

From: [Jonathan Walling](#)
To: [Sarah Carlock](#)
Cc: [OCE](#)
Subject: Demi John Place
Date: Friday, September 11, 2020 4:48:16 PM
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon, Ms. Carlock:

The TCEQ has evaluated your enforcement discretion request to extend the deadline to submit well completion data for Undine's Demi John Place Water System located in Freeport (Brazoria County), Texas. Based on a review of our records, it appears that the request for Undine to submit this information is related to an investigation originally conducted in March 2019. There are other alleged violations, in addition to the need for well completion data, for which compliance documentation has not been submitted, in violation of requirements found in 30 Texas Administrative Code Chapter 290.

It appears the original request for compliance documentation, and the associated deadlines, occurred prior to any challenges presented by the COVID-19 pandemic. For this reason, the TCEQ is unable to extend enforcement discretion due to COVID-19.

The TCEQ is committed to working cooperatively and reasonably with the regulated community during the COVID-19 pandemic, as appropriate. The decision to disapprove the current request will not reflect on any future request that Undine may make. Each enforcement discretion request is evaluated based on its own merits.

For additional direction on how to proceed in addressing the alleged violations, please contact Latricia Spikes, Public Water Supply Team Leader, in the TCEQ's Houston Region Office at 713-767-3660 or Latrichia.spikes@tceq.texas.gov.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: Sarah Carlock <[REDACTED]>
Sent: Thursday, September 10, 2020 12:50 PM
To: OCE <OCE@tceq.texas.gov>; Kathleen Campbell <Kathleen.Campbell@tceq.texas.gov>; Latrichia Spikes <Latrichia.Spikes@tceq.texas.gov>; Nichole Batista Nunes <Nichole.Nunes@Tceq.Texas.Gov>
Cc: Andy Thomas <[REDACTED]> Carey Thomas <[REDACTED]> Doug Hearn <[REDACTED]>
Subject: FW: Demi John Place

Good afternoon OCE Team,

Please grant a 30 day extension to submit engineering and exception requests for Well Completion Data at Demi John Place.

We have experienced delays across the board due to Covid-19 pandemic including restrictions or delay of access to previous owner records and TCEQ Central Records.

Thank you,

Sarah Carlock
Manager of Compliance
Mobile: 979-864-5582

From: Kathleen Campbell <Kathleen.Campbell@tceq.texas.gov>
Sent: Wednesday, September 9, 2020 1:47 PM
To: Sarah Carlock <[REDACTED]>
Cc: Andy Thomas <[REDACTED]> Carey Thomas <[REDACTED]>
Latrichia Spikes <Latrichia.Spikes@tceq.texas.gov>; Nichole Batista Nunes <Nichole.Nunes@Tceq.Texas.Gov>
Subject: RE: Demi John Place

Good afternoon,
I just heard back!

During the COVID-19 pandemic, there are alternatives that are acceptable to TCEQ if a Regulated Entity is unable to submit a hard copy and also unable to submit an electronic version of a required document to a TCEQ Regional Office and/or a TCEQ Division.

To request additional time please send an email to OCE@tceq.texas.gov.

The email should include:

- (1) A concise statement supporting the request for enforcement discretion;
- (2) The anticipated duration of the need for enforcement discretion; and
- (3) A citation of the rule/permit provision for which enforcement discretion is requested.

Thank You,
Kathleen Campbell
Environmental Investigator
TCEQ Houston Region Office
5425 Polk Street, Suite H
Houston, Texas 77023

713-767-3725



How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey.

TCEQ Has Inspected Your Business

https://www.tceq.texas.gov/assets/public/comm_exec/pubs/rg/rg-344.pdf

From: Kathleen Campbell

Sent: Wednesday, September 9, 2020 1:38 PM

To: Sarah Carlock <[REDACTED]>

Cc: Andy Thomas <[REDACTED]> Carey Thomas <[REDACTED]>

Latrichia Spikes <Latrichia.Spikes@tceq.texas.gov>; Nichole Batista Nunes

<Nichole.Nunes@tceq.texas.gov>

Subject: RE: Demi John Place

Good afternoon,

I have submitted your request for additional time to management for approval. I will let you know as soon as I hear back.

Thank you for the approval letter, I am keeping track of what you have sent.

Thank You,

Kathleen Campbell

Environmental Investigator

TCEQ Houston Region Office

5425 Polk Street, Suite H

Houston, Texas 77023

713-767-3725



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www.tceq.texas.gov/customersurvey.

TCEQ Has Inspected Your Business

https://www.tceq.texas.gov/assets/public/comm_exec/pubs/rg/rg-344.pdf

From: Sarah Carlock <[REDACTED]>
Sent: Tuesday, September 8, 2020 4:41 PM
To: Kathleen Campbell <Kathleen.Campbell@tceq.texas.gov>
Cc: Andy Thomas <[REDACTED]> Carey Thomas <[REDACTED]>
Subject: Demi John Place

Hi Ms. Campbell,

Please find attached approval letter for Demi John Place.

The engineering consultant is submitting as-builts for the remote well to Technical Review this week. He is preparing the exception request for Well Completion Data requirements. Please allow an additional 30 days for this information to be submitted. We have experienced delays across the board due to the Covid-19 pandemic.

Thank you,

Sarah Carlock
Manager of Compliance
Mobile: 979-864-5582
[REDACTED]