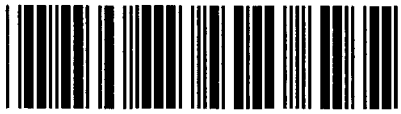
Control Number: 42961



Item Number: 30

Addendum StartPage: 0

PUC DOCKET NO. 42961

REQUEST OF GREENWOOD WATER	§	PUBLIC UTILITY COMMISSION
CORPORATION FOR APPROVAL OF	§	
WATER UTILITY STOCK TRANSFER	§	OF TEXAS
CCN NO. 11792	§	

Permian Basin Water Resources, LLC's
First Supplement to Petition for Release of Financial Assurance

To: The Executive Director of the Public Utility Commission:

COMES NOW Permian Basin Water Resources, LLC ("Permian"), and files this First Supplement to Petition for Release of Financial Assurance and would show the following:

The Order entered in this proceeding on June 19, 2015, provides, that within 45 days of the date of the Order, Permian shall post a letter of credit with the Commission in the amount of $20,000.00 as financial assurance to ensure the remediation of the issues arising from the Texas Commission on Environmental Quality's ("TCEQ") comprehensive compliance investigation that was conducted on February 24, 2014. Permian posted the letter of credit on July 27, 2015, as required by the Order.

Attached to this First Supplement is a copy of the investigation report for the TCEQ's comprehensive compliance investigation. The summary of investigation findings lists the following issues to be addressed: **"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 Petition filed by Permian in this matter on June 1, 2017, includes the affidavit of Richard M. Oller, engineer for Greenwood Water Corporation, along with a letter dated April 14, 2017, from the TCEQ. The affidavit and TCEQ letter confirm that the comprehensive compliance investigation issues have been resolved.

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1

Wherefore, premises considered, Permian respectfully requests that the Commission's Executive Director grant approval for the release of the letter of credit that was posted by Permian on July 27, 2015.

Respectfully submitted,

Richard Hamala

Richard Hamala
State Bar No. 08810750
TIEMANN, SHAHADY & HAMALA, P.C.
102 N. Railroad Ave.
Pflugerville, Texas 78660
(512) 251-1920 (telephone)
(512) 251-8540 (facsimile)

ATTORNEY FOR PERMIAN BASIN
WATER RESOURCES, LLC

Certificate of Service

I certify that a copy of this document was served on all parties of record in this proceeding on June 8, 2017, by regular mail, facsimile transmission, or hand delivery.

Richard Hamala

Richard Hamala

Texas Commission on Environmental Quality
Investigation Report

Customer: Greenwood Water Corporation
Customer Number: CN600664528

Regulated Entity Name: GREENWOOD WATER SYSTEM
Regulated Entity Number: RN101439040

Investigation # 1158809
Investigator: LINDSEY BUCKNER
Conducted: 02/24/2014 -- 02/24/2014
Program(s): PUBLIC WATER SYSTEM/SUPPLY
Investigation Type: Compliance Investigation
Additional ID(s): 1650078

Incident Numbers
Site Classification GW 251-1K CONNECTION
No Industry Code Assigned
Location: South of Greenwood High School on FM 1379

Address: 2810 FM 1379,
MIDLAND, TX , 79706

Local Unit: REGION 07 - MIDLAND
Activity Type(s): PWSCCIGWCM - CCI GW
PURCHASE - COMMUNITY MANDATORY

Principal(s):

Role	Name
RESPONDENT	GREENWOOD WATER CORPORATION

Contact(s):

Role	Title	Name	Phone	
Notified	PRESIDENT	MR PAUL R WILHITE		
Participated in Investigation		MS CAROL WILHITE		
Participated in Investigation	PRESIDENT	MR PAUL R WILHITE	Cell Work Fax	(432) 352-7577 (432) 687-2070 (432) 687-3545
Regulated Entity Mail Contact	PRESIDENT	MR PAUL R WILHITE		

RECEIVED
APR 15 2014
TCEQ
CENTRAL FILE ROOM

Other Staff Member(s):

Role	Name
Supervisor	WILLIAM EDMISTON

Associated Check List

Checklist Name	Unit Name
PWS EMERGENCY POWER INITIATIVE	1650078
PWS STANDARD FIELD	1650078
WQ IN-HOUSE LABORATORY COMPLIANCE INVESTIGATION	1650078
PWS INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING revised 06/2013	1650078

Investigation Comments:

INTRODUCTION:
Mr. Paul Wilhite is President, manager and operator. Ms. Carol Wilhite is office manager and operator. The investigator, Mr. Lindsey Buckner, notified Mr. Wilhite on February 12, 2014 of the planned Comprehensive Compliance Investigation (CCI) of the system. Mr. Buckner then met with Mr. Wilhite and Ms. Wilhite on-site on February 24, 2014 and conducted an announced CCI of the public water system. Additional issues include 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. Exit interview was conducted with Mr. Wilhite.

GENERAL FACILITY AND PROCESS INFORMATION:
This community system provides treated ground water to 289 metered connections with estimated population of 867. Mailing address, physical address, location, phone numbers, RN and CN for the system are:

2121 South County Road 1083
Midland, TX 79706

South of FM 307 on east side of S CR 1083

432/687-2070	Office
432/686-0155	Fax
432/352-7577	Paul Wilhite cell
432/661-0089	On call and emergency cell

greenwoodcitywater@att.net

RN101439040
CN600664528.

POE 001: EP sampling is from faucet at service pumps.
Six wells pump to ground storage. Two wells, owner designation A and B, pump to dedicated RO systems. The RO system at each well, A and B, consist of five micron then one micron particulate filters and then seven RO membranes and finally to storage. Transfer pumps take suction from the permeate tanks and discharge to ground storage for blending with ground water. RO effluent from both RO systems is stored in one tank. The effluent is sold for industrial purposes. Each RO plant is rated at 100 GPM. Well A has a sand trap which precedes the RO system. Service pumps 1 through 4 take suction from ground storage and discharge through two 0.002700 pressure tanks with each pressure tank discharging to a separate subdivision. Service pump 5 takes suction from ground storage and discharges through one 0.010000 MG pressure tank which discharges to the southern portion of the distribution. The distribution is looped so all the pressure tanks float on the system. Hypochlorination is ahead of ground storage.

System Facilities Totals:
Water Production = 557 GPM = 0.802 MGD
Pressure Tank Storage = 0.015400 MG
Total Storage = 0.115000 MG
Service Pumps = 1160 GPM = 1.670 MGD.

BACKGROUND:
Prior CCI was conducted on March 16, 2011. Groundwater exceeds arsenic primary MCL and secondary MCL for

Fluoride. The system is under a compliance agreement for enforcement case 34220, for exceeding the maximum contaminant level (MCL) for Arsenic.

ADDITIONAL INFORMATION:
The system has two class C Groundwater certified operators and one Customer Service Inspector certification. Average water use for February, 2013 through January, 2014 was 0.140 MGD and max day was 0.679, (major leak) MGD on April 16, 2013. Bacteriological analysis is conducted by City of Odessa Laboratory Services which has NELAC approval. Disinfectant residuals and water pressure are determined by field analysis. Reagents and standards are in date. Appropriate methodology, checks and calibration are utilized. Emergency power is required and the system has an agreement with TanMar Rentals for generator rental during emergencies. Pigtails are installed.

44 psi at and 0.33 mg/L Free chlorine disinfectant residual at 2121 S CR 1083.
The investigator used an Ashcroft analog pressure gauge to determine distribution water pressure and a HACH Pocket Colorimeter to determine disinfectant residual.

No Violations Associated to this Investigation

Signed [signature] **Date** 4-2-14
Environmental Investigator

Signed Wm. Michael Johnston **Date** 4/2/14
Supervisor

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
✓ Letter to Facility (specify type) : GC
Investigation Report
___Sample Analysis Results
___Manifests
___Notice of Registration
✓ Maps, Plans, Sketches
___Photographs
___Correspondence from the facility
✓ Other (specify) :
Equipment Check List
TWUA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 2, 2014

Mr. Paul Wilhite, President
Greenwood Water Corporation
2121 South County Road 1083
Midland, TX 79706-5331

Re: Comprehensive Compliance Investigation of Public Water Supply at:
Greenwood Water System, Midland County, Texas
RN101439040, TCEQ Public Water Supply: 1650078

Dear Mr. Wilhite:

On February 24, 2014, Mr. Lindsey Buckner of the Texas Commission on Environmental Quality (TCEQ) Midland Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply. No violations were documented during the investigation; however, an additional issue is addressed by the enclosed Summary of Investigation Findings.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Buckner in the Midland Region Office at (432) 570-1359.

Sincerely,

Wm. Michael Edmiston

Wm. Michael Edmiston, P.E.
Section Manager
Midland Region

WME/ldb

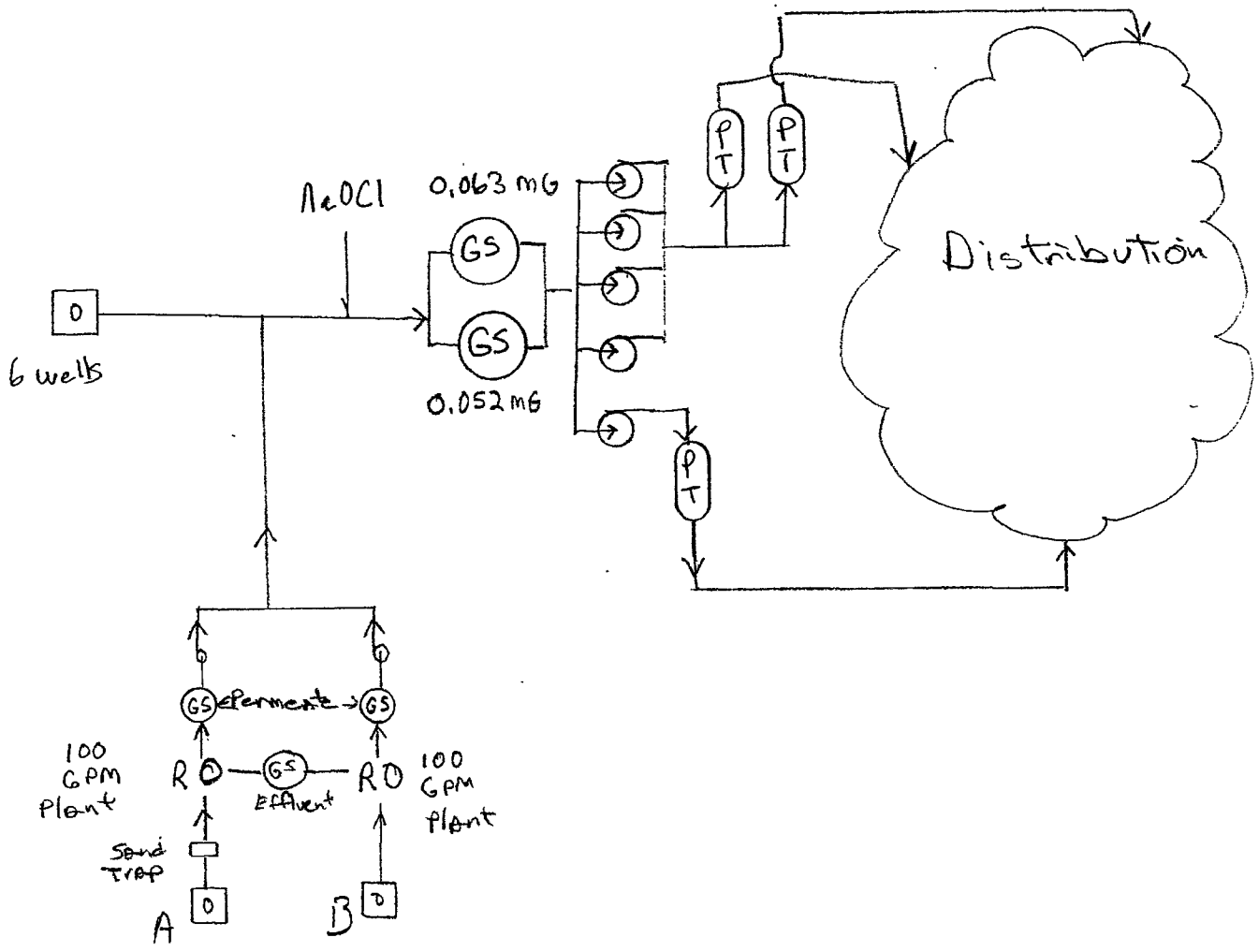
cc: Summary of Investigation Findings

SUMMARY OF INVESTIGATION FINDINGS

Entity:	Public Water Supply:	Inspection Date:
Greenwood Water System	1650078	February 24, 2014

ADDITIONAL ISSUES

1. 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.



Greenwood Water System

PWS ID No. 1650078
RN101439040
Ector County

System Diagram

Not to Scale
Date: 4-1-2014 Surveyed by: L. Buckner

1

N

Texas Commission on Environmental Quality

PWS INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING revised 06/2013 Checklist

Unit Name : 1650078
Investigation # :1158809
Facility Name : GREENWOOD WATER SYSTEM

County : MIDLAND
TCEQ Investigator : LINDSEY BUCKNER

m).	Description	Answer	Comments	Due Date
	EQUIPMENT MONITORING SECTION			
	Was an Anemometer used during this investigation?	NO		
	Was the Area RAE Multi-Gas Monitor used during this investigation?	NO		
	Was the Civil Defense V-700 Radiation Survey Instrument used during this investigation?	NO		
	Was the DataRAM(TM) Real-Time Aerosol Monitor used during this investigation?	NO		
	Was the Dissolved Oxygen Meter used during this investigation?	NO		
	Was the Drager Gas Detector Pump/Tube System used during this investigation?	NO		
	Was the El Paso Method for Measurement of Air-Strippable VOCs in Water used during this investigation?	NO		
	Was the Garmin GPSMap 60CS GPS Receiver used during this investigation?	NO		
	Was the Garmin RINO 130 GPS Receiver used during this investigation?	NO		
	Was the GAS FindIR used during this investigation?	NO		
	Was the Hach Model 2100P Portable Turbidimeter used during this investigation?	NO		
	Was the Hach Pocket Colorimeter used during this investigation?	NO		
	Was the Hach Pocket Turbidimeter used during this investigation?	NO		
	Was the Haz-Dust 5000 Environmental Particulate Air Monitor (EPAM) used during this investigation?	NO		
	Was the Hydrolab DataSonde® 4 and Hydrolab MiniSonde® Water Quality Multiprobes used during this investigation?	NO		
	Was the IDEXX Colilert® and IDEXX Enterolert® Methods used during this investigation?	NO		
	Was the Jerome 631-X Hydrogen Sulfide (H2S) Analyzer used during this investigation?	NO		
	Was the LANDTEC GEM 2000(TM) Landfill Gas analyzer used during this investigation?	NO		
	Was the Ludlum Model 14C Geiger Mueller (GM) counter used during this investigation?	NO		
	Was the Ludlum Model 19 Micro R Meter used during this investigation?	NO		
	Was the Marsh-McBirney Flo-Mate 2000 Electromagnetic Flow Meter used during this investigation?	NO		
	Was the MiniRAE 2000 Photoionization Detector used during this investigation?	NO		
	Was the MIRAN 205B SapphIRe Portable Infrared Ambient Analyzer used during this investigation?	NO		
	Was the MSA Passport® PID II Organic Vapor Monitor used during this investigation?	NO		
	Was the Multi-parameter Water Quality Monitoring Sonde and Display used during this investigation?	NO		
	Was the MultiRAE Plus Multi-Gas Monitor used during the investigation?	NO		

	Environmental Analyzer used during th[illegible]stigation?			
3	Was the ORS Interface Probe(TM) used during this investigation?	NO		
3	Was the pH Meter used during this investigation?	NO		
3	Was the Portable Organic Vapor Monitor (OVM) Photoionization Detector used during this investigation?	NO		
	Was the Pressure Gauge used during this investigation?	NO		
2	Was the Pressure Recorder used during this investigation?	NO		
3	Was the QRAE Multi-gas Monitor used during this investigation?	NO		
1	Was the Sample Collection of VOCs in Ambient Air Using Passivated, Stainless Steel Canisters used during this investigation?	NO		
5	Was the Sampling of Microscopic Characterization used during this investigation?	NO		
3	Was the Self Contained Breathing Apparatus (SCBA) used during this investigation?	NO		
7	Was the Smith-Root Boat Mounted and Backpack Electrofishers used during this investigation?	NO		
3	Was the Sontek Flowtracker used during this investigation?	NO		
3	Was the TESTO 350 Portable Flue Gas Analyzer used during this investigation?	NO		
3	Was the Toxic Vapor Analyzer (TVA) 1000B Flame Ionization Detector (FID) used during this investigation?	NO		
1	Was the TravelIR Portable FT-IR Infrared Analysis System used during this investigation?	NO		
2	Was the VRAE Multi Gas Monitor used during this investigation?	NO		
3	Was the Water Level Indicator used during this investigation?	NO		
4	Was the Weatherpak 2000 used during this investigation?	NO		
5	Was any other equipment used during this investigation that is not listed above? If YES, list the equipment in the Comment section.	NO		
	SAMPLING SECTION			
	Was there sampling conducted for Effluent?	NO		
	Was there sampling conducted for Groundwater?	NO		
	Was there sampling conducted for Leachate/Contaminated Water?	NO		
	Was there sampling conducted for PWS Chemical?	NO		
	Was there sampling conducted for Sediment/Soil?	NO		
	Was there sampling conducted for Spills/Unauthorized Discharge?	NO		
	Was there sampling conducted for Surface Water?	NO		
	Was there any other type of sampling conducted during this investigation? If YES, include it in the Comment section.	NO		

PWS ID	PWS Name	Central Registry RN
1650078	**GREENWOOD WATER SYSTEM**	**RN101439040**

Organization/Customer *	Central Registry CN
GREENWOOD WATER CORPORATION	**CN600664528**

* Regulatory mail will be addressed to this organization / person

Responsible Official **	Title
PAUL WILHITE ✓	**PRESIDENT** ✓

License Type	License Number

Mailing Address:

Street Address	C/O or Address Line 2

City	State	Zip

Business Phone	Other Phone	Other Phone Type	Email

** Regulatory mail will be addressed to this person

No PWS Primary Contact assigned to this PWS

Emergency Contact Name ****	Emergency Phone	Emergency Email
PAUL WILHITE ✓		

License Type	License Number

**** This contact information will be used only in the event of an emergency

Owner Type	Owner Type Options: AFFECTED COUNTIES, COUNTY, DISTRICT \ AUTHORITY, EXEMPT, FEDERAL GOVERNMENT, INVESTOR, MUNICIPALITY, NATIVE AMERICAN, PRIVATE, SUBMETER \ ALLOCATION, STATE GOVERNMENT, NOT RETAIL PUBLIC UTILITIES, WATER SUPPLY CORPORATION, MISC \ UNKNOWN
INVESTOR	

System Type	System Type Options: SB 361, COMMUNITY, COMMUNITY (NON-GOVERNMENT OWNED), TRANSIENT/NON-COMMUNITY, NON-PUBLIC, NON-TRANSIENT/NON-COMMUNITY
COMMUNITY	

Customer Class	Customer Category	Population Served	# of Connect	# of Meters	# I/C w/other PWS
RESIDENTIAL	**RESIDENTIAL AREA**	~~855~~	~~285~~	~~288~~	**0** ✓
	conn x3 = pop	867	289	287	

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Total Product (MGD)	Average Daily Consump.	Total Storage (MG)	Elev. Storage (MG)	Booster Pump Cap. (MGD)	Aux.Prod.Cap. Max.Pur.Cap.(MGD)	Pressure Tank Cap.(MG)
~~0.497~~ 0.802	0.140 ✓	0.115 ✓	0.000 ✓	1.670 ✓	0.000	~~0.00540~~ 0.015400

Activity Status	Deactivation Date	Reason
ACTIVE		

Operator Grade	Number
WATER GRADE C GROUND	32

Last Survey Date	Surveyor	Survey Type	Code	Region	County	Def.Score
03/16/2011	LINDSEY BUCKNER	SURVEY		7	MIDLAND	5
09/24/2008	LINDSEY BUCKNER	SURVEY		7	MIDLAND	22
03/27/2007	LINDSEY BUCKNER	SURVEY		7	MIDLAND	0

2-24-14

(Entry Point)							
Entry Point	EP Name/Source Summation (Activity Status)	Plant Name (Activity Status)	WUD Plant Num	Chemical Mon Type	Chem Sample Point	Distribution Mon Type	Dist Sample Point
001	FAUCET @ SP 3 & 4 / GROUND STORAGE(A)	PLANT - 2810 FM 1379(A)	10261		No		No

Train:	(Unnamed)

(Treatments)				
Disinfection Zone	Treatment Sequence	Objective	Process	Treatment
	1	D	423 ✓	HYPOCHLORINATION(PRE)

(Active Sources)						
Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G1650078B	2 - S OF 1(A)	O ✓	G	180	~~50~~ 10	0
Drill Date	Well Data					
8/17/1987	OGALLALA FORMATION					
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	GPS Cert. No.	Seller	
32.004299	101.874099	0		98081217		
Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G1650078C	3 - E OF 2(A)	O ✓	G	100	~~35~~ 8	0
Drill Date	Well Data					
6/21/1983	OGALLALA FORMATION					
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	GPS Cert. No.	Seller	
32.004531	101.873001	0		98081217		
Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G1650078D	4 - E OF 3(A)	O ✓	G	165	~~80~~ 17	200
Drill Date	Well Data					
8/11/1983	OGALLALA FORMATION					
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	GPS Cert. No.	Seller	
32.00489	101.871803	0		98081217		
Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G1650078E	5 - NE OF 4(A)	O ✓	G	180	~~80~~ 25	200
Drill Date	Well Data					
8/11/1983	OGALLALA FORMATION					
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	GPS Cert. No.	Seller	
32.00542	101.871002	0		98081217		

Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G1650078F	6 - SE OF 5(A)	O ✓	G	190	~~400~~ 32	350

Drill Date	Well Data
0/0/0	

GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	GPS Cert. No.	Seller
32.004833	101.870194	0			

(Inactive/Offline Sources)

SourceNumber	Name	Status	Depth
G1650078A	1 - 2 MI SE OF PLANT	A	162

Code Explanations
Monitoring Type Codes: (GW) GROUNDWATER , (GWP) GROUNDWATER - PURCHASED , (GUP) GROUNDWATER UNDER THE INFLUENCE - PURCHASED , (SWP) SURFACE WATER - PURCHASED , (GU) GROUNDWATER UNDER THE INFLUENCE OF SURFACE WATER , (N) NO SOURCES , (SW) SURFACE WATER
Activity Status Codes: (A) ACTIVE , (C) CCN CANCELLED , (D) DELETED/DISSOLVED , (G) SB 361 , (I) INACTIVE , (M) MERGED/ANNEXED , (N) NON-PUBLIC , (P) PROPOSED , (U) UNKNOWN-NO ACTIVITY OR NON-RESPONSIVE , (W) UTILITY WATER SYS XFER
Operational Status Codes: (C) CAPPED , (D) DEMAND , (E) EMERGENCY , (F) FORMER PWS SOURCE , (I) INACTIVE PWS SYSTEM , (N) NON-DRINKING WATER , (O) OPERATING , (P) PLUGGED , (T) TEST , (Y) PWS NOT ACTIVE AND NOT EXPECTED TO BE SO
Source Types: (G) GROUND WATER , (S) SURFACE WATER , (U) GROUND WATER UNDER THE INFLUENCE

- End of Report -

At the time of your query this data was the most current information available from our database, which is in real time. Every effort was made to retrieve it according to your query. Thank-you for using WUD.

G1650078G 1A North of #1 Operating 220'TD 125 GPM

A 0.4 miles west of FM1379 & 0.1 mile South of E CR120 " 182' TD 180 GPM

has sand trap & RO Plant

B East of A Operating 180' TD 160 GPM

has RO Plant

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