

Control Number: 43943



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VINSON & ELKINS L.L.P. THE TERRACE 7 2801 VIA FORTUNA, SUITE 100 AUSTIN, TEXAS 78746 TELEPHONE (512) 542-8400 FAX (512) 542-8612 www.velaw.com

Bryan J. Moore Direct Dial (512) 542-8729 Direct Fax (512) 236-3257 bmoore@velaw.com

January 18, 2005

Via Facsimile & First Class Mail

LaDonna Castañuela, TCEQ Docket Clerk Office of the Chief Clerk, MC - 105 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78753

> SOAH Docket No. 582-05-1005 Re: TCEQ Docket No. 2004-1384-UCR Petition of Bexar Metropolitan Water District to Compel Raw Water Commitment from Guadalupe-Blanco River Authority

CHIEF CLERKS OFFICE Ģ

Dear Ms. Castañuela:

Enclosed for filing in the above referenced docket, please find one original and one copy of Guadalupe-Blanco River Authority's Request for Disclosure to Petitioner Bexar Metropolitan Water District. Please date stamp the enclosed copy and return it to my attention in the self addressed stamped envelope.

Respectfully submitted,

Bryan J. Moore

Enclosure

Service List cc:

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SOAH DOCKET NO. 582-05-1005 TCEQ DOCKET NO. 2004-1384-UCR

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PETITION OF BEXAR METROPOLITAN
WATER DISTRICT TO COMPEL RAW
WATER COMMITMENT FROM
GUADALUPE-BLANCO RIVER
AUTHORITY

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

GUADALUPE-BLANCO RIVER AUTHORITY'S REQUEST FOR DISCLOSURE TO PETITIONER BEXAR METROPOLITAN WATER DISTRICT

Petitioner, Bexar Metropolitan Water District, by and through its attorney of record, To: Paul M. Terrill, Hazen & Terrill, P.C., 810 W. 10th Street, Austin, Texas 78701.

Guadalupe-Blanco River Authority serves the following Request for Disclosure upon Petitioner, Bexar Metropolitan Water District, pursuant to the Administrative Law Judge's Order No. 1 in this proceeding and Rules 192 and 194 of the Texas Rules of Civil Procedure. This Request for Disclosure is continuing in nature and you are requested to supplement your disclosures promptly and to the full extent required by the Texas Rules of Civil Procedure, 300 CHIEF CLERKS OFF including, but not limited to, Rule 193.5.

Respectfully submitted,

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Molly Cagle/State Bar No. 03591800 VINSON & ELKINS L.L.P. The Terrace 7 2801 Via Fortuna, Suite 100 Austin, Texas 78746 Telephone: (512) 542-8552 Facsimile: (512) 236-3280

Roger Nevola/State Bar No. 14937500 LAW OFFICES OF ROGER NEVOLA P.O. Box 2103 Austin, Texas 78767-2103 Telephone: (512) 499-0500 Facsimile: (512) 499-0575

ATTORNEYS FOR GUADALUPE-BLANCO RIVER AUTHORITY

CERTIFICATE OF SERVICE

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I certify that a true and correct copy of the following Request for Disclosure was served on the following person(s) via electronic mail and/or facsimile on January 18, 2005.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY	Docket Clerk Office of the Chief Clerk P. O. Box 13087 Austin, Texas 78711-3087 PH: 239-3300 FAX: 51/239-3311
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY	Todd Galiga, Staff Attorney Texas Commission on Environmental Quality MC-173 P. O. Box 13087 Austin, Texas 78711-3087 PH: 512/239-0600 FAX: 512/239-0606 Email: tgaliga@tceq.state.tx.us
OFFICE OF PUBLIC INTEREST COUNSEL OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY	Scott Humphrey Office of the Public Interest Counsel Texas Commission on Environmental Quality MC-103 P. O. Box 13087 Austin, Texas 78711-3087 PH: 512/239-6363 FAX: 512/239-6377 Email: shumphre@tceq.state.tx.us
BEXAR METROPOLITAN WATER DISTRICT	Louis Rosenberg 322 Martinez, DeMazieres Building San Antonio, TX 78205 PH: 210/225-5454 FAX: 210/225-5450 Email: firm@ltrlaw.com
BEXAR METROPOLITAN WATER DISTRICT	Paul M. Terrill Hazen & Terrill, P.C. 810 W. 10th Street Austin, Texas 78701-2785 PH: 512/474-9100 FAX: 512/474-9888 Email: pterrill@hazen-terrill.com
	Z M

Bryan J. Moore

REQUEST FOR DISCLOSURE

Pursuant to Rule 194, you are requested to disclose, within 30 days of service of this request, the information or material described in Rule 194.2(a)-(i). This request for disclosure is not intended to and does not supercede the timelines contained in Order No. 1; however, you are requested to provide all information responsive to this Request for Disclosure, the production or disclosure of which is not controlled by Order No. 1, within 30 days of service of this request.

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SOAH DOCKET NO. 582-05-1005 TCEQ DOCKET NO. 2004-1384-UCR

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PETITION OF BEXAR METROPOLITAN WATER DISTRICT TO COMPEL RAW WATER COMMITMENT FROM GUADALUPE-BLANCO RIVER AUTHORITY CHEF CLERKS OFFICE BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

GUADALUPE-BLANCO RIVER AUTHORITY'S REQUEST FOR DISCLOSURE TO PETITIONER BEXAR METROPOLITAN WATER DISTRICT

To: Petitioner, Bexar Metropolitan Water District, by and through its attorney of record, Paul M. Terrill, Hazen & Terrill, P.C., 810 W. 10th Street, Austin, Texas 78701.

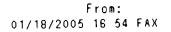
Guadalupe-Blanco River Authority serves the following Request for Disclosure upon Petitioner, Bexar Metropolitan Water District, pursuant to the Administrative Law Judge's Order No. 1 in this proceeding and Rules 192 and 194 of the Texas Rules of Civil Procedure. This Request for Disclosure is continuing in nature and you are requested to supplement your disclosures promptly and to the full extent required by the Texas Rules of Civil Procedure, including, but not limited to, Rule 193.5.

Respectfully submitted,

Molly Cagle State Bar No. 03591800 VINSON & ELKINS L.L.P. The Terrace 7 2801 Via Fortuna, Suite 100 Austin, Texas 78746 Telephone: (512) 542-8552 Facsimile: (512) 236-3280

Roger Nevola/State Bar No. 14937500 LAW OFFICES OF ROGER NEVOLA P.O. Box 2103 Austin, Texas 78767-2103 Telephone: (512) 499-0500 Facsimile: (512) 499-0575

ATTORNEYS FOR GUADALUPE-BLANCO RIVER AUTHORITY



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Jan 18 2005 16:56

P.03 Ø 003/004

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the following Request for Disclosure was served on the following person(s) via electronic mail and/or facsimile on January 18, 2005.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY	Docket Clerk Office of the Chief Clerk P. O. Box 13087 Austin, Texas 78711-3087 PH: 239-3300 FAX: 51/239-3311
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY	Todd Galiga, Staff Attorney Texas Commission on Environmental Quality MC-173 P. O. Box 13087 Austin, Texas 78711-3087 PH: 512/239-0600 FAX: 512/239-0606 Email: tgaliga@tceq state.tx.us
OFFICE OF PUBLIC INTEREST COUNSEL OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY	Scott Humphrey Office of the Public Interest Counsel Texas Commission on Environmental Quality MC-103 P. O. Box 13087 Austin, Texas 78711-3087 PH: 512/239-6363 FAX: 512/239-6377 Email: shumphre@tceq.state.tx.us
BEXAR METROPOLITAN WATER DISTRICT	Louis Rosenberg 322 Martinez, DeMazieres Building San Antonio, TX 78205 PH: 210/225-5454 FAX: 210/225-5450 Email: firm@ltrlaw.com
BEXAR METROPOLITAN WATER DISTRICT	Paul M. Terrill Hazen & Terrill, P C. 810 W. 10th Street Austin, Texas 78701-2785 PH: 512/474-9100 FAX: 512/474-9888 Email: pterrill@hazen-terrill.com
	Bryan J. Moore

P.04 ☑ 004/004

REQUEST FOR DISCLOSURE

Pursuant to Rule 194, you are requested to disclose, within 30 days of service of this request, the information or material described in Rule 194.2(a)-(i). This request for disclosure is not intended to and does not supercede the timelines contained in Order No. 1; however, you are requested to provide all information responsive to this Request for Disclosure, the production or disclosure of which is not controlled by Order No. 1, within 30 days of service of this request.

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CHIEF OLENKS OFFICE

VINSON & ELKINS L.L.P. THE TERRACE 7 2001 VIA PORTUNA, SUITE 100 ALISTIN, TEXAS 78746 TELEPHONE (512) 542-8400 FAX (512) 542-8612

Bryan Moore Direct Dial (512) 542-8729 Direct Fax (512) 236-3257 bmoorc@vclaw.com

BROADCAST FACSIMILE TRANSMITTAL PAGE

DATE: January 18, 2005

TO:	Docket Clerk, TCEQ	FAX:	(512) 239-3311
		PHONE:	(512) 239-3300
TO: Todd Ga	Todd Galiga, Staff Attorney	FAX:	(512) 239-0606
		PHONE:	(512) 239-0600
TO:	Scott Humphrey, Office of the Public	FAX:	(512) 239-6377
Interest Counsel	PHONE:	(512) 239-6363	
TO:	Louis Rosenberg	FAX:	(210) 225-5450
		PHONE:	(210) 225-5454
TO:	Paul M. Terrill	FAX:	(512) 474-9888
	PHONE:	(512) 474-9100	
PAGES:	4 (including this transmittal page)	CLIENT/	MATTER: GUA160/23007
FROM:	Bryan Moore		
MESSAGE:	Please see the attached Request for Disclosure.		

498207_1 DOC

Hard Copy Follows. 🛛 Yes 🗵 No

CONFIDENTIALITY NOTICE:

The information contained in this FAX may be confidential and/or privileged. This FAX is intended to be reviewed initially by only the individual named above. If the reader of this TRANSMITTAL PAGE is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this FAX or the information contained herein is prohibited. If you have received this FAX in error, please immediately notify the sender by telephone and return this FAX to the sender of the above. Thank you