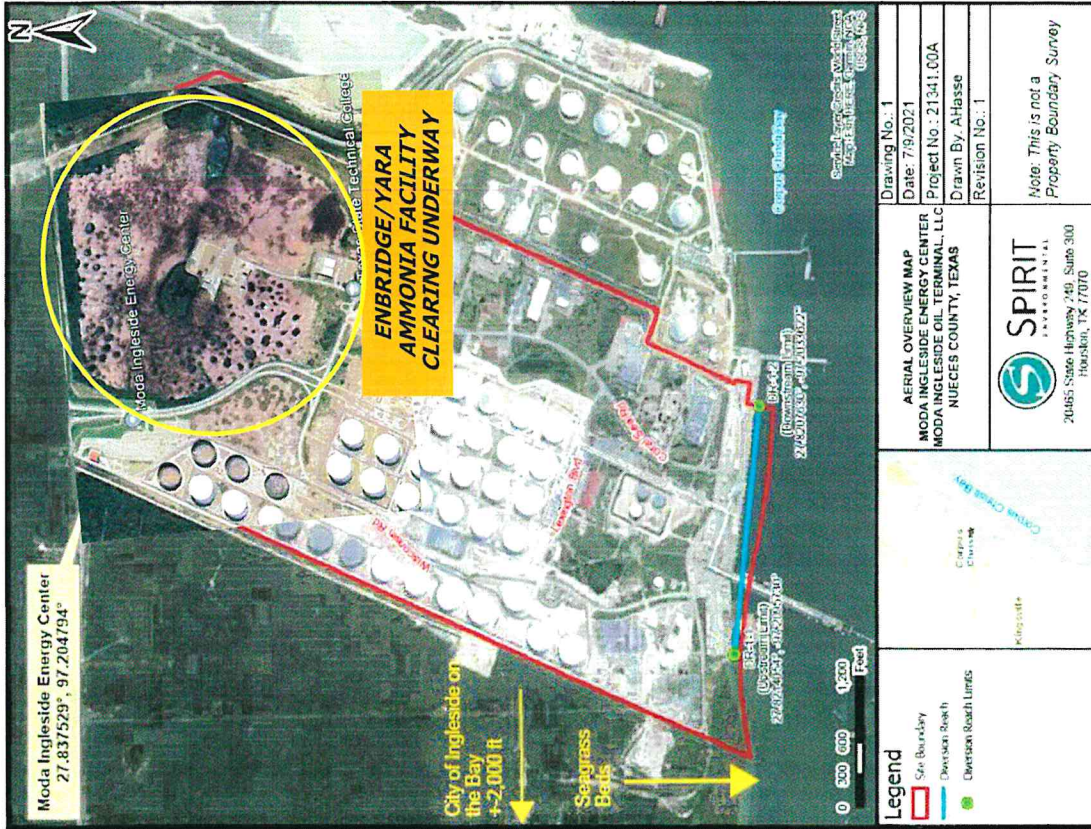
Desalination threatens to  
destroy CC Bay. Shipping  
traffic & dredging  
destroying seagrass beds.  
Threat of oil spills, vessel  
collisions **always** present

## WATER RIGHTS PERMIT WRI3775

- Enbridge states the water permit is for 500acft of water per year to be used as “fire water”.
- 500acft of water = 162,925,714 gallons annually, 446,371 gallons per day
- Additionally, they applied for 100,000 gal./minute!!! = 6,000,000 gal./hour!!!! That’s a lot of water!!!!
- Oil and Gas fires can be put out with a combination of water and foam.
- Reason why salt water would not be used for fire water? = Corrosion
- What they could possibly be using this much volume for?
- Where does Enbridge/Yara intend to get their water for ammonia facility?







2.8 Million Metric Tons per Year of Ammonia Production Enbridge/Yara has never told the public **WHERE** this water is coming from nor **HOW MUCH WATER NEEDED**.

#### Purpose of Use:

The new appropriation of State Water requested with this application will be for industrial use. Moda will use the water for the following two (2) reasons, but not limited to:

Moda Ingleside Oil Terminal LLC  
Surface Water Rights Permit Application – Supplemental Information  
Technical Information Report

#### 3.6.1 Diversion Reach 1: DR-1-1 and DR-1-2 July 2021

There are currently three (3) proposed mobile pump systems to be located along this diversion reach. However, Moda may add additional pump systems to be placed anywhere along the proposed diversion reach as needed for future expansion. The three (3) proposed mobile pump systems, and any additional pump systems constructed in the future, will divert water at a combined maximum flow rate not to exceed 100,000gpm.

**WATER RIGHTS ARE IN PERPETUITY & CAN BE SOLD OR TRANSFERRED BY APPLICANT**



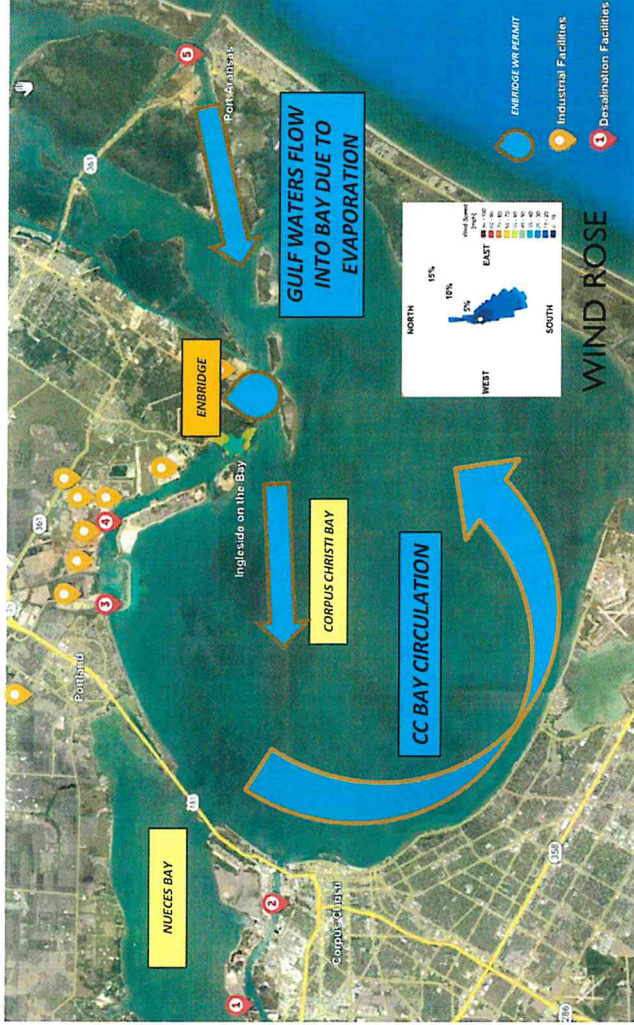
IOBCWA



# WHERE WILL MILLIONS OF GALLONS OF FIRE WATER GO?

## Direct Effects

- How can Enbridge justify 100,000 gallons per minute 476,371 gallons per day for fire water?
- Impingement & entrainment of aquatic species by intake. CC Bay takes 50-months for circulation of Nueces Bay freshwater.
- Where does spent fire water consisting of saltwater, oil and foam go? Flint Hills oil spill circulated in CC Bay and caused huge negatively impacts on water quality.



## ADDITIONAL ISSUES WITH WR PERMIT

Upstream & Downstream locations are the opposite of predominate water flow. Downstream is towards Ingleside on the Bay, TX. Upstream & Downstream locations are too close (~100) to seagrasses.

Are Screen size & velocity at the intakes calculate not to cause impingement and entrainment of marine organisms?

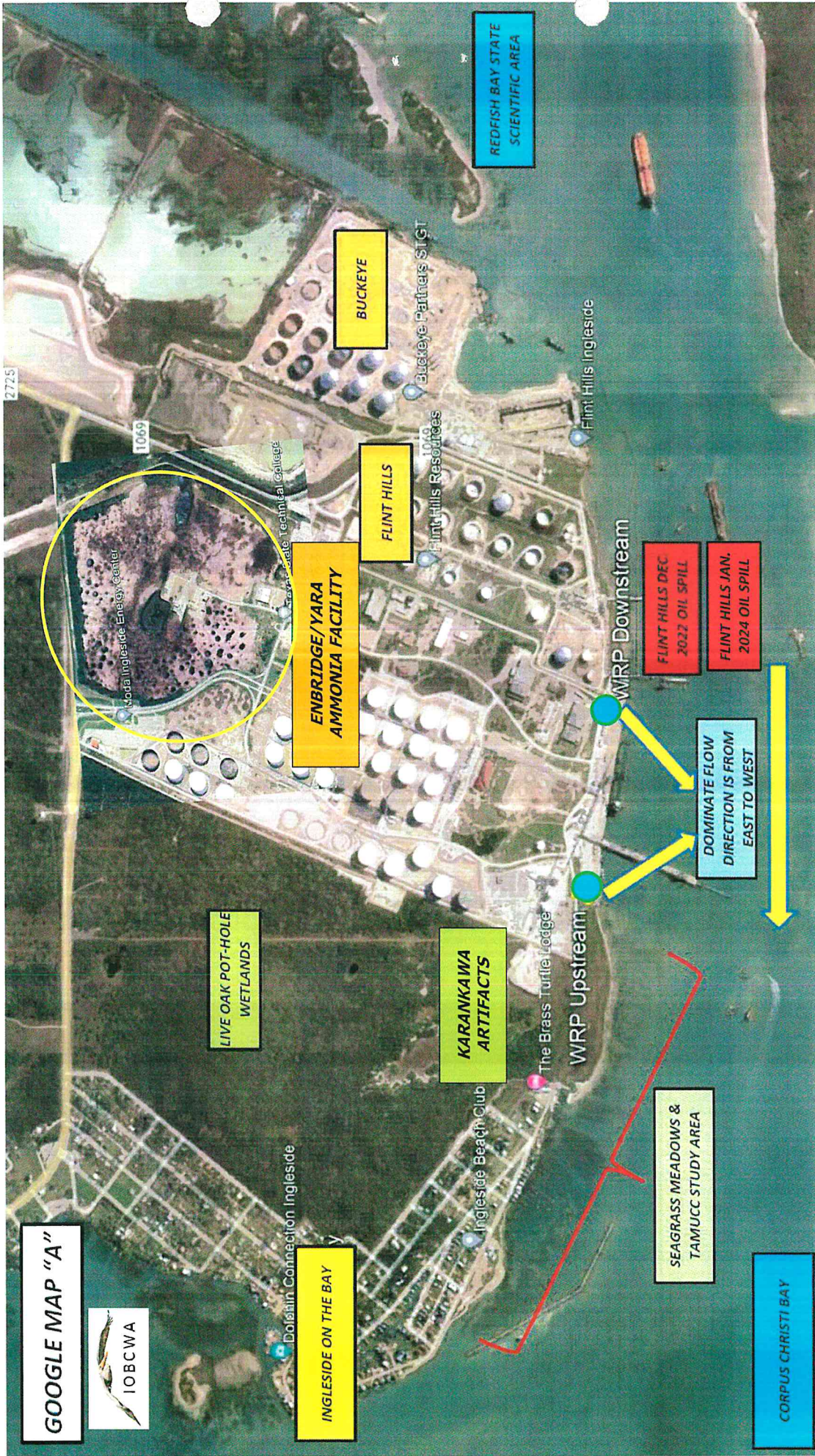
Permit allows for additional pump systems for "Future Expansion". NO Guarantee this WR will not be modified for Ammonia.

2.8mmty Ammonia requires ~1.2 billion gallons water per year. Using 100,000gpm with distillation processes yields ample water for ammonia production.

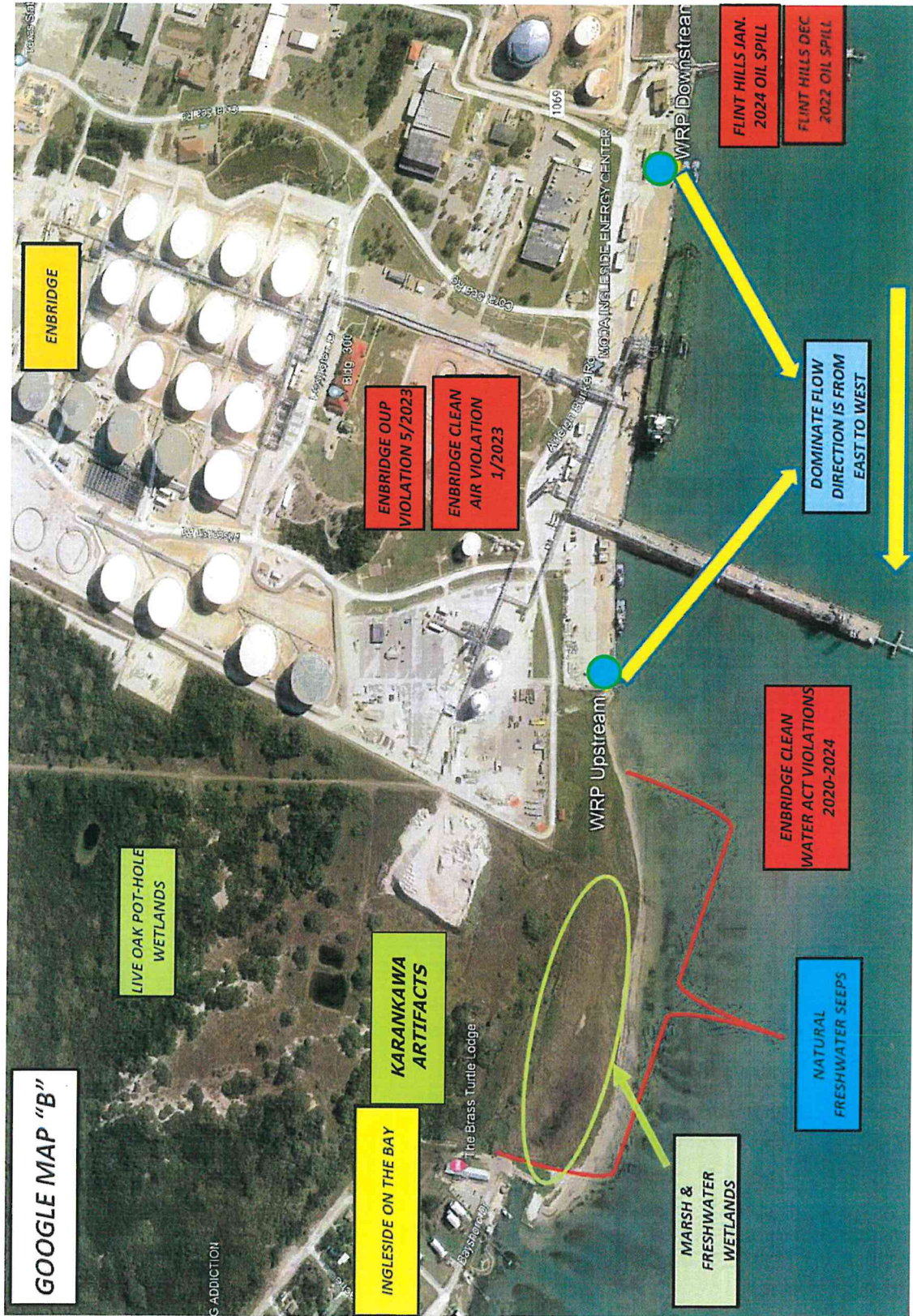
Request for TCEQ to study risks to such huge volumes of bay water to marine life, vegetation & nearby communities













# DIVERSION POINT REACH

Mobile Pumps Along Reach at 100,000gpm  
This is Too Close to Seagrasses



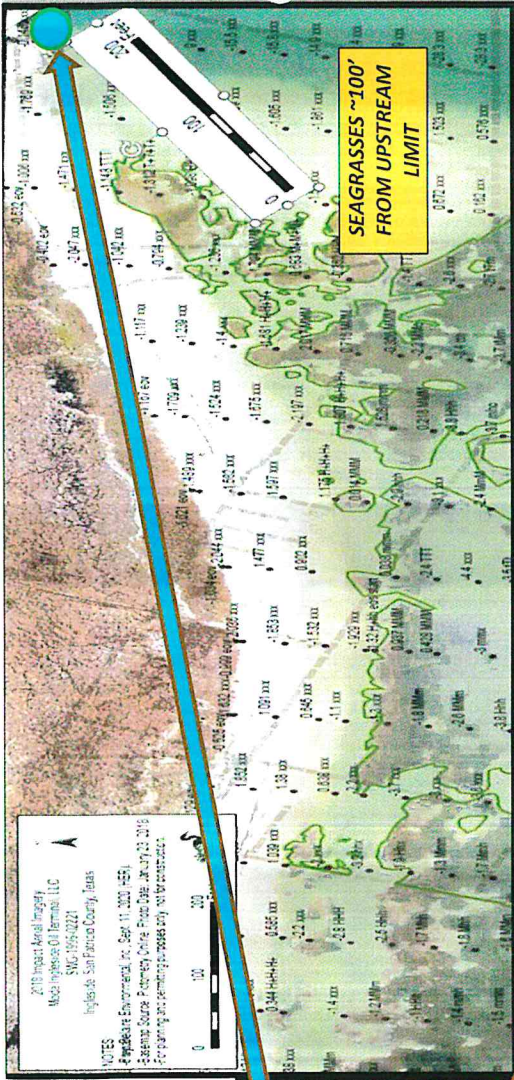
## Legend

- Site Boundary
- Diversion Reach
- Diversion Reach Limits

AERIAL OVERVIEW MAP  
MODA INGLESIDE ENERGY CENTER  
MODA INGLESIDE OIL TERMINAL, LLC  
NUECES COUNTY, TEXAS



20465 State Highway 249, Suite 300  
Houston, TX 77070



Ruler

Line Path Polygon Circle 3D path 3D polygon

Measure the distance between two points on the ground

Map Length: 466.42 Feet

Ground Length: 466.43

Heading: 101.36 degrees

✓ Mouse Navigation Save Clear

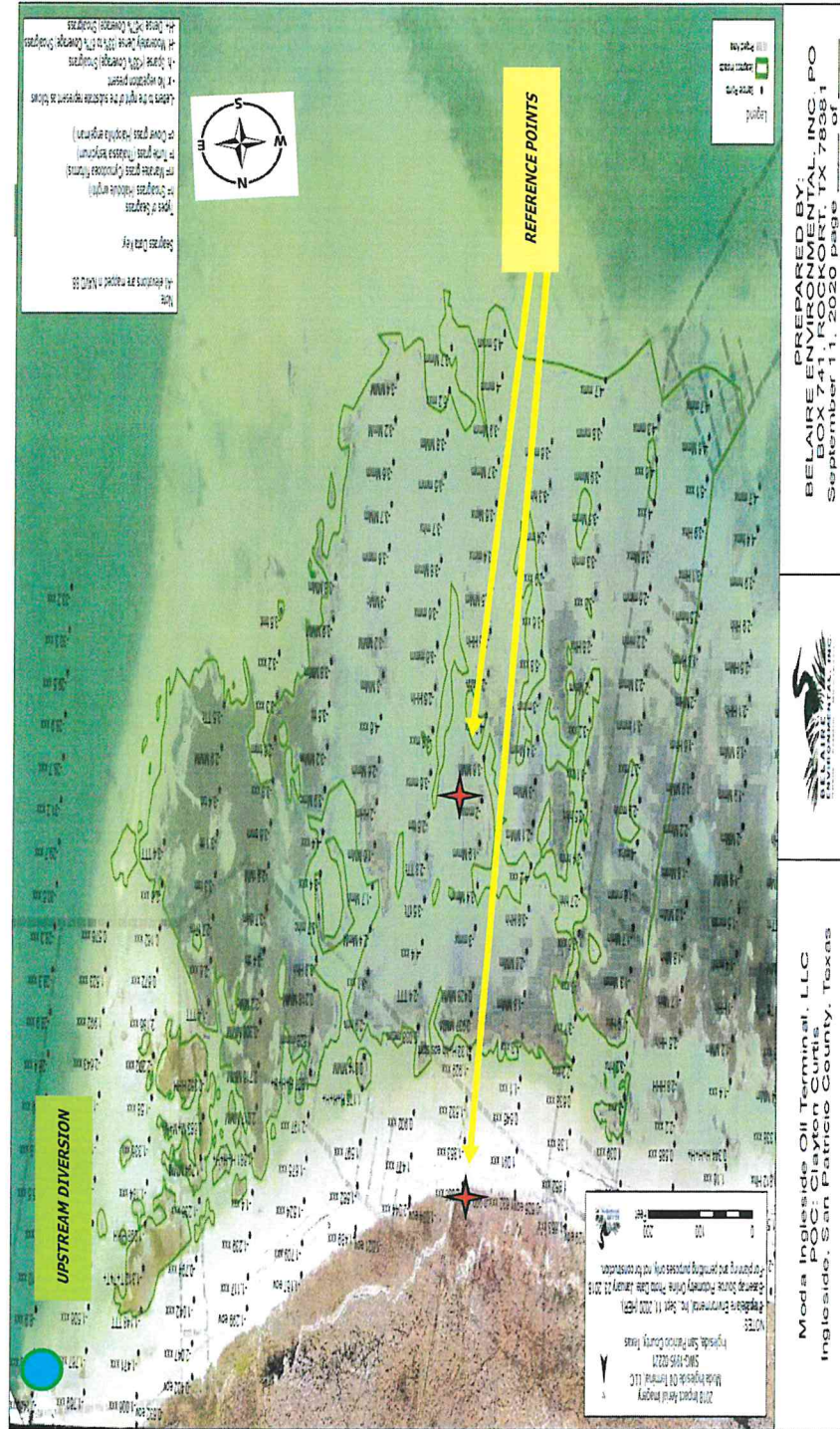




# SEAGRASS STUDY

## Belaire Environmental for Enbridge

### SEPTEMBER 11, 2020





# SEAGRASS STUDY Dr. Kirk Cammarata - TAMUCC 2020-2022

WHAT EFFECT WILL INTAKE &  
DISCHARGE HAVE ON EVEN MORE  
SEAGRASS LOSS?



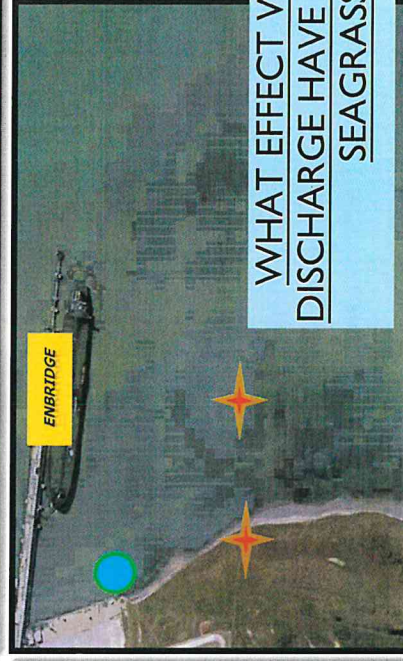
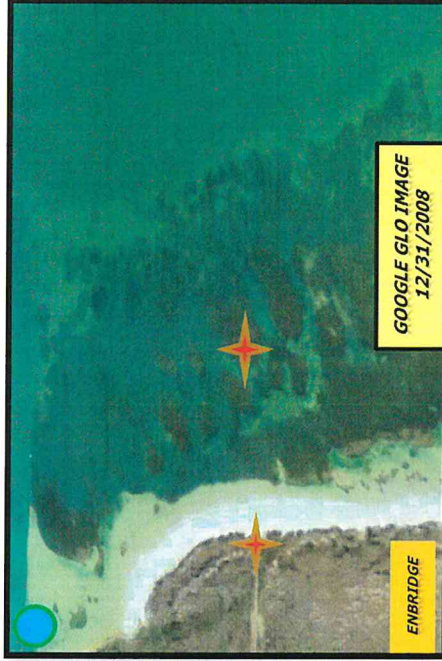
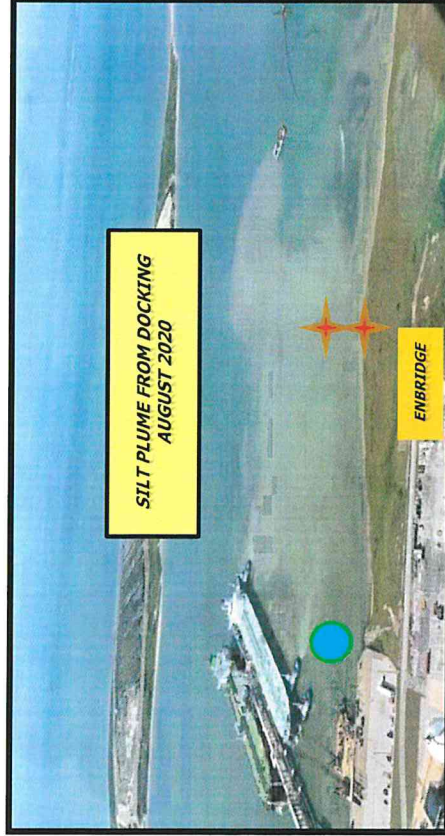
This study provided strong, consistent evidence that docking operations at the existing facility are degrading seagrass habitat quality. The expansion to larger vessels can be expected to produce greater tug roiling impacts, and they will be occurring closer to the IOB community waterfront and adjacent to the highest quality seagrass habitat (Site Z).







## ENBRIDGE – LARGEST NORTH AMERICA OIL EXPORTER



UPSTREAM DIVERSION

WHAT EFFECT WILL INTAKE &  
DISCHARGE HAVE ON EVEN MORE  
SEAGRASS LOSS?

Silt Plume from tugboats during docking  
operations. NOTE loss of seagrasses since 2008.



## ARE SEAGRASSES PROTECTED?

### Seagrasses Distribution

Seagrasses are a highly sensitive part of the ocean ecosystem. These habitats are important for so much more than just being the front lawns of the ocean. Seagrass habitat is vital to providing oxygen to the ocean as well as removing carbon dioxide and therefore can act as a natural carbon sink. Seagrasses also buffer wave energy, bind sediment in the root matrix, contribute vital nutrients to the ecosystem, act as habitat and food for a variety of species, and provide indirect economic value. In addition, they are protected under a number of state and federal statutes. So why should ocean planners pay attention to seagrass data?

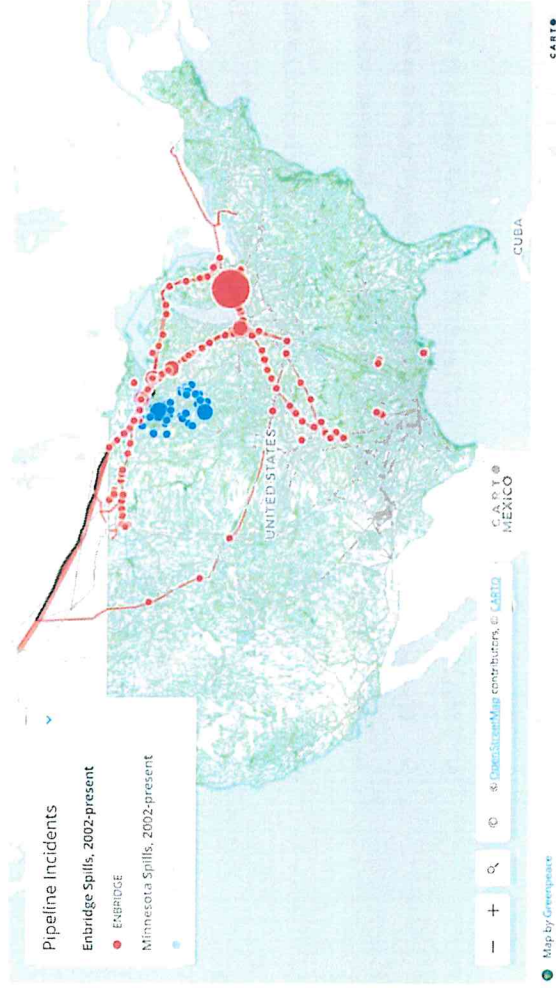
1. Seagrasses are protected by the Clean Water Act. Seagrasses are considered a wetland under Section 404 of the Clean Water Act (CWA) and thus protected from fill activities, stormwater runoff, and other water quality issues. Digging into the seagrass beds for burying cables, dredging, and other seafloor activities will require federal and possible state permits.
2. HAPCs and essential fish habitats include seagrasses. Both the essential fish habitat (EFH) and the Habitat Area of Particular Concern (HAPC) designations take into account where seagrass beds are when protecting an area. Therefore, tread carefully, because seagrass presence could mean a HAPC or EFH is nearby, too. Similarly, marine sanctuaries help to protect seagrass beds under the mini D12 program (same program that protects coral reefs). This includes protecting seagrass beds from propeller scarring, boat groundings, or ship strikes, as well as digging and dredging within a sanctuary.
3. No seagrass beds means reduced fish for commercial and recreational fisheries. Seagrass beds are one of the most productive natural resources in the world and serve as perfect nurseries for many juvenile fish species. Seagrass beds are also great places for smaller organisms to hide from predators. Healthy seagrass beds can produce over 10 tons of leaves per year. This biomass contributes to these juveniles' food source and nursery habitat. A single acre of seagrass may even be able to support as many as 30,000 fish and 50 million small invertebrates.



# Enbridge Spill History 1996-Present

The Graph on right is Enbridge Spill History in the US and Canada from 1996 through 2014 of over 1000 spills and approaching 10 million gallons.

Map below depicts **Enbridge Spills from 2002 to present**.  
Does this indicate high probability of a spill or worse??



Greenspace.org

| Enbridge Liquids Spills in Canada and United States                        |                  |                     |                        |  |
|--|------------------|---------------------|------------------------|--|
| Year   | Number of Spills | Quantity in Barrels | Quantity in US Gallons |  |
| 1996   | 49               | 13,698              | 575,316                |  |
| 1997   | 47               | 19,853              | 833,826                |  |
| 1998   | 39               | 9,830               | 412,860                |  |
| 1999   | 54               | 28,760              | 1,207,920              |  |
| 2000   | 48               | 7,513               | 315,546                |  |
| 2001   | 33               | 25,980              | 1,091,160              |  |
| 2002   | 48               | 14,683              | 616,686                |  |
| 2003   | 62               | 6,410               | 269,220                |  |
| 2004   | 69               | 3,252               | 136,584                |  |
| 2005   | 70               | 9,825               | 412,650                |  |
| 2006   | 61               | 5,663               | 237,846                |  |
| 2007   | 65               | 13,777              | 578,634                |  |
| 2008   | 80               | 2,682               | 112,644                |  |
| 2009   | 103              | 8,441               | 354,522                |  |
| 2010   | 91               | 34,258              | 1,438,836              |  |
| 2011   | 58               | 2,284               | 95,928                 |  |
| 2012   | 85               | 10,224              | 429,408                |  |
| 2013   | 114              | 4,298               | 180,516                |  |
| 2014   | 100              | 2,943               | 123,606                |  |
| Total  | 1,276            | 224,374             | 9,423,708              |  |
| Data compiled from Enbridge websites<br>Archived data available on request |                  |                     |                        |  |

February 2012 360.org/ Kishwaukee files

- 2.41 - Consideration and action on John Hernandez, County Engineers, request to allow a Utility Permit for Enbridge to access the County's old landfill site for the purpose of performing Surveying operations on a proposed C02 line.

- Gillipse says he doesn't know if it's for the line, or if they're just looking for CO2 sequestration areas.

- They say *this is for the line*

## Co. Commissioners February 2024 ENBRIDGE APPROVAL FOR PIPELINE SURVEY

- Yardley asks where the old landfill is located, they say off of 35.

- Krebs asks to make sure they won't be digging, and will just be doing seismograph work.

- Gillispie doesn't believe it's not about Co2 Sequestration says "as long as they don't come on to the airport" *moves to approve.*

- Gillespie says the energy companies are set to report to him every 6 weeks and he will report on those meetings when they happen.

- Motion carries

## ENBRIDGE CONTINUES AMMONIA PROJECT 2/2024

### OUR NEIGHBOR ENBRIDGE

### INGLESIDE INDEX MAY 3, 2023

*he would ask them to quote, "stop screwing us over with the local government."*

### OUR NEIGHBOR YARA

*people travelling to Hearson's Cove or Deep Gorge. The emissions have produced gas concentrations in the vicinity of the road to Hearson's Cove up to 23 times higher than stated in the Australian health standard guidelines. Evidence in the Report shows that most of the large releases of nitrogen dioxide occur outside daylight hours and have not been reported to government.*

 Yahoo Finance UK

<https://uk.finance.yahoo.com/news/yara-delays-pot...> ;

## Yara postpones clean ammonia IPO after weak valuation

Jun 25, 2023 — OSLO (Reuters) -Norway's Yara has postponed a planned initial public offering of its Yara Clean Ammonia (YCA) business by one or two years ...

*Goal – To Maintain our Quality of Life*





## TALKING POINTS

- Water Rights (WR) are forever – WR can be transferred, sold & modified by applicant with TCEQ approval.
- Permit states the Purpose is for industrial use “but not limited to” fire water & firewater pump testing.
- Permit allows for “additional pump systems for future expansion”. What type of expansion – ammonia?
- Enbridge/Yara have already initiated construction & are continuing to seek permits for pipelines.
- Where is Enbridge’s emergency plan to justify the 476,371 gallons per day of bay water use?
- How much volume does the current fire suppression equipment have?
- Where does wastewater go during emergency use? Live oak trees, groundwater, CC Bay pollution & nearby communities are all at risk.
- What is the intake velocity & expected aquatic mortality through impingement & entrainment?
- Proximity of intake to seagrasses (~100’ - 466’) increases risks of aquatic mortality.
- Upstream & Downstream flow direction are incorrect. Predominate tidal flow direction towards west & IOB.
- Where will Enbridge/Yara get its water for producing 2.8million metric tons/year of ammonia?
- TCEQ should perform an in-depth study to determine the risks for the huge volumes of bay water permitted for the intake & wastewater discharge.



## Christina Bourque

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, April 12, 2023 11:20 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775  
**Attachments:** Enbridge WRPERM 13775 Additional Comments 20230412.pdf

PM  
H

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**From:** patrick@nyexp.us <patrick@nyexp.us>  
**Sent:** Wednesday, April 12, 2023 10:23 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Patrick Arnold Nye

**EMAIL:** [patrick@nyexp.us](mailto:patrick@nyexp.us)

**COMPANY:** Ingleside on the Bay Coastal Watch Association

**ADDRESS:** 1018 BAYSHORE DR  
INGLESIDE TX 78362-4647

**PHONE:** 3616581089

**FAX:**

**COMMENTS:** Please find attached my comments and request for a Contested Case Hearing on behalf of Ingleside on the Bay Coastal Watch Association. Note that Enbridge has received a cease-and-desist order by the City of Ingleside for

construction on the ammonia location. This WR permit is misleading TCEQ and the public on its application and water rights use.

## Eilie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:23 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775  
**Attachments:** DRONE 20210318 vs GOOGLE 2022 Attachment A 20230324 WRPERM13775.pdf

PM  
H

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**From:** patrick@nyexp.us <patrick@nyexp.us>  
**Sent:** Sunday, March 26, 2023 6:34 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Patrick Arnold Nye

**EMAIL:** [patrick@nyexp.us](mailto:patrick@nyexp.us)

**COMPANY:** Ingleside on the Bay Coastal Watch Association

**ADDRESS:** 1018 BAYSHORE DR  
INGLESIDE TX 78362-4647

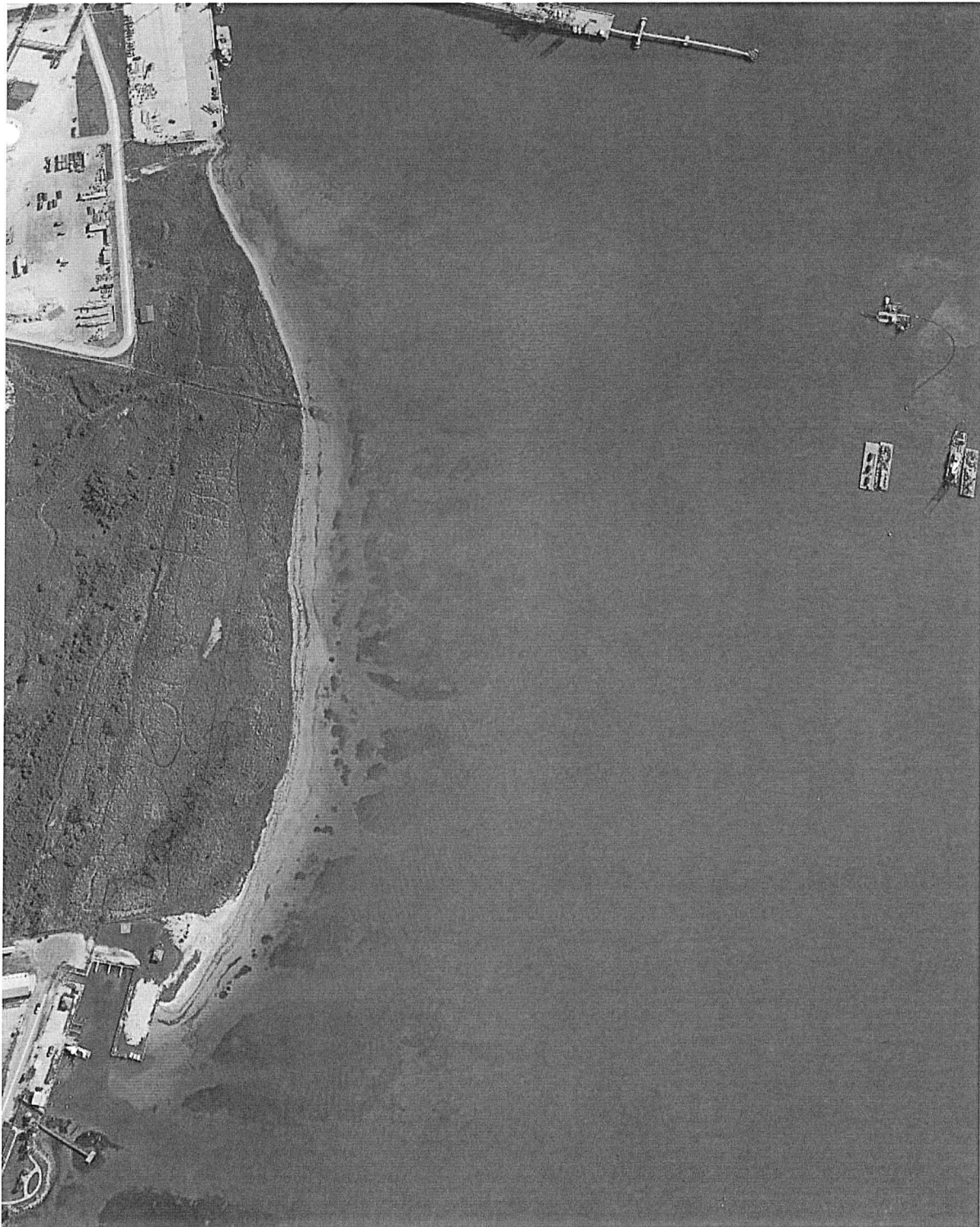
**PHONE:** 3616581089

**FAX:**

**COMMENTS:** Attachment 2 of 2

DRONE TIMELINE ATTACHEMENT "B" to WRPERM 13775, March 24, 2023

GOOGLE MAP 1/31/2020



FLYOVER AUGUST 2021



DRONE PHOTO 3/18/2021





GOOGLE EARTH 2022





Seagrass Study 11/7/2022





## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:22 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775  
**Attachments:** Enbridge WRPERM 13775 Comments 20230326.pdf

PM  
H

---

**From:** patrick@nyexp.us <patrick@nyexp.us>  
**Sent:** Sunday, March 26, 2023 6:33 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Patrick Arnold Nye

**EMAIL:** [patrick@nyexp.us](mailto:patrick@nyexp.us)

**COMPANY:** Ingleside on the Bay Coastal Watch Association

**ADDRESS:** 1018 BAYSHORE DR  
INGLESIDE TX 78362-4647

**PHONE:** 3616581089

**FAX:**

**COMMENTS:** I will be attaching two separate documents for my comments, request for public meeting and contested case hearing request.

Ingleside on the Bay Coastal Watch Association  
Patrick A. Nye  
1018 Bayshore Dr.  
Ingleside, Texas 78362-4840  
[iobcwa.org](http://iobcwa.org)



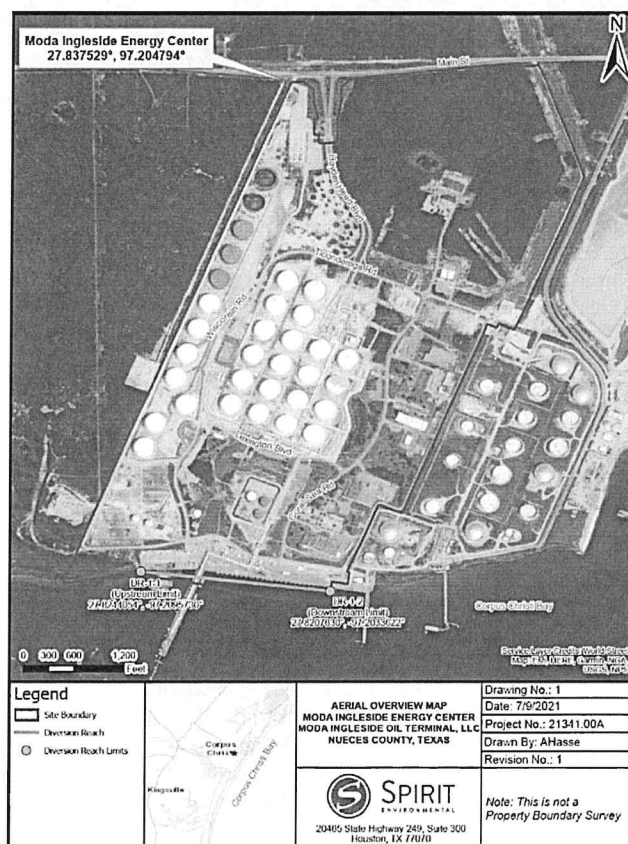
March 26, 2023

RE: Request for Public Meeting, Contested Case Hearing and Comments Opposing WRPERM 13775  
CN605636521, RN111303897  
Affecting Corpus Christi Bay, San Patricio and Nueces Counties, Texas and Cities of Ingleside on the  
Bay and Ingleside, Texas

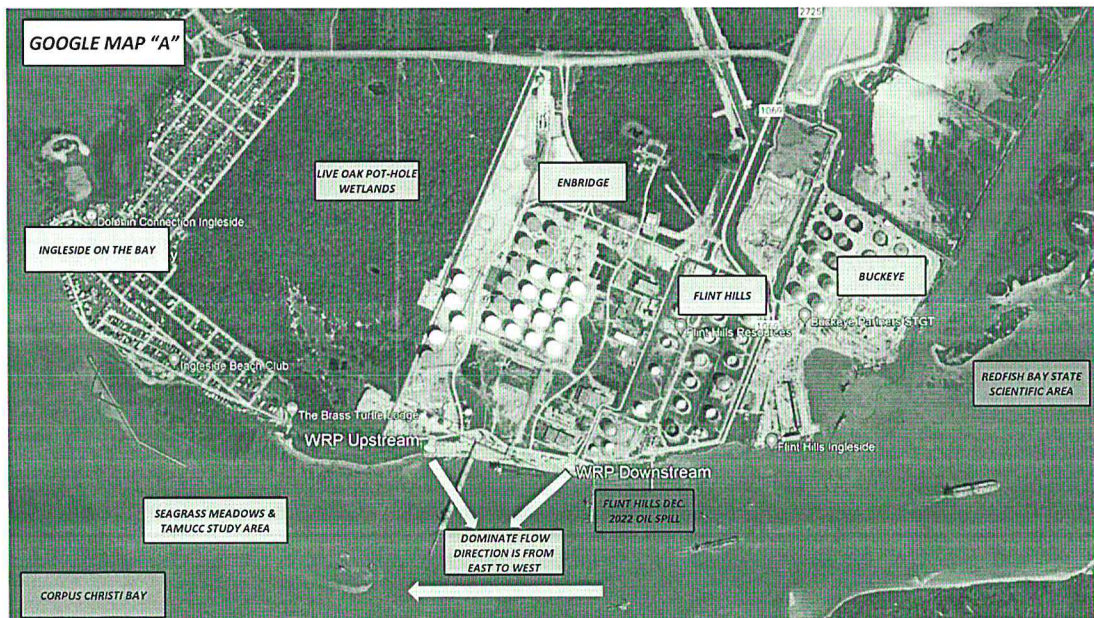
Dear Sir or Madam;

There are many unanswered questions for this water rights permit and how it would affect the environment as well as the health and safety of residents in the area. This permit does not provide adequate data to prove the true purpose, use and safety needs to protect residential communities, wildlife, plants, wetlands, freshwater tables and aquatic life.

1. Is this Permit WRPERM 13775 Draft Notice valid since it was first drafted by Moda in July 2021? Why didn't Enbridge submitted the Water Right Application Administration Information Report for TEEQ10204 per Page 2?
2. Attachment 5 Corporate Authorization for Duly Authorized Representatives is invalid as it lists representatives from Moda, not from Enbridge. How can this permit be complete when the list of responsible representatives are not from the company seeking the permit. Enbridge must resubmit showing the correct and missing data.
3. Does the Draft Permit for Enbridge facility for "firewater testing" apply to only the facility as outlined on Drawing No. 1 (below) or could the Water Right Permit be expanded to include more surface area owned by Enbridge? We have learned in the past that applications such as amended air permits are followed up with even greater emissions amounts that collectively should have been a major modification with one application. What is the procedure if Enbridge wanted to use this permit for another use such as desalination, ammonia or hydrogen production instead of firewater testing?



4. What is the volume of the current or proposed firewater flowlines and how does that volume compare to the needs and purpose? What does the manufacturer say about testing with saltwater? Does saltwater lower the life expectancy of the equipment including the pumps, meters, fire lines, valves, intake and discharge lines? Firewater volume of 500-acrefeet is beyond the present and future firewater needs. Permit suggests in 3.7 Worksheet 4.0: Discharge Information that (Moda) Enbridge will release the water directly back to Corpus Christi Bay and will ensure no illicit discharges under TPDES at this site." If the permit water is used as firewater, how can the Permit guarantee that discharge during a fire or leak incident will not contaminate Corpus Christi Bay? This permit only contemplates testing not actual use. What plans are in place to protect adjacent waters from discharge for even 1 hour of use 6,000,000 mgh? Will this application be revoked in the event of a spill or change in the use and discharge?
5. This permit is incomplete since it does not demonstrate safe discharge plan into CC Bay. Google Map "A" below points out the environmental risks to contaminated saltwater to various ecosystems and the community of Ingleside on the Bay. The proposed application misidentifies the flow direction showing "Upstream" west of the "Downstream". There are many articles that show the opposite of the proposed application. Two examples. [https://www.researchgate.net/figure/Total-surface-current-vector-map-of-Corpus-Christi-Bay-for-April-04-2004-1700-UTC\\_fig1\\_4110675](https://www.researchgate.net/figure/Total-surface-current-vector-map-of-Corpus-Christi-Bay-for-April-04-2004-1700-UTC_fig1_4110675). <https://sedarweb.org/documents/s18rd04-spatial-and-temporal-patterns-in-modeled-particle-transport-to-estuarine-habitat-with-comparisons-to-larval-fish-settlement-patterns/>

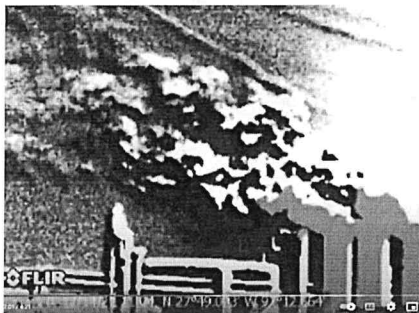


6. Flow direction of the "Downstream" discharge will certainly affect the remaining seagrass meadows located in the littoral zone from Enbridge pier through Ingleside on the Bay and Ingleside Cove Sanctuary. How will this oversight be corrected to protect the fragile wetland habitat ecosystem? How often and how will the discharge be tested for contamination? What happens when oil or other products are discharged into the bay and pollutants are carried throughout the Coastal Bend waters?
7. What fire protection does Enbridge have currently in place? How is that system tested for safety and reliability? Based upon the permit application, Enbridge seems to indicate that no safety equipment is in place and they are totally reliant on this permit.
8. Enbridge requests 500 acre-feet at rate of 222.8 cfs (100,000 GPM) therefore using 144,000,000 MGD. How does this calculate for an oil tank fire with other safety protections in place? Oil storage tank fires use extinguishing foam as the only effective solution for fighting fires as outlined in article below. The purpose and use do not match the request knowing that only foam and chemicals are used on oil/condensate tank fires as water would spread the fires? What measures are taken for the foam and chemicals that would flow into the bay? [https://www.google.com/search?q=what+do+you+use+for+oil+tank+fires&rlz=1C1GCEA\\_enUS894US894&oq=what+do+you+use+for+oil+tank+fires&aqs=chrome..69j57j33i160j3.12428j0j15&sourceid=chrome&ie=UTF-8](https://www.google.com/search?q=what+do+you+use+for+oil+tank+fires&rlz=1C1GCEA_enUS894US894&oq=what+do+you+use+for+oil+tank+fires&aqs=chrome..69j57j33i160j3.12428j0j15&sourceid=chrome&ie=UTF-8)
9. How will Ingleside and Ingleside on the Bay communities be notified during emergencies? What is the expected blast radius of several tanks exploding at the Enbridge facility and how will the smoke and emissions affect Ingleside and Ingleside on the Bay?
10. What happens to the saltwater runoff of a tank fire using Corpus Christi Bay water? A recent oil spill at Flint Hills immediately east of the Enbridge facility spread west throughout Corpus Christi Bay. Two bottle-nose dolphins and a sea turtle were found in the vicinity of this spill. There are an unknown number of birds, crustaceans, fish and wetlands affected but not reported. Unfortunately Flint Hills was not truthful about the spill citing different oil spill numbers and reporting to the public that it was "all contained" during several news casts when in fact it was never contained and oil spill amounts were in excess of their highest reported number. How can the lack of trust with large corporations and agencies be reinforced so that our quality of life is protected? Where does this draft permit show how oil pollution and emissions from fires be contained as to not contaminate Corpus Christi and Redfish Bays? TCEQ approved the most recent amended air permit for Flint Hills even though there was proof of leaking tank seals and numbers that exceeded the major limit of SO2.



11. Moda's deviation report from VCU temperature in 2018 were 4,859. In 7/14/2019-1/16/2020 there were 713 deviations with some of the reports missing. For the dates of 1/17/2020-7/16/2020 there were 420 with missing reports suggesting much more violations. Many of the citizens of Ingleside on the Bay have filed complaints of oil odor and this has been identified in air monitors within the community. In December 2019 and September 2022, Tim Doty, a retired TCEQ employee outlined detailed complaints at Enbridge as shown below.

OGI Image Enbridge December 14, 2021



OGI Image Enbridge 9/22/2022



Images Credit of Earthworks

#### **Additional Comments**

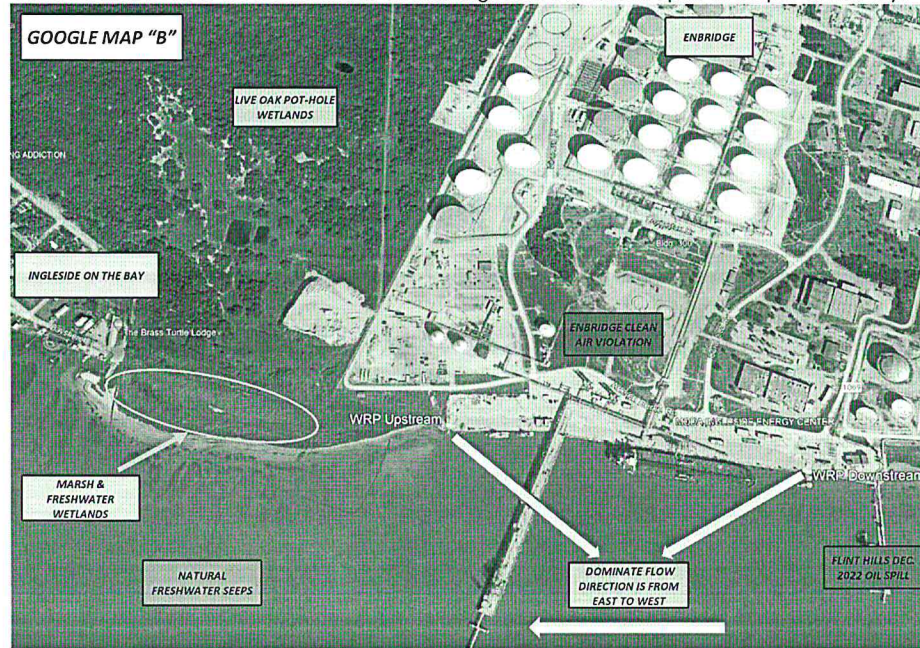
On January 9, 2023, the TCEQ Corpus Christi Region investigated the above-referenced site in response to a citizen complaint alleging unauthorized emissions. During the investigation, Vapor Combustor 8 (Emissions Point No. [EPN] VCU-8) exceeded short-term emissions rates for NO<sub>x</sub> and CO under Standard Permit Registration No. 162551. This issue is related to a violation disclosure under the Texas Environmental, Health, and Safety Audit Privilege Act. A permit action to consolidate the standard permit with NSR Permit No. 122362 will address EPN VCU-8's hourly potential to emit.

It appears that even with numerous violations/deviations, complaints and noted violations at Enbridge above, the TCEQ wishes to consolidate permits to prevent another emissions rate violation. In other words, the TCEQ wishes to facilitate Enbridge instead of requiring great emission controls that would lessen the harmful pollutants that Ingleside and Ingleside on the Bay experience. Can we rely on the TCEQ to thoroughly review the WRPERM 13775 to prevent non-compliance at this facility?

12. Fire protection for the facility was in place for Naval Station Ingleside utilizing the City of Ingleside's large water tower located directly across the street from Enbridge. Will the same water lines be used for the baywater testing and how will contamination be prevented for entering City of Ingleside and Ingleside on the Bay's water supplies?
13. What are the current fire testing results and how often has Enbridge tested this fire protection system? If Enbridge is not testing the fire equipment, would that be a violation that TCEQ would enforce? What agency is responsible for monitoring the fire equipment for Enbridge, Flint Hills and Buckeye?
14. Applicant should use "best practices" to limit the harming aquatic life from the intake and diversion structures. Under the Texas Water Quality Standards, the source waters have been characterized as used for exceptional aquatic life uses. Issuance of the draft permit fails to protect the ecology and productivity for the impacted bay and estuary system, and fails to maintain existing uses of the impacted source water. The impingement and entrainment impacts of the intake endangers the ecology and productivity of the source waters, and would prevent maintenance of existing uses of the source waters. The water will be withdrawn at a rate of 100,000 gallons per minute. If Enbridge installed a 48" diameter intake pipe (which is a VERY large pipe) to withdraw the water, the velocity of the water would still be 17.73 feet per second. This is more than 35 times the EPA recommended intake velocity of .5 fps in a littoral zone. Under applicable statute and rules, Enbridge is required to demonstrate that the facility will employ reasonable measures to minimize impingement and entrainment. NO such measure have been described or undertaken as part of this permitting process. Only best practices should be recommended by TCEQ to reduce aquatic life impact and de minimis effect on the ecosystem. Will TCEQ require best practices?
15. Enbridge does not specify the size of pipe so that the intake velocity cannot be determined, but at the rate of 100,000 gpm, it is most definitely going to be well above the recommended velocity to be protective of aquatic life. Enbridge did not provide adequate information regarding presence or the configuration of the screens that will be used to protect aquatic life. The permit must stipulate the velocity of the intake flow in a littoral zone to be protective of aquatic life. The location of the proposed withdrawal within an estuary triggers the consideration of specific additional criteria under the TCEQ rules. Pursuant to 30 TAC § 297.55(b), the Commission is to consider the ecology and productivity of the affected bay and estuary system in determining whether to issue a water right.
16. A recent seagrass study by Dr. Kirk Cammarata, determined that seagrasses are already impacted by silt covering seagrasses during Enbridge tanker docking operations. Flow direction is diagnosed as coming from East to West

as determined by the extreme loss of seagrasses closer to Enbridge yet affecting seagrasses thousands of feet away in front of Ingleside on the Bay. (SEE DRONE TIMELINE ATTACHED AS ATTACHEMENT "A")

17. Corpus Christi Bay circulation pattern is counterclockwise with flow coming from Gulf of Mexico. Therefore, the map submitted with Upstream Limit and Downstream Limit is flawed. Downstream discharge would affect seagrasses, littoral zone, the community of IOB and Ingleside Cove Sanctuary. (SEE GOOGLE MAP "B")
18. Freshwater seeps and springs are located all along the McGloin's Bluff (Live Oak Peninsula) area and contribute to the ecological diversity of wetlands along the shoreline. Contamination of saltwater on the permeable sand would be disastrous to the environment. Oil discharge would be catastrophic to Corpus Christi Bay!



19. Freshwater pot-hole wetlands are located throughout Live Oak Peninsula and would be threatened by saltwater. How are the pot-hole wetlands protected and the wildlife they support?
20. Water wells in the Ingleside on the Bay community could be ruined if saltwater is placed on the porous and permeable Live Oak Peninsula during testing or firefighting. What safeguards are in place to prevent this from happening and how would this problem be remedied by the applicant if it occurs?
21. Representatives of the South Texas Watermaster should be allowed full access to the property and inspect records to determine that if violations are committed the facility would be penalized and modified to conform. Enbridge is a known as a persistent violator of air and water permits having hundreds of air monitoring violations and numerous complaints filed for water degradation. How can the public trust that the TECQ would regulate the permit requirements will the requirements be adhered to by Enbridge?
22. The recent oil spill of 2800+ gallons of oil at Flint Hills December 24, 2022 illustrates the lack of spill control in Corpus Christi Bay. Oil ended up on North Beach and the shoreline of TAMUCC as the clockwise direction of currents send oil throughout the Bay. Where is the spill control plan for this permit since the permit only reflects testing of pipelines?
23. Permit should be limited to "testing of pipelines for firewater" and not include the statement; "but not limited to:". Addition of this statement is disingenuous of the applicant suggesting other motives.
24. Worksheet 3.7 conflicts with Summary of Request 2.1 as "used in case of an emergency." Why does the Summary state that waters will be released directly back to Corpus Christi Bay but excludes what happens in case of emergency?
25. Worksheet 4.0 is not filled out and TPDES is not answered. Is this why Enbridge fails to provide their name as the Permittee and leaving Moda as the signatory on this permit?
26. Section 3.9.1 states that "Due to amount of water needed for emergency firewater pump testing....to ensure the facility has adequate water for testing and emergency situations." What happens to the discharged water during and after emergency use?
27. Section 3.12 Certifies that Moda owns property. This is a fatal flaw and untruth by the applicant for this permit and therefore the permit should be denied.
28. Applicant denies that freshwater was recirculated at the facility as copied below. How was fire protection and safety equipment tested for mechanical integrity? Is Enbridge in violation of an operator that stores large volumes of hydrocarbons and offloads to tankers and barges? How often was the safety equipment tested since the applicant is asking for testing every 30 days?

1. Was fresh water recirculated at this facility? ☐ Yes ☒ No

2. Provide a detailed description of how the water will be utilized in the industrial process.

The water will be used to test firewater pump systems for mechanical integrity and leaks. The water will be pulled from Corpus Christi Bay. Once testing is complete, the water will be returned directly to the bay. Additionally, the water will be used for emergency situations.

29. Where do the surface water savings calculations come from? Leaks should be repaired in an expeditious manner. See copied section below from the permit.

2. Provide specific, quantified 5-year and 10-year targets for water savings and the basis for development of such goals for this water use/facility.

Moda will ensure that water used for mechanical integrity and leak testing of the firewater pump system will only be conducted using the least amount of time and water as required by manufacturer specification. This will ensure that the tests are not pulling more water than necessary. Additionally, Moda will monitor the pump system for potential leaks and will repair discovered leaks in a timely manner. The percentage of surface water savings proposed by limiting water use and fixing leaks for the five (5) year goal is a water savings of 5%; ten (10) year goal is a water savings of 10%.

30. What agency will monitor the accuracy of the capacity rates and keep a log of water being diverted as copied below? How often?

3. Describe the device(s) and/or method(s) used to measure and account for the amount of water diverted from the supply source, and verify the accuracy is within plus or minus 5%.

Moda will monitor pumping capacity rates and keep a log of water being diverted. This practice will measure the amount of water diverted from the supply source within an accuracy of plus or minus 5%.

31. Applicant did not describe the state-of the art equipment nor process modifications used to improve water use efficiency. What type of equipment and what are the manufacturer specifications that will be used? Does the volume of gpm intake match the purpose and use of the equipment? See application copied below.

5. Describe the application of state-of-the-art equipment and/or process modifications used to improve water use efficiency.

Water used for firewater pump mechanical leak testing will be conducted using the least amount of time and water as required by manufacturer specifications. Leaks will be repaired promptly to reduce water loss.

32. This statement below did not answer the permit's question – applicant just repeated previous answer. Should the monitoring of the pump system leaks be reviewed upon each test?

6. Describe any other water conservation practice, method, or technique which the user shows to be appropriate for achieving the stated goal or goals of the water conservation plan:

Periodic monitoring of pump system for leaks will ensure that the maximum amount of water diverted will be returned.

33. What is the volume of the firewater lines? Where are they located on the Enbridge Plat?

34. What about pump noise and how it will affect the nearby communities? How much noise will these additional pumps increase combined with the current operations?

35. Permit should limit application to only the present facility firewater testing. Any use outside this facility would require additional permitting.

Respectfully submitted,



Patrick A. Nye  
President  
Ingleside on the Bay Coastal Watch Association  
1018 Bayshore Dr.  
Ingleside, Texas 78362-4840  
361-658-1089  
[iobcwa.org](http://iobcwa.org)





# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

PLEASE PRINT

Name: Lynne Porter

Mailing Address: 511 Bayshore Dr

Physical Address (if different): \_\_\_\_\_

City/State: Ingleside Zip: 78362

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: drlgporter511@gmail.com

Phone Number: (361) 563 1627

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_

☒ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:12 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** drlgporter@yahoo.com <drlgporter@yahoo.com>  
**Sent:** Friday, March 24, 2023 4:41 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** DR. Lynne Porter

**EMAIL:** [drlgporter@yahoo.com](mailto:drlgporter@yahoo.com)

**COMPANY:**

**ADDRESS:** 511 BAYSHORE DR PO box 335  
INGLESIDE TX 78362-4707

**PHONE:** 3615631627

**FAX:**

**COMMENTS:** I am requesting a public hearing. How can this permit be allowed when the list of responsible representative is not from the company seeking the permit. Attachment 5 Corporate Authorization for Duly Authorized Representatives is not correct as it lists the representative from Moda, not from Enbridge. Enbridge currently has firewater provided by the City of Ingleside. They show no need for the water other than a statement for fire water which



is provided by the city of Ingleside. I live right down the street from them. Why should they get this water for no reason? How they will protect marine life from being sucked in the intake pipes? Why cannot Enbridge recirculate, recycle and store the potable water currently provided by the City of Ingleside at each testing cycle and therefore only need the additional water from the city in the event of an emergency. NO such measures have been described as part of this permitting process. We need a hearing.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 4, 2023 3:17 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** BUTCH.PORTER@INGLESIDEISD.ORG <BUTCH.PORTER@INGLESIDEISD.ORG>  
**Sent:** Tuesday, April 4, 2023 3:15 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** William Porter

**EMAIL:** [BUTCH.PORTER@INGLESIDEISD.ORG](mailto:BUTCH.PORTER@INGLESIDEISD.ORG)

**COMPANY:**

**ADDRESS:** PO BOX 640 511 Bayshore Drive  
INGLESIDE TX 78362-0640

**PHONE:** 3617767631

**FAX:**

**COMMENTS:** I am requesting a public hearing. Section 3.12 of the permit Certifies that Moda owns the property. I thought it was Enbridge? Attachment 5 Corporate Authorization for Duly Authorized Representatives is also not correct as it list representatives from Moda, not from Enbridge. How can this permit be complete when the list of responsible representatives is not from the company seeking the permit. If just the names are incorrect, what else is inaccurate or

untrue??? Currently Enbridge has firewater provided by the City of Ingleside and does not meet the burden of proof that no feasible alternative exists. This permit is requesting a diversion of 500 af/year for fire water testing and emergency use. The applicant has not justified the use of this and there is not description of the fire suppression system. There are no calculations provided of the fire suppression system to quantify need based upon facilities to be protected and system capabilities. What is going on here??? We need a public hearing.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:11 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** lmtriley@aol.com <lmtriley@aol.com>  
**Sent:** Friday, March 24, 2023 3:13 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Lisa T. Riley

**EMAIL:** [lmtriley@aol.com](mailto:lmtriley@aol.com)

**COMPANY:**

**ADDRESS:** 344 INGLEWOOD  
INGLESIDE TX 78362-4843

**PHONE:** 3618776344

**FAX:**

**COMMENTS:** Dear Sir/Madam: I am requesting a public hearing against the current application of Permit No. WRPERM 13775 for Enbridge's request for the intake of sea water literally yards from the sea beds of Ingleside on the Bay where my husband and I live. There are too many unspecified details in their application, like size of water pipes, chemicals flowing back into the Corpus Christi Bay if used on a fire in the chemical facility, et cetera. The application also has Moda

as the agent - not Enbridge, a red flag as well. A public hearing is of the upmost urgent need to allow so many unexplained details to come to light that Enbridge should be a party to in a public hearing with concerned members of my community. Thank you very much for your time.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:11 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** royleeiob@gmail.com <royleeiob@gmail.com>  
**Sent:** Friday, March 24, 2023 3:26 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Roy Riley

**EMAIL:** [royleeiob@gmail.com](mailto:royleeiob@gmail.com)

**COMPANY:**

**ADDRESS:** 344 INGLEWOOD  
INGLESIDE TX 78362-4843

**PHONE:** 3618771297

**FAX:**

**COMMENTS:** In Re: TCEQ Permit No.: WRPERM 13775 I am requesting a public hearing for the above TCEQ Permit number because of the major impacts it will have on Ingleside on the Bay, my home, and the damage to the marine life and sea water within miles of the intake and discharge locations of Enbridge's facility. Their facility is already provided water from the City of Ingleside, Texas, for all purposes at their facility as this site was a fully functioning Naval Base that

was in operations for years before being converted in a chemical storage site. There is no shortage of water at their facility. And if a fire were to happen, wouldn't the proper fire fighting agents have to have foam and not salt water? Thank you.



## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:35 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** jamietracyjamietracy@gmail.com <jamietracyjamietracy@gmail.com>  
**Sent:** Wednesday, April 5, 2023 3:05 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Jamie Tracy

**EMAIL:** [jamietracyjamietracy@gmail.com](mailto:jamietracyjamietracy@gmail.com)

**COMPANY:**

**ADDRESS:** 609 TANGLEWOOD LN  
INGLESIDE TX 78362-4846

**PHONE:** 8178817330

**FAX:**

**COMMENTS:** Requesting a public hearing before this permit is issued. I am concerned about the environmental impact this would have on our bay. This ammonia plant with water extraction would greatly impact our quality of life and home values in this area.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 11:01 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** francy.thompson@gmail.com <francy.thompson@gmail.com>  
**Sent:** Friday, April 7, 2023 11:57 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Frances Thompson

**EMAIL:** [francy.thompson@gmail.com](mailto:francy.thompson@gmail.com)

**COMPANY:**

**ADDRESS:** 133 SEA BREEZE DR  
ARANSAS PASS TX 78336-5803

**PHONE:** 2065127135

**FAX:**

**COMMENTS:** This is an outrageous request that will harm our marine life and estuaries. As one who lives on Redfish Bay, it will decrease my property values. As a citizen of the area, it will have negative impact on ALL area residents and visitors. This needs a public hearing or contested case hearing. Brine discharge needs to be done OFFSHORE, not in a shallow estuary. Moving forward with this project demands environmental and economic impact studies.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:44 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** jaythompson.home@gmail.com <jaythompson.home@gmail.com>  
**Sent:** Thursday, April 6, 2023 8:08 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Jay Thompson

**EMAIL:** [jaythompson.home@gmail.com](mailto:jaythompson.home@gmail.com)

**COMPANY:**

**ADDRESS:** 133 SEA BREEZE DR  
ARANSAS PASS TX 78336-5803

**PHONE:** 2065127135

**FAX:**

**COMMENTS:** This is an outrageous request that will harm our marine life and estuaries. As one who lives on Redfish Bay, it will decrease my property values. As a citizen of the area, it will have negative impact on ALL area residents and visitors. This needs a public hearing or contested case hearing. Moving forward with this project demands environmental and economic impact studies.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

PLEASE PRINT

Name: Cyndi Valdes

Mailing Address: 809 Bayshore Dr Ingleside TX

Physical Address (if different): \_\_\_\_\_

City/State: Ingleside TX Zip: 78362

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: iobcwa@gmail.com

Phone Number: (480) 254-1693

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? \_\_\_\_\_



Please add me to the mailing list.



I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.



I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, March 28, 2023 9:57 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** txanimalhouse@gmail.com <txanimalhouse@gmail.com>  
**Sent:** Monday, March 27, 2023 4:37 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Cyndi L Valdes

**EMAIL:** [txanimalhouse@gmail.com](mailto:txanimalhouse@gmail.com)

**COMPANY:**

**ADDRESS:** 809 BAYSHORE DR  
INGLESIDE TX 78362-4933

**PHONE:** 4802541693

**FAX:**

**COMMENTS:** I Cynthia Valdes at 809 Bayshore Drive, Ingleside on the Bay, TX. 78362 request a contested case hearing. This permit application WRPERM 13775 from Enbridge is asking to pump water from our Corpus Christi Bay for FREE for testing of their fire system with no regard to what impact this will have on the already compromised shoreline from their industry. Why in the world would you allow a billion-dollar company to get water for FREE and from the ocean?



This ocean water needs to remain where it is! I live just a few yards down the shoreline from this industry and have notice a drastic reduction in the sea grasses and the aquatic life. Dolphin traffic had diminished and recently a dead baby dolphin was seen. Crab tapping is useless right now with the silty mess they have left for us from their dredging. Enough is enough! The water shores and wildlife won't take much more. Do not let them extinguish our way of life here. Please do NOT grant this permit. Thank you!

## Vincent Redondo

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**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, February 29, 2024 4:48 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775  
**Attachments:** Enbridge Water Permit 13775 Assessment (TD 021824) (1).docx

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Jesús Bárcena  
Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Office Phone: 512-239-3319

How is our customer service? Fill out our online customer satisfaction survey at:  
[www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** iobcwa@gmail.com <iobcwa@gmail.com>  
**Sent:** Thursday, February 29, 2024 8:24 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**NAME:** Cyndi Valdes

**EMAIL:** [iobcwa@gmail.com](mailto:iobcwa@gmail.com)

**COMPANY:**

**ADDRESS:** 1018 BAYSHORE DR  
INGLESIDE TX 78362-4647

**PHONE:** 4802541693

**FAX:**

**COMMENTS:** As Executive Director of IOBCWA please see an attached technical review of permit outlining issues and I am requesting a Contested Case Hearing on behalf of IOBCWA and its members.

**Technical Assessment**  
**Water Use Permit Application #13775**  
**February 18, 2024**

**Background**

Various technical materials were provided by Ingleside on the Bay Coastal Watch Association to TCHD Consulting for review of the Notice of an Application for Water Use Permit #13775 that was submitted to the Texas Commission on Environmental Quality (TCEQ) by Enbridge (then Moda) Ingleside Oil Terminal, LLC on July 27, 2021. TCEQ declared the data package administratively complete on August 11, 2021. Materials reviewed included but were not limited to the Notice of Application, along with supporting technical materials provided to and by TCEQ.

**General Conclusions**

After review of the technical materials provided, it outwardly appears that proposed Water Use Permit #13775 is likely a legal water grab for future industrial expansion. There was a considerable time gap from the time the TCEQ declared the application administratively complete on August 11, 2021, until Spirit Environmental (Enbridge contractor) inquired about it via email in October 2022. This does not make much sense if the purpose of the permit is really firewater and safety protection, as a company that typically becomes safety conscience would tend to push TCEQ for the permit more quickly rather than slowly walking it.

Although TCEQ recommended Special Conditions in the permit, the language appears to be boilerplate rather than carefully thought-out narratives for a specific location with special concerns. Additionally, the technical language appears to be mostly generalized and sparse with little specificity. Consequently, the proposed technical language and Special Conditions are largely unenforceable. And finally, and most importantly, the proposed permit will clearly allow Enbridge to resell water, if the rights are transferred with the proposed water conservation requirements. Enbridge Ingleside Oil Terminal, LLC selling its water rights to Ingleside Clean Ammonia Partners, LLC (or to another company) seems like a real possibility.

**Specific Technical Comments**

1. With regard to the relevant crafted paragraph described in the TCEQ Interoffice Memorandum from Trent Jennings, Water Conservation Specialist on the Resource Protection Team to Sarah Henderson, Project Manager on the Water Rights Permitting Team dated December 28, 2022, that is in the TCEQ Water Use Permit No. 13775 data packet that reads "Permittee shall implement water conservation plans that provide for

the utilization of those practices, techniques, and technologies that reduce or maintain the consumption of water, prevent or reduce the loss or waste of water, maintain or improve the efficiency in the use of water, increase the recycling and reuse of water, and prevent the pollution of water, so that a water supply is made available for future of alternative uses. Such plans shall include a requirement that in every water supply contract entered into on or after the effective date of this permit, including any contract extension or renewal, that each successive wholesale customer develop and implement conservation measures. If the customer intends to resell the water, then the contract for resale of the water shall have water conservation requirements so that each successive customer in the resale of the water will be required to implement water conservation measures.” **This appears to be boilerplate language that would allow Enbridge to sell its water rights to other interested parties rather than specific technical language for a particular area that TCEQ has concerns about. Presumably, this would provide flexibility for future industrial expansion in the area.**

2. With regards to Special Conditions A reading “Permittee shall implement reasonable measures in order to reduce impacts to aquatic resources due to entrainment or impingement. Such measures shall include, but shall not be limited to, the installation of screens at the diversion structure(s).” **This is generalized language with little teeth. The term “reasonable” is not well-defined, thus this would be difficult to enforce and “reduce impacts” is an acknowledgment that impacts are expected. Also, there is no specificity to the “diversion structure,” though Enbridge is expected to do something so presumably the company should be able to describe it if it was trying to be transparent.**
3. With regards to Special Condition B reading “Permittee shall install and maintain a measuring device, which accounts for, within 5% accuracy, the quantity of water diverted from the point(s) authorized above in Paragraph 2. DIVERSION and maintain measurement records.” **Again, this appears to be mostly generalized language as there are no specific requirements for the measuring device other than 5% accuracy. There are no specifics on calibration procedures or frequency, recordkeeping requirements, or if a declaration from the manufacturer is acceptable all by itself.**
4. Per the listed TCEQ Special Conditions listed in Water Use Permit #13775, there is no mention of who must be contacted and what the procedures or references will be regarding reselling water rights. **Would it affect this proposed permit, and is the permittee expected to do anything differently with regards to its permitting representations? More detailed information in this regard would make for a better permit.**
5. In the same TCEQ Interoffice Memorandum from Mr. Jennings to Ms. Henderson, dated December 28, 2022, the Consideration of Water Conservation Goals Section reads



“Applicant stated the requested water will be used for firefighting and testing the firewater pump system for mechanical integrity and leaks. The target for water use efficiency is 98 percent of water will not be consumed and therefore returned as flow, with an estimated loss of 2 percent due evaporation. Water diverted but not consumed shall be discharged into Corpus Christi Bay. Additionally, Applicant will monitor the pump system for potential leaks and will repair discovered leaks in a timely manner. The target for water savings proposed by limiting water use the fixing leaks is a savings of 5 percent for a five-year goal and 10 percent for a ten-year goal.” **The phrase “The target for water use efficiency ....” seems to have a meaning that there is some wiggle room there. Also, the language is non-specific regarding infrastructure that is/will be in place from the pumps – will they be flexible hoses, rigid water pipes, what are the hose/pipes lengths and diameter? There are also no details on how the company calculated the water savings of 5 – 10% over the five-to-ten-year period, and therefore, the statement is not defensible at this time. Again, there is some generalized information here, but not enough technical details are provided for full transparency and enforceability.**

6. Records indicate that Moda Ingleside Oil Terminal, LLC water use permit application to TCEQ was declared administratively complete on August 11, 2021, while Spirit Environmental stated in an email to TCEQ on November 18, 2022, that the “... applicants legal name has since changed to Enbridge Ingleside Oil Terminal, LLC as listed in the Texas Secretary of State, attached.” Why the huge delay in time from August 2021 – November 2022? Contractor Spirit Environmental Associate Project Manager Chase Campbell checked back with TCEQ Sarah Campbell via email on October 2022, regarding this application, as there appeared to have been no update from the TCEQ regarding its technical review since an email on May 6, 2022. **The huge time delay and lack of communication between the two parties does not seem to be indicative of a company that is genuinely concerned about its firewater availability for emergencies.**
7. In the Surface Water Rights Permit Application – Supplemental Information packet dated July 2021, “the purpose of this document is to provide the necessary information to obtain a water use permit from the TCEQ to provide the site with adequate firewater in case of an emergency. Additionally, the water would be used to test the firewater pump systems for mechanical integrity and leaks.” **This section lacks specific language that is needed to make a solid technical assessment – what are the procedures and the frequency in testing for mechanical integrity checks and leaks?**
8. The Application generically states in Section 2.0 that it will have multiple firewater pumps that will be used to divert water with a combined maximum flow rate, but it provides no specificity in the section regarding the number of pumps or technical specifications of the pumps. This became a bit more clear in Section 3.6.1 when it stated that “there are currently three (3) proposed mobile pump systems to be placed

anywhere along the proposed diversion reach as needed for future expansion. The three (3) proposed mobile pump systems, and any additional pump systems constructed in the future, will divert water at a combined maximum flow rate not to exceed 100,000 gpm.” That being said, Enbridge’s FOP renewal application included a memorandum from Edge Engineering and Science dated July 15, 2022, that stated that Enbridge wanted to “add three (3) firewater pump engines. These firewater pump engines were previously temporary engines and have now become permanent. These engines will be grouped as GRPFWP2.” **It is unclear as to what the real story is here. One document states that there will be three proposed mobile pump systems, while the other document states that there will be three permanent firewater pump engines – certainly, this needs to be clarified with more details on the engineering, technology, and infrastructure to fully gauge what is currently going on here.**

9. In Section 2.0, the Application states under the Purpose of Use paragraph that “the new appropriation of State Water requested with this application will be for industrial use. Moda (now Enbridge) will use the water for the following two (2) reasons, **but not limited to:** firewater – water will be used for firefighting in case of an emergency at the site and firewater pump systems flow tests – the firewater pump systems will be periodically tested for mechanical integrity and leaks. **This language is clearly not limiting Enbridge water use to firewater, which seems indicative that the water permit request is not clearly straightforward, and thus Enbridge will use its water rights for whatever it deems fit.**
10. **The Application provides no information on the transportation lines from the portable pumps to other infrastructure. What are the lengths and diameters of lines/pipes to determine the full volume of fluids being used so that realistic flow rates can be calculated instead of theorized?**
11. Section 3.8 of the Application states that “Moda (now Enbridge) will take reasonable measures to avoid impingement and entrainment of aquatic organisms for all new diversion structures. **Reasonable measures include, but are not limited to, filter screens. Again, generic language and no specificity. If Enbridge were trying to be a good steward of the environment and the community, there would be transparency in its data packet instead of generic statements. If TCEQ was trying to be an effective regulatory authority, its representatives would be asking relevant technical questions so that the permit could be beefed up and made more enforceable.**
12. On the Application’s Attachment 3 – Water Conservation Plan declarations, it was signed and approved by Vice President of Regulatory Affairs Clayton Curtis on July 15, 2021, who declared a water use rate of 500-acre feet with a diversion rate of 222.8 cfs. **On page 2, however, it lists 100% surface water usage at 300 – 500-acre feet which seems**

- inconsistent with requesting 500-acre feet in multiple other locations. Was this a mistake or purposeful? Enbridge and TCEQ should clarify this discrepancy.**
- 13. What is Enbridge doing now as far as making firewater available at it site – there appears to be no mention of this in the Application. Also, what kind of firewater system still exists at the site now, as it is likely that Moda and the Naval Station firewater infrastructure is still in place? It would certainly be appropriate to ask for and have Enbridge and TCEQ to add this technical information to the Application.**
  - 14. The Application package has declarations for mergers and name changes with formalized statements and paperwork within the Application from certified notaries, yet when Moda sold to Enbridge there was only an email notification to TCEQ in October – November 2022. Why did the Application name change not have to be formalized as it was done under previous ownership?**
  - 15. The Application provided no water discharge details about efforts required by TCEQ or that will be performed by Enbridge to ensure minimal impacts on aquatic life by mindfully controlled water flow rates and physical attributes of the engineered discharge system that will be physically put in place.**
  - 16. Again, there are few details in the Application that were provided by Enbridge and acknowledged by TCEQ. Why for instance were there no technical details on the possibility or consideration of using foam in firefighting mode. It is possible that it would be a preferred method that might have fewer negative impacts on the environment both on aquatic life and inevitable water runoff negative impacts.**
  - 17. Air permits tend to have specific technical specifications on compressor engines – like engine size, capacity, RPM, etc. Why were there no technical specifications supplied or asked for regarding the firewater pumps that are being sparsely described and proposed within the Application? This is relevant technical information that would be helpful in more fully gauging the potential environmental impacts of this proposed water permit.**
  - 18. When reviewing the Surface Quality Water Rights Permit Application – Supplemental Information packet, Enbridge claims and TCEQ is allowing the declaration that 98% of the water will be returned to Corpus Christi Bay after use, as only 2% will be lost to evaporation. How is it possible that there will be no spillage when connecting and disconnecting transfer lines or when doing integrity testing? The 98% estimation is not going to reflect reality. Per this part of the Application, it clearly states that the estimated diversion amounts from January – December is expected to be 25 acre-feet per month (which adds up to 300 acre-feet total) which equates to using more than 13.5 million liquid gallons of water per month, 446,371 gallons per day, and more than 160 million gallons (162,925,714.29) of water annually, which seems very extreme when testing a firewater system. Enbridge should be made to be more fully**

forthcoming in its proposed engineered firewater system to calculate and gauge the practicality of its technical statements in this proposed water permit.

19. If Enbridge wanted to be less environmentally intrusive and community friendly, it would pay the City of Ingleside for water and would store the fluid on-site in storage tanks and transfer it via pipeline. Afterall, if the firewater system will actually recover some 98% of the water, replenishment costs would be minimal after the initial water investment. Consequently, the technical statement in Section 3.9.1 of the Application's Water Conservation Plan that says "Due to the amount of water needed for emergency firewater pump system testing, no feasible alternatives exist to the proposed appropriation and the requested amount of appropriation is necessary and reasonable to ensure the facility has adequate water for testing and emergency situations" is not technically accurate and is misleading. Enbridge (then Moda) did not provide any economic models to back up such a statement. Comparatively, TCEQ will be giving Enbridge, in essence, a tax break (who will be paying \$789.10 for 500-acre feet of water) for not investing back into the Ingleside community.
20. And lastly, the upstream and downstream plots on the enclosed documents within the Application do not seem technically correct based on personal recollection, thus the downstream impacts would be expected to be felt more by Ingleside on the Bay rather being swept out to Redfish Bay. Presumably, this would increase the negative impacts to aquatic species and seagrasses in the vicinity of the populated areas. It appears that the company's contractor either made a mistake or misrepresented the potential negative impacts to the local community, and TCEQ seemed not to notice.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 18, 2023 10:28 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

PM  
H

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**From:** pwadham@outlook.com <pwadham@outlook.com>  
**Sent:** Monday, April 17, 2023 1:48 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MRS Pamela A Wadham

**EMAIL:** [pwadham@outlook.com](mailto:pwadham@outlook.com)

**COMPANY:** Ingleside on the Bay Coastal Watch Association

**ADDRESS:** 701 N SANDPIPER  
INGLESIDE TX 78362-4725

**PHONE:** 9367183749

**FAX:**

**COMMENTS:** I oppose WRPERM 13775 permit and request a Public Meeting and Contested Case Hearing. Enbridge currently has firewater provided by the City of Ingleside and as such does not meet the burden of proof that no feasible alternative to the appropriation exists and that the requested amount of appropriation is necessary and reasonable for



the proposed use. Analysis and calculations are not provided of the fire suppression system to quantify need based upon facilities to be protected and system capabilities. Therefore, Enbridge has not adequately demonstrated a need for the water. This water rights permit will allow Enbridge to pump water from the bay, for free, every week, for testing of their fire system. Therefore, the need for the water is simply to save money at the expense of aquatic resource and to the detriment of the public, specifically the community of Ingleside on the Bay and the commercial and recreational shrimpers and anglers that regularly fish this area. As an alternative, Enbridge could recirculate, recycle and store the potable water currently provided by the City of Ingleside at each testing cycle and therefore only need the additional water from the City in the event of an emergency. Regular testing of equipment is an scheduled event and therefore conservation and recycling efforts should be required of the system currently in place, not at the expense of the natural environment. In the permit map provide, the location of the intake is within the definition of the littoral zone, near shore, within the tidal range, and adjacent to seagrass beds. Therefore it has the highest incidence on impingement and entrainment, and thus the greatest negative impact to aquatic life in the area. See attachment "A" Aerial map showing diversion locations included in permit application. Under the Texas Water Quality Standards, the source waters have been characterized as used for exceptional aquatic life uses. Issuance of the draft permit fails to protect the ecology and productivity for the impacted bay and estuary system, and fails to maintain existing uses of the impacted source water. The impingement and entrainment impacts of the intake endanger the ecology and productivity of the source waters, and would prevent maintenance of existing uses of the source waters. The water will be withdrawn at a rate of 100,000 gallons per minute. If Enbridge installed a 48" diameter intake pipe (which is a VERY large pipe) to withdraw the water, the velocity of the water would still be 17.73 feet per second. This is more than 35 times the EPA recommended intake velocity of .5 fps in a littoral zone. Under applicable statute and rules, Enbridge is required to demonstrate that the facility will employ reasonable measures to minimize impingement and entrainment. NO such measure have been described or untaken as part of this permitting process. Enbridge does not specify the size of pipe so that the intake velocity can be determined, but at the rate of 100,000 gpm, it is most definitely going to be well above the recommended velocity to be protective of aquatic life. Enbridge did not provide adequate information regarding presence or the configuration of the screens that will be used to protect aquatic life. The permit must stipulate the velocity of the intake flow in a littoral zone to be protective of aquatic life. The location of the proposed withdrawal within an estuary triggers the consideration of specific additional criteria under the TCEQ rules. Pursuant to 30 TAC § 297.55(b), the Commission is to consider the ecology and productivity of the affected bay and estuary system in determining whether to issue a water right.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

**PLEASE PRINT**

Name: THOMAS WADHAM

Mailing Address: 701 OAK RIDGE DR, INGLESIDE 78362

Physical Address (if different): \_\_\_\_\_

City/State: INGLESIDE Zip: 78362

**\*\*This information is subject to public disclosure under the Texas Public Information Act\*\***

Email: WADHAMC@NETSCAPE.NET

Phone Number: (936) 232 2889

- Are you here today representing a municipality, legislator, agency, or group? ☒ Yes ☐ No

If yes, which one? IOBCWA

☒ Please add me to the mailing list.

☐ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 18, 2023 10:28 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

PM  
H

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**From:** wadhamc@netscape.net <wadhamc@netscape.net>  
**Sent:** Monday, April 17, 2023 1:45 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** MR Thomas C Wadham

**EMAIL:** [wadhamc@netscape.net](mailto:wadhamc@netscape.net)

**COMPANY:** Ingleside on the Bay Coastal Watch Association

**ADDRESS:** 701 N SANDPIPER  
INGLESIDE TX 78362-4725

**PHONE:** 9362322889

**FAX:**

**COMMENTS:** Request Public Meeting and Contested Case Hearing for WRPERM 13775. This permit is in excess of the proposed purpose for firewater volumes. Enbridge currently has firewater provided by the City of Ingleside and as such does not meet the burden of proof that no feasible alternative to the appropriation exists and that the requested

amount of appropriation is necessary and reasonable for the proposed use. Analysis and calculations are not provided of the fire suppression system to quantify need based upon facilities to be protected and system capabilities. Therefore, Enbridge has not adequately demonstrated a need for the water. This water rights permit will allow Enbridge to pump water from the bay, for free, every week, for testing of their fire system. Therefore, the need for the water is simply to save money at the expense of aquatic resource and to the detriment of the public, specifically the community of Ingleside on the Bay and the commercial and recreational shrimpers and anglers that regularly fish this area. As an alternative, Enbridge could recirculate, recycle and store the potable water currently provided by the City of Ingleside at each testing cycle and therefore only need the additional water from the City in the event of an emergency. Regular testing of equipment is an scheduled event and therefore conservation and recycling efforts should be required of the system currently in place, not at the expense of the natural environment. In the permit map provide, the location of the intake is within the definition of the littoral zone, near shore, within the tidal range, and adjacent to seagrass beds. Therefore it has the highest incidence on impingement and entrainment, and thus the greatest negative impact to aquatic life in the area. See attachment "A" Aerial map showing diversion locations included in permit application. Under the Texas Water Quality Standards, the source waters have been characterized as used for exceptional aquatic life uses. Issuance of the draft permit fails to protect the ecology and productivity for the impacted bay and estuary system, and fails to maintain existing uses of the impacted source water. The impingement and entrainment impacts of the intake endanger the ecology and productivity of the source waters, and would prevent maintenance of existing uses of the source waters. The water will be withdrawn at a rate of 100,000 gallons per minute. If Enbridge installed a 48" diameter intake pipe (which is a VERY large pipe) to withdraw the water, the velocity of the water would still be 17.73 feet per second. This is more than 35 times the EPA recommended intake velocity of .5 fps in a littoral zone. Under applicable statute and rules, Enbridge is required to demonstrate that the facility will employ reasonable measures to minimize impingement and entrainment. NO such measure have been described or undertaken as part of this permitting process. Enbridge does not specify the size of pipe so that the intake velocity can be determined, but at the rate of 100,000 gpm, it is most definitely going to be well above the recommended velocity to be protective of aquatic life. Enbridge did not provide adequate information regarding presence or the configuration of the screens that will be used to protect aquatic life. The permit must stipulate the velocity of the intake flow in a littoral zone to be protective of aquatic life. The location of the proposed withdrawal within an estuary triggers the consideration of specific additional criteria under the TCEQ rules. Pursuant to 30 TAC § 297.55(b), the Commission is to consider the ecology and productivity of the affected bay and estuary system in determining whether to issue a water right. The permit is not appropriately limiting the use of the water by the applicant. The proposed use is not being limited to testing and emergency operation of fire suppression systems. The applicant may therefore at any time in the future use the water for other uses as it deems appropriate, such as for cooling water. The permit allows the applicant to sell the diverted water to another entity that could use the water for irrigation or cooling water purposes. In so much as the intake of cooling water is not prohibited, the intake of this water is thus subject to the requirements of federal regulations implementing CWA 316 (b). Accordingly to those regulations, impingement and entrainment must be minimized when an intake structure is proposed to be located when there are sport or commercial species of impingement and entrainment concern within the area of the proposed intake. Enbridge has not provided the information necessary to evaluate the impact that the impingement and entrainment resulting from the diversion of 500 acre feet. This portion of Corpus Christi Bay has contact recreation, boating and fishing as well as primary recreation in the manner of swimming and beach going. The conservation plan does not describe best available technology in leak detection. Visual inspection is rudimentary and does not meet conservation goal requirements #4 regarding leak detection and repair, and water-loss accounting measures to be use.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, May 5, 2023 9:39 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

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**From:** wadhamc@netscape.net <wadhamc@netscape.net>  
**Sent:** Thursday, May 4, 2023 4:27 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Thomas Craig Wadham

**EMAIL:** [wadhamc@netscape.net](mailto:wadhamc@netscape.net)

**COMPANY:**

**ADDRESS:** 701 N SANDPIPER  
INGLESIDE TX 78362-4725

**PHONE:** 9362322889

**FAX:**

**COMMENTS:** The City of Ingleside is currently providing fire water to Enbridge. This permit does not meet the proof that the requested amount of firewater is necessary and only to be used for fire water purposes by Enbridge. Especially not at the permitted rates requested in this permit. Preventing the potential damage to the bay water's marine life is not



called out in this permit request. This is extremely important to the residents who live and enjoy our fishing and swimming in the area surrounding the permitted property.

## Ellie Guerra

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, May 19, 2023 7:58 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** bess\_t@hotmail.com <bess\_t@hotmail.com>  
**Sent:** Thursday, May 18, 2023 5:26 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**NAME:** Mary Bess Willis

**EMAIL:** [bess\\_t@hotmail.com](mailto:bess_t@hotmail.com)

**COMPANY:**

**ADDRESS:** 316 INGLEWOOD  
INGLESIDE TX 78362-4843

**PHONE:** 3615223593

**FAX:**

**COMMENTS:** I oppose the request of the 500 acres of water requested from the Corpus Christi Bay. It is an excessive amount of water requested. The environmental impact needs to be evaluated, they have already covered and killed acres of sea grass. Please do not allow this permit. I request a public hearing on this matter. Thank you

## Interested Person Detail

IP No. 226877

Name WALTON, SHEILA

Organization

Title

IP Detail Address Electronic Communications **Items & Actions** Additional IDs Counties Zip Codes Customers & Regulated Entities

### Items

Show more columns

| Number                 | Program   | ID Type    | Additional ID | Principal              | CN          | Status | Active | Comments           | Delete            |
|------------------------|-----------|------------|---------------|------------------------|-------------|--------|--------|--------------------|-------------------|
| <a href="#">131975</a> | AIRNSR    | EPA PERMIT | 139479 - 2    | CORPUS CHRISTI LIQU... | CN604136374 | ACTIVE | YES    | <a href="#">NO</a> | <a href="#">x</a> |
| <a href="#">130479</a> | AIROP     | PERMIT     | 3454          | FLINT HILLS RESOURC... | CN605721935 | CLOSED | YES    | <a href="#">NO</a> | <a href="#">x</a> |
| <a href="#">126778</a> | WWPERMIT  | PERMIT     | WQ0005019000  | CORPUS CHRISTI POLY... | CN605616226 | ACTIVE | YES    | <a href="#">NO</a> | <a href="#">x</a> |
| <a href="#">126282</a> | AIRNSR    | PERMIT     | 3454 - 3      | FLINT HILLS RESOURC... | CN605721935 | ACTIVE | YES    | <a href="#">NO</a> | <a href="#">x</a> |
| <a href="#">124669</a> | WATERIGHT | PERMIT     | WRPERM 13775  | ENBRIDGE INGLESIDE ... | CN605636521 | ACTIVE | YES    | <a href="#">NO</a> | <a href="#">x</a> |

Associate...

### Actions

| Date/Time                           | Type                    | Delivery | Acknowledgement | Comments | Documents | Delete            |
|-------------------------------------|-------------------------|----------|-----------------|----------|-----------|-------------------|
| <a href="#">03/24/2023 02:14 PM</a> | HEARING REQUEST ENGLISH | ECOMMENT | -               | YES      | NO        | <a href="#">x</a> |

Add...

## Edit Item Action

\* Delivery Method

\* Type

\* Date/Time

Acknowledgement Date

☒ [Protestant Comments](#)

Save

Reset

Cancel

## Edit Protestant Comments

### Comments

I request a public hearing. Such salinity changes are also capable of affecting the diversity and metabolic capacity of coastal microorganisms and impairing the photosynthetic capacity of (coastal and open ocean) phytoplankton, macroalgae, and seagrass. Water salinity can significantly affect plant growth, i.e. sea grass, by disturbing their water balance, causing ionic imbalances, and inducing toxicity.

Due to the high probability of bay water, marine plant and animal danger, a proposed desal plant by the Port of Corpus Christi Authority, was moved from the same area to another area where the discharge will be in the Gulf of America and not into the bay.

Modeling does not show the realistic outcome; it's just a guess at best. The numbers can be manipulated to express whatever outcome is needed.

### Documents

+ Choose File

Drag & Drop files to the box above to upload, or select Choose File

Ok

Reset

Cancel

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 18, 2023 10:32 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

PM  
H

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**From:** slwilder@yahoo.com <slwilder@yahoo.com>  
**Sent:** Monday, April 17, 2023 2:54 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Steve L Wilder

**EMAIL:** [slwilder@yahoo.com](mailto:slwilder@yahoo.com)

**COMPANY:**

**ADDRESS:** 1215 BAYSHORE DR  
INGLESIDE TX 78362-4701

**PHONE:** 3616333566

**FAX:**

**COMMENTS:** My name is Steve Wilder, I live 1/2 mile west of this Facility. I am requesting a public meeting and a contested case hearing on the Enbridge water rights. We bought our home 7 years ago because of the location on Corpus Christi Bay to spend time with our family and friends fishing and crabbing from our pier. We have spent years



fishing from our pier and countless evenings cooking this bounty to share with our family and friends. Our crab boils and fish fries are regular occurrences under our palapa and are being threatened by Enbridge's huge saltwater grab without proper screens and velocity controls. Enbridge has not provided adequate usage information regarding the need for this amount of water. A description of their fire system and the amount of water required should be provided. Enbridge currently receives Firewater from the City of Ingleside and should be encouraged water in a drought stricken area instead of threatening the marine resources that our family and community rely on. Testing the fire lines can use recycled water and is not a valid use of water filled with sea life.

# TCEQ Registration Form

February 29, 2024

## Enbridge Ingleside Oil Terminal, LLC Proposed Water Use Permit Application No. 13775

PLEASE PRINT

Name:

<sup>#1</sup>  
Suzi & Steve Wilder

Mailing Address:

1215 Bayshore Dr.

Physical Address (if different):

City/State:

Ingleside on the Bay

Zip:

78362

*\*\*This information is subject to public disclosure under the Texas Public Information Act\*\**

Email:

wildersuzi@gmail.com

Phone Number:

(361) 537-3418

- Are you here today representing a municipality, legislator, agency, or group?

☐ Yes

☒ No

If yes, which one? \_\_\_\_\_

☐ Please add me to the mailing list.

☒ I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

☐ I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

**Ellie Guerra**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:13 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** Kenwillbtoo@yahoo.com <Kenwillbtoo@yahoo.com>  
**Sent:** Saturday, March 25, 2023 9:33 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Ken Willis

**EMAIL:** [Kenwillbtoo@yahoo.com](mailto:Kenwillbtoo@yahoo.com)

**COMPANY:**

**ADDRESS:** 316 INGLEWOOD  
INGLESIDE TX 78362-4843

**PHONE:** 3615483308

**FAX:**

**COMMENTS:** I highly disagree with the amount of saltwater requested! I would like a public hearing on this matter. This amount only leads me to believe it is intended for other purposes in the future. The environmental impact needs to be evaluated. They have already covered and killed acres of sea grasses in the loading area. Please do not allow this permit. The per/day quantity they are requesting is enough to more than cover an entire football field 1 foot deep. Thank you.

## Ellie Guerra

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 27, 2023 1:13 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** bess\_t@hotmail.com <bess\_t@hotmail.com>  
**Sent:** Saturday, March 25, 2023 9:43 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Mary Bess Willis

**EMAIL:** [bess\\_t@hotmail.com](mailto:bess_t@hotmail.com)

**COMPANY:**

**ADDRESS:** 316 INGLEWOOD  
INGLESIDE TX 78362-4843

**PHONE:** 3615223593

**FAX:**

**COMMENTS:** I oppose the request of the 500 acres of water requested from the Corpus Christi Bay. It is an excessive amount of water requested. The environmental impact needs to be evaluated, they have already covered and killed acres of sea grass. Please do not allow this permit. I request a public hearing on this matter. Thank you

## Christina Bourque

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:38 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

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**From:** Michaelwood1950@yahoo.com <Michaelwood1950@yahoo.com>  
**Sent:** Wednesday, April 5, 2023 6:31 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Michael Wood

**EMAIL:** Michaelwood1950@yahoo.com

**COMPANY:**

**ADDRESS:** 603 TANGLEWOOD LN  
INGLESIDE TX 78362-4846

**PHONE:** 2817967338

**FAX:**

**COMMENTS:** Don't understand the reasoning for the water grab. Respectfully request a public hearing on this subject.  
Thank you Mike Wood



## Christina Bourque

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:38 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** Michaelwood1950@yahoo.com <Michaelwood1950@yahoo.com>  
**Sent:** Wednesday, April 5, 2023 6:31 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Michael Wood

**EMAIL:** [Michaelwood1950@yahoo.com](mailto:Michaelwood1950@yahoo.com)

**COMPANY:**

**ADDRESS:** 603 TANGLEWOOD LN  
INGLESIDE TX 78362-4846

**PHONE:** 2817967338

**FAX:**

**COMMENTS:** Don't understand the reasoning for the water grab. Respectfully request a public hearing on this subject.  
Thank you Mike Wood

## Christina Bourque

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:34 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** michaeldwood1950@protonmail.com <michaeldwood1950@protonmail.com>  
**Sent:** Wednesday, April 5, 2023 1:56 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Christa Gayle Wood

**EMAIL:** [michaeldwood1950@protonmail.com](mailto:michaeldwood1950@protonmail.com)

**COMPANY:**

**ADDRESS:** 603 TANGLEWOOD LN  
INGLESIDE TX 78362-4846

**PHONE:** 2814676904

**FAX:**

**COMMENTS:** I am concerned and firmly against the referenced application number by Enbridge to build an ammonia plant literally across the street from me. And it is a narrow city street. I also oppose the ridiculous amount of water they want to pump out of our bay. That number is ridiculously high and I'm sure you see that. These 2 things would be so

close to our city that the property would become wasteland. EPA will certainly see this as well. I request a hearing as Enbridge is doing things now they are not permitted to do. Please check this out and see for yourself.

## Christina Bourque

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:33 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** Michaelwood1950@yahoo.com <Michaelwood1950@yahoo.com>  
**Sent:** Wednesday, April 5, 2023 10:51 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Michael Wood

**EMAIL:** [Michaelwood1950@yahoo.com](mailto:Michaelwood1950@yahoo.com)

**COMPANY:**

**ADDRESS:** 603 TANGLEWOOD LN  
INGLESIDE TX 78362-4846

**PHONE:** 2817967338

**FAX:**

**COMMENTS:** Don't understand the reasoning for the water grab. Respectfully request a public hearing on this subject.  
Thank you Mike Wood

## Christina Bourque

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 10, 2023 10:33 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS  
**Subject:** FW: Public comment on Permit Number WRPERM 13775

H

---

**From:** Michaelwood1950@yahoo.com <Michaelwood1950@yahoo.com>  
**Sent:** Wednesday, April 5, 2023 11:18 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WRPERM 13775

**REGULATED ENTY NAME** WRPERM 13775

**RN NUMBER:** RN111303897

**PERMIT NUMBER:** WRPERM 13775

**DOCKET NUMBER:**

**COUNTY:** SAN PATRICIO

**PRINCIPAL NAME:** ENBRIDGE INGLESIDE OIL TERMINAL LLC

**CN NUMBER:** CN605636521

**FROM**

**NAME:** Michael Wood

**EMAIL:** [Michaelwood1950@yahoo.com](mailto:Michaelwood1950@yahoo.com)

**COMPANY:**

**ADDRESS:** 603 TANGLEWOOD LN  
INGLESIDE TX 78362-4846

**PHONE:** 2817967338

**FAX:**

**COMMENTS:** Don't understand the reasoning for the water grab. Respectfully request a public hearing on this subject.  
Thank you Mike Wood