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PUBLIC UTILITY COMMISSION
OF TEXAS

REQUEST OF GREENWOOD WATER CORPORATION FOR APPROVAL OF WATER UTILITY STOCK TRANSFER CCN NO. 11792 §
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**Greenwood Water Corporation's
Third Supplement to Request for Approval of Water Utility Stock Transfer**

COMES NOW the Greenwood Water Corporation ("Greenwood"), and files this Third Supplement to Request for Approval of Water Utility Stock Transfer and would show the following:

As a supplement to its application, Greenwood submits the following information:

Attached as Exhibit A is an Action Plan Addressing Comprehensive Compliance Investigation of Public Water Supply at: Greenwood Water System, Midland County, Texas.

Respectfully submitted,

Richard Hamala

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ATTORNEY FOR GREENWOOD WATER CORPORATION

Certificate of Service

I certify that a copy of this document was served on all parties of record in this proceeding on December 2, 2014, by regular mail, facsimile transmission, or hand delivery.

Richard Hamala
Richard Hamala

**Action Plan Addressing
Comprehensive Compliance Investigation of Public Water Supply at:
Greenwood Water System, Midland County, Texas
RN 101439040, TCEQ Public Water Supply 1650078**

The report of the February 24, 2014, Comprehensive Compliance Investigation of the Greenwood Water System, resulted in a statement of additional issues as follows: **“Submittal of completion paperwork for new wells A and B and associated reverse osmosis treatment systems and request for final samples for new wells A and B.”** The proposed purchaser, Permian Basin Water Resources, LLC (“Permian”) is conducting an assessment to determine the actions and submittals that are necessary to resolve the additional issues. Engineers working on behalf of Greenwood Water Corporation (“Greenwood”) and Permian are gathering all of the existing paperwork and records on wells A and B and the reverse osmosis treatment system in order to file completion documents and testing reports, and to apply for any exceptions to TCEQ rules that are needed. Following are the proposed actions that Greenwood and Permian will undertake to resolve the additional issues.

1. The information addressing the completion paperwork and final samples for Wells A and B is being compiled for filing with the Texas Commission on Environmental Quality (TCEQ). This process is underway, and engineers working on behalf of Greenwood and Permian are in direct communication with TCEQ for guidance. In the event that any required information does not exist or cannot be developed to satisfy the completion requirements for Wells A and B, a request for an exception to the requirements for public water systems pursuant to TCEQ Rule 30 TAC §290.39(l) will be prepared and submitted to TCEQ.

2. Addressing the submittal of information for the reverse osmosis treatment systems associated with Wells A and B will require preparation and submittal to the TCEQ of a request for an exception to the requirements for public water systems pursuant to TCEQ Rule 30 TAC §290.39(1). Preparation and support of the request for an exception will require a commitment of engineering and administrative resources. Completing the process of obtaining TCEQ's approval of an exception for installing the reverse osmosis system will require a substantial period of time. Greenwood and Permian will pursue this submittal and request for approval after completion of the closing of the stock transfer.

Attached is a project schedule that is planned to be implemented by Greenwood and Permian to address these issues in a timely and appropriate manner.

ID	Task Name	Duration (Days)	Start	Finish
1	Wells	131	11/5/2014	5/6/2015
2	Obtain Existing Information	19	11/5/2014	12/1/2014
3	Identify Missing Information	3	12/2/2014	12/4/2014
4	Attempt to Obtain Missing Information	4	12/5/2014	12/10/2014
5	Submit Checklist for Interim Approval	0	12/11/2014	12/11/2014
6	Design of Corrective Action	31	12/11/2014	1/22/2015
7	Prepare Requests for Exceptions	17	12/11/2014	1/2/2015
8	Submit Request for Exceptions to TCEQ	0	1/5/2015	1/5/2015
9	Submit Corrective Design to TCEQ	0	1/23/2015	1/23/2015
10	TCEQ Review	41	1/23/2015	3/20/2015
11	Obtain Approval	0	3/23/2015	3/23/2015
12	Begin Construction Work	7	3/23/2015	3/31/2015
13	Complete Construction Work	23	4/1/2015	5/1/2015
14	Submit Written Certification of Completed Construction	3	5/4/2015	5/6/2015

ID	Task Name	Duration (Days)	Start	Finish
15	Arsenic Treatment	219	11/5/2014	9/7/2015
16	Obtain Existing Information	24	11/5/2014	12/8/2014
17	Identify Missing Information	5	12/9/2014	12/15/2014
18	Attempt to Obtain Missing Information	10	12/16/2014	12/29/2014
19	Design of Corrective Action	25	12/30/2014	2/2/2015
20	Prepare Requests for Exceptions/Pilot Study	20	12/30/2014	1/26/2015
21	Submit Results of Pilot Study	60	1/27/2015	4/20/2015
22	Submit Requests to TCEQ	0	1/27/2015	1/27/2015
23	Submit Corrective Design to TCEQ	0	2/3/2015	2/3/2015
24	TCEQ Review	41	2/3/2015	3/31/2015
25	Obtain Approval	0	4/1/2015	4/1/2015
26	Begin Construction Work	7	4/21/2015	4/29/2015
27	Complete Construction Work	90	4/30/2015	9/2/2015
28	Submit Written Certification of Completed Construction	3	9/3/2015	9/7/2015