

Control Number: 43890



Item Number: 7

Addendum StartPage: 0

House Bill (HB) 1600 and Senate Bill (SB) 567 83<sup>rd</sup>  
Legislature, Regular Session, transferred the functions  
relating to the economic regulation of water and sewer  
utilities from the TCEQ to the PUC effective  
September 1, 2014

ATTACHMENT #1



RECEIVED

2014 DEC -5 PM 1:33

TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

SUSAN COMBS • COMPTROLLER • AUSTIN, TEXAS 78774 PUBLIC UTILITY COMMISSION  
FILING CLERK

September 24, 2008

**CERTIFICATE OF ACCOUNT STATUS**

THE STATE OF TEXAS  
COUNTY OF TRAVIS

I, Susan Combs, Comptroller of Public Accounts of the State of Texas, DO  
HEREBY CERTIFY that according to the records of this office

**TEXAS WATER SYSTEMS INC**

is, as of this date, in good standing with this office having no franchise  
tax reports or payments due at this time. This certificate is valid through  
the date that the next franchise tax report will be due May 15, 2009.

This certificate does not make a representation as to the status of the  
entity's registration, if any, with the Texas Secretary of State.

This certificate is valid for the purpose of conversion when the converted  
entity is subject to franchise tax as required by law. This certificate is  
not valid for any other filing with the Texas Secretary of State.

GIVEN UNDER MY HAND AND  
SEAL OF OFFICE in the City of  
Austin, this 24th day of  
September 2008 A.D.

A handwritten signature of Susan Combs in cursive script, located below the "GIVEN UNDER MY HAND AND" text.

Susan Combs  
Texas Comptroller

Taxpayer number: 17522535883  
File number: 0109227500

Form 05-304 (Rev. 12-07/17)

3370 0011

2014 DEC -5 AM 8:07

**Attachment 2**

**SECTION IB - MISCELLANEOUS INFORMATION**

D. Water Utilities

System Name	TCEQ PWS ID#	County	Rate Increase Applicable?
Cape Tranquility Water System	1070176	Henderson	Yes
Mt. Sylvan Water System	2120034	Smith	Yes
Country Club Water System	2300021	Upshur	Yes
Friendship Water System	2300020	Upshur	Yes
Rosewood Water System	2300026	Upshur	Yes
Stallion Lake Water System	2120104	Smith	Yes
Garden Valley Water System	2120081	Smith	Yes
Garden Acres Water System	O920031	Gregg	Yes

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Glenn Shankle, *Executive Director*



**ATTACHMENT 3**

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

May 29, 2008

**CERTIFIED MAIL 91 7108 2133 3934 8772 9209**  
**RETURN RECEIPT REQUESTED**

Mr. Glenn Trimble, President  
Texas Water Systems  
PO BOX 131945  
Tyler, TX 75713

Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Cape Tranquility Water System, Located on CR 4202, N of CR 4201  
PWS ID No.: 1070176

Dear Mr. Trimble:

On April 24, 2008, Mr. Dan Dawson of the Texas Commission on Environmental Quality (TCEQ) Tyler Regional Office conducted an investigation of the above-referenced system to evaluate compliance with applicable requirements for public water supply systems. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required as well as additional issues.

Please submit a compliance plan by **June 27, 2008** for track numbers 332751, 332752, and 332753. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If the violations have already been corrected, please submit compliance documentation, such as a photograph, purchase order, etc, demonstrating what actions were taken

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules."

REPLY TO: REGION 5 • 2916 TEAGUE DR. • TYLER, TEXAS 75701-3734 • 903-535-5100 • FAX 903-595-1562

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • Internet address: [www.tceq.state.tx.us](http://www.tceq.state.tx.us)

Mr. Glen Trimble

May 29, 2008


Page 2

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements.

We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify the Tyler Region 5 Office within 10 days from the date of this letter. At that time, C. Noel Luper, P.E., Water Program Manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Dan Dawson in the Region 5-Tyler Office at (903) 535-5122.

Sincerely,



William Gibson  
PWS Work Leader  
Tyler Region Office

WDG/DED

Enclosures:     Summary of Investigation Findings  
                     *Obtaining TCEQ Rules*

## Summary of Investigation Findings

CAPE TRANQUILITY SYSTEM

Investigation # 671149

, HENDERSON COUNTY,

Investigation Date: 04/24/2008

Additional ID(s): 1070176

### OUTSTANDING ALLEGED VIOLATIONS

Track No: 332751 Compliance Due Date: To Be Determined  
30 TAC Chapter 290.43(c)(8)

**Alleged Violation:**

Investigation: 671149

Comment Date: 05/14/2008

Failure to cover and design, fabricate, erect, test and disinfect in strict accordance with current American Water Works Association (AWWA) standards, all facilities for potable water storage.

During the investigation occurring 04/24/08, the investigator observed that the pressure tank had significant corrosion on some valves, and according to the inspection forms and Mr. Trimble, the interior is pitted in places.

**Recommended Corrective Action:** Please submit a compliance plan by June 27, 2008. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

Track No: 332752 Compliance Due Date: To Be Determined  
30 TAC Chapter 290.46(m)

**Alleged Violation:**

Investigation: 671149

Comment Date: 05/14/2008

Failure to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. The grounds and facilities shall be maintained in a manner so as to minimize the possibility of the harboring of rodents, insects, and other disease vectors, and in such a way as to prevent other conditions that might cause the contamination of the water.

During the investigation occurring 04/24/08, the investigator observed that the fence around the plant is heavily covered by vines and other vegetation. The vegetation should be cleared from the fence, especially off of the barbed wire, to ensure the fence remains intruder resistant.

**Recommended Corrective Action:** Please submit a compliance plan by June 27, 2008. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

Track No: 332753 Compliance Due Date: To Be Determined  
30 TAC Chapter 290.42(e)(4)(C)

**Alleged Violation:**

Investigation: 671149

Comment Date: 05/14/2008

Failure to properly install the high level vent in the chlorination room. The chlorination room must be equipped with both high level and floor level screened vents. In addition, if the room contains more than one operating 150 pound cylinder of chlorine, a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent must be provided, with the fan switch located outside the enclosure.

During the investigation occurring 04/24/08, the investigator observed that the chlorine room only had a low level vent, and not a high level vent.

**Recommended Corrective Action:** Please submit a compliance plan by June 27, 2008. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

### ADDITIONAL ISSUES

#### Description

Other violations noted during the investigation?  
(If non-compliant then describe violation in the comment section.)

#### Additional Comments

During the investigation occurring on 04/24/08, the investigator documented through a file review that the water system did not maintain specification for its storage and pressure tanks. However, both tanks are from the 1970's, and these records were not maintained by the water system from this time.



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

June 23, 2008

William Gibson; PWS Work Leader  
TCEQ – Region 5  
2916 Teague Dr.  
Tyler, TX 75701-3734

RE: Compliance Investigation of 4/24/08 @ Cape Tranquility PWS ID # 1070176

Dear Mr. Gibson:

Per the above reference inspection, we have corrected the chlorine vent problem described in Track No. 332753, and have enclosed photos to verify.

On Track No. 332751 (pressure tank maint.), we intend to remedy by a sand blast job (with plate weld repairs if needed) and new AWWA Epoxy Lining. A new exterior coat will also be applied.

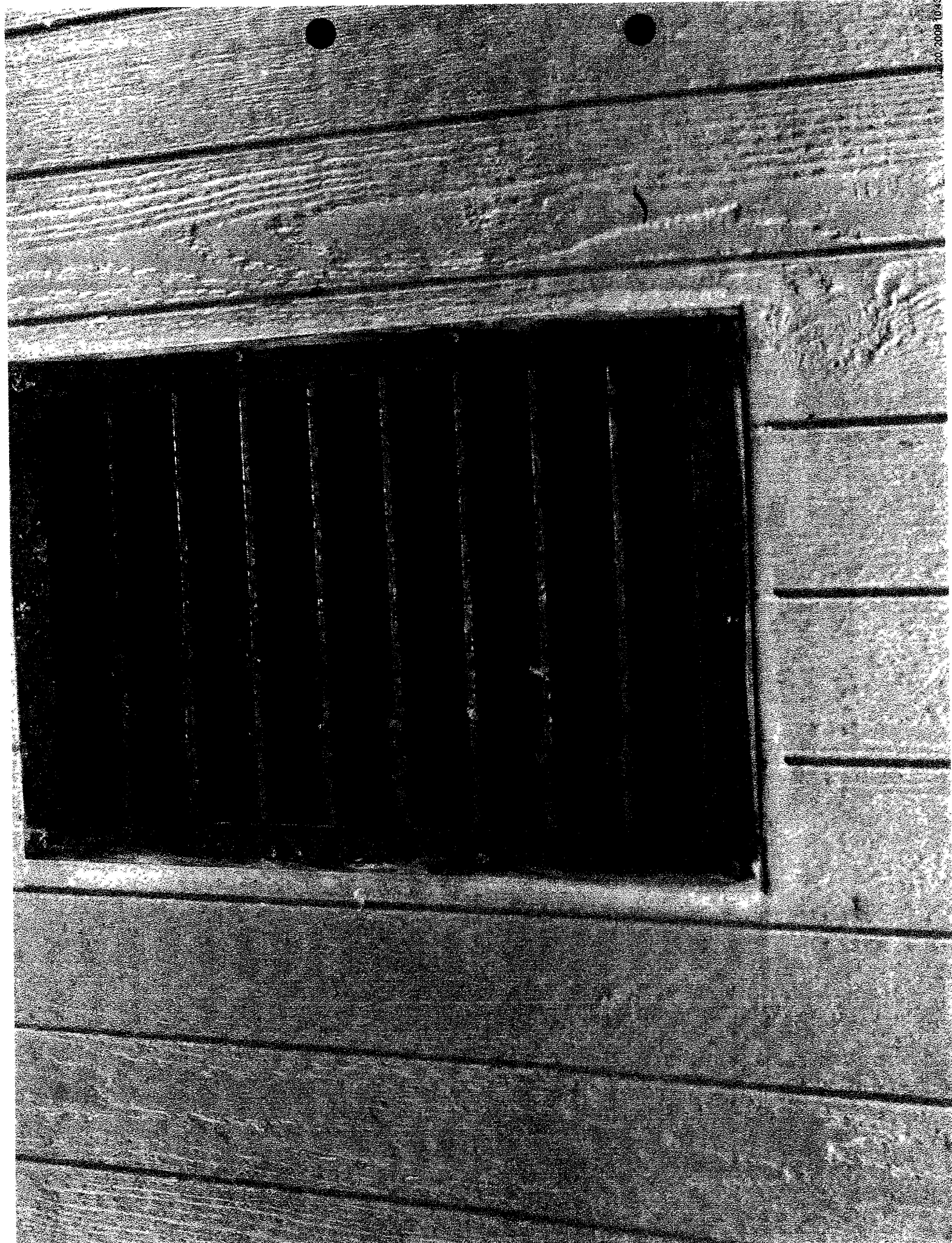
On Track No. 332752 (Fencing), we will remedy by abandoning the existing fence around the 1 acre lot perimeter and constructing two smaller fences closer to the plant fixture and away from the jungle.

We hereby request a compliance deadline of Nov. 30, 2008, on these two remaining tracks.

Sincerely,

Glenn E. Trimble  
President





Kathleen Hartnett White, *Chairman*  
Larry R. Soward, *Commissioner*  
H. S. Buddy Garcia, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 24, 2007

Mr. Glenn Trimble, President  
Mount Sylvan Water System  
P.O. Box 131945  
Tyler, TX 75713

Re: **Comprehensive Compliance Investigation at:**  
**Mt. Sylvan Water System, SH 110 @ FM 724, near Tyler (Smith County), Texas**  
**PWS ID No.: 2120034**

Dear Mr. Trimble:

The Texas Commission on Environmental Quality (TCEQ) Tyler Region Office has received the compliance documentation that you submitted on July 6, 2007, for the alleged violations noted during the investigation of the above-referenced facility conducted on January 19, 2007. The compliance documentation contained in your response appears to indicate that corrective action has been taken for the alleged violations. No further submittal from you is required concerning this investigation.

The Texas Commission on Environmental Quality 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 Ms. Samantha Smith in the Tyler Region Office at (903) 535-5159.

Sincerely,

A handwritten signature in cursive script that reads "William D. Gibson".

William D. Gibson, Work Leader  
Tyler Region Office

WDG:sss

(Rev. 9/25/00)

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## Summary of Investigation Findings

COUNTRY CLUB ESTATES

Investigation # 558293

Investigation Date: 05/04/2007

, UPSHUR COUNTY,

Additional ID(s): 2300021

### OUTSTANDING ALLEGED VIOLATIONS

Track No: 274790 Compliance Due Date: No Date Entered

30 TAC Chapter 290.43(c)(4)

**Alleged Violation:**

Investigation: 558293

Comment Date: 05/16/2007

Failure to equip the ground storage tank with a water level indicator located at the tank site. The indicator may be a float with a moving target, an ultrasonic level indicator, or a pressure gauge calibrated in feet of water. Pressure gauges must be not less than 3 inches in diameter and calibrated at not more than 2 foot intervals.

It was observed during the investigation on May 4, 2007 that there were no level markers on the ground storage tank.

**Recommended Corrective Action:** Please submit a compliance plan by June 27, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

Track No: 274918 Compliance Due Date: No Date Entered

30 TAC Chapter 290.46(m)

**Alleged Violation:**

Investigation: 558293

Comment Date: 05/17/2007

Failure to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment. These practices should include cleaning the protective coating on the outside of the tank as well as the interior.

It was observed during the investigation on May 4, 2007 that the outside of the ground storage tank needed to be cleaned as well as the interior of the tank.

**Recommended Corrective Action:** Please submit a compliance plan by June 27, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

### ADDITIONAL ISSUES

**Description**

Other violations noted during the investigation? (If non-compliant then describe violation in the comment section.)

**Additional Comments**

Failure, by a retail public utility that possesses a certificate of public convenience and necessity that has reached 85% of its capacity as compared to the most restrictive criteria of the commission's minimum capacity requirements in Chapter 290 T.A.C., to submit to the executive director a planning report that clearly explains how the retail public utility will provide the expected service demands to the remaining areas within the boundaries of its certificated area.

It was documented during the investigation on May 4, 2007 that Country Club Estates had exceeded the 85% rule for total storage capacity. They are required to provide 6600 gallons of total storage capacity and they provide 7500 gallons. At the current number of 33 connections they have reached 88% of their total storage capacity.



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

Mr. William D. Gipson  
TCEQ Region 5  
2916 Teague Dr.  
Tyler, TX 75701-3734

12/4/07

RE: Compliance Requirements for Inspection of May 4, 2007, at Country Club Estates  
I.D. # 2300021

Dear Mr. Gibson:

Concerning compliance requirements due for 11/30/07, pursuant to inspection  
referred above:

Track # 274918; GST cleaning  
Status: complete photo included

Note: We should blast and recoat this tank within 2 years.

Sincerely,

Glenn E. Trimble



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

6/26/2007

Mr. William D. Gibson  
TCBQ Region 5  
2916 Teague Dr.  
Tyler, TX 75701-3734

RE: Compliance Requirements for Inspection of May 4, 2007 at Country Club Estates  
I.D. # 2300021

Dear Mr. Gibson:

Our compliance plan by Track No. for involved issues is as follows:

(a) Track # 274790; Tank level indicator:  
complete; Photos enclosed

(b) Track # 274918; GST cleaning:

Because this is a stand alone plant, it seems prudent to avoid bypassing the GST for internal cleaning until after the peak season subsides. Therefore, our requested compliance deadline is 11/30/2007

(c) Additional issues. Storage capacity employment of 88%:

The system serves a small subdivision that is near full build-out and may never exceed the existing capacity levels. However, we have fenced lot space available, and should we reach 36 connections, we will use as a trigger to submit plans to add a second G S tank. It will be of comparable height, piped in parallel configuration with isolation valving, and be in the capacity range of seven to ten thousand gallons.

We hope this plan is satisfactory. Please contact us if more input is needed.

Sincerely,

Glenn Trimble  
President



Kathleen Hartnett White, *Chairman*  
Larry R. Soward, *Commissioner*  
H. S. Buddy Garcia, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

May 25, 2007

**CERTIFIED MAIL 91 7108 2133 3933 9717 2188**  
**RETURN RECEIPT REQUESTED**

Mr. Glen Trimble, President  
Friendship WS  
P.O. Box 131945  
Tyler, TX 75713

Re: Comprehensive Compliance Inspection at:  
Friendship WS  
Located off FM 852 NW of SH 154 in (Upshur County), Texas  
PWS ID No.: 2300020

Dear Mr Trimble:

On May 4, 2007, Mr. Clayton Nicolardi of the Texas Commission on Environmental Quality (TCEQ) Tyler Region Office conducted an investigation of the above-referenced system to evaluate compliance with applicable requirements for public water systems. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required.

Please submit to this office by August 23, 2007, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for outstanding alleged violations Track No. (274541) and please submit a compliance plan by June 25, 2007 for violation Track No. (274588) and (274600). The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If the violation has already been corrected, please submit compliance documentation, such as a photograph, purchase order, etc, demonstrating what actions were taken.

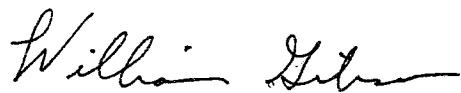
In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules."

Mr. Glen Trimble  
May 25, 2007  
Page 2

The Texas Commission on Environmental Quality appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify the Tyler Region 5 Office within 10 days from the date of this letter. At that time, C. Noel Luper, P.E., Water Program Manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Mr. Clayton Nicolardi in the Tyler Region Office at (903) 535-5162.

Sincerely,



William D. Gibson, Work Leader  
Tyler Region Office

WDG/pcn

Enclosures:     Summary of Investigation Findings



# Summary of Investigation Findings

**FRIENDSHIP WATER SYSTEM**

**Investigation # 558295**

**, UPSHUR COUNTY,**

**Investigation Date: 05/04/2007**

**Additional ID(s): 2300020**

## OUTSTANDING ALLEGED VIOLATIONS

**Track No: 274541      Compliance Due Date: 08/23/2007**

**30 TAC Chapter 291.93(3)**

**Alleged Violation:**

Investigation: 558295

Comment Date: 05/14/2007

Failure, by a retail public utility that possesses a certificate of public convenience and necessity that has reached 85% of its capacity as compared to the most restrictive criteria of the commission's minimum capacity requirements in Chapter 290 T.A.C., to submit to the executive director a planning report that clearly explains how the retail public utility will provide the expected service demands to the remaining areas within the boundaries of its certificated area.

It was documented during the investigation on May 4, 2007 that Friendship Water System had exceeded the 85% rule for well production capacity and total storage capacity.

**Recommended Corrective Action:** Please submit compliance documentation by August 23, 2007. The documentation should demonstrate what actions have been taken and may include photographs, purchase orders, results of analyses, etc.

**Track No: 274588      Compliance Due Date: No Date Entered**

**30 TAC Chapter 290.42(f)(1)(E)(ii)(V)**

**Alleged Violation:**

Investigation: 558295

Comment Date: 05/15/2007

Failure to provide secondary containment for hypochlorite solution containers that are greater than 35 gallons.

It was observed during the investigation on May 4, 2007 that the 55 gallons of hypochlorite solution did not have secondary containment.

**Recommended Corrective Action:** Please submit a compliance plan by June 25, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

**Track No: 274600      Compliance Due Date: No Date Entered**

**30 TAC Chapter 290.42(e)(5)**

**Alleged Violation:**

Investigation: 558295

Comment Date: 05/15/2007

Failure to provide a housed and locked enclosure for hypochlorinator solution containers and pumps, to protect them from vandalism and adverse weather conditions. The solution container lid must be properly covered and sealed to prevent the entry of dust, insects, and other contaminants.

It was observed during the investigation on May 4, 2007 that the hypochlorite solution at the plant was not covered and protected from adverse weather conditions and vandalism.

**Recommended Corrective Action:** Please submit a compliance plan by June 25, 2007. The

plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

---

Track No: 274604      Compliance Due Date: No Date Entered

30 TAC Chapter 290.43(d)(3)

**Alleged Violation:**

Investigation: 558295

Comment Date: 05/15/2007

Failure to provide the pressure tank with facilities for maintaining the air-water volume at the design water level and working pressure.

It was observed during the investigation on May 4, 2007 that the 1500 gallon pressure tank did not have a working visi-probe.

**Recommended Corrective Action:** Please submit a compliance plan by June 25, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation, photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

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### ALLEGED VIOLATIONS NOTED AND RESOLVED

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Track No: 274624

30 TAC Chapter 290.46(d)(2)

30 TAC Chapter 290.46(d)(2)(A)

30 TAC Chapter 290.46(d)(2)(B)

**Alleged Violation:**

Investigation: 558295

Comment Date: 05/17/2007

Failure to maintain a free chlorine residual of at least 0.5 mg/L in the distribution at all times.

It was documented during the investigation on May 4, 2007 that Friendship Water Supply was not maintaining at least 0.5 mg/L free chlorine residual in the far reaches of their distribution system. The water system must maintain 0.5 mg/L because septic tank field lines are located within 150 feet of the well and in lieu of a sanitary control easement for the well. Free chlorine residuals taken in the distribution area were as follows: 1) 0.2 mg/L (Free) @ 928 Burrow 2) 0.4 mg/L (Free) @ 2066 Fawn Crossing.

**Recommended Corrective Action:**

**Resolution:** The operator for Friendship Water System flushed dead-end lines and took chlorine residuals which were above 0.5 mg/L respectively.



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

6/25/07

William D. Gibson  
TCEQ Region 5  
2916 Teague Dr.  
Tyler, TX 75701-3734

RE: Compliance requirements for Inspection of May 2, 2007 Friendship WS, PWS,  
#2300020

Dear Mr. Gibson,

Our compliance plan by Track No. for involved issues is as follows:

- (a) Track No's 274588 and 274600: A conversion to gas chlorination is planned for this plant, which will cancel the presence of the current sodium hypochlorite drums and eliminate the need for both cover and containment. Requested compliance schedule deadline: May 31, 2008
- (b) Track No. 274604: The pressure tank here is a 1500 gal vertical tank, approx. 15 ft. tall. We plan to fabricate saddles, pour pads, and lay the tank horizontal, in order to locate a functional visiprobe assembly inside the existing pump house. Requested compliance schedule deadlines: June 30, 2008.

We shall await word on your review of our proposals and please contact us if additional input is required.

Sincerely,

Glenn Trimble  
President





Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Margaret Hoffman, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 9, 2004

Mr. Glenn Trimble, President  
Texas Water Systems Inc.  
P.O. Box 131945  
Tyler, Texas 75713

Re: Comprehensive Compliance Investigation at:  
Rosewood Water System  
Located on Mimosa Rd., south off SH 154 in Rosewood, Upshur County, Texas  
PWS ID No.: 2300026

Dear Mr. Trimble:

On February 17, 2004, Mr. Clayton Nicolardi of the Texas Commission on Environmental Quality (TCEQ) Tyler Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water systems. No violations were documented during the investigation, however, an area of concern was noted.

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. Clayton Nicolardi in the Tyler Region Office at (903)535-5162.

Sincerely,

A handwritten signature in cursive script that reads "William D. Gibson".

William D. Gibson, Work Leader  
Tyler Region Office

WDG/pcn

(Rev. 2/25/01)

REPLY TO: REGION 5 • 2916 TEAGUE DR. • TYLER, TEXAS 75701-3756 • 903/535-5100 • FAX 903/595-1562

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Mr. Glenn Trimble  
October 26, 2007  
Page 2

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify the Tyler Region Office within 10 days from the date of this letter. At that time, C. Noel Luper, P.E., Water Program Manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Smith in the Tyler Region Office at (903) 535-5159.

Sincerely,



William D. Gibson, Work Leader  
Tyler Region Office

WDG/SSS

Enclosures:     Summary of Investigation Findings  
                      *Obtaining TCEQ Rules*

# Summary of Investigation Findings

STALLION LAKE RANCH

Investigation # 598146

, SMITH COUNTY,

Investigation Date: 10/09/2007

Additional ID(s): 2120104

## OUTSTANDING ALLEGED VIOLATIONS

Track No: 290898

Compliance Due Date: No Date Entered

30 TAC Chapter 290.46(s)(1)

**Alleged Violation:**

Investigation: 598146

Comment Date: 10/16/2007

Failure by the regulated entity to calibrate the well meter at least every three years.

During the investigation on October 9, 2007, the investigator documented that the president reported that the well meters had not been calibrated during the past three years.

**Recommended Corrective Action:** Please submit a compliance plan by November 26, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation such as photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

## ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 290897

30 TAC Chapter 290.43(c)(3)

**Alleged Violation:**

Investigation: 598146

Comment Date: 10/16/2007

Failure to provide an overflow pipe gravity-hinged and weighted cover on the ground storage tank with a good mechanical seal when closed in order to prevent the possible entrance of insects or other contaminants into the water supply. The cover must seat properly with a gap of no more than 1/16 inch.

During the investigation on October 9, 2007, the investigator observed that there was a gap of approximately 3/8 inch at the cover of the overflow pipe of the ground storage tank.

**Recommended Corrective Action:**

**Resolution:** On October 9, 2007, the overflow pipe cover was adjusted by the president during the investigation, thus resolving the alleged violation.





**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

William D. Gibson  
TCEQ Region 5  
2916 Teague St.  
Tyler, TX 75701-9756

11/6/07

RE: Inspection of Stallion Lake System PWS I.D.#2120104, on 10/9/07, an Violation Notice dated 10/26/07, Track #290898

Dear Mr. Gipson:

Enclosed are meter test results on Well #1 and Well #2 @ Stallion Lake Ranch, along with test procedures and recent calibration test results on our test meter. Based on these results, we will soon replace the meter on Well #2.

Sincerely,

Glenn E. Trimble  
President/Chief Operator



**TWS MANAGEMENT Inc**  
*A Licensed Operating Company*

METER TEST CERTIFICATE

Texas Water System, Inc.

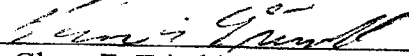
10/29/07

Stallion Lake Ranch  
Plant 1 Well #1  
1 1/2" Master Meter  
Reading: 13,206,549

Flow Rate  
26 GPM

Results  
0.5% under

Gross Capacity  
99.5%

Signature:   
Chief Operator: Glenn E. Trimble

Field Tech: Cortney Sohl



**TWS MANAGEMENT Inc**  
*A Licensed Operating Company*

METER TEST CERTIFICATE

Texas Water System, Inc.

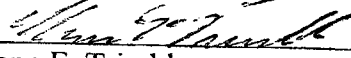
10/29/07

Stallion Lake Ranch  
Plant 1 Well #1  
1 1/2" Master Meter  
Reading: 22,042,180

Flow Rate  
47 GPM

Results  
12.7% under

Gross Capacity  
87.3%

Signature:   
Chief Operator: Glenn E. Trimble

Field Tech: Cortney Sohl



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

STALLION LAKE

Master Meter Test Procedures 10/29/07

Note: Both Well #1 and Well #2 Master Meters were tested by "In Series" Flow through a recently calibrated test meter (04/07 test results enclosed)

Well #1

Test Meter @ 26 GPM S/N 2897317  
Start Read: 1067950 Stop Read 1068572  
Gals Registered = 622.0  
Adjustment factor @ 26GPM = 1.0% under registering  
Adjusted precise gallons = 628.2

Well #1 Meter @ 26 GPM  
Start Read: 13,206,549 Stop Read 13,207,174  
Gals Registered 625.0  
Actual gallons 628.2  
Net error 0.5% under register or 99.5%

Well #2

Test Meter @ 47 GPM S/N 2897317  
Start Read : 1068572.6 Stop Read 1069451.8  
Gals Registered 879.2  
Adjustment factor over 35 GPM = 0.8% under registering  
Adjusted precise gallons = 886.2

Well #2 Meter @ 47 GPM  
Start Read : 22042180 Stop Read 22042954  
Gals Registered 774.0  
Actual gallons 886.2  
Net error : 12.7% under register or 87.3%



# METER TEST CERTIFICATE

CUSTOMER NAME: Texas Water Systems

RETURN ADDRESS: \_\_\_\_\_

DATE: 4.12.07

Meter Manufacturer: Master Meter

Meter size: 1" Master Meter

Serial Number: 2897317

Reading: 1066350

Test Flow Rates

## AWWA STANDARDS

	NEW	REPAIRED	TEST RESULTS
3/4 GPM	1.5 % +/-	3.5 % +/-	<u>95</u> %
3 GPM	1.5 % +/-	3.5 % +/-	<u>98.5</u> %
35 GPM	1.5 % +/-	3.5 % +/-	<u>99.2</u> %

TESTED BY:

Hal Wells  
Hal Wells

NOTARIZED:

Hal Wells appeared before me this day 04 12, 2007  
and has certified the above to be true and correct.

[Signature], notary, Smith county, Texas. My commission  
04/20/09

COMMENTS:



Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 20, 2007

**CERTIFIED MAIL 91 7108 2133 3933 8894 9300**  
**RETURN RECEIPT REQUESTED**

Mr. Glenn Trimble, President  
Garden Valley Resort Water System  
P.O. Box 131945  
Tyler, Texas 75713

**Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Garden Valley Resort WS, 22049 FM 1995, west of SH 110 in Smith Co.  
PWS ID No. 2120081**

Dear Mr. Trimble:

On December 7, 2007, Ms. Samantha Smith of the Texas Commission on Environmental Quality (TCEQ) Tyler Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for public water supply systems. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required.

Please submit to this office by **January 21, 2008**, a compliance plan for Outstanding Alleged Violation Track Numbers **210747**, **296200**, and **296211**. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If the violation has already been corrected, please submit compliance documentation, such as a photograph, purchase order, etc., demonstrating what actions were taken.

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled *Obtaining TCEQ Rules*.

REPLY TO: REGION 5 • 2916 TEAGUE DR. • TYLER, TEXAS 75701-3734 • 903-535-5100 • FAX 903-595-1562

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • Internet address: [www.tceq.state.tx.us](http://www.tceq.state.tx.us)

Mr. Glenn Trimble  
December 20, 2007  
Page 2

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify the Tyler Region Office within 10 days from the date of this letter. At that time, C. Noel Luper, P.E., Water Program Manager will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Smith in the Tyler Region Office at (903) 535-5159.

Sincerely,



William D. Gibson, Work Leader  
Tyler Region Office

WDG/ss

Enclosures:    *Summary of Investigation Findings*  
                  *Obtaining TCEQ Rules*

# Summary of Investigation Findings

GARDEN VALLEY RESORT

Investigation # 610596

, SMITH COUNTY,

Investigation Date: 12/07/2007

Additional ID(s): 2120081

## OUTSTANDING ALLEGED VIOLATIONS

Track No: 210747 Compliance Due Date: No Date Entered

30 TAC Chapter 290.38(25)

30 TAC Chapter 290.43(e)

**Alleged Violation:**

Investigation: 399878

Comment Date: 07/12/2005

Failure to enclose the pressure maintenance facilities with an intruder-resistant fence with lockable gates or a locked, ventilated house. The gates and doors must be kept locked whenever the facility is unattended.

It was observed during the investigation on 05/20/2005 that the Garden Valley Resort failed to maintain in good condition the barbed wire at the top of the fence around the pressure tank at plant # 1.

Investigation: 465006

Comment Date: 07/13/2006

Above comments still apply. On 6/2/2006, TCEQ Tyler office was informed by telephone that the facility fencing for the new plant will be constructed as the final phase of the new plant's construction, estimated to be several months in the future.

Investigation: 610596

Comment Date: 12/10/2007

See descriptive wording from the previous investigation above.

The entire plant, including the pressure tank, has fairly recently been moved to a new location. The final phase of construction is to build a fence, which is estimated to be accomplished in May 2008.

**Recommended Corrective Action:** Please submit a compliance plan by January 21, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation such as photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

Track No: 296200 Compliance Due Date: No Date Entered

30 TAC Chapter 290.42(e)(4)(C)

**Alleged Violation:**

Investigation: 610596

Comment Date: 12/10/2007

Failure to provide the chlorination room with both high level and floor level screened vents. If the room contains more than one operating 150 pound cylinder of chlorine, a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent must be provided, with the fan switch located outside the enclosure.

During the investigation on December 7, 2007, the investigator observed that the floor level and high level vents were completely covered with tape, preventing the chlorination room from venting.

**Recommended Corrective Action:** Please submit a compliance plan by January 21, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation such as photographs, purchase orders, results of



analyses, etc., demonstrating what actions were taken.

Track No: 296211 Compliance Due Date: No Date Entered

30 TAC Chapter 290.43(c)(3)

**Alleged Violation:**

Investigation: 610596

Comment Date: 12/10/2007

Failure to provide an overflow pipe gravity-hinged and weighted cover on the ground storage tank with a good mechanical seal when closed in order to prevent the possible entrance of insects or other contaminants into the water supply. The cover must seat properly with a gap of no more than 1/16 inch.

During the investigation on December 7, 2007, the investigator observed that there was a gap of approximately 1/8 inch at the cover of the overflow pipe of the ground storage tank.

**Recommended Corrective Action:** Please submit a compliance plan by January 21, 2007. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If this violation has already been corrected, please submit compliance documentation such as photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

### ALLEGED VIOLATIONS NOTED AND RESOLVED

Track No: 210824

30 TAC Chapter 290.38(25)

30 TAC Chapter 290.41(c)(3)(O)

**Alleged Violation:**

Investigation: 399878

Comment Date: 07/13/2005

Failure to protect the well unit with an intruder-resistant fence with locked gates, or a locked, ventilated well houses to exclude possible contamination or damage to the facilities by trespassers. The gates or wellhouses shall be locked during periods of darkness and when the plant is unattended.

It was observed during the investigation on 05/20/2005 that Garden Valley Resort failed to maintain in good condition the barbed wire at the top of the fence at well # 2.

Investigation: 465006

Comment Date: 07/13/2006

Above comments still apply. On 6/2/2006, TCEQ Tyler office was informed by telephone that the well head fencing for the new plant will be constructed as the final phase of the new plant's construction, estimated to be several months in the future.

Investigation: 610596

Comment Date: 12/10/2007

See descriptive wording from the previous investigation above.

**Recommended Corrective Action:**

**Resolution:** During the investigation on December 7, 2007, the investigator observed that there was a locked, ventilated wellhouse protecting Well #2.



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

Samantha Smith  
TCEQ Region 5  
2916 Teague Dr  
Tyler, TX 75701-3756

12/17/07

RE: Exhibit document; Garden Valley Inspection of 12/7/07

Dear Ms. Smith:

Enclosed please find photos of the remedial work done on the overflow flap cover for the GST. A gasket of 50% thickness reduction solved the gap problem at the bottom.

We will soon forward pictures of the tape removal from the chlorine room vents.

Thank you,

Glenn E. Trimble  
President



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

William D. Gibson, Work Leader  
TCEQ Region 5  
2916 Teague Dr.  
Tyler, TX 75701-3756

1/15/08

Re: Violation Notice for Investigation of Garden Valley  
PWS ID #2120081 Dec. 7, 2007

Dear Mr. Gibson:

Our requested compliance schedule for the issues listed per the above investigation is as follows:

1. Track #296211: Completed and photos sent to Ms. Samantha Smith on 12/17/07.
2. Track #296200: Completed, photos enclosed of the upper vents showing tape removal. Note: the floor level vent is a saw-slotted plastic bucket covering the exhaust fan inlet and it never was obstructed. I think the inspector overlooked the open slots.
3. Track #210747: Fence completion by May 31, 2008.

Sincerely,

Glenn E. Trimble  
President/General Manager



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

Samantha Smith  
TCEQ Region 5  
2916 Teague Dr  
Tyler, TX 75701-3756

12/17/07

RE: Exhibit document; Garden Valley Inspection of 12/7/07

Dear Ms. Smith:

Enclosed please find photos of the remedial work done on the overflow flap cover for the GST. A gasket of 50% thickness reduction solved the gap problem at the bottom.

We will soon forward pictures of the tape removal from the chlorine room vents.

Thank you,

Glenn E. Trimble  
President

# TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name		GARDEN VALLEY RESORT		TCEQ Add. ID No. RN No. (optional)		2120081	
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	COMPREHENSIVE COMPLIANCE w/ 30 TAC 241		
Regulated Entity Contact	GLENN TRIMBLE		Telephone No.	903	545-2128	Date Contacted	12-3-07
Title	PRESIDENT		Fax No.	903	526-0076	Date Faxed	12-3-07

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and does not represent final TCEQ findings related to violations. Any potential or alleged violations discovered after the date on this form will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue		For Records Request: identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues: include the rule in question with the clearly described potential problem. Other type of issues: fully describe.		Description of Issue
No.	Type <sup>1</sup>	Rule Citation (if known)		
1	AV			VENTS IN CHARLIE ROOM WERE TAPED SHUT.
2	AV			GAP IN OVERFLOW PIPE OF GST AT LEAK COVER.
3				BROUGHT FORWARD: FENCE TO BE CONSTRUCTED AROUND PLANT.
1				

<sup>1</sup>Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

**Document Acknowledgment.** Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Investigator Name (Signed & Printed)	Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date
Samantha Smith	SAMANTHA SMITH	12-7-07	[Signature]	

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512-239-3282.

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 25, 2005

**CERTIFIED MAIL Certified # 75005 1820 0001 4433 5430**  
**RETURN RECEIPT REQUESTED**

Mr. Glenn E. Trimble, President/Chief Operator  
Texas Water Systems Inc.  
7891 Hwy 271  
Tyler, Texas 75708

Re: Acceptance of Compliance Plan for:  
Garden Acres Subdivision,  
Located 2 mi W of W Loop 281 on FM 2206 on Poppy Lane in Gregg County, Texas  
PWS ID No.: 0920031

Dear Mr. Trimble:

The Texas Commission on Environmental Quality (TCEQ) Tyler Region Office has completed a review of the compliance plan that you submitted July 24, 2006, for resolving the alleged violations regarding the sanitary easement for bordering property tracts and the tree and shrub removal from the fencing. These alleged violations were noted during the investigation of the above-referenced Site conducted on April 28, 2006. The compliance plan appears to identify necessary corrective action for the alleged violations. We will monitor your progress in implementing the corrective action. You should submit the appropriate compliance documentation to our office by October 31, 2006, demonstrating that the alleged violations have been resolved. Please be advised, though, that if we determine during follow-up monitoring that you are not working towards compliance or the problem has escalated, further enforcement action will be considered.

The Texas Commission on Environmental Quality appreciates your assistance in this matter and anticipates that you will resolve the alleged violation as required in order to protect the State's environment. If you or members of your staff have any questions, please feel free to contact Mr. Tom Erny in the Tyler Region Office at (903) 535-5142.

Sincerely,

A handwritten signature in cursive script that reads "William Gibson".

William Gibson, Work Leader  
Tyler Region Office

WDG/THE

REPLY TO: REGION 5 • 2916 TEAGUE DR. • TYLER, TEXAS 75701-3756 • 903/535-5100 • FAX 903/595-1562

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: [www.tceq.state.tx.us](http://www.tceq.state.tx.us)

Printed on recycled paper. 50% post consumer waste.

, GREGG COUNTY,

Additional ID(s): 0920031

**OUTSTANDING ALLEGED VIOLATIONS**

Track No: 241480

Compliance Due Date: 10/31/2006

30 TAC Chapter 290.41(c)(1)(F)

**Alleged Violation:**

Investigation: 464314

Comment Date: 6/16/2006

Failure to make available sanitary control easements for the wells at the time of inspection, or executive director approval for a substitute authorized in §290.41(c)(1)(F)(iv). A sanitary easement covering all property within 150 feet each well location must be secured from adjacent landowners and recorded at the county courthouse to ensure that hazards will not develop in the well area. Residential type wells within the easement must be constructed to public water well standards. An approved substitute, such as a copy of the recorded deed and map demonstrating that the public water system owns all real property within 150 feet of the well, may qualify as an exception to obtaining the easement.

The water system may request an exception to this requirement by contacting the Water Supply Division, Public Drinking Water Section, Surveillance and Technical Assistance at 512-239-6020 or 903-535-5104. Please be reminded that all requests for exceptions must be in writing and supported with adequate documentation.

It was documented during the investigation on 04/28/2006 that Garden Acres Subdivision failed to make available for inspection documentation that a sanitary control easement had been obtained or that a substitute had been approved for the wells.

Investigation: 512727

Comment Date: 9/14/2006

Failure to make available sanitary control easements for the wells at the time of inspection, or executive director approval for a substitute authorized in §290.41(c)(1)(F)(iv). A sanitary easement covering all property within 150 feet each well location must be secured from adjacent landowners and recorded at the county courthouse to ensure that hazards will not develop in the well area. Residential type wells within the easement must be constructed to public water well standards. An approved substitute, such as a copy of the recorded deed and map demonstrating that the public water system owns all real property within 150 feet of the well, may qualify as an exception to obtaining the easement.

During a Record Review investigation performed on September 14, 2006, it was determined that a Compliance Plan had been submitted indicating that this violation will be corrected by October 31, 2006.

**Recommended Corrective Action:** Texas Water Systems Inc. should submit compliance documentation by October 31, 2006, as proposed in Compliance Plan dated July 20, 2006. The documentation should demonstrate what actions have been taken and may include photographs, purchase orders, results of analyses, etc.

Track No: 241482

Compliance Due Date: 09/30/2006

30 TAC Chapter 290.41(c)(3)(O)

**Alleged Violation:**

Investigation: 464314

Comment Date: 6/16/2006

Failure to provide an intruder-resistant fence in order to protect the well site. The



**TEXAS WATER SYSTEMS Inc**  
*An Investor Owned Utility*

June 8, 2007

William D. Gibson, Work Leader  
TCEQ – Region 5  
2916 Teague Dr.  
Tyler, TX 75701-3756

Ref: Garden Acres PWS ID # 0920031  
Compliance Investigation Violation Notice of July 22, 2006  
Track # 241480

Dear Mr. Gibson:

We encountered considerable cooperation challenges with the Sanitary easement Procurements after we had asked for a compliance date based on what our involved land owners had told us. Nevertheless, enclosed are copies of the full set of recorded instruments for both Garden Acres well.

This should close out all outstanding compliance issues relative to the investigation of April, 2006.

If there are questions or a need for further information, please call.

Sincerely,

Glenn E. Trimble  
President

cc: Judson Smith  
Texas Water Systems, Inc. Board



#### Attachment #4

Texas Water Systems, Inc., is a Utility Corporation with no payroll, as all operating and management services are contracted by a sister corporate TWS Management, Inc., which is a licensed "Operating Co." (Lic. # WC0000094). Both Corporations have common ownership by TWS Holdings, Inc.

A comprehensive operating management contract is executed for \$17.00 per month per tap according to the attached rate schedule, which lists various regular responsibilities of the operating company.

On issues that go outside of regular operation, such as major repairs and new construction, a rate schedule is attached to describe how this is billed.

These rates apply to both Texas Water Systems, Inc. and other utilities that TWS Management, Inc. works for.

The approximate average total man hours per week that TWS Management, Inc. applies toward the "In-Contract" operating duties for Texas Water Systems, Inc. is 120, in general accord with the following allocations:

Field operations	50 Hrs
Operator Supervision	3 Hrs
Gen. Manager/Chief Operations	25 Hrs
Clerical	35 Hrs
Bookkeeping	<u>7 Hrs</u>
Total	120 Hrs

#### Personnel:

Glenn E. Trimble  
"B" Ground Lic. # WG0010237  
CSI # CI0005256  
General Manager/Chief Operator  
General oversight of all areas including compliance and expansion strategy.

Rudolph Jacobs  
"C" Ground Lic. # WG0004500  
Main Field Operator  
Routine surveillance and most field functions

Reginald Banks  
"D" Water Lic. # WO0021040  
Operations Supervisor  
Reviews inspection sheets & dispatches minor maintenance priorities, monitors regular duty execution.

David Odle

"C" Ground Lic. # WG0011502

Construction Manager

Oversight of new construction and major repairs, special issues such as large location assignments.

Jason M. Jones

"D" Water Lic. # WO0022497

Construction Foreman

New taps, main construction, major repairs, location work.

Andrew Palmer

"D" Water Lic. # WO0023458

Support Operator

Meter readings, system surveillance assistance, general maintenance.

## **EXHIBIT A**

### **System Operation rate structure – Per Tap (Systems over 500) Effective 6/1/08**

#### **Level 1: \$5.50 - Basic Operation**

1. Regular plant/system checks & comprehensive report entrees such as master meter read, GPD usage calculation, plant residual and other monitored levels, site residuals per site plan rotation, Production rate, Rotometer or feed pump settings, scale weights and/or chemical reservoir levels, plant pressure, storage tank level & VP checks, regular static level checks, plant security & maintenance required notes.
2. Monthly sample pulls & delivery.
3. Monthly maintenance flushing and estimated gallonage reports.
4. Disconnects and reconnects.
5. Chemical adjustments and regular maintenance such as batching, stock management and cylinder changes.
6. Provision of monthly report totals.
7. Deal with TCEQ inspector.

#### **Level 2: \$1.00 Meter readings**

#### **Level 3: \$1.50 (8.00 inclusive of Levels 1 – 2) – Expanded operation**

1. Line locations
2. Customer complaint management
3. New tap and extension estimates including developer inquiry.
4. Minor maintenance labor (work that can be done by 1 man, light truck)
5. Incident investigations
6. Extension management
7. 24 Hour on call availability
8. Permit management

#### **Level 4: \$2.50 (10.50 inclusive of Levels 1 – 3) – Surface maintenance**

1. Plant grounds maintenance including mowing, trimming, house keeping & cleaning, exterior paint labor.
2. Fence maintenance; generally vine & shrub removal, reinforcing, gate adjustments, etc.
3. Winterization labor on maintaining heating devices, installing insulation, etc.
4. Distribution system maintenance: maintaining, cleaning around valve boxes, cementing valve cuffs, sign maintenance.

#### **Level 5: \$4.00 (14.50 inclusive of Levels 1 – 4) General Office Management**

1. Administrative services, billing.

2. Accounts set-up and maintenance.
3. Rate issues
4. CSI and BF certification monitoring
5. Customer administrating complaint management
6. Temporary & permanent service agreement management
7. TCEQ required reports
8. Accounting reports, etc.

Level 6: \$2.50 (17.00 inclusive of Levels 1 – 5) General Management

1. General operations management
2. Compliance management and strategy
3. Expansion and development management including design and specifications and projects over sight
4. Rate change applications and formulations
5. CCN Territory maintenance, amendment application & rules compliance.
6. Plans submittals and management.

**TEXAS WATER SYSTEMS, INC. MANAGEMENT CO.**

**SERVICES SCHEDULE**

**Effective 6/1/08**

1 man service truck -	\$60.00 per hour
2 man service truck crew -	\$85.00 per hour
3 man service truck crew -	\$110.00 per hour
4 man service truck crew-	\$140.00 per hour
5 man service truck crew-	\$170.00 per hour

Includes time from base or last location through departure from subject jobsite.

Emergency hours @ - 1.75 times of above  
(6pm to 8am and 6pm Friday to 8am Monday)

Travel 1.00 per mile -light trucks - total net trip  
1.00 per mile-heavy trucks- total net trip  
(Mileage may be one way if another job location follows)

Equipment use - Back hoe \$75.00 per job/per day  
Trencher use .60 per foot

Meter sets, routine repairs, special jobs:  
Per estimate when feasible

**Attachment 5**

**SECTION III. PLANT & EQUIPMENT INFORMATION - WATER**

**A. CUSTOMER CONTRIBUTIONS**

**Table III. A.**

Item [A]	Date of installation [B]	Total Cost [C]	Amount of Customer Contribution [D]	Difference [E] = [C] - [D]
Service Lines & Taps	1/1995	5384.31	800.00	4584.31
Service Lines & Taps	2/1996	813.83	350.00	463.83
Service Lines & Taps	4/1996	11651.44	2961.00	8690.44
Service Lines & Taps	1/1998	5400.23	3643.42	1756.81
Service Lines & Taps	2/1998	2712.88	1340.00	1372.88
Service Lines & Taps	12/1999	4003.81	330.00	3673.81
Service Lines & Taps	12/1999	1754.18	850.00	904.18
New mains	12/2000	15795.11	7352.00	8443.11
New mains	12/2001	11133.06	615.00	10518.06
New mains	12/2001	18324.99	6244.00	12080.99
CR 419 mains	12/2002	21166.48	4764.00	16402.48
SLR Taps	9/2005	1341.65	600.00	741.65
SLR Taps	10/2005	2743.10	1500.00	1243.10
SLR Taps	11/2005	1316.02	600.00	716.02
Rosewood Taps	12/2005	893.68	878.00	15.68
SLR Taps	12/2005	6211.02	2700.00	3511.02
FS New Main	11/2005	4457.28	1536.00	2921.28
Main Install	8/2006	3409.74	235.00	3174.74
Main Install	8/2006	7175.46	2060.00	5115.46
Main Install	12/2006	7353.18	330.00	7023.18
Main Install	3/2007	10136.88	3259.17	6877.71
Main Install	6/2007	8226.09	1500.00	6726.09
Main Install	9/2007	42231.67	10863.75	31367.92
Main Install	10/2007	10593.15	7558.00	3035.15
Meter set	3/2007	1052.37	300.00	752.37
Meter set	4/2007	472.36	300.00	172.36
Meter set	8/2007	442.94	300.00	142.94
Meter set	9/2007	677.02	300.00	377.02
Meter set	10/2007	668.28	300.00	368.28

## SECTION III. PLANT &amp; EQUIPMENT INFORMATION - WATER

## B. ORIGINAL COST &amp; DEPRECIATION SCHEDULE - WATER

[A]  Item	[B]  Date of Installation	[C] Service Life (yrs)		[D] Original Cost when installed (\$)	Depreciation			[E] = [D]/[C] Annual (\$)	[F] Accumulated (\$)	[G] = [D] - [F] Net Book Value (\$)
		*	**		Years in Service					
					Yrs	Mos	Days			
<b>Land</b>										
1 Acre plant	Jan 70			2000.00						
Plant lot	Jan 77			1000.00						
Plant lot	Jan 87			9854.00						
Survey	Sept 00			541.25						
Sanitary Easement	July 00			395.00						
Sanitary Easement & Plant 2	July 01			2703.92						
Easement	Nov 01			275.00						
Harmony lot survey to divide & easement recording	Sept 01			756.56						
Land contracts plant 2	Feb 02			588.00						
Easement	Feb 04			102.00						
Garden Acres acquisition	Mar 07			6345.00						
				24560.73						24560.73
<b>Land</b>										
<b>Wells</b>										
4" x 415' steel	Jan 61	50	30	2075.00	46	11		0.00	2075.00	0.00
6" x 419' steel	Aug 64	50	30	4190.00	43	4		0.00	4190.00	0.00
West 4" x 800' galv steel w/ss screen	Jan 67	50	30	6200.00	40	11		0.00	6200.00	0.00
West 4" x 460' rated 40gpm, current 30gpm	Jan 70	50	30	2700.00	37	11		0.00	2700.00	0.00
East 6" x 460' rated 35gpm, current 35gpm	Jan 77	50	30	9000.00	30	11		0.00	9000.00	0.00
4" x 628' rated 45gpm, current 42gpm	Jan 77	50	30	14000.00	30	11		0.00	14000.00	0.00
4" x 830' steel case rated 47gpm, current 30gpm	Aug 82	50	30	16046.89	25	4		534.90	13372.49	2674.40
Workover, Inv. 17921	Aug 95	50	30	2918.42	12	4		97.28	1167.36	1751.06
Well #3 & 4	Dec 01	50	30	12635.59	6			421.19	2527.13	10108.46
Well #1	Dec 02	50	30	5081.00	5			169.37	846.84	4234.16
Well #2	Mar 03	50	30	7410.00	4	9		247.00	1235.00	6175.00
Well head #2 rebuild	Nov 05	50	30	2275.19	2	1		75.84	227.52	2047.67
<b>Total Wells</b>				84532.09				1545.57	57541.34	26990.75
<b>Well Pumps - 5HP &amp; under</b>										
5HP pump installation	Dec 85	5		1368.00	22			0.00	1368.00	0.00
Original pump	Aug 86	5		2241.00	21	4		0.00	2241.00	0.00
Replacement	Jan 93	5		1561.29	14	11		0.00	1561.29	0.00
5HP motor replace	Dec 95	5		2022.91	12			0.00	2022.91	0.00
5HP well pump	Dec 98	5		1277.25	9			0.00	1277.25	0.00
Plant 2	Dec 01	5		3788.76	6			0.00	3788.76	0.00
Pump replaced	Dec 01	5		2553.98	6			0.00	2553.98	0.00
Plant 1, well 1	Dec 02	5		2638.32	5			0.00	2638.32	0.00
New pump	Jan 03	5		140.00	4	11		0.00	140.00	0.00
New pump for well #2	Jul 03	5		2329.78	4	5		0.00	2329.78	0.00
Pump replaced	Apr 04	5		4859.31	3	8		971.86	3887.45	971.86
Pump for well #3	Jun 04	5		1662.82	3	6		332.56	1330.26	332.56
Well pump change & reset	Sep 05	5		4769.73	2	3		953.95	2861.84	1907.89
Pump motor replacement	Jan 06	5		3215.68	1	11		643.14	1286.27	1929.41
Well pump replacement	Jul 06	5		3736.51	1	5		747.30	1494.60	2241.91
Well pump replacement	Mar 07	5		1747.34		9		349.47	349.47	1397.87
Garden Acres acquisition	Mar 07	5		1545.00		9		309.00	309.00	1236.00
<b>Total Well Pumps &lt;5HP</b>				41457.68				4307.28	31440.18	10017.50

**Well Pumps over 5HP**

New 7.5HP, replaced 5HP lower 147' west wall	June 93	10		12895.47	14	6		0.00	12895.47	0.00
Upgrade to 7.5HP, ck 507	Dec 01	10		4130.90	6			413.09	2478.54	1652.36
Set up well #2 for control & operation at well head	Jan 06	10		3872.75	1	11		387.28	774.55	3098.20
Conversion to well head controls	Apr 06	10		1732.01	1	8		173.20	346.40	1385.61
Bore cost for conduit to well 2	Jul 06	10		1080.00	1	5		108.00	216.00	864.00
Conduit & wire, meter to disconnect	Jul 06	10		495.23	1	5		49.52	99.05	396.18
Repair & replace well pump, plant 1 well 1	Apr 07	10		6308.77		8		630.88	630.88	5677.89
<b>Total Well Pumps &gt;5HP</b>				30515.13				1761.97	17440.89	13074.24

**Booster Pumps - 5HP &**

Country Club Pumps	Mar 86	5	10	1500.00	21	9		0.00	1500.00	0.00
Pump Controls	Dec 88	5	10	1912.00	19			0.00	1912.00	0.00
Paco 5HP 1 1/2x1, 65gpm @	Mar 94	5	10	980.00	13	9		98.00	980.00	0.00
Inv 18771 & 18772	Feb 96	5	10	565.75	11	10		56.58	565.75	0.00
Inv 18077 & 18078	Sept 95	5	10	1267.40	12	3		126.74	1267.40	0.00
Emergency Service Pump, ck 2311	Jan 99	5	10	400.00	8	11		40.00	360.00	40.00
2 new service pumps, ck 2954	Nov 99	5	10	1973.99	8	1		197.40	1579.20	394.79
Plant 2 booster wells, ck 426, 466	Dec 01	5	10	3639.99	6			364.00	2184.00	1455.99
ck 345	Nov 02	5	10	3333.87	5	1		333.39	1666.94	1666.93
Harmony booster wells	Dec 02	5	10	1645.11	5			164.51	822.55	822.56
Harmony booster pump	Jan 03	5	10	1103.65	4	11		110.37	551.83	551.82
Booster pump #1 change	Oct 05	5	10	1868.08	2	2		186.81	560.42	1307.66
N. pump replacement	Dec 05	5	10	833.85	2	1		83.39	250.16	583.69
Replacement	Dec 05	5	10	724.18	2	1		72.42	217.25	506.93
Pump in west booster well	Jul 06	5	10	1490.21	1	5		149.02	298.04	1192.17
Work on west service pump	Jul 06	5	10	2847.73	1	5		284.77	569.55	2278.18
A/C replacement, break repair	Aug 06	5	10	825.01	1	4		82.50	165.00	660.01
Pump replacement - east booster	Aug 06	5	10	2921.70	1	4		292.17	584.34	2337.36
<b>Total Booster Pumps &lt;5HP</b>				29832.52				2642.05	16034.43	13798.09

**Booster Pumps over 5HP**

10HP Marlow	May 91	10	30	316.00	16	7		10.53	179.02	136.98
Pump rebuild, Inv. 13860	Nov 94	10	30	383.64	13	1		12.79	166.26	217.38
Installed 2 - 7.5 Paco 75gpm @ 190'	Dec 96	10	30	627.38	11			20.91	230.02	397.36
7.5 HP Peerless, ck 481, 631	Mar 98	10	30	1183.46	9	9		39.45	394.49	788.97
7.5 HP Hydraflo pump	Jul 04	10	30	8021.11	3	5		267.37	1069.48	6951.63
7.5 HP Hydraflo pump	Aug 04	10	30	3484.73	3	4		116.16	464.63	3020.10
Change motor on e booster well after overhear	Jul 06	10	30	1885.00	1	5		62.83	125.67	1759.33
Plant 1 startup	Jul 06	10	30	1006.01	1	5		33.53	67.07	938.94
Repair & replace motor on west booster well	Sep 06	10	30	2828.60	1	3		94.29	188.57	2640.03
<b>Total Booster Pumps &gt;5HP</b>				19735.93				657.86	2885.21	16850.72

**Hypochlorinators**

Replacement	Oct 91	10		210.00	16	2		0.00	210.00	0.00
Replacement	Aug 93	10		418.00	14	4		0.00	418.00	0.00
Replacement	Nov 94	10		565.26	13	1		56.53	565.26	0.00
Chemtech 124	Aug 95	10		489.33	12	4		48.93	489.33	0.00
Chemtech 124 Feed pump	Dec 00	10		295.00	7			29.50	236.00	59.00



Chemtech 124 Feed pump, ck 463	Dec 01	10		364.00	6			36.40	218.40	145.60
Chemtech 200 pump, ck 523	Dec 01	10		550.00	6			55.00	330.00	220.00
Chemtech 124 pump, ck 502	Dec 01	10		247.50	6			24.75	148.50	99.00
Chemtech 200 pump, ck 403	Dec 02	10		669.58	5			66.96	334.79	334.79
Chemtech 124 feed pump	Oct 03	10		229.00	4	2		22.90	114.50	114.50
Chemtech 200	Feb 04	10		584.00	3	10		58.40	233.60	350.40
Repair & replace caustic feed pump	Aug 06	10		329.00	1	4		32.90	65.80	263.20
Repair & replace chlorine feed pump	Jan 07	10		367.00		11		36.70	36.70	330.30
<b>Total Hypochlorinators</b>				5317.67				468.97	3400.88	1916.79
<b>Gas Chlorinators</b>										
"Advance" 25gpd system	Jan 82	10	20	2400.00	25	11		0.00	2400.00	0.00
"Advance" 25gpd system	June 84	10	20	975.00	23	6		0.00	975.00	0.00
Regal sys, Inv. 20677	Nov 96	10	20	2598.96	11	1		129.95	1429.44	1169.52
Regal sys Plant 2, ck 522	Dec 01	10	20	2014.75	6			100.74	604.43	1410.32
Superior sys, plant 1, ck 399	Dec 02	10	20	2413.62	5			120.68	603.40	1810.22
Chlorine sys. Prep & install	Mar 05	10	20	3013.06	2	9		150.65	451.96	2561.10
Work on chlorine room	Dec 05	10	20	1549.49	2			77.47	232.42	1317.07
Inv #1672	Dec 05	10	20	2584.87	2			129.24	387.73	2197.14
Chlorine system install	Apr 06	10	20	3097.12	1	8		154.86	309.71	2787.41
<b>Total Gas Chlorinators</b>				20646.87				863.59	7394.09	13252.78
<b>Wood Structures</b>										
Country Club pump house	May 77	15	20	375.00	30	7		0.00	375.00	0.00
Rosewood trailer purchase	Oct 88	15	20	400.00	19	2		20.00	380.00	20.00
Trailer upgrade	Feb 89	15	20	815.00	18	10		40.75	774.25	40.75
Chlor. Vent install	Nov 91	15	20	130.50	16	1		6.53	105.66	24.84
Pump house rebuild	Sept 95	15	20	1939.45	12	3		96.97	1163.65	775.80
Pump house repipe/rewire	Mar 96	15	20	3314.25	11	9		165.71	1988.53	1325.72
Pump house completion	Sept 96	15	20	478.00	11	3		23.90	261.85	216.15
Pump house for booster station	Jan 99	15	20	2285.00	8	11		114.25	1028.25	1256.75
Pump house for plant rebuild	Oct 99	15	20	1226.27	8	2		61.31	490.49	735.78
Pump house construction	Mar 03	15	20	1060.98	4	9		53.05	265.25	795.73
Well #2 house construction	Jul 06	15	20	3700.84	1	5		185.04	370.08	3330.76
<b>Total Wood Structures</b>				15725.29				767.51	7203.01	8522.28
<b>Masonry &amp; Metal Structures</b>										
Plant 2 pump house	Dec 01	30		4131.00	6			137.70	826.20	3304.80
Plant 2 pump house	Dec 02	30		382.39	5			12.75	50.99	331.40
Plant 1 pump house	Dec 02	30		1151.11	5			38.37	153.48	997.63
Plant pump house	Dec 03	30		4008.10	4	1		133.60	534.41	3473.69
Fill line piping & tie in work	Jan 06	30		2490.93	1	11		83.03	166.06	2324.87
Install new service entry	Jul 06	30		2076.22	1	5		69.21	138.41	1937.81
<b>Total Masonry &amp; Metal Struct.</b>				14239.75				474.66	1869.55	12370.20
<b>Storage Tanks</b>										
Orig 4000 gal storage tank	Jan 74	50		1000.00	33	11		20.00	680.00	320.00
Orig 7500 gal tank	May 77	50		2500.00	30	7		50.00	1550.00	950.00
16000 gal fiberglass tank	Nov 84	50		1036.00	23	1		20.72	476.56	559.44
Storage tank mod.	Dec 94	50		1140.33	13			22.81	296.52	843.81
12000 gal tank installed	Feb 95	50		4004.21	12	10		80.08	1041.06	2963.15
2nd 20000 gal bolted tank	Nov 96	50		7258.64	11	1		145.17	1596.88	5661.76
12000 gal tank mod.	Oct 97	50		783.18	10	2		15.66	156.61	626.57
26k tank completion, ck 747, 763, 764, 812, 850	May 98	50		2483.79	9	7		49.68	496.72	1987.07
Final tank work, ck 1159, 1962, 1963	Aug 98	50		1482.73	9	4		29.65	266.92	1215.81

New Rosewood, ck 2162	Nov 98	50		5000.00	9	1		100.00	900.00	4100.00
New Rosewood 20k tank, cks	Jun 99	50		5926.17	8	6		118.52	1066.79	4859.38
New Rosewood 20k tank, cks 2694, 2773, 2803	Aug 99	50		2469.00	8	4		49.38	395.04	2073.96
Partial Harmony tank, ck 2725	July 99	50		500.00	8	5		10.00	80.00	420.00
Cape Tranq. Storage tank, ck 2904	Oct 99	50		971.43	8	2		19.43	155.43	816.00
Storage tank recoat, ck 422	July 00	50		2268.73	7	5		45.37	362.98	1905.75
Tank work	Jan 03	50		262.50	4	11		5.25	26.25	236.25
Tank work	Jul 04	50		18266.03	3	5		365.32	1461.28	16804.75
Attempt to move tank	Apr 06	50		285.00	1	8		5.70	11.40	273.60
Blast & recoat tank	Jul 06	50		1535.15	1	5		30.70	61.41	1473.74
Garden Acres acquisition - 5000 gal tank	Mar 07	50		2670.00		9		53.40	53.40	2616.60
Garden Acres acquisition - 19000 gal tank	Mar 07	50		1650.00		9		33.00	33.00	1617.00
Acquisition, transfer, install, recoat, piping and start of GST at Mt Sylvan plant 2	Jun 07	50		26171.16		6		523.42	523.42	25647.74
<b>Total Storage Tanks</b>				<b>89664.05</b>				<b>1793.28</b>	<b>11691.67</b>	<b>77972.38</b>
<b>Pressure Tanks</b>										
Mt. Sylvan Main tank	Jan 60	50		2800.00	47	11		56.00	2688.00	112.00
1400 gal pressure tank	May 77	50		2250.00	30	7		45.00	1395.00	855.00
4'X20' 2000 gal 60psi	Sept 87	50		2400.00	20	3		48.00	960.00	1440.00
Pressure tank purchase	Apr 88	50		600.00	19	8		12.00	240.00	360.00
1400 gal pressure tank	Jan 92	50		2000.00	15	11		40.00	640.00	1360.00
900 gal pressure tank installed	May 93	50		3666.96	14	7		73.34	1100.10	2566.86
Tank modification	Dec 94	50		823.11	13			16.46	213.99	609.12
Lag vertical tanks, Inv 18069, 18071, 18072, 18073	Sept 95	50		922.72	12	3		18.45	221.42	701.30
Lag vertical tanks, Inv 19105	May 96	50		2703.21	11	7		54.06	648.74	2054.47
Pressure tank, booster station, ck 2311	Jan 99	50		541.00	8	11		10.82	97.38	443.62
Pressure tank modification, ck 2985	Dec 99	50		333.63	8			6.67	53.41	280.22
2nd tank, booster sta., ck 566	Oct 00	50		715.42	7	2		14.31	100.16	615.26
2500 gal tank, plant 2, ck 525	Dec 01	50		8755.57	6			175.11	1050.67	7704.90
3000 gal tank, plant 1, ck 398	Dec 02	50		8733.07	5			174.66	873.31	7859.76
Move tank	Jan 06	50		2360.00	1	11		47.20	94.40	2265.60
Surge tank installation bypass line, insulation, etc at plt 1	Apr 06	50		3118.67	1	8		62.37	124.75	2993.92
Plant 2 start up	Jul 06	50		1291.12	1	5		25.82	51.64	1239.48
<b>Total Pressure Tanks</b>				<b>44014.48</b>				<b>880.29</b>	<b>10552.97</b>	<b>33461.51</b>
<b>Distribution System</b>										
13200' of 3" & some 2" pvc	Jan 70	50		13200.00	37	11		264.00	10032.00	3168.00
3100' of 2" galv steel	May 77	50		3260.00	30	7		65.20	2021.20	1238.80
System upgrades	Jan 85	50		3850.00	22	11		77.00	1771.00	2079.00
Orig length 20000' per letter ref misc allocation	Jan 85	50		9963.00	22	11		199.26	4582.98	5380.02
Reroute main around constr.	Feb 85	50		1387.30	22	10		27.75	638.25	749.05
Mt Sylvan work, ck 125	June 97	50		300.00	10	6		6.00	66.00	234.00
cks 1930, 1938, 1957, 1911, 2039, 2046, 2058, 2079, 2106, 2112, 2118, 2121	Nov 98	50		9178.04	9	1		183.56	1835.60	7342.44
724 Main, cks 2123, 2124, 2149, 2172, 2201, 2221	Dec 98	50		8733.40	9			174.67	1746.70	6986.70
Dean Putman, cks 2685, 2701, 2702, 2708, 2712, 2713, 2722, 2724, 2898, 2899, 2996, 3009, 3025	Dec 99	50		8997.36	8			179.95	1619.55	7377.81