

Chief Clerk's Office, MC 105  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

September 5, 2025

Attn: Kelly Keel, Executive Director  
Phillip Ledbetter, Director Office of Legal Services  
Charmaine Backens, Deputy Director Environmental Law Division  
Harrison Malley, Staff Attorney Environmental Law Division

Reviewed By JS  
SEP 16 2025 RFR

2025 SEP 15 AM 9:47

Herbert and Sherry Brown  
6945 CR 392, Stephenville, Texas 76401  
Day time phone: 254-434-3454  
Pulido Calf Ranch, LLC Permit No. WQ0004208000

We are requesting that the decision of the Executive Director of the Texas Commission of Environmental Quality (TECQ) be rescinded and reconsidered based on the following facts:

Beginning on page 2 of your decision you state that the draft permit if issued "meets all statutory and regulatory requirements and is protective of the environment, water quality, and human health". This statement is not true and does not reflect the conditions that the contiguous landowners must live under because you state all is well. You further state that "the facility may be subject to enforcement actions". There were no enforcement actions of any nature, when we went to the office in Stephenville to discuss our complaints regarding the Pulido Calf Ranch, LLC the person who was not assigned to inspect the said property could not even identify or show us where the calf hutches were located on the site plan she had. She also admitted no one visited the site for more than a year.

Page 5, Comment 3, addresses our complaint about the negative impact of this operation on air quality and fly population generated by the number of calves located on the permitted land.

Fact: the air quality and fly population have a constant impact on the adjacent landowners. The owners of Pulido Calf Ranch, LLC in fact, do not live anywhere close to this operation. Therefore not ever being affected by the stench of poor air quality and the fly population, while enjoying the comfort of their home. We on the other hand do not have the same privilege to enjoy our homes or outdoor activities because of the poor air quality and fly population.

Your response to Comment 3, States.” A number of requirements in 30 TAC Chapter 321, Subchapter B, the draft permit are designed to address the potential For nuisance orders or air pollution conditions” The potential problems do in fact exist and you state: 30 TAC 321.43(i)(1)(A) requires that CAFO facilities be operated in such a manner to prevent the creation of a nuisance or air pollution condition as defined by 30 TAC 321.32 (36) and Texas Health and Safety Code (THSC) 341.011 and as prohibited by 30 TAC 101.4 (relating to nuisance).All the sections you address in the Safety Code are useless when conditions exist that are harmful to the adjacent landowners.

You address what a nuisance is, and these conditions do in fact exist today and every day because of this facility. You then address “best management practices” (BMPs) and state: “if properly implemented, should reduce the potential for insect and fly breeding” there are no BMPs implemented by this facility or enforced by TECQ that address the nuisance. You state the facility is required to operate according to the requirements in 30 TAC 321.43. If in fact a plan was submitted it has never been implemented or followed.

You address the number of animals on this facility as 5000 head maximum “dairy calves”, however this facility houses calves other than “dairy calves”. Since there is no inspection of this facility there will not be enforcement of the “dairy calves” which you address in the third paragraph on page6. Their paperwork states they house dairy heifers”. If you drive by the calf ranch you will see very few dairy calves, most are stocker calves. You can go by at any time and there will be calves out of hutches and pens running around the property.

Fact: When Americalf operated this facility, they observed firsthand the problems associated with air, water and fly nuisances because they lived on the property. Because of their firsthand knowledge of the problems associated with the large

number of calves the owners of Americalf agreed to never house more than 2500 head of animals and thereby filing a Deed Restriction on the facilities property to state that a 2500 head maximum of calves.

Page 6 Comment 4, your response once again addresses provisions in TECQ rules and compliances with provisions of the permit. We have addressed our concerns with the TECQ in Stephenville Special Project Office. Nothing ever gets addressed let alone taken care of concerning the nuisance of poor air quality or fly pollution problems. You further state if the Regional Office finds that If the facility is not in compliance, the facility “may be subject o enforcement actions”.

Fact: there are no enforcement actions concerning this facility.

Page 7 Comment 5, neighbor’s in fact fought the previous owners to the facility that resulted in rulings by the Supreme Court of Texas that ruled this facility is unsustainable to house 5000 head of animals.

The design and construction requirements of the RCSs do nothing to ensure the safety of every landowner that is contiguous to this facility.

Lastly you state “No changes to the draft permit have been in response to the public comment”.

My final response to your findings:

You, the Executive Director and all employees that fall under your umbrella along with the owners of Pulido Calf Ranch, LLC have not any idea of the very real problem that exist because your careless recommendations as to how Pulido Calf Ranch, LLC operates. As contiguous landowners all we have is the assurance that this facility complies with all the State Laws and Statues regarding their permit, however this is not the case. The state does not regulate or enforce the Laws that protect contiguous landowners.

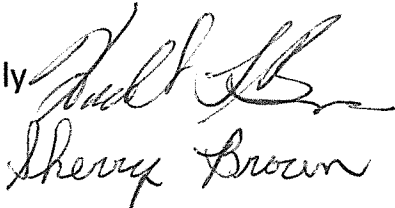
In a perfect setting where a facility such as Pulido Calf Ranch, LLC were located on acreage where they do not have multiple neighbors within few hundred feet of

their facility, the above referenced requirements, safety codes, rules, laws set forth by the State of Texas may possibly be attained. The fact that Pulido Calf Ranch, LLC is located next to multiple neighbors proves it is impossible to attain such requirements set out by the State of Texas.

Most families in Texas can entertain their families in an outdoor setting for cookouts and family time, however, the contiguous families to Pulido Calf Ranch, LLC cannot begin to enjoy their property because the lack of enforcement of BMPs set out by the State of Texas fail to give us protection against the nuisance of rancid smell and flies. Most mornings when you step outside you will find your automobile covered in flies, and nothing we can do about it. Some days the automobile looks black so many flies.

It is our hope and prayer that you please reconsider your decision.

Sincerely

Handwritten signatures of Herbert Brown and Sherry Brown. The signature for Herbert Brown is written in a cursive style, and the signature for Sherry Brown is also in cursive.

Herbert Brown and Sherry Brown



Mr. & Mrs. Herbert L. Brown  
2629 County Road 365  
Dublin, TX 76446

2025 SEP 15 AM 9:47

SEP 15 2025  
MAIL SERVICE  
AI

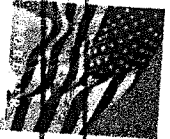
PO Box 13087

Texas Commission on Environmental Quality  
Austin, Texas 78711-3087

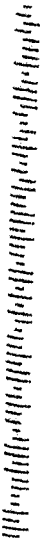
NORTH TEXAS TX P&DC  
DALLAS TX 75212  
12 SEP 2025 PM 9 L



1773\*



78711-308787



Request a Contested Case Hearing Permit # WQ0004208000

Name: Herbert and Sherry Brown  
6945 CR 392  
Stephenville, Texas 76401  
254-434-3454

Applicant's Name: Pulido Calf Ranch, LLC  
16468 FM 219  
Dublin, Texas 76446

Reviewed By GAW

MAY 12 2025 H

CHIEF CLERKS OFFICE

2025 MAY 12 AM 10:46

ON ENVIRONMENTAL  
QUALITY

Re: Permit number: WQ0004208000

Location: East side of FM 219 approximately 2.5 miles south of Lingleville,  
Texas in Erath County

Pulido Calf Ranch LLC on property located on FM 219. The property was originally a part of the property I presently own at 6945 CR 392, it was sold off several years ago before our ownership. Leaving our acreage in the middle of the property. The water does not run on our land but it does on our neighbors. Adding an increased elevated fly population and deteriorating air quality, a condition we are already beginning to experience firsthand.

When we purchased the property there was an odor we thought to be from a dog staying in the house. We cleaned, scrubbed, bleached the floors, odor still there, we discovered the odor was coming from the calf ranch.


The owner and operator of this facility lives in another county, not being affected by the stench, fly problems or poor air quality once again putting the burden on the neighboring landowners.

This does not affect myself, the property is rented out to Monica Fenn, who has been covered up with the stench, fly problems and poor air quality.

It is our hope that the major Amendment for application Permit #WQ0004208000 to add pens and calf hutch area and reconfigure the damage of the retention control structures "NOT be granted."

We are asking that the health, environment and property rights of neighboring landowners be considered. We respectfully request that the permitting authority grant our request for a contest hearing, schedule and hearing at the earliest possible date.

Respectfully,



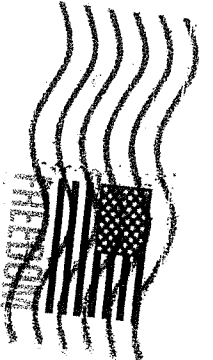
Herbert L. Brown



Sherry Brown

2629 County Road 365  
Dublin, TX 76446

NORTH TEXAS TX P&DC  
DALLAS TX 750  
7 MAY 2025 PM 5 L

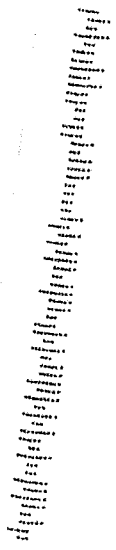


TCEQ  
Chief Clerk MC105  
P.O. Box 13087  
Austin, Texas 78711-3087

RECEIVED  
CHIEF CLERKS OFFICE  
MAY 17 2025  
TCEQ MAIL CENTER  
CL

ON QUALITY  
COMMUNICATIONS  
2025 MAY 12 AM 10:46

78711-308787



Chief Clerk's Office, MC 105  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087  
Attn: Kelly Keel, Executive Director  
Phillip Ledbetter, Director Office of Legal Services  
Charmaine Backens, Deputy Director Environmental Law Division  
Harrison Malley, Staff Attorney Environmental Law Division

September 11, 2025

Reviewed By DS

SEP 23 2025 RFR

COMMUNICATIONS OFFICE

2025 SEP 22 AM 10 28

Monica Fenn  
6945 CR 392, Stephenville, Texas 76401  
Day time phone: 254-485-2961  
Pulido Calf Ranch, LLC Permit No. WQ0004208000

We are requesting that the decision of the Executive Director of the Texas Commission of Environmental Quality (TECQ) be rescinded and reconsidered based on the following facts:

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Page 5, Comment 3, addresses our complaint about the negative impact of this operation on air quality and fly population generated by the number of calves located on the permitted land.

Fact: the air quality and fly population have a constant impact on the adjacent landowners. The owners of Pulido Calf Ranch, LLC in fact, do not live anywhere close to this operation. Therefore not ever being affected by the stench of poor air quality and the fly population, while enjoying the comfort of their home. We on the other hand do not have the same privilege to enjoy our homes or outdoor activities because of the poor air quality and fly population.

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Fact: When Americalf operated this facility, they observed firsthand the problems associated with air, water and fly nuisances because they lived on the property. Because of their firsthand knowledge of the problems associated with the large

number of calves the owners of Americalf agreed to never house more than 2500 head of animals and thereby filing a Deed Restriction on the facilities property to state that a 2500 head maximum of calves, NO MORE.

Page 6 Comment 4, your response once again addresses provisions in TECQ rules and compliances with provisions of the permit. We have addressed our concerns with the TECQ in Stephenville Special Project Office. Nothing ever gets addressed let alone taken care of concerning the nuisance of poor air quality or fly pollution problems. You further state if the Regional Office finds that the facility is not in compliance, the facility "may be subject to enforcement actions".

Fact: there are no enforcement actions concerning this facility.

Page 7 Comment 5, neighbor's in fact fought the previous owners to the facility that resulted in rulings by the Supreme Court of Texas that ruled this facility is unsustainable to house 5000 head of animals.

The design and construction requirements of the RCSs do nothing to ensure the safety of every landowner that is contiguous to this facility.

Lastly you state "No changes to the draft permit have been in response to the public comment".

My final response to your findings:

You, the Executive Director and all employees that fall under your umbrella along with the owners of Pulido Calf Ranch, LLC have not any idea of the very real problem that exist because your careless recommendations as to how Pulido Calf Ranch, LLC operates. As contiguous landowners and tenants all we have is the assurance that this facility complies with all the State Laws and Statues regarding their permit, however this is not the case. The state does not regulate or enforce the Laws that protect contiguous landowners.

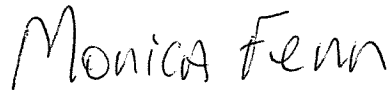
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their facility, the above referenced requirements, safety codes, rules, laws set forth by the State of Texas may possibly be attained. The fact that Pulido Calf Ranch, LLC is located next to multiple neighbors proves it is impossible to attain such requirements set out by the State of Texas.

Most families in Texas can entertain their families in an outdoor setting for cookouts and family time, however, the contiguous families to Pulido Calf Ranch, LLC cannot begin to enjoy their property because the lack of enforcement of BMPs set out by the State of Texas fail to give us protection against the nuisance of rancid smell and flies. Most mornings when you step outside you will find your automobile covered in flies, and nothing we can do about it. Some days the automobile looks black so many flies. We have pictures addressing the concerns of the flies. The stench of the calves is so bad at times it makes its way into the interior of your home. I have used bleach and other items to mop the floors and clean with, when I finish the stench is still there and you discover it is coming from the calf ranch.

It is our hope and prayer that you please reconsider your decision.

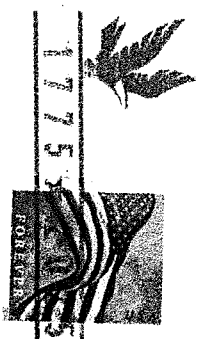
Sincerely

A handwritten signature in cursive script that reads "Monica Fenn".

Monica Fenn

Monica Fenn  
6945 28392  
Stephenville, TX 76401

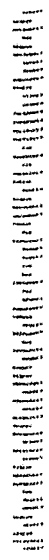
NORTH TEXAS TX P&DC  
DALLAS TX 750  
18 SEP 2025 PM 6 L



Chief Clerk's Office, MC 105  
Texas Commission on Environmental Quality  
P O Box 13087  
Austin, TX 78711-3087

RECEIVED  
SEP 22 2025  
MAIL CENTER  
AT

78711-308787



Request a Contested Case Hearing Permit # WQ0004208000

Name: Monica Fenn  
6945 CR 392  
Stephenville, Texas 76401  
254-485-2961

Applicant's Name: Pulido Calf Ranch, LLC  
16468 FM 219  
Dublin, Texas 76446

Reviewed By GCW

MAY 12 2025 H

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2025 MAY 12 AM 10:47  
CHIEF CLERKS OFFICE

Re: Permit number: WQ0004208000

Location: East side of FM 219 approximately 2.5 miles south of Lingleville,  
Texas in Erath County

Pulido Calf Ranch LLC on property located on FM 219. The property was originally a part of the property I presently rent at 6945 CR 392. The water does not run on the land that I rent but it does on my neighbors. Adding an increased elevated fly population and deteriorating air quality, a condition I are already beginning to experience firsthand.

When I rented the property there was an odor in the house they thought to be from a dog staying in the house. The Brown's cleaned, scrubbed, bleached the floors the odor was still there, they finally found out it was the odors from the calf farm.


The owner and operator of this facility lives in another county, not being affected by the stench, fly problems or poor air quality once again putting the burden on the neighboring landowners.

I rent the property and have been covered up with the stench, fly problems and poor air quality from the calf ranch.

It is my hope that the major Amendment for application Permit #WQ0004208000 to add pens and calf hutch area and reconfigure the damage of the retention control structures "NOT be granted."

I are asking that the health, environment and property rights of renters be considered. I respectfully request that the permitting authority grant my request for a contest hearing a schedule and hearing at the earliest possible date.

Respectfully,

A handwritten signature in cursive script that reads "Monica Fenn". The signature is written in black ink and is positioned above a horizontal line.

Monica Fenn

**Marielle Bascon**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 22, 2025 3:47 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004208000

H

**From:** rppatwilson@yahoo.com  
**Sent:** Tuesday, April 22, 2025 12:42 PM  
**To:** PUBCOMMENT-OCC  
**Subject:** Public comment on Permit Number WQ0004208000

**REGULATED ENTY NAME** AMERICALF

**RN NUMBER:** RN101519395

**PERMIT NUMBER:** WQ0004208000

**DOCKET NUMBER:**

**COUNTY:** ERATH

**PRINCIPAL NAME:** PULIDO CALF RANCH LLC

**CN NUMBER:** CN605907914

**NAME:** Ronald Patrick Wilson

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

**COMPANY:**

**ADDRESS:** 560 County Road 383  
Stephenville, TX 76401

**PHONE:** 2544852701

**FAX:**

**COMMENTS:** REQUEST A CONTESTED CASE HEARING Name: R. P. & Tracey Wilson 560 CR 383 Stephenville, Texas 76401 254-485-2701 Applicant's Name: Pulido Calf Ranch, LLC Permit Number: WQ0004208000 Location: East side of FM 219 approximately 2.5 miles south of the community of Lingleville, Texas in Erath County, Texas Adversely Affected by the Facility: Our property is contiguous to the above-mentioned facility. The runoff from this facility would flow through my property causing many

adverse effects to the ground water and surface water flowing through my land. This was determined by the Texas Supreme Court. The air quality across my property would be greatly affected along with the fly population generated by the number of calves located on said permitted land. This facility is requesting a larger number of calves than was originally permitted under this facility's location. They have also lowered the number of acres to dispose of their waste generated by this facility which would also cause an adverse impact to my property and air quality. We have lived on our property for over 45 years and had the pleasure/displeasure of dealing with other Calf Ranch owners from the above-mentioned property. One of our major concerns and problems is that once a permit is granted the enforcement process is almost nonexistent causing an undo burden on the neighboring landowners. When this facility was owned by F & R Cattle it was determined by the Supreme Court that this property was not suitable for the number of calves requested in this permit. The owner and operator of this facility lives in another county, therefore, not being affected by the stench, fly problems or poor air quality once again putting the burden on the neighboring landowners. This does not only affect me and my family, but twelve (12) other families living on my property. I own and operate a small mobile home park along with two duplexes and the stench, fly problem and poor air quality would adversely affect these families and their children. It is our hope and prayer that the Major Amendment for Application Permit Number WQ0004208000 "to add pens and calf hutch area and reconfigure the drainage of the retention control structures" NOT be granted. It was also mentioned in the Supreme Court hearing that the Paluxy Aquifer outcrops in the middle of their lagoon (retention control structure), which would adversely affect the many people within the community of Lingleville, Texas. Respectfully submitted R. P. Wilson and Tracey Wilson

**Tammy Johnson**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 22, 2025 3:47 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004208000

H

**From:** rppatwilson@yahoo.com <rppatwilson@yahoo.com>  
**Sent:** Tuesday, April 22, 2025 12:42 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0004208000

**REGULATED ENTY NAME** AMERICALF

**RN NUMBER:** RN101519395

**PERMIT NUMBER:** WQ0004208000

**DOCKET NUMBER:**

**COUNTY:** ERATH

**PRINCIPAL NAME:** PULIDO CALF RANCH LLC

**CN NUMBER:** CN605907914

**NAME:** Ronald Patrick Wilson

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

**COMPANY:**

**ADDRESS:** 560 County Road 383  
Stephenville, TX 76401

**PHONE:** 2544852701

**FAX:**

**COMMENTS:** REQUEST A CONTESTED CASE HEARING Name: R. P. & Tracey Wilson 560 CR 383 Stephenville, Texas 76401 254-485-2701 Applicant's Name: Pulido Calf Ranch, LLC Permit Number: WQ0004208000 Location: East side of FM 219 approximately 2.5 miles south of the community of Lingleville, Texas in Erath County, Texas Adversely Affected by the Facility: Our property is contiguous to the above-mentioned facility. The runoff from this facility would flow through my property causing many

adverse effects to the ground water and surface water flowing through my land. This was determined by the Texas Supreme Court. The air quality across my property would be greatly affected along with the fly population generated by the number of calves located on said permitted land. This facility is requesting a larger number of calves than was originally permitted under this facility's location. They have also lowered the number of acres to dispose of their waste generated by this facility which would also cause an adverse impact to my property and air quality. We have lived on our property for over 45 years and had the pleasure/displeasure of dealing with other Calf Ranch owners from the above-mentioned property. One of our major concerns and problems is that once a permit is granted the enforcement process is almost nonexistent causing an undo burden on the neighboring landowners. When this facility was owned by F & R Cattle it was determined by the Supreme Court that this property was not suitable for the number of calves requested in this permit. The owner and operator of this facility lives in another county, therefore, not being affected by the stench, fly problems or poor air quality once again putting the burden on the neighboring landowners. This does not only affect me and my family, but twelve (12) other families living on my property. I own and operate a small mobile home park along with two duplexes and the stench, fly problem and poor air quality would adversely affect these families and their children. It is our hope and prayer that the Major Amendment for Application Permit Number WQ0004208000 "to add pens and calf hutch area and reconfigure the drainage of the retention control structures" NOT be granted. It was also mentioned in the Supreme Court hearing that the Paluxy Aquifer outcrops in the middle of their lagoon (retention control structure), which would adversely affect the many people within the community of Lingleville, Texas. Respectfully submitted R. P. Wilson and Tracey Wilson

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Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087  
Attn: Kelley Keel, Executive Director  
Phillip Ledbetter, Director Office of Legal Services  
Charmaine Backens, Deputy Director Environmental Law Division  
Harrison Malley, Staff Attorney Environmental Law Division

September 1, 2025

R.P. and Tracey Wilson  
560 CR 383 Stephenville, Texas 76401  
Day time phone: 254-485-2701  
Pulido Calf Ranch, LLC Permit No. WQ0004208000

Reviewed By DS  
SEP 16 2025 RPR

2025 SEP 12 AM 10:37

We are requesting that the decision of the Executive Director of the Texas Commission of Environmental Quality (TCEQ) be rescinded and reconsidered based on the following facts:

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On page 3-4 and 5, your response to comment 2 which addresses the adverse effects of runoff that transverses our property and the adverse effect of surface water that flows through our property. You state the TCEQ enforces standards to protect Human Health and Safety of the environment. Again, the applicant is required to operate the facility to the Texas Water Code, TCEQ rules, however, no one enforces anything that is found out of compliance with State Rules.

Page 5, Comment 3, addresses our complaint about the negative impact of this operation on air quality and fly population generated by the number of calves located on the permitted land.

Fact: the air quality and fly population have a constant impact on the adjacent landowners. The owners of Pulido Calf Ranch, LLC in fact, do not live anywhere close to this operation. Thereby not ever being affected by the stench of poor air quality and the fly population, while enjoying the comfort of their home. We on the other hand do not have the same privilege to enjoy our homes or outdoor activities because of the poor air quality and fly population.

Your response to Comment 3, States:" A number of requirements in 30 TAC Chapter 321, Subchapter B, the draft permit are designed to address the potential for nuisance orders or air pollution conditions" The potential problems do in fact exist and you state: 30 TAC 321.43(j)(1)(A) requires that CAFO facilities be operated in such a manner to prevent the creation of a nuisance or air pollution condition as defined by 30 TAC 321.32(36) and Texas Health and

Safety Code (THSC) 341.011 and as prohibited by 30 TAC 101.4 (relating to nuisance). All the sections you address in the Safety Code are useless when conditions exist that are harmful to the adjacent landowners.

You address what a nuisance is, and these conditions do in fact exist today and every day because of this facility. You then address “best management practices” (BMPs) and state: “if properly implemented, should reduce the potential for insect and fly breeding” there are no BMPs implemented by this facility or enforced by TECQ that address the nuisance. You state the facility is required to operate according to the requirement of the Air Standard Permit by meeting the requirements in 30 TAC 321.43. If in fact a plan was submitted it has never been implemented or followed.

You address the number of animals on this facility as 5000 head maximum “dairy calves”, however, this facility houses calves other than “dairy calves”. Since there is no inspection of this facility there will not be enforcement of the “dairy calves” which you address in the third paragraph on page 6. Their paperwork says they house “dairy heifers”. We presently have 3 of their calves on our property and 2 of them are not heifers and none of them are “dairy calves” they are stocker calves. These calves wandered on to our property because they did not contain them in pens.

Fact: When Americalf operated this facility, they observed firsthand the problems associated with air, water and fly nuisances because they lived on the property. Because of their firsthand knowledge of the problems associated with the large number of calves the owners of Americalf agreed to never house more than 2500 head of animals and thereby filing a Deed Restriction on the facilities property to state that a 2500 head maximum of calves.

Page 6 Comment 4, your response once again addresses provisions in TCEQ rules and compliances with provisions of the permit. We have addressed our concerns with the TCEQ in Stephenville Special Project Office. Nothing ever gets addressed let alone taken care of concerning the nuisance of poor air quality or fly pollution problems. You further state if the Regional Office finds that **if** the facility is not in compliance, the facility “may be subject to enforcement actions”

Fact: there are no enforcement actions concerning this facility.

Page 7 Comment 5, We did in fact fight the previous owners of the facility that resulted in rulings by the Supreme Court of Texas that ruled this facility is unsustainable to house 5000 head of animals.

The design and construction requirements of the RCSs do nothing to ensure the safety of every landowner that is contiguous to this facility.

Lastly you state “No changes to the draft permit have been made in response to the public comment”.

My final response to your findings:

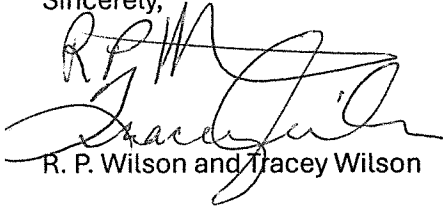
You, the Executive Director and all employees that fall under your umbrella along with the owners of Pulido Calf Ranch, LLC have not any idea of the very real problems that exist because your carless recommendations as to how Pulido Calf Ranch, LLC operates. As contiguous landowners all we have is the assurance that this facility complies with all the State Laws and Statues regarding their permit, however, this is not the case. The State does not regulate or enforce the Laws that protect contiguous landowners.

In a perfect setting where a facility such as Pulido Calf Ranch, LLC were located on acreage where they do not have multiple neighbors within a few hundred feet of their facility, the above referenced requirements, safety codes, rules, laws set forth by the State of Texas may possibly be attained. The fact that Pulido Calf Ranch, LLC is located next to multiple neighbors proves it is impossible to attain such requirements set out by the State of Texas.

Most families in Texas can entertain their families in an outdoor setting for cookouts and family time, however, the contiguous families to Pulido Calf Ranch, LLC cannot begin to enjoy their property because the lack of enforcement of BMPs set out by the State of Texas fail to give us protection against the nuisance of rancid smell and flies.

It is our hope and prayer that you please reconsider your decision.

Sincerely,



R. P. Wilson and Tracey Wilson



Mr. R. P. Wilson  
560 County Road 383  
Stephenville, TX 76401

2025 SEP 12 AM 10:37

NORTH TEXAS TX P&DC  
DALLAS TX 750  
9 SEP 2025 AM 6 L



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Chief Clerk's Office, MC 105  
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TCEQ

SEP 12 2025

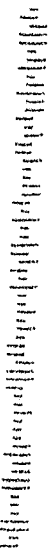
P.O. Box 13087

TCEQ MAIL CENTER  
WT

Austin, Texas 78711-3087

Athn Kelley Keel, ED

78711-308767



Chief Clerk's Office, MC 105  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087  
Attn: Kelley Keel, Executive Director  
Phillip Ledbetter, Director Office of Legal Services  
Charmaine Backens, Deputy Director Environmental Law Division  
Harrison Malley, Staff Attorney Environmental Law Division

September 1, 2025

R.P. and Tracey Wilson  
560 CR 383 Stephenville, Texas 76401  
Day time phone: 254-485-2701  
Pulido Calf Ranch, LLC Permit No. WQ0004208000

Reviewed By DS  
SEP 16 2025 KPR

2025 SEP 12 AM 10:3

We are requesting that the decision of the Executive Director of the Texas Commission of Environmental Quality (TCEQ) be rescinded and reconsidered based on the following facts:

Beginning on page 2 of your decision you state that the draft permit if issued "meets all statutory and regulatory requirements and is protective of the environment, water quality, and human health". This statement is not true and does not reflect the conditions that the contiguous landowners must live under because you state all is well. You further state that "the facility may be subject to enforcement actions". There were no enforcement actions of any nature, when we went to the office in Stephenville to discuss our complaints regarding the Pulido Calf Ranch, LLC the person who was assigned to inspect the said property could not even identify or show us where the calf hutches were located on the site plan she had. She also admitted no one had visited the site for more than a year.

On page 3-4 and 5, your response to comment 2 which addresses the adverse effects of runoff that transverses our property and the adverse effect of surface water that flows through our property. You state the TCEQ enforces standards to protect Human Health and Safety of the environment. Again, the applicant is required to operate the facility to the Texas Water Code, TCEQ rules, however, no one enforces anything that is found out of compliance with State Rules.

Page 5, Comment 3, addresses our complaint about the negative impact of this operation on air quality and fly population generated by the number of calves located on the permitted land.  
Fact: the air quality and fly population have a constant impact on the adjacent landowners. The owners of Pulido Calf Ranch, LLC in fact, do not live anywhere close to this operation. Thereby not ever being affected by the stench of poor air quality and the fly population, while enjoying the comfort of their home. We on the other hand do not have the same privilege to enjoy our homes or outdoor activities because of the poor air quality and fly population.

Your response to Comment 3, States:" A number of requirements in 30 TAC Chapter 321, Subchapter B, the draft permit are designed to address the potential for nuisance orders or air pollution conditions" The potential problems do in fact exist and you state: 30 TAC 321.43(j)(1)(A) requires that CAFO facilities be operated in such a manner to prevent the creation of a nuisance or air pollution condition as defined by 30 TAC 321.32(36) and Texas Health and

Safety Code (THSC) 341.011 and as prohibited by 30 TAC 101.4 (relating to nuisance). All the sections you address in the Safety Code are useless when conditions exist that are harmful to the adjacent landowners.

You address what a nuisance is, and these conditions do in fact exist today and every day because of this facility. You then address "best management practices" (BMPs) and state: "if properly implemented, should reduce the potential for insect and fly breeding" there are no BMPs implemented by this facility or enforced by TECQ that address the nuisance. You state the facility is required to operate according to the requirement of the Air Standard Permit by meeting the requirements in 30 TAC 321.43. If in fact a plan was submitted it has never been implemented or followed.

You address the number of animals on this facility as 5000 head maximum "dairy calves", however, this facility houses calves other than "dairy calves". Since there is no inspection of this facility there will not be enforcement of the "dairy calves" which you address in the third paragraph on page 6. Their paperwork says they house "dairy heifers". We presently have 3 of their calves on our property and 2 of them are not heifers and none of them are "dairy calves" they are stocker calves. These calves wandered on to our property because they did not contain them in pens.

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Lastly you state "No changes to the draft permit have been made in response to the public comment".

My final response to your findings:

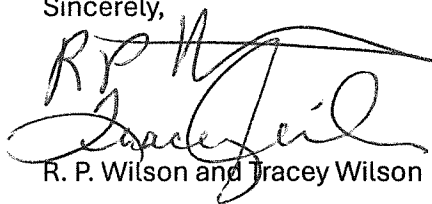
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In a perfect setting where a facility such as Pulido Calf Ranch, LLC were located on acreage where they do not have multiple neighbors within a few hundred feet of their facility, the above referenced requirements, safety codes, rules, laws set forth by the State of Texas may possibly be attained. The fact that Pulido Calf Ranch, LLC is located next to multiple neighbors proves it is impossible to attain such requirements set out by the State of Texas.

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It is our hope and prayer that you please reconsider your decision.

Sincerely,

Handwritten signatures of R. P. Wilson and Tracey Wilson. The signature of R. P. Wilson is written in a cursive style with a large 'R' and 'W'. The signature of Tracey Wilson is also in cursive, with a large 'T' and 'W'.

R. P. Wilson and Tracey Wilson

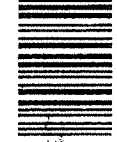
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DUBLIN, TX 78446  
SEP 08, 2025

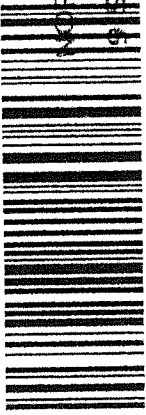
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78711



NORTH  
SEP 2

7020 3160 0001 9288 8078

RDC 99

Mr. R. P. Wilson  
560 County Road 383  
Stephenville, TX 76401



Chief Clerk's Office, MC 105

Po Box 13087

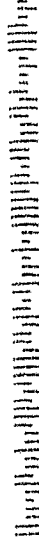
Austin, Texas, 78711

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SEP 12 2025

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2025 SEP 12 AM 10:39



78711-306787

Reviewed By GCW

APR 25 2025 H

## REQUEST A CONTESTED CASE HEARING

Name: R. P. & Tracey Wilson

560 CR 383 Stephenville, Texas 76401

254-485-2701

Applicant's Name: Pulido Calf Ranch, LLC

Permit Number: WQ0004208000

Location: East side of FM 219 approximately 2.5 miles south of the community of Lingleville, Texas in Erath County, Texas

CHIEF CLERK'S OFFICE

2025 APR 25 AM 9:48

ON EXISTING PERMIT  
ON EXISTING PERMIT  
ON EXISTING PERMIT

### Adversely Affected by the Facility:

Our property is contiguous to the above-mentioned facility. The runoff from this facility would flow through my property causing many adverse effects to the ground water and surface water flowing through my land. This was determined by the Texas Supreme Court. The air quality across my property would be greatly affected along with the fly population generated by the number of calves located on said permitted land. This facility is requesting a larger number of calves than was originally permitted under this facility's location. They have also lowered the number of acres to dispose of their waste generated by this facility which would also cause an adverse impact to my property and air quality.

We have lived on our property for over 45 years and had the pleasure/displeasure of dealing with other Calf Ranch owners from the above-mentioned property. One of our major concerns and problems is that once a permit is granted the enforcement process is almost nonexistent causing an undo burden on the neighboring landowners.

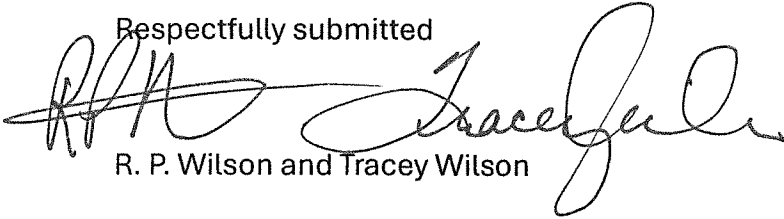
When this facility was owned by F & R Cattle it was determined by the Supreme Court that this property was not suitable for the number of calves requested in this permit. The owner and operator of this facility lives in another county, therefore, not being affected by the stench, fly problems or poor air quality once again putting the burden on the neighboring landowners.

This does not only affect me and my family, but twelve (12) other families living on my property. I own and operate a small mobile home park along with two duplexes and the stench, fly problem and poor air quality would adversely affect these families and their children.

It is our hope and prayer that the Major Amendment for Application Permit Number WQ0004208000 "to add pens and calf hutch area and reconfigure the drainage of the retention control structures" NOT be granted. It was also mentioned in the Supreme Court

hearing that the Paluxy Aquifer outcrops in the middle of their lagoon (retention control structure), which would adversely affect the many people within the community of Lingleville, Texas.

Respectfully submitted

Handwritten signatures of R. P. Wilson and Tracey Wilson. The signature for R. P. Wilson is on the left, and the signature for Tracey Wilson is on the right, written in a cursive style.

R. P. Wilson and Tracey Wilson

Submitted electronically April 22, 2025

Mailed copy of letter to: P.O. Box 13087 Austin, Texas 78711-3087

Hand Delivered to Stephenville office April 22, 2025



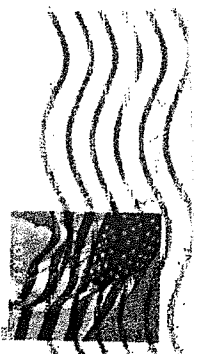
TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2025 APR 25 AM 9: 45

CHIEF CLERKS OFFICE

Mr. R. P. Wilson  
560 County Road 383  
Stephenville TX 76661

POSTNET TEXAS TX 75000  
DALLAS TX 750  
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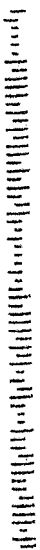
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DA

TCEQ  
Chief Clerk's Office, MC 105  
P.O. Box 13087  
Austin TX 78711-3087

78711-308787



## Tammy Johnson

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 28, 2025 2:56 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0004208000  
**Attachments:** Request For Contested Case Hearing Permit No. WQ0004208000.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)

**From:** paula.wood@live.com <paula.wood@live.com>  
**Sent:** Monday, April 28, 2025 8:13 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0004208000

**REGULATED ENTY NAME** AMERICALF

**RN NUMBER:** RN101519395

**PERMIT NUMBER:** WQ0004208000

**DOCKET NUMBER:** 2025-0656-AGR-E

**COUNTY:** ERATH

**PRINCIPAL NAME:** PULIDO CALF RANCH LLC

**CN NUMBER:** CN605907914

**NAME:** Paula Wood

**EMAIL:** [paula.wood@live.com](mailto:paula.wood@live.com)

**COMPANY:**

**ADDRESS:** 575 Private Road 1009  
Dublin, TX 76446

**PHONE:** 2545928130

**FAX:**

**COMMENTS:** Request for contested case hearing.

Request For Contested Case Hearing Permit No. WQ0004208000

Contesters: Kobie & Paula Wood  
575 Private Road 1009 (Off FM 219)  
Dublin, Texas 76446  
(254)592-2016

Contested Permit Applicant: Pulido Calf Ranch, LLC  
16468 FM 219  
Dublin, TX 76446

Re: Permit Number: WQ0004208000

April 24<sup>th</sup>, 2025

As landowners of property directly adjacent to the above-referenced calf feedlot facility, we hereby request a contested case hearing to dispute the proposed Major Amendment to Permit No. WQ0004208000 by Pulido Calf Ranch, LLC. The amendment would authorize an increase in the facility's livestock capacity, despite a concurrent reduction in available acreage for waste disposal, which we strongly urge not to be approved.

We believe a contested case hearing is warranted, as approval of the referenced permit amendment would result in significant adverse impacts to our property. The proposed changes present an increased risk of environmental degradation, including greater waste runoff, elevated fly populations, and deteriorating air quality—conditions we are already beginning to experience firsthand.

Furthermore, the facility's management has previously admitted to exceeding the permitted number of calves, reporting up to 5,000 head in recent months, well above their permitted capacity. Despite acknowledging this violation and claiming it was temporary, they have taken no corrective action, demonstrating ongoing noncompliance and disregard for regulatory limits.

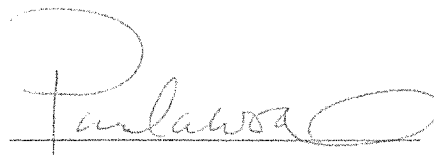
We are particularly concerned that, if this amendment is approved, enforcement will remain virtually nonexistent, placing an undue burden on neighboring landowners like us to monitor and report violations. We are already bearing the consequences of lax oversight, as they are already operating well above their permitted capacity.

It is our hope that the permitting authority will deny this permit amendment to protect the health, environment, and property rights of neighboring landowners. We respectfully request that the permitting authority grant our request for a contest hearing a schedule a hearing at the earliest possible date.

Respectfully,



Kobie Wood



Paula Wood

## Tammy Johnson

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, April 25, 2025 2:22 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004208000

H

**From:** Paula.wood@live.com <Paula.wood@live.com>  
**Sent:** Friday, April 25, 2025 8:45 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0004208000

**REGULATED ENTY NAME** AMERICALF

**RN NUMBER:** RN101519395

**PERMIT NUMBER:** WQ0004208000

**DOCKET NUMBER:**

**COUNTY:** ERATH

**PRINCIPAL NAME:** PULIDO CALF RANCH LLC

**CN NUMBER:** CN605907914

**NAME:** Kobie Wood

**EMAIL:** [Paula.wood@live.com](mailto:Paula.wood@live.com)

**COMPANY:**

**ADDRESS:** 575 Private Road 1009  
Dublin, TX 76446

**PHONE:** 2545922016

**FAX:**

**COMMENTS:** Please see attached letter requesting a hearing to contest a case.