

TCEQ DOCKET NO. 2026-0413-AIR

APPLICATION BY CITGO REFINING AND CHEMICALS COMPANY L.P., FOR AMENDMENT OF AIR QUALITY PERMIT NUMBER 9604A	§ § § §	BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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APPLICANT’S RESPONSE TO CONTESTED CASE HEARING REQUESTS

TO THE HONORABLE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY:

Citgo Refining and Chemicals Company LP (“CITGO”) respectfully submits this response to the contested case hearing requests filed on behalf of Citizen’s Alliance for Fairness and Progress in Corpus Christi (the “Alliance”) and Hillcrest Residents Association (“HRA”) in the above-captioned matter.¹ CITGO has applied to amend Air Quality Permit Number 9604A to establish hydrogen cyanide (“HCN”) and ammonia (“NH₃”) emission limits for the fluid catalytic cracking unit (“FCCU”) at its Corpus Christi Refinery East Plant (the “2023 Application”). The 2023 Application does not seek to authorize any physical or operational changes to the FCCU, only to establish emission limits and associated monitoring and recordkeeping requirements.

Neither hearing request satisfies the relevant standards for the Commission to grant a contested case hearing. As detailed below, the Alliance filed its request in connection with a separate air permit application *years before* CITGO filed the 2023 Application. The Alliance’s request was, therefore, not only untimely for this matter but also fails to raise any issue relevant to the 2023 Application. Moreover, given the ten years that have elapsed since the Alliance filed its request, it no longer satisfies the requirements for associational standing. HRA’s request fares no

¹ As explained in Section III.A, the Alliance’s request was not actually filed in this matter. Rather, the Alliance filed its 2015 hearing request in response to a separate, prior application that was later withdrawn.

better—it raises only generalized concerns unsupported by any evidence that would call into question the Executive Director’s determinations that the permit amendment complies with applicable law and is protective of public health and the environment. Accordingly, CITGO respectfully requests that the Commission deny both hearing requests.

I. BACKGROUND AND PROCEDURAL HISTORY

CITGO owns and operates the Corpus Christi Refinery East Plant located at 1801 Nueces Boulevard, Corpus Christi, Texas 78407. A central component of the refinery is the FCCU, which transforms gas oil into lighter components that are ultimately blended into valuable fuels such as gasoline and diesel.

The existing FCCU is authorized by Air Quality Permit Number 9604A. In June 2023, after emissions stack testing confirmed the presence of HCN and NH₃ in the FCCU exhaust, CITGO applied to amend Air Quality Permit Number 9604A to establish HCN and NH₃ emission limits for the FCCU. The 2023 Application includes both an emissions control technology analysis demonstrating that HCN and NH₃ emissions from the FCCU will be controlled by the best available control technology (“BACT”) and air dispersion modeling demonstrating that those emissions will be protective of human health and the environment.

The Texas Commission on Environmental Quality (“TCEQ” or “Commission”) received the 2023 Application on June 18, 2023, and declared it administratively complete on June 21, 2023. The Notice of Receipt and Intent to Obtain an Air Quality Permit (“NORI”) was published in English in the *Corpus Christi Caller-Times* on July 13, 2023, and in Spanish in the *Tejano y Gruperio News* on July 15, 2023. After completing its technical review, determining that the 2023 Application meets all statutory and regulatory requirements, and preparing a draft permit containing HCN and NH₃ emissions limits along with associated monitoring, recordkeeping, and

stack-testing requirements, TCEQ made the preliminary decision to issue the permit. The Notice of Application and Preliminary Decision for an Air Quality Permit (“NAPD”) was published in English in the *Corpus Christi Caller-Times* on June 25, 2025, and in Spanish in *Tejano y Grupero News* on July 1, 2025.² The public comment period ended on July 31, 2025. Following the close of the public comment period, TCEQ issued a Response to Public Comments (“RTC”) on February 18, 2026, reconfirming that the 2023 Application meets all requirements of applicable law.

II. APPLICABLE LAW

Section 5.556 of the Texas Water Code and Chapter 55, Subchapter F of TCEQ’s rules provide the procedures and criteria for considering requests for a contested case hearing on an air permit. Where a permit application filed before September 1, 2015, is withdrawn by the applicant after the Chief Clerk mails the NAPD, and a “substantially similar” application is later refiled, the refiled application is governed by TCEQ rules as they existed before September 1, 2015, when the requirements of Senate Bill 709, 84th Legislature, 2015, were promulgated. *See* 30 Tex. Admin. Code § 80.25(f). For air permit applications, TCEQ considers the name of the applicant, the location of activity to be authorized, and the air contaminants to be emitted when determining whether the withdrawn and refiled applications are “substantially similar.” *Id.*

CITGO first applied to amend Air Quality Permit Number 9604A to establish HCN and NH₃ emissions limits for the FCCU in June 2015 (the “2015 Application”). CITGO withdrew the 2015 Application effective May 14, 2021, after the NAPD had been mailed and published. Although the 2015 Application and the 2023 Application differ in many key respects, the applicant (CITGO), activity location (FCCU), and air contaminants (HCN and NH₃) are the

² TCEQ’s Response to Public Comments incorrectly indicates that the Spanish-language NAPD was published in *Tejano y Grupero News* on July 2, 2025. As shown in attached publisher’s affidavit included as Exhibit A, the Spanish-language NAPD was published in *Tejano y Grupero News* on July 1, 2025. The public comment period therefore ended July 31, 2025, not August 1, 2025, as indicated in TCEQ’s Response to Public Comments.

same. Accordingly, for purposes of 30 Texas Admin. Code § 80.25(f), the applications are substantially similar, and the 2023 Application is therefore subject to TCEQ rules as they existed before September 1, 2015.

III. ANALYSIS

The Alliance's contested case hearing request should be denied because it was filed in response to a separate, now-withdrawn application that has no bearing on the 2023 Application. Nevertheless, because the RTC asserts otherwise, it is addressed below alongside HRA's. Even assuming the Alliance's hearing request were somehow applicable to the 2023 Application, it is deficient under applicable TCEQ requirements. Moreover, neither the Alliance nor HRA qualifies as an affected person.

A. The Alliance's 2015 Hearing Request

Inapplicable and Untimely

The Alliance's hearing request was filed on August 28, 2015, several years before CITGO filed the 2023 Application. Nevertheless, in the RTC, the Executive Director states that "the original hearing request from the 2015 amendment application applies to this revised application." RTC at 2. This unsupported statement is incorrect for multiple reasons.

First, CITGO did not file a revised application in 2023. Rather, it filed a new, standalone, application. CITGO paid a separate application fee, and the 2023 Application was assigned a distinct TCEQ project number and was subject to independent administrative completeness and technical reviews. The 2023 Application also went through the full public notice process.

Second, while the 2023 Application is substantially similar to the previously withdrawn 2015 Application for purposes of Section 80.25(f), the consequences of that determination are clear and limited: the refiled application is governed by TCEQ rules as they existed before September

1, 2015. Nothing more, nothing less. Neither the pre- nor post-September 1, 2015, version of TCEQ's rules provides that a hearing request filed on a withdrawn application carries over to a separate application filed many years later, even if the two applications are substantially similar under Section 80.25(f). Accordingly, there is no regulatory basis for the Executive Director's assertion that the Alliance's hearing request on the 2015 Application "applies to" the 2023 Application.

Third, the Alliance's request was filed several years before CITGO filed the 2023 Application. Accordingly, even if the Alliance's hearing request were somehow deemed to "apply to" the 2023 Application, it was not timely filed, a prerequisite to being granted. *See* 30 Tex. Admin. Code § 55.211(c)(2)(B). The Alliance had every opportunity to submit a timely hearing request on the 2023 Application. It did not.

The Alliance Does Not Raise Disputed Issues of Fact Relevant and Material to the Commission's Decision

Even if the Alliance's request was deemed applicable and timely, it is fatally deficient for other reasons. To be granted, a request for contested case hearing must raise disputed issues of fact that are relevant and material to the Commission's decision on the application. *See* 30 Tex. Admin. Code § 55.211(c)(2)(A)(i)(III). Because the Alliance's hearing request predates the 2023 Application, the issues it raises are directed at a different application and are not relevant to the Commission's decision here.

For example, the Alliance's request claims the 2015 Application was inadequate because it underestimated emissions. As explained in TCEQ's RTC, the 2023 Application includes updated and increased emissions estimates. *See* RTC at 2 (The 2023 Application "proposes higher HCN and NH₃ emissions rates for [the] FCCU than the original 2015 amendment project."). The request also alleges the 2015 Application was deficient because it did not include air dispersion modeling.

Again, as the RTC confirms, the 2023 Application includes air dispersion modeling. *See* RTC at 3 (“The applicant conducted site-wide air dispersion modeling using AERMOD software (Version 22112) for hydrogen cyanide (HCN) and ammonia (NH₃) emitted by the [FCCU].”). The request further alleges that the draft permit was not made available for comment, a claim that has no basis in fact as applied to the 2023 Application, which, as discussed in Section I, underwent the full notice and comment process. The Alliance, of course, could not have been aware of these facts when it filed its hearing request years before the 2023 Application existed. Because the Alliance’s request raises only outdated, irrelevant, and immaterial concerns about a now-superseded application, the Commission should deny the request.

The Alliance Does Not Meet Requirements for Associational Standing

Even if it were not procedurally flawed, the Alliance’s hearing request cannot satisfy TCEQ’s requirements for groups or associations because, in the ten years that have elapsed since the request was filed, two of the Alliance’s identified members have moved away, and the remaining two have transferred their associational interests to HRA. The Alliance therefore cannot demonstrate that (1) one or more of its members have standing to request a hearing in their own right; (2) the interests the Alliance seeks to protect are germane to its purpose; and (3) neither the claim asserted nor the relief requested requires the participation of the individual members in the case. *See* 30 Tex. Admin. Code § 55.205(a).

The Alliance’s 2015 request identifies four members: Rose Cornelius Crawford (1400 Peabody), Janie Mumphord (2011 Palm), Lamont Taylor (1701 Stillman), and Daniel Pena (2813 Hulbirt). Two members—Rose Crawford and Janie Mumphord—have moved away as of 2021 and 2017, respectively, and no longer have standing to request a hearing in their own right. *See* Exhibit B (Nueces County property records).

The remaining two members—Daniel Pena and Lamont Taylor—appear to continue to live in the neighborhood but have shifted their respective interests to support HRA’s 2025 hearing request. TCEQ’s rules and common-law restrictions on associational standing do not permit two separate organizations to rely on the interests of the same members in a single proceeding. TCEQ Rule 55.205 codifies the common-law principles of associational standing, which provide a limited exception to the “general prohibition on a litigant’s raising another person’s legal rights.” *United Food & Commercial Workers Union Local 751 v. Brown Group, Inc.*, 517 U.S. 544, 557 (1996); *Sierra Club & Pub. Citizen v. Tex. Comm’n on Env’tl. Quality*, No. 03-14-00130-CV, 2016 WL 1304928, at *1 (Tex. App.—Austin Mar. 31, 2016, no pet.) (Section 55.205(a) incorporates principles of associational standing). One requirement in Texas’s doctrine of associational standing is that “neither the claim asserted nor the relief requested requires the participation of the individual members in the case.” See 30 Tex. Admin. Code § 55.205(a)(3); *Tex. Ass’n of Bus. v. Tex. Air Control Bd.*, 852 S.W.2d 440, 447 (Tex. 1993) (adopting three-prong test for associational standing). This third prong is rooted in “concerns of judicial economy”—essentially, if a member must participate individually in a proceeding, the organization’s participation becomes duplicative and undermines the very administrative conveniences that justified creating associational standing in the first instance. *Big Rock Inv’rs Ass’n v. Big Rock Petroleum, Inc.*, 409 S.W.3d 845, 849 (Tex. App.—Fort Worth 2013, pet. denied) (“The third prong of the associational standing test is not constitutional but is prudential and is based on concerns of judicial economy.”); *City of Arlington v. Tex. Oil & Gas Ass’n*, No. 02-13-00138-CV, 2014 WL 4639912, at *3 (Tex. App.—Fort Worth Sept. 18, 2014, no pet.) (participation of an individual member in addition to organization would “thwart[] the administrative convenience, efficiency, and judicial economy served by the doctrine of associational standing.”).

These principles bar Mr. Pena and Mr. Taylor from serving as represented members for both the Alliance and HRA. If both organizations rely on the same underlying interests, the proceeding becomes duplicative, inefficient, and contrary to all standards of judicial economy. Accordingly, because the Alliance cannot rely on the duplicative interests of Mr. Pena and Mr. Taylor, and the remaining identified members have moved away, the Alliance has not demonstrated associational standing under TCEQ Rule 55.205, and the Commission should deny the request.

B. HRA’s Hearing Request

HRA is Not an Affected Person

“The commission may not grant a request for a contested case hearing unless the commission determines that the request was filed by an affected person” Tex. Water Code § 5.556(c). Accordingly, TCEQ rules provide that “affected persons, when authorized by law” may request a contested case hearing. 30 Tex. Admin. Code § 55.201(b)(4). An “affected person” is defined as follows:

A person who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest.

30 Tex. Admin. Code § 55.203(a) (adopting the definition at Tex. Water Code § 5.115(a)).

A requestor has the burden of making a minimal jurisdictional showing of a justiciable interest to establish its status as an “affected person.” *TCEQ v. City of Aledo*, No. 03-13-00113-CV, 2015 WL 4196408, at *4 (Tex. App.—Austin July 8, 2015, no pet.). Section 55.203(e) of TCEQ’s rules provides that when determining whether a person has met this burden and thus is an affected person for purposes of granting a hearing request for an application filed before September 1, 2015, the Commission may consider the following factors in Section 55.203(d) to the extent consistent with case law:

- (1) the merits of the underlying application and supporting documentation in the Commission's administrative record, including whether the application meets the requirements for permit issuance;
- (2) the analysis and opinions of the Executive Director; and
- (3) any other expert reports, affidavits, opinions, or data submitted by the executive director, the applicant, or hearing requestor.

30 Tex. Admin. Code § 55.203(d)–(e).

Even prior to September 1, 2015, Texas courts confirmed that TCEQ, in evaluating affected-person status, “enjoys the discretion to weigh and resolve matters that may go to the merits of the underlying application, including the likely impact the regulated activity . . . will have on the health, safety, and use of property by the hearing requestor and on the use of natural resources.” *See, e.g., Sierra Club v. Tex. Comm’n on Env’tl. Quality*, 455 S.W.3d 214, 224 (Tex. App.—Austin 2014, pet. denied). Pre-September 1, 2015, affected-person determinations could consider “the permit application, attached expert reports, the analysis and opinions of professionals on its staff, and any reports, opinions, and data it has before it.” *Id.* at 223. This case law supports TCEQ’s ability to consider the factors in Section 55.203(d) when evaluating contested case hearing requests on the 2023 Application.

The Commission has ample evidence before it that the proposed permit amendment is compliant with applicable law and protective of public health and the environment, as evidenced in the 2023 Permit Application, the draft permit, the Permit Amendment Source Analysis & Technical Review, and the RTC. HRA’s hearing request offers no contrary evidence and, therefore, must be denied.

Without any supporting evidence, HRA generically alleges that (1) no analysis has been provided which demonstrates that emissions will be protective of public health and property, (2) TCEQ has not incorporated adequate technological controls, (3) the monitoring, recordkeeping,

and reporting requirements in the amended permit are not adequate to ensure compliance, (4) no adequate analysis of cumulative emissions impacts has been performed , and (5) TCEQ has not appropriately considered disproportionate impacts on the Hillcrest neighborhood.

Notably, HRA submitted its hearing request during the public comment period, before the RTC was issued, and has not reasserted its claims since. The RTC thoroughly responds to each of HRA's broad-brush comments, referencing specific evidence included in the 2023 Application, TCEQ's review of that application, and public databases showing available control technologies. In response to HRA's first issue, the RTC explains how modeling conducted with the 2023 Application, as well as analyses conducted by both Applicant and the TCEQ Toxicology Division, demonstrate that the emissions authorized by the draft permit are protective of human health and welfare and the environment. RTC at 3–5. To address HRA's second issue, the RTC notes that there are currently no known add-on control technologies specifically designed to reduce HCN or NH₃ emissions from FCCUs, and the draft permit's imposition of a carbon monoxide limit of 500 ppmv (as an indicator of effective combustion) thereby constitutes BACT for the FCCU. *Id.* at 6–7. On HRA's third issue, the RTC affirms that Special Conditions 10, 17, and 13.E of the draft permit impose continuous monitoring, periodic stack testing, and recordkeeping requirements that will demonstrate compliance with the permit's emission limitations. *Id.* at 8–9. Finally, for issues four and five, the RTC confirms that TCEQ's analysis specifically considered potential cumulative impacts in determining that the permit is protective of human health and the environment, regardless of location. *Id.* at 4, 10.

Ultimately, the person seeking to be admitted as a party “has the burden of making a minimum jurisdictional showing of a justiciable interest.” *TCEQ v. San Antonio Bay Estuarine Waterkeeper*, 714 S.W.3d 270, 284 (Tex. App. [15th Dist.] 2025). In alleging generic concerns

with no supporting evidence, HRA has failed to meet this burden. The Commission should deny the request.

IV. RELIEF REQUESTED

For the reasons stated above, CITGO requests that the Commission deny the requests for contested case hearing, approve the 2023 Application, and issue the draft permit. Alternatively, CITGO requests referral to TCEQ's Alternative Dispute Resolution program prior to any referral to the State Office of Administrative Hearings.

Dated: April 20, 2026

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Christopher C. Thiele

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***Counsel for Citgo Refining and Chemicals
Company LP***

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Applicant’s Response to Contested Case Hearing Requests has been served on the following counsel/persons by U.S. Mail, electronic mail, or electronically filed with the Chief Clerk, on this 20th day of April, 2026.

FOR THE EXECUTIVE DIRECTOR

via U.S. mail:

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Ivan Naranjo, Staff Attorney
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FOR THE PUBLIC INTEREST COUNSEL

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FOR THE OFFICE OF THE CHIEF CLERK:

via eFilings:

Docket Clerk
TCEQ
Office of Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711
<https://www.tceq.texas.gov/goto/efilings>

REQUESTORS:

via U.S. mail:

Hillcrest Residents Association
Eric Allmon
Marisa Perales
Perales, Allmon, & Ice, P.C.
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Citizen’s Alliance for Fairness and Progress
in Corpus Christi
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Austin, Texas 78751

/s/ Christopher C. Thiele

Christopher C. Thiele

TCEQ DOCKET NO. 2026-0413-AIR

APPLICATION BY CITGO REFINING	§	
AND CHEMICALS COMPANY L.P.,	§	BEFORE THE
FOR AMENDMENT OF AIR	§	
QUALITY PERMIT NUMBER 9604A,	§	TEXAS COMMISSION ON
CITGO CORPUS CHRISTI	§	
REFINERY EAST PLANT, CORPUS	§	ENVIRONMENTAL QUALITY
CHRISTI, NUECES COUNTY	§	

Exhibit A

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: CITGO Refining and Chemicals Company, L.P.,
Permit No.: 9604A
Notice of Draft Federal Operating Permit

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §
COUNTY OF Nueces §

Before me, the undersigned authority, on this day personally appeared

Leonardo Quiroz, who being by me duly sworn, deposes and says that (s)he is (Name of Person Representing Newspaper)

the Publisher of the Tejano Y Grupero News
(Title of Person Representing Newspaper) (Name of the Newspaper)

that said newspaper is generally circulated in Nueces, Texas;
(The municipality or county in which the site or proposed site is located)

that the enclosed notice was published in said newspaper on the following date(s):
July 1, 2025

[Signature]
(Newspaper Representative's Signature)

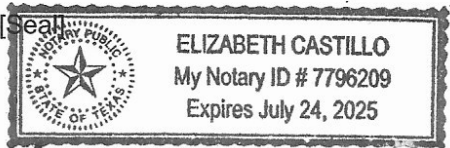
Subscribed and sworn to before me this the 1st day of July, 2025
to certify which witness my hand and seal of office.

[Signature]

Notary Public in and for the State of Texas

Elizabeth Castillo
Print or Type Name of Notary Public

07-24-2025
My Commission Expires



TCEQ DOCKET NO. 2026-0413-AIR

APPLICATION BY CITGO REFINING	§	
AND CHEMICALS COMPANY L.P.,	§	BEFORE THE
FOR AMENDMENT OF AIR	§	
QUALITY PERMIT NUMBER 9604A,	§	TEXAS COMMISSION ON
CITGO CORPUS CHRISTI	§	
REFINERY EAST PLANT, CORPUS	§	ENVIRONMENTAL QUALITY
CHRISTI, NUECES COUNTY	§	

Exhibit B

Nueces CAD Property Search

Appraisal values for the 2026 tax year are still preliminary and subject to change prior to certification.

Property Details

Account		
Property ID:	273260	Geographic ID: 5820-0012-0120
Type:	R	Zoning: RS
Property Use:		
Location		
Situs Address:	2011 PALM DR CORPUS CHRISTI, TX 78407	
Map ID:	U-23	Mapsco:
Legal Description:	NUECES BAY HTS LTS 12 THRU 14 BK 12	
Abstract/Subdivision:	S5820	
Neighborhood:	(E14A) BRKLN W/GRACE HTS/NUECES BY HTS/HGHLND/HTCH JHN G	
Owner		
Owner ID:	490902	
Name:	CITY OF CORPUS CHRISTI	
Agent:		
Mailing Address:	P O BOX 9277 CORPUS CHRISTI, TX 78469-9277	
% Ownership:	100.0%	
Exemptions:	EX-XV - For privacy reasons not all exemptions are shown online.	

Property Values

Improvement Homesite Value:	\$0 (+)
Improvement Non-Homesite Value:	\$0 (+)
Land Homesite Value:	\$0 (+)
Land Non-Homesite Value:	\$33,750 (+)
Agricultural Market Valuation:	\$0 (+)
Value Method:	C
Market Value:	\$33,750 (=)

Exhibit B

Agricultural Value Loss:	\$0 (-)
Appraised Value:	\$33,750 (=)
HS Cap Loss:	\$0 (-)
Circuit Breaker:	\$0 (-)
Assessed Value:	\$33,750
Ag Use Value:	\$0

Appraisal values for the 2026 tax year are still preliminary and subject to change prior to certification. Information provided for research purposes only. Legal descriptions and acreage amounts are for Appraisal District use only and should be verified prior to using for legal purpose and or documents. Please contact the Appraisal District to verify all information for accuracy.

Property Taxing Jurisdiction

Owner: CITY OF CORPUS CHRISTI **%Ownership:** 100.0%

Entity	Description	Tax Rate	Market Value	Taxable Value	Estimated Tax	Freeze Ceiling
CAD	APPRAISAL DISTRICT	0.000000	\$33,750	\$0	\$0.00	
GNU	NUECES COUNTY	0.286449	\$33,750	\$0	\$0.00	
JRC	DEL MAR JR COLLEGE	0.275903	\$33,750	\$0	\$0.00	
RFM	FARM TO MKT ROAD	0.003340	\$33,750	\$0	\$0.00	
SE	CORPUS CHRISTI ISD	0.958300	\$33,750	\$0	\$0.00	
HOSP	HOSPITAL DISTRICT	0.089495	\$33,750	\$0	\$0.00	

Total Tax Rate: 1.613487

Estimated Taxes With Exemptions: \$0.00

Estimated Taxes Without Exemptions: \$544.56

Property Land

Type	Description	Acreage	Sqft	Eff Front	Eff Depth	Market Value	Prod. Value
RL	RESIDENTIAL LAND	0.26	11,250.00	37.50	0.00	\$33,750	\$0

Property Roll Value History

Year	Improvements	Land Market	Ag Valuation	Appraised	HS Cap Loss	Assessed
2026	\$0	\$33,750	\$0	\$33,750	\$0	\$33,750
2025	\$0	\$33,750	\$0	\$33,750	\$0	\$33,750
2024	\$0	\$33,750	\$0	\$33,750	\$0	\$33,750
2023	\$0	\$12,938	\$0	\$12,938	\$0	\$12,938
2022	\$0	\$12,938	\$0	\$12,938	\$0	\$12,938
2021	\$0	\$9,000	\$0	\$9,000	\$0	\$9,000
2020	\$0	\$9,000	\$0	\$9,000	\$0	\$9,000
2019	\$0	\$9,000	\$0	\$9,000	\$0	\$9,000
2018	\$0	\$9,000	\$0	\$9,000	\$0	\$9,000

Property Deed History

Deed Date	Type	Description	Grantor	Grantee	Volume	Page	Number
2/27/2024	SWD	SPCL W/DEED	PORT OF CORPUS CHRISTI AUTHORITY	CITY OF CORPUS CHRISTI			2024006845
6/15/2017	D	DEED	MUMPHORD JANIE MARIE	PORT OF CORPUS CHRISTI AUTHORITY			2017025353
9/25/2008	AFH	AFFT HEIRSHIP	MUMPHORD LESLIE JESSE AND	MUMPHORD JANIE MARIE			2011026896

Notice of Confidentiality Rights: If you are a natural person, you may remove or strike any or all of the following information from this instrument that transfers an interest in real property before it is filed for record in the public records: your Social Security number or your driver's license number.

DEED

STATE OF TEXAS §
 § KNOW ALL PERSONS BY THESE PRESENTS:
COUNTY OF NUECES §

THAT, JANIE MARIE MUMPHORD of Nueces County, Texas ("Grantors," whether one or more), for and in consideration of the sum of TEN AND NO/100 DOLLARS (\$10.00) and for other good and valuable consideration, does/do hereby grant, sell and convey to the **Port of Corpus Christi Authority of Nueces County, Texas, a navigation district and political subdivision of the State of Texas** ("Grantee"), whose mailing address is 222 Power Street, Corpus Christi, Texas 78401, all that certain tract or parcel of land in Nueces County, Texas, more particularly described as follows:

Lot Nos. Twelve (12), Thirteen (13) and Fourteen (14), Block No. Twelve (12), NUECES BAY HEIGHTS, an Addition to the City of Corpus Christi, Nueces County, Texas, as shown by the map or plat thereof recorded in Volume 3, Page(s) 6, Map Records of Nueces County, Texas, to which reference is here made for all pertinent purposes.

together with all of the improvements thereon ("Property") and the benefits, privileges, easements, tenements, hereditaments and appurtenances on the Property or in anywise appertaining thereto, and any and all right, title and interest of Grantors in and to roads and rights-of-way adjacent to the Property.

This conveyance is made by Grantors and accepted by Grantee subject to all valid and subsisting encumbrances, conditions, covenants, restrictions, reservations, exceptions, rights of way and easements appearing of record in the Official Public Records of Nueces County, Texas, but only to the extent the same are applicable to the Property and enforceable against the Grantee.

TO HAVE AND TO HOLD the Property, together with all and singular the rights and appurtenances thereto in any way belonging, unto Grantee and Grantee's successors and assigns forever. Grantors hereby bind Grantors, and Grantors' heirs and successors, to warrant and forever defend all and singular the Property unto Grantee, and Grantee's successors and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof, except as to the reservations from conveyance and the exceptions to conveyance and warranty described above.

When the context requires, singular nouns and pronouns include the plural.

Executed this 15 day of June, 2017.

GRANTORS:

Janie Marie Mumphord

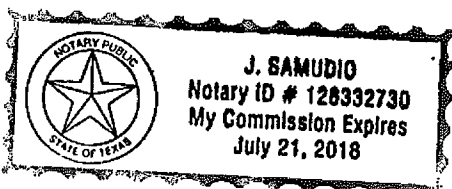
JANIE MARIE MUMPHORD

STATE OF TEXAS §
 §
COUNTY OF Nueces §

This instrument was acknowledged before me on the 15 day of June, 2017, by
JANIE MARIE MUMPHORD

J. Samudio

NOTARY PUBLIC, State of Texas



AFTER RECORDING RETURN TO:
Port of Corpus Christi Authority
Attn: Real Estate Manager
222 Power Street
Corpus Christi, Texas 78401
GF#99161808

Doc# 2017025353
Pages 3
06/16/2017 2:25PM
e-Filed & e-Recorded in the
Official Public Records of
NUECES COUNTY
KARA SANDS
COUNTY CLERK
Fees \$19.00

Any provision herein which restricts the Sale, Rental
or use of the described REAL PROPERTY because of
Race, Color, Religion, Sex, Handicap, Familial Status
or National Origin is invalid and unenforceable
under FEDERAL LAW, 3/12/89

STATE OF TEXAS
COUNTY OF NUECES
I HEREBY CERTIFY THAT THIS INSTRUMENT WAS
FILED IN FILE NUMBER SEQUENCE ON THE DATE AND
AT THE TIME STAMPED HEREON BY ME AND WAS DULY
RECORDED IN THE OFFICIAL PUBLIC
RECORDS OF NUECES COUNTY TEXAS



Kara Sands
COUNTY CLERK
NUECES COUNTY, TEXAS

Nueces CAD Property Search

Appraisal values for the 2026 tax year are still preliminary and subject to change prior to certification.

Property Details

Account		
Property ID:	244496	Geographic ID: 3443-0038-0010
Type:	R	Zoning: RS
Property Use:		
Location		
Situs Address:	1400 PEABODY AVE CORPUS CHRISTI, TX 78407	
Map ID:	U-21	Mapsco:
Legal Description:	HILLCREST LTS 1 & 2 & S/2 OF LT 14 BLK 38	
Abstract/Subdivision:	S3443	
Neighborhood:	(E14A) BRKLN W/GRACE HTS/NUECES BY HTS/HGHLND/HTCH JHN G	
Owner		
Owner ID:	525582	
Name:	PORT OF CORPUS CHRISTI AUTHORITY	
Agent:		
Mailing Address:	c/o CHIEF EXECUTIVE OFFICER 400 HARBOR DR CORPUS CHRISTI, TX 78401-1115	
% Ownership:	100.0%	
Exemptions:	EX-XV - For privacy reasons not all exemptions are shown online.	

Property Values

Improvement Homesite Value:	\$0 (+)
Improvement Non-Homesite Value:	\$0 (+)
Land Homesite Value:	\$0 (+)
Land Non-Homesite Value:	\$26,085 (+)
Agricultural Market Valuation:	\$0 (+)
Value Method:	C
Market Value:	\$26,085 (=)

Exhibit B

Agricultural Value Loss:	\$0 (-)
Appraised Value:	\$26,085 (=)
HS Cap Loss:	\$0 (-)
Circuit Breaker:	\$0 (-)
Assessed Value:	\$26,085
Ag Use Value:	\$0

Appraisal values for the 2026 tax year are still preliminary and subject to change prior to certification. Information provided for research purposes only. Legal descriptions and acreage amounts are for Appraisal District use only and should be verified prior to using for legal purpose and or documents. Please contact the Appraisal District to verify all information for accuracy.

Property Taxing Jurisdiction

Owner: PORT OF CORPUS CHRISTI AUTHORITY %**Ownership:** 100.0%

Entity	Description	Tax Rate	Market Value	Taxable Value	Estimated Tax	Freeze Ceiling
C03	CITY OF CORPUS CHRISTI	0.599774	\$26,085	\$0	\$0.00	
CAD	APPRAISAL DISTRICT	0.000000	\$26,085	\$0	\$0.00	
GNU	NUECES COUNTY	0.286449	\$26,085	\$0	\$0.00	
JRC	DEL MAR JR COLLEGE	0.275903	\$26,085	\$0	\$0.00	
RFM	FARM TO MKT ROAD	0.003340	\$26,085	\$0	\$0.00	
SE	CORPUS CHRISTI ISD	0.958300	\$26,085	\$0	\$0.00	
HOSP	HOSPITAL DISTRICT	0.089495	\$26,085	\$0	\$0.00	

Total Tax Rate: 2.213261

Estimated Taxes With Exemptions: \$0.00

Estimated Taxes Without Exemptions: \$577.32

Property Land

Type	Description	Acreage	Sqft	Eff Front	Eff Depth	Market Value	Prod. Value
RL	RESIDENTIAL LAND	0.20	8,695.00	25.00	0.00	\$26,085	\$0

Property Roll Value History

Year	Improvements	Land Market	Ag Valuation	Appraised	HS Cap Loss	Assessed
2026	\$0	\$26,085	\$0	\$26,085	\$0	\$26,085
2025	\$0	\$26,085	\$0	\$26,085	\$0	\$26,085
2024	\$0	\$26,085	\$0	\$26,085	\$0	\$26,085
2023	\$109,436	\$9,999	\$0	\$119,435	\$0	\$119,435
2022	\$88,276	\$9,999	\$0	\$98,275	\$0	\$98,275
2021	\$76,762	\$6,956	\$0	\$83,718	\$0	\$83,718
2020	\$79,066	\$6,956	\$0	\$86,022	\$0	\$86,022
2019	\$80,430	\$6,956	\$0	\$87,386	\$0	\$87,386
2018	\$83,156	\$6,956	\$0	\$90,112	\$19,841	\$70,271

Property Deed History

Deed Date	Type	Description	Grantor	Grantee	Volume	Page	Number
8/25/2021	D	DEED	CORNELIUS STERLING J	PORT OF CORPUS CHRISTI AUTHORITY			2021044933

Notice of Confidentiality Rights: If you are a natural person, you may remove or strike any or all of the following information from this instrument that transfers an interest in real property before it is filed for record in the public records: your Social Security number or your driver's license number.

DEED

STATE OF TEXAS §
 §
COUNTY OF NUECES §

KNOW ALL PERSONS BY THESE PRESENTS:

THAT, ARLENE ROBINSON CORNELIUS AS DEPENDENT ADMINISTRATOR OF THE ESTATE OF STERLING JAMES CORNELIUS UNDER PROBATE CAUSE NO. 2019-PR-00506-1, IN THE COUNTY COURT AT LAW NO. 1, NUECES COUNTY, TEXAS ("Grantors," whether one or more), for and in consideration of the sum of TEN AND NO/100 DOLLARS (\$10.00) and for other good and valuable consideration, does/do hereby grant, sell and convey to Port of Corpus Christi Authority of Nueces County, Texas, a navigation district and political subdivision of the State of Texas ("Grantee"), whose mailing address is 222 Power Street, Corpus Christi, TX 78401, tracts of land situated in Nueces County, Texas, more particularly described as follows:

LOTS ONE (1) AND TWO (2), AND THE SOUTH FIFTY FEET (S50') OF LOT FOURTEEN (14), BLOCK THIRTY-EIGHT (38), HILLCREST ADDITION, an addition to the City of Corpus Christi, Texas, as shown on the map or plat thereof recorded in Volume 3, Page 30, Map Records of Nueces County, Texas; and sometimes as shown per map or plat thereof recorded in Volume 3, Page 29, Map Records of Nueces County, Texas, to which reference is here made for all pertinent purposes.

together with all of the improvements thereon ("Property") and the benefits, privileges, easements, tenements, hereditaments and appurtenances on the Property or in anywise appertaining thereto, and any and all right, title and interest of Grantors in and to roads and rights-of-way adjacent to the Property. In addition to the Property conveyed herein and as part of the consideration paid for the Property, Grantor hereby assigns, transfers and conveys to Grantee, all of its right, title and interest in and to any claims or causes of action it may have or that could be asserted against third parties arising out of any injury or damage to the Property accruing or occurring prior to the Date of this Deed. This assignment includes and conveys unto Grantee, its successors and assigns, the full right and power to maintain an action against any such third party (but not in the name of Grantor) and to settle, compromise, or reassign any such claim and cause of action, and to give a release in full discharge of liability of the same.

This conveyance is made by Grantors and accepted by Grantee subject to all valid and subsisting encumbrances, conditions, covenants, restrictions, reservations, exceptions, rights of way and easements appearing of record in the Official Public Records of Nueces County, Texas, but only to the extent the same are applicable to the Property and enforceable against the Grantee.

TO HAVE AND TO HOLD the Property, together with all and singular the rights and appurtenances thereto in any way belonging, unto Grantee and Grantee's successors and assigns forever. Grantors hereby bind Grantors, and Grantors' heirs and successors, to warrant and forever defend all and singular the Property unto Grantee, and Grantee's successors and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof, except as to the reservations from conveyance and the exceptions to conveyance and warranty described above.

When the context requires, singular nouns and pronouns include the plural.

Executed this 25 day of August, 2021.

GRANTOR:

THE ESTATE OF STERLING JAMES CORNELIUS
UNDER PROBATE CAUSE NO. 2019-PR-00506-1,
IN THE COUNTY COURT AT LAW NO. 1,
NUECES COUNTY, TEXAS

BY: Arlene Robinson Cornelius
ARLENE ROBINSON CORNELIUS, DEPENDENT
ADMINISTRATOR

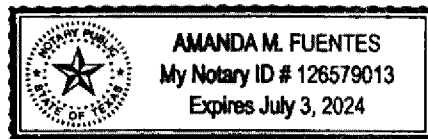
ACKNOWLEDGMENT

STATE OF TEXAS §
 Travis §
COUNTY OF ~~NUECES~~ §

This instrument was acknowledged before me on the 25 day of August, 2021, by
ARLENE ROBINSON CORNELIUS, DEPENDENT ADMINISTRATOR OF THE ESTATE OF STERLING
JAMES CORNELIUS UNDER PROBATE CAUSE NO. 2019-PR-00506-1, IN THE COUNTY COURT AT
LAW NO. 1, NUECES COUNTY, TEXAS.

Amanda M Fuentes
NOTARY PUBLIC, State of Texas

PREPARED BY:
SLUSHER & ASSOCIATES, PLLC
4900 N. 10TH, STE, E-2
McALLEN, TEXAS 78504
GF# 210241541



AFTER RECORDING, RETURN TO:
Port of Corpus Christi Authority of Nueces County
Attn: Real Estate Manager
222 Power Street
Corpus Christi, TX 78401

Nueces County
Kara Sands
Nueces County
Clerk

Instrument Number: 2021044933

eRecording - Real Property

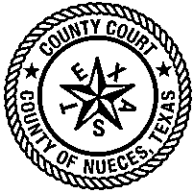
DEED

Recorded On: August 30, 2021 01:02 PM

Number of Pages: 3

" Examined and Charged as Follows: "

Total Recording: \$25.00



STATE OF TEXAS
NUECES COUNTY

I hereby certify that this Instrument was FILED In the File Number sequence on the date/time printed hereon, and was duly RECORDED in the Official Records of Nueces County, Texas.

Kara Sands
Nueces County Clerk
Nueces County, TX

***** THIS PAGE IS PART OF THE INSTRUMENT *****

Any provision herein which restricts the Sale, Rental or use of the described REAL PROPERTY because of color or race is invalid and unenforceable under federal law.

File Information:

Document Number: 2021044933
Receipt Number: 20210830000157
Recorded Date/Time: August 30, 2021 01:02 PM
User: Lisa C
Station: CLERK09

Record and Return To:

Simplifile
484 North 300 West, Suite 202
Provo UT