

Control Number: 46996



Item Number: 17

Addendum StartPage: 0

DOCKET NO. 46996

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2017 MAY 18 PM 3: 09

APPLICATION OF CHUCK BELL DBA CHUCK BELL WATER SYSTEM, LLC AND UNDINE TEXAS, LLC FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN JOHNSON AND TARRANT COUNTIES

THREATY COMMISSION

PUBLIC UTILITY COMMISSI

OF TEXAS

UNDINE TEXAS, LLC'S RESPONSE TO COMMISSION STAFF'S ORDER NO. 2

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Undine Texas, LLC ("Undine") files this Response to Order No. 2. In support thereof, Undine states the following:

I. Background

On March 27, 2017, Undine filed with the Public Utility Commission of Texas ("Commission") an application for sale, transfer, or merger of a retail public utility in Johnson and Tarrant Counties.

On March 30, 2017, the Commission administrative law judge (ALJ) issued Order No. 1, requiring Staff to file its recommendation regarding the administrative completeness of the Application by April 27, 2017.

On April 27, 2017, Commission Staff filed their First Administrative Completeness Recommendation. Staff recommended that Applicants be given until May 18, 2017 to cure the identified deficiencies in the Application and that Staff be given until June 1, 2017 to file a supplemental administrative completeness recommendation.

On May 1, 2017, the Administrative Law Judge issued Order No. 2, finding that Undine's application for sale, transfer or merger of a retail public utility in Johnson and Tarrant Counties

was deficient and incomplete, for the reasons specified in the pleading and memorandum of Sean Scaff in the Commission's Water Utilities Regulation Division.

II. Supplemental Application Information Provided

In response to Commission Staff Order No. 2, Undine hereby files the following information.

Deficiency - Mapping

The Applicants must file the following items to resolve the mapping deficiencies:

a. A general location map identifying each requested area in reference to the nearest county boundary, city, or town.

Response:

Attached as Exhibit A are the general location maps identifying each requested area in reference to the nearest county boundary, city or town.

b. Revised detailed maps identifying each requested area in reference to verifiable manmade and natural landmarks, such as roads, rivers, and railroads.

Response:

Attached as <u>Exhibit B</u> are the revised detailed maps identifying each requested area in reference to verifiable man-made and natural landmarks, such as roads, rivers, and railroads.

c. Clarification of the <u>total acreage</u> for all requested areas and <u>number of customer</u> <u>connections</u> to be transferred from Chuck Bell to Undine. This information is required for the notice documents.

Response:

Attached as <u>Exhibit C</u> is the clarification of the total acreage for all requested areas and number of customer connections to be transferred from Chuck Bell to Undine.

d. The Applicants must also provide a list of licensed operational staff that will be hired to operate the proposed areas. The list must contain the operator's name, license number and class of license (i.e. A, B, C, D).

Response:

Attached as <u>Exhibit D</u> is a list of licensed operational staff, including the operator's name, license number and class of license.

Undine also submits with this response the following:

- 1. Other utilities within 2 miles attached as Exhibit E.
- 2. System description information attached as Exhibit F.
- 3. Digital data attached as Exhibit G.

III. Conclusion

Undine respectfully requests, upon confirmation by Commission Staff, that the ALJ issue an order finding the application administratively complete and direct Commission Staff to continue application processing. If for any reason Commission Staff does not view the attachments as sufficient for application acceptance, Undine respectfully requests that it be notified immediately and provided an opportunity to cure any remaining deficiencies that are identified.

Respectfully submitted,

DuBois, Bryant & Campbell, LLP

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Austin, Texas 78701

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(512) 457-8000

(512) 457-8008 (fax)

Attorneys for Undine Texas, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document was served on the persons as indicated below on this the 18th day of May, 2017:

Matthew A. Arth
Public Utility Commission of Texas
Legal Division
1701 N. Congress Avenue
P. O. Box 13326
Austin, Texas 78711-3326
Matthew.Arth@puc.texas.gov

Peter T. Gregg

EXHIBIT A GENERAL LOCATION MAP

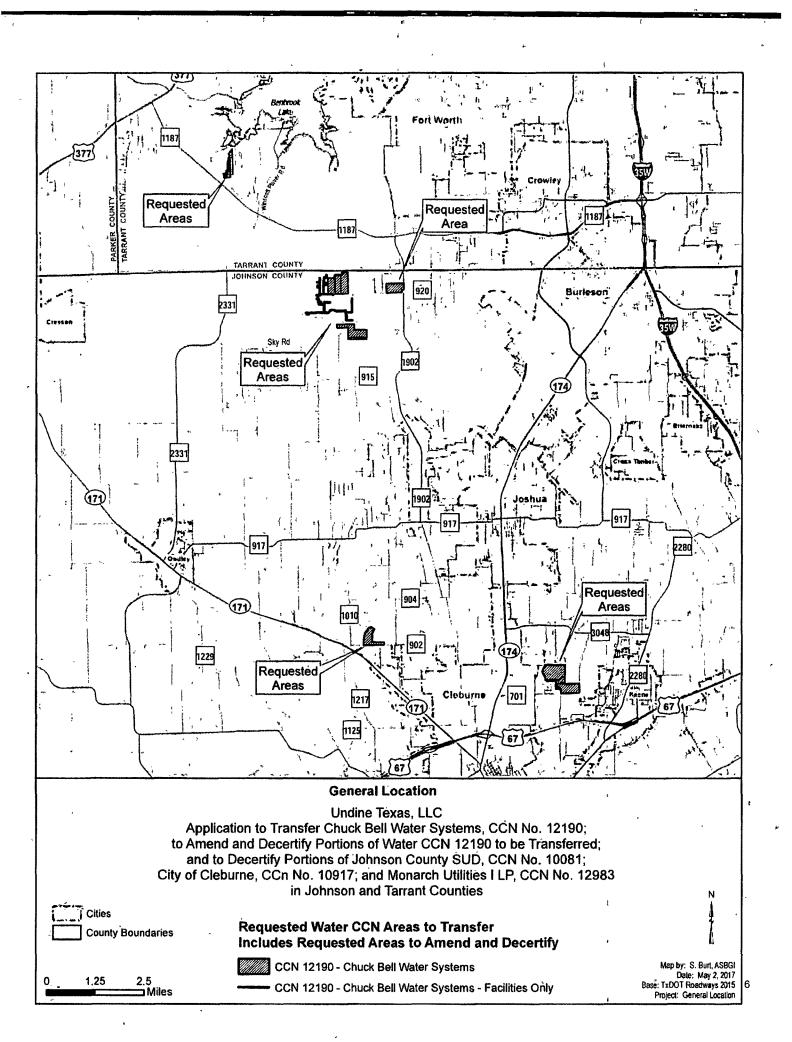
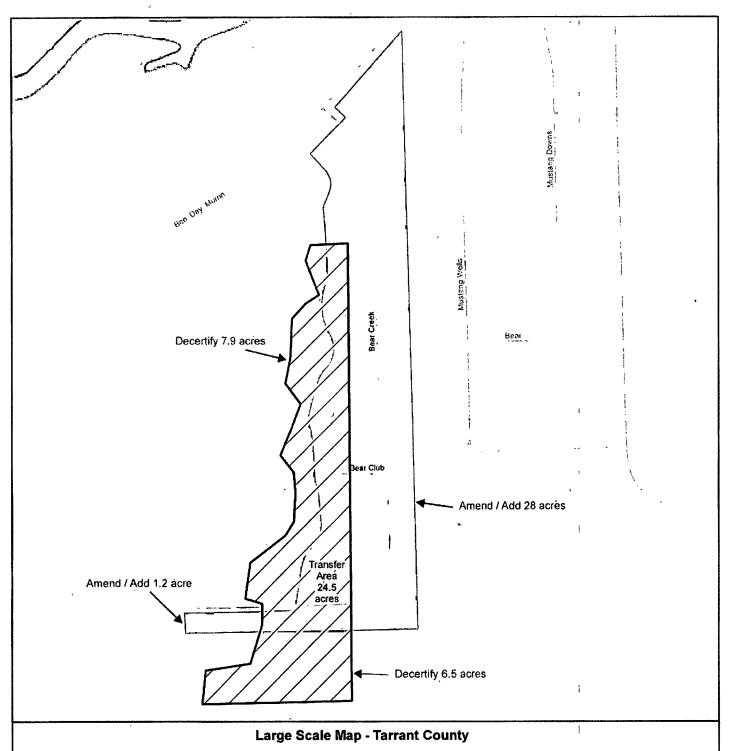


EXHIBIT B

DETAILED MAPS



Undine Texas, LLC

Application to Transfer Chuck Bell Water Systems, CCN No. 12190; to Amend and Decertify Portions of Water CCN 12190 to be Transferred; and to Decertify Portions of Johnson County SUD, CCN No. 10081; City of Cleburne, CCN No. 10917; and Monarch Utilities I LP, CCN No. 12983 in Johnson and Tarrant Counties

Transfer CCN 12190 - Chuck Bell Water Systems Amend / Add Areas

Decertify Areas

Map by: S. Burt, ASBGI Date: April 27, 2017 Base' TxDOT Roadways 2015 Project: Bear Creek Large Scale

500 ☐Feet 250



Undine Texas, LLC

Application to Transfer Chuck Bell Water Systems, CCN No. 12190; to Amend and Decertify Portions of Water CCN 12190 to be Transferred; and to Decertify Portions of Johnson County SUD, CCN No. 10081; City of Cleburne, CCN No. 10917; and Monarch Utilities I LP, CCN No. 12983 in Johnson and Tarrant Counties

Requested Water	CC	N A	Areas
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	Ζ	Transfer CCN 12190 - Chuck Bell Water Systems
Ţ		Decertify Areas
r		Amend / Add Areas

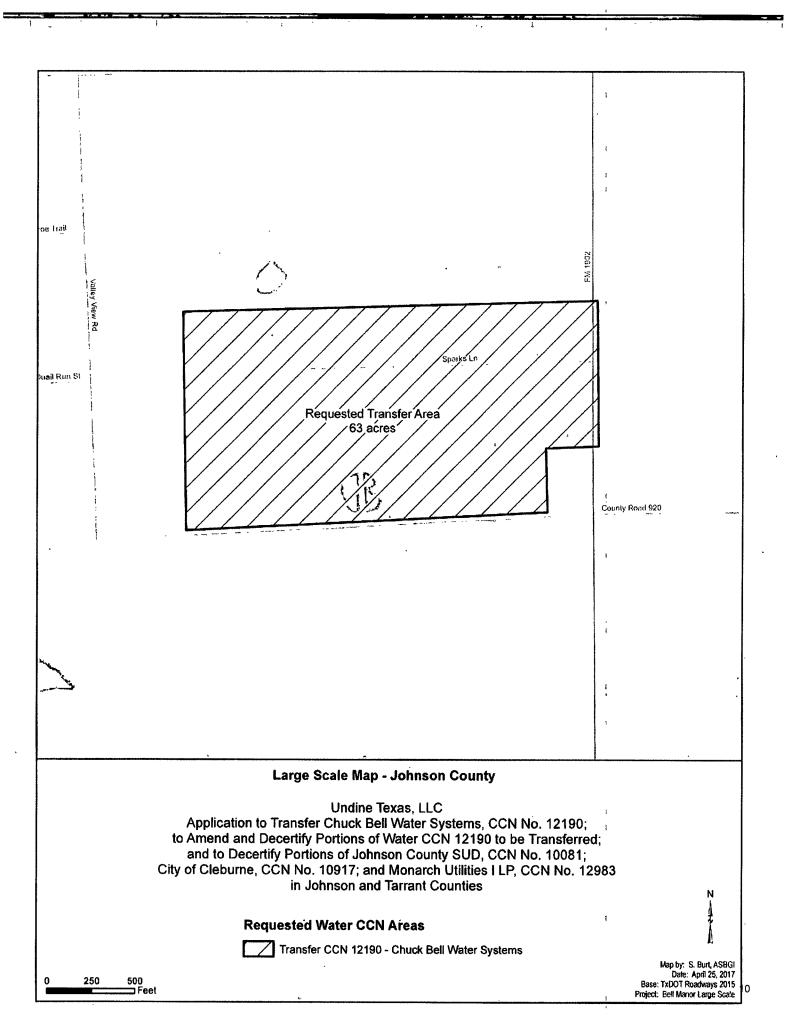
Map by. S Burt, ASBGI Dale: April 27, 2017

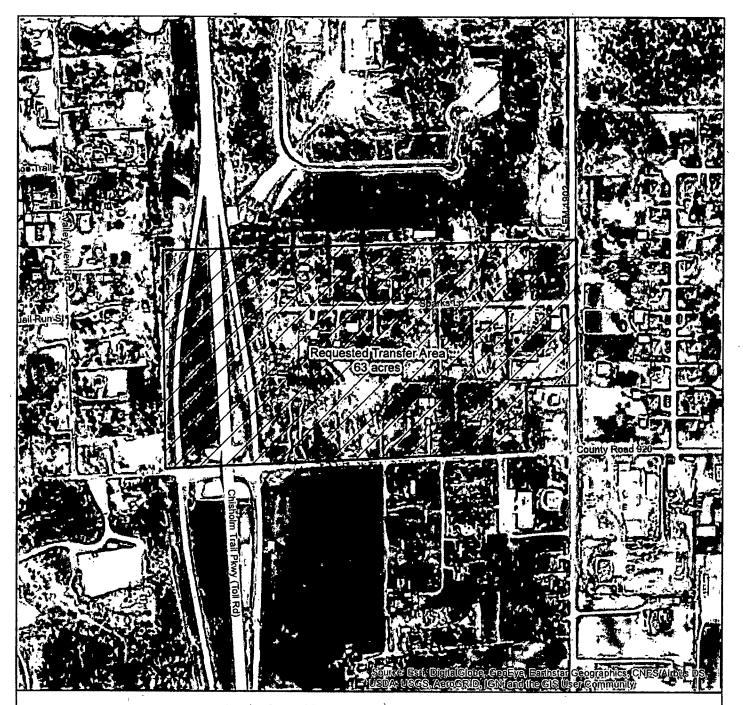
Base: ESRI World Imagery

Project: Bear Creek Large Scale on Imagery

500 ☐ Feet

250





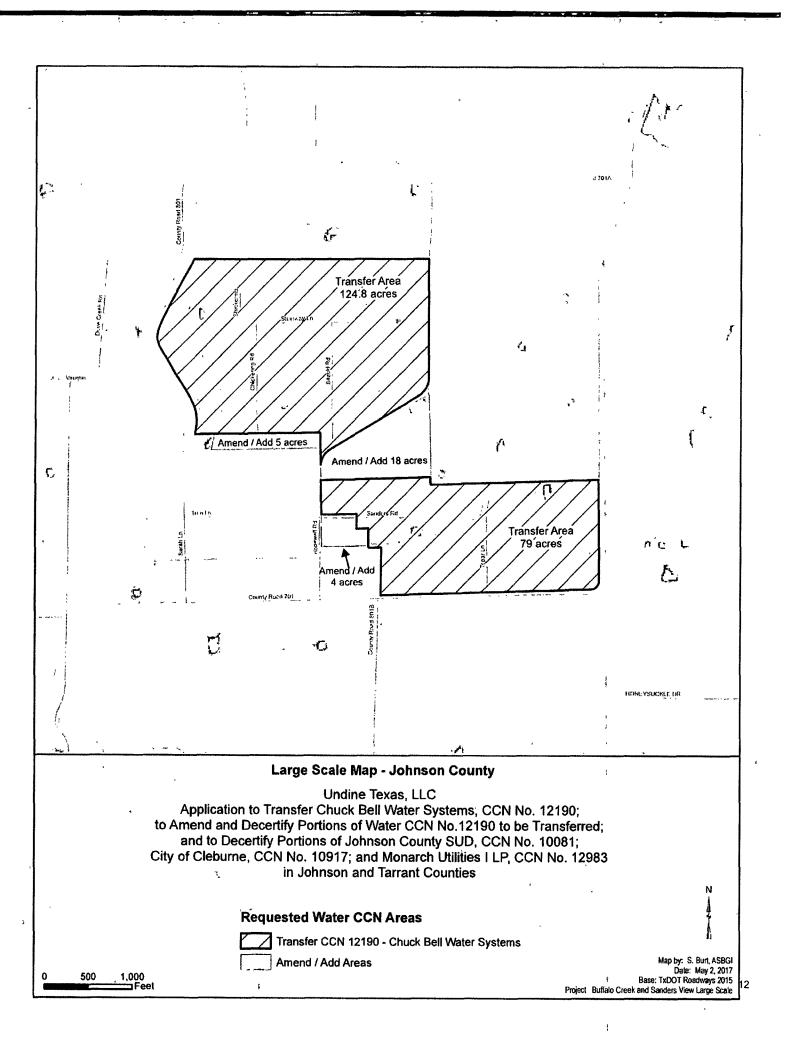
Undine Texas, LLC
Application to Transfer Chuck Bell Water Systems, CCN No. 12190;
to Amend and Decertify Portions of Water CCN 12190 to be Transferred;
and to Decertify Portions of Johnson County SUD, CCN No. 10081;
City of Cleburne, CCN No. 10917; and Monarch Utilities I LP, CCN No. 12983
in Johnson and Tarrant Counties

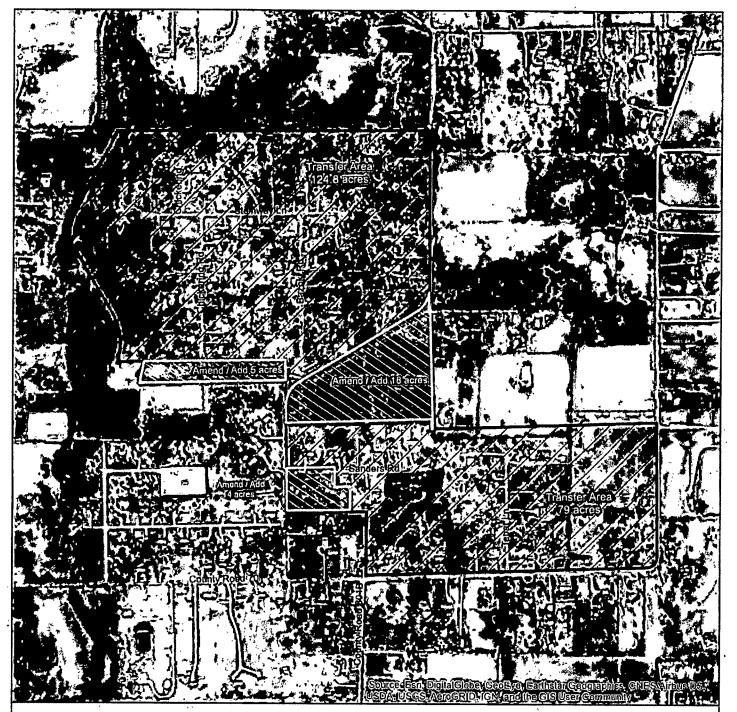
Requested Water CCN Areas

Transfer CCN 12190 - Chuck Bell Water Systems

Map by: S. Burt, ASBGI 1 Date: April 27, 2017 Base: ESRI World Imagery Project: Bell Manor Large Scale on Imagery

250 500 Feet





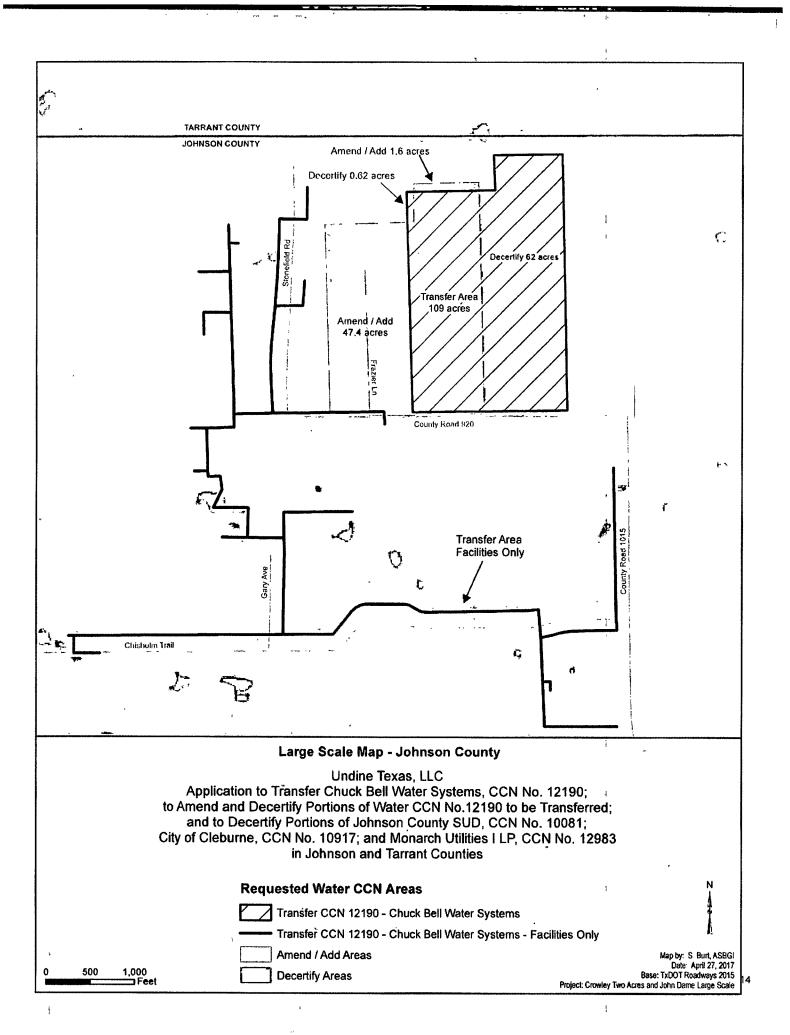
Undine Texas, LLC
Application to Transfer Chuck Bell Water Systems, CCN No. 12190; to Amend and Decertify Portions of Water CCN 12190 to be Transferred; and to Decertify Portions of Johnson County SUD, CCN No. 10081; City of Cleburne, CCN No. 10917; and Monarch Utilities I LP, CCN No. 12983 in Johnson and Tarrant Counties

Requested Water CCN Areas

Amend / Add Areas

Transfer CCN 12190 - Chuck Bell Water Systems

Map by. S. Burt, ASBGI Date: May 5, 2017 Base: ESRI World Imagery





Undine Texas, LLC

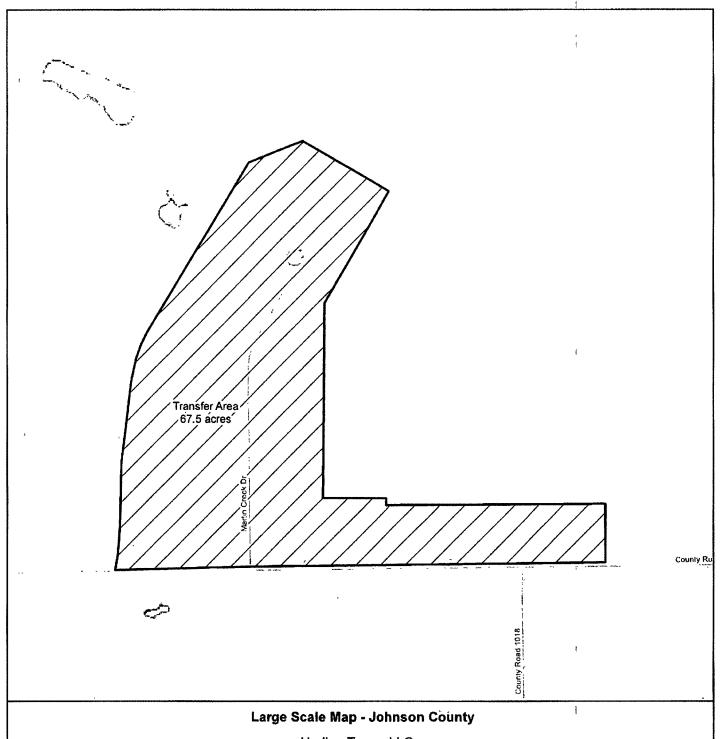
Application to Transfer Chuck Bell Water Systems, CCN No. 12190; to Amend and Decertify Portions of Water CCN No. 12190 to be Transferred; and to Decertify Portions of Johnson County SUD, CCN No. 10081; City of Cleburne, CCN No. 10917; and Monarch Utilities I LP, CCN No. 12983 in Johnson and Tarrant Counties

1,000 Feet

500

Requested Water CCN Areas	
Transfer CCN 12190 - Chuck Bell Water Systems	
Transfer CCN 12190 - Chuck Bell Water Systems	- Facilities Only
Amend / Add Areas	
Decertify Areas	Project [®] Crowley Two Ac

Map by: S. Burl, ASBGI Date: April 27, 2017 Base: ESRI World Imagery



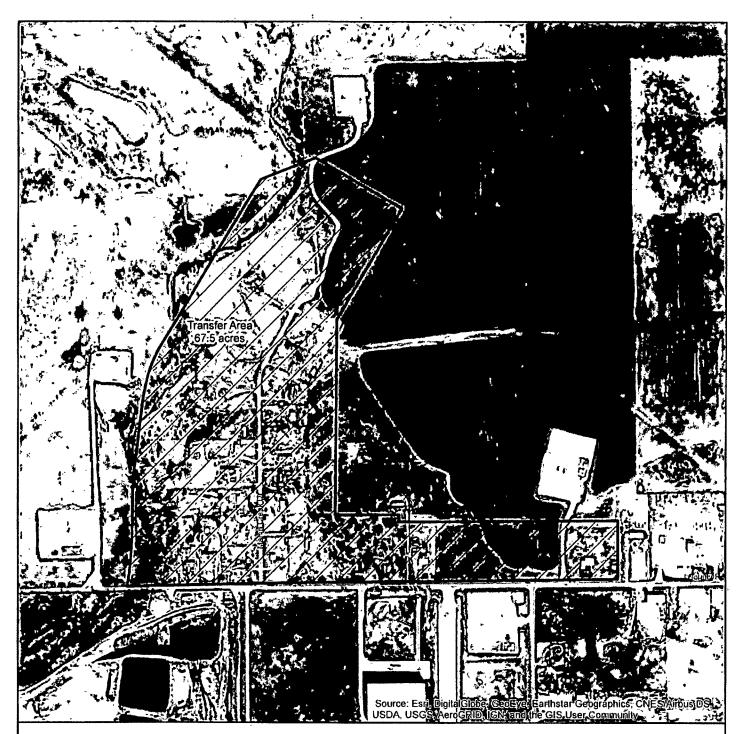
Undine Texas, LLC
Application to Transfer Chuck Bell Water Systems, CCN No. 12190;
to Amend and Decertify Portions of Water CCN No.12190 to be Transferred;
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City of Cleburne, CCN No. 10917; and Monarch Utilities I LP, CCN No. 12983
in Johnson and Tarrant Counties

Requested Water CCN Areas

Transfer CCN 12190 - Chuck Bell Water Systems

Map by: S. Burt, ASBGI Date: April 27, 2017 Base: TxDOT Roadways 2015 Project: Martin Creek Large Scale 1

250 500 Feet



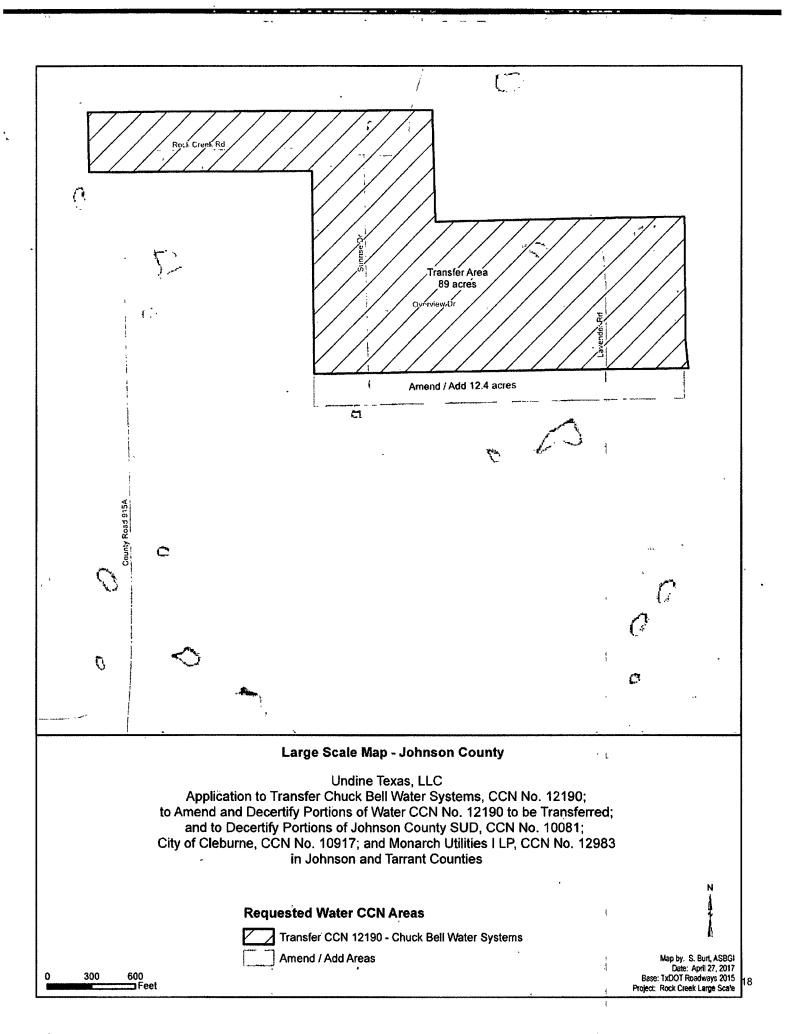
Undine Texas, LLC

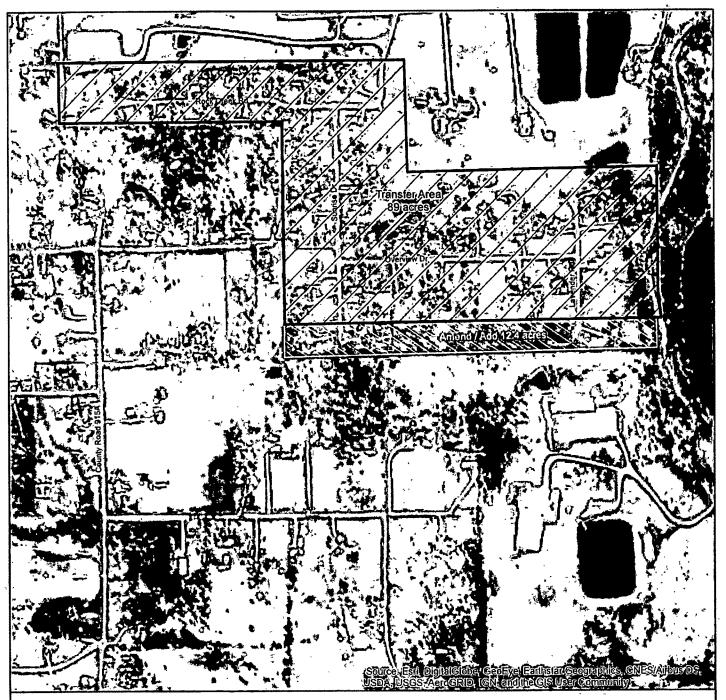
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Requested Water CCN Areas

Transfer CCN 12190 - Chuck Bell Water Systems

Map by: S. Burt, ASBGI Date: April 27, 2017 Base: ESRI World Imagery Project: Martin Creek Large Scale on Imagery





Undine Texas, LLC

Application to Transfer Chuck Bell Water Systems, CCN No. 12190; to Amend and Decertify Portions of Water CCN No. 12190 to be Transferred; and to Decertify Portions of Johnson County SUD, CCN No. 10081; City of Cleburne, CCN No. 10917; and Monarch Utilities I LP, CCN No. 12983 in Johnson and Tarrant Counties

Requested Water CCN Areas

Transfer CCN 12190 - Chuck Bell Water Systems

Amend / Add Areas

Map by, S. Burt, ASBGI Date: May 2, 2017 Base: ESRI World Imagery Project: Rock Creek Large Scale on Imagery

EXHIBIT C

TOTAL ACREAGE

Chuck Bell #12190

Descriptions

Bear Creek (Tarrant County):

The proposed utility service area is located approximately <u>14.5</u> miles <u>southwest</u> of downtown <u>Fort Worth</u>, TX; and is generally bounded on the <u>north</u> by <u>Ben Day Murrin Rd</u>; on the <u>east</u> by <u>Mustang Wells</u>; on the <u>south</u> by <u>550' south of Bear Creek Dr. East</u>; and on the <u>west</u> by <u>1200' west of Bear Creek Dr. East</u>. The total area being requested includes approximately <u>53.7</u> acres and <u>20</u> current customers. (Includes amending/adding <u>29.2</u> acres decertifying <u>14.4</u> acres.)

Bell Manor Estates (Johnson County):

The proposed utility service area is located approximately <u>6</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>350' north of Spark's Ln</u>; on the <u>east</u> by <u>FM 1902</u>; on the <u>south</u> by <u>CR 920</u>; and on the <u>west</u> by 500' east of Valley View Rd.

The total area being requested includes approximately 63 acres and 23 customer connections.

Buffalo Creek Estates (Johnson County):

The proposed utility service area is located approximately <u>4</u> miles <u>northeast</u> of downtown <u>Cleburne</u>, TX; and is generally bounded on the <u>north</u> by <u>700' north of Steinway Ln</u>; on the <u>east and south</u> by <u>CR 801A</u>;; and on the <u>west</u> by East Buffalo Creek.

The total area being requested includes approximately <u>129.8</u> acres and <u>49</u> customer connections. (Includes amending / adding approximately <u>5</u> acres.)

Crowley Two Acres Addition (Johnson County):

The proposed utility service area is located approximately <u>7.5</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>½ mile north of CR 920</u>; on the <u>east and south</u> by <u>CR 1015</u>; and on the <u>west</u> by <u>E. Chisholm Ct.</u>

The total area being requested includes approximately 162 acres and 81 customer connections.

John Dame Addition (Johnson County):

The proposed utility service area is located approximately <u>7.5</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>.56 mile north of CR 920</u>; on the <u>east</u> by <u>940' east of Creekview St.</u>; on the <u>south</u> by <u>CR 920</u>; and on the <u>west</u> by <u>450' west of Frazier Ln</u>.

The total area being requested includes approximately <u>158</u> acres and <u>48</u> customer connections. (Includes amending/adding approximately <u>49</u> acres and decertifying approximately <u>62</u> acres.)

Martin Creek Estates (Johnson County):

The proposed utility service area is located approximately <u>5.7</u> miles <u>northwest</u> of downtown <u>Cleburne</u>, TX; and is generally bounded on the <u>north</u> by <u>½ mile north of CR 902</u>; and on the <u>east by .38 mile east of Martin Creek Dr.</u>; on the <u>south</u> by <u>CR 902</u>; and on the <u>west by Martin Creek</u>.

The total area being requested includes 67.5 acres and 23 customer connections.

Rock Creek Estates (Johnson County):

The proposed utility service area is located approximately <u>7.2</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>260' north of Rock Creek Rd</u>; on the <u>east</u> by <u>Rock Creek</u>; on the <u>south</u> by <u>640' south of Overview Dr</u>.; and on the <u>west</u> by <u>.35 mi west of Sunrise Dr</u>.

The total area being requested includes approximately 101.4 acres and 36 customer connections.

(Includes amending / adding approximately 12.4 acres.)

Sanders View Addition (Johnson County):

The proposed utility service area is located approximately <u>4</u> miles <u>northeast</u> of downtown <u>Cleburne</u>, TX; and is generally bounded on the <u>north</u> by <u>430' north of Sanders Rd</u>.; on the <u>east and south</u> by <u>CR 701</u>; and on the <u>west</u> by <u>Hopewell Rd</u>.

The total area being requested includes approximately $\underline{101}$ acres and $\underline{25}$ customer connections. (Includes amending / adding approximately $\underline{22}$ acres.)

EXHIBIT D LIST OF LICENSED OPERATIONAL STAFF CONFIDENTIAL

EXHIBIT E <u>UTILITIES WITHIN 2 MILES</u>

Chuck Bell Utilities PWSID System Name	Utility Name Within 2-miles	CCN# Street	City	State Zip
e en sen en en en en en en en el el en	TARRANT COUNTY	100 E, WEATHERFORD	FORT WORTH TX	76196.
	CITY OF FORT WORTH	1000 THROCKMORTON ST		76102
	MONARCH UTILITIES I LP	12983 12535 REED RD	SUGAR LAND	77478
	SHELCON COMPANY	13055 4101 W GREEN OAKS BLVD STE 305 PMB #143	ARLINGTON	75016
	TRINITY RIVER AUTHORITY OF TEXAS	PO BOX 60	ARLINGTON T	76004
	TARRANT REGION WATER DISTRICT	PO BOX 4508	FORT WORTH TX	76164
	NORTHERN TRINITY GCD	1100 CIRCLE DR #300	FORT WORTH. TX	
Bell Manor Subdivision				!
	JOHNSON COUNTY	2 N. MAIN ST	CLEBURNE TX	(. 76033
	JOHNSON COUNTY SUD	10081 PO BOX 509	CLEBURNE TX	76033
	EMCAD WATER & WASTEWATER	20816 801 S FILES ST	ITASCA	76055
	MONARCH UTILITIES I LP	12983 12535 REED RD	SUGAR LAND TX	
	CITY OF FORT WORTH	12311 1000 THROCKMORTON ST	FORT WORTH T	76102
		141 RENFRO ST	BURLESON TO	76028
	TRINITY RIVER AUTHORITY OF TEXAS	PO BOX 60	ARLINGTON TX	
	TARRANT REGIONAL WATER DISTRICT	PO BOX 4508	FORT WORTH TO	76164
The state of the s	PRAIRIELANDS GCD	816 CONGRESS AVE STE 1900	TUSTIN	78701
Buffalo Creek	The state of the s	The second of th		ì
		10917 PO BOX 677	CLEBURNE T)	16033
•	CITY OF KEENE	10905 PO BOX 547	KEENE TO	(76039
	JOHNSON COUNTY SUD	10081 PO BOX 509	CLEBURNE TO	(76033
	AQUA TEXAS INC	13201 1106 CLAYTON LN STE 400W	CT NISTIN TO	(78723
	CREST WATER COMPANY	12037 PO BOX 460	KEENE TY	(76059
	BETHESDA WSC	10089 PO BOX 130	BURLESON T	26092
		2 N MAIN ST	CLEBURNE T)	(76033
	BRAZOS RIVER AUTHORITY	→ PO BOX 7555	WACO T	(76714
		12983 12535 REED RD	SUGAR LAND TO	(77478
	CITY OF JOSHUA	101 S. MAIN ST	JOSHUA TO	76058
to the state of th	PRAIRIELANDS GCD	B16 CONGRESS AVE STE 1900	AUSTIN	10787
Crowiey II Acres Subdivision	The second secon		-	
	JOHNSON COUNTY	2 N. MAIN ST	CLEBURNE T)	(76033
	JOHNSON COUNTY SUD		«NE	
	CREST WATER COMPANY		KEENE	
		12983 12535 REED RD	0	•
	CITY OF FORT WORTH	12311 1000 THROCKMORTON ST	ORTH	
	NORTH WHISPERING MEADOWS WATER	12621 8616 ROARING CREEK RD	JOSHUA TX	
	HOLLING SHIPS WASIEWALEK	20816 801 S FILES S1		
	I KINI I Y KIVEK AUTHOKI I OF LEXAS PRAIRIELANDS GCD	PO BOX 60 B16 CONCRESS AVESTET 1900	ARLINGTON TX	76004
John Dame	The second secon	A STATE OF THE PARTY OF THE PAR		
The state of the s	JOHNSON COUNTY	2 N. MAIN ST	CLEBURNE TX	76033
	JOHNSON COUNTY SUD	10081 PO BOX 509	CLEBURNE TX	76033
	CREST WATER COMPANY	12037 PO BOX 460	KEENE TX	
	MONARCH UTILITIES I LP	12983 12535 REED RD	SUGAR LAND	77478
	CITY OF FORT WORTH	12311 1000 THROCKMORTON ST	FORT WORTH TX	76102
1	TARRANT REGIONAL WATER DISTRICT	PO BOX 4508	FORT WORTH TX	76164
	TRINITY RIVER AUTHORITY OF TEXAS	PO BOX 60	ARLINGTON TX	
	PRAIRIELANDS GCD	816 CONGRESS AVE STE 1900	AUSTIN	78701
Martin Greek Estates	the shapping of marine . The state of the property of	The second secon	ļ	4
	CITY OF CLEBURNE	10917 PO BOX 677		
	JOHNSON COUNTY SOLD	SOS XOS ON TRANST		
	CONSON COUNTY	Z.N. MAIN SI	KVF.	
	BRAZUS KIVEK AUTROKLIT PRAIRIELANDS GCD	PO BOX 7555 816 CONCRESS AVI: STE 1900	WACO TX	76714

Rock Greek Estatos 1985 Till	The state of	· ·	the state of the s	1	•	1
a constituent of the constituent of the confit of the constituent of t		JOHNSON COUNTY	2N MAIN ST	CLEBURNE	, X	76033
	**	JOHNSON COUNTY SUD	PO BOX 509	CLEBURNE	ŗ	76033
		CREST WATER COMPANY	12037 PO BOX 460	KEENE	Ϋ́	76059
		MONARCH UTILITIES I LP	12983 12535 REED RD	SUGAR LAND	_	77478
		CITY OF FORT WORTH	12311 1000 THROCKMORTON ST	FORT WORTH	Ϋ́	76102
		NORTH WHISPERING MEADOWS WATER	12621 8616 ROARING CREEK RD	POSITION	Ϋ́	76058
		EMCAD WATER & WASTEWATER	20816 801 S FILES ST	ITASCA		76055
		TRINITY RIVER AUTHORITY OF TEXAS	PO BOX 60	ARLINGTON	Ϋ́	76004
		PRAIRIELANDS GCD	816 CONGRESS AVE STE 1900	AUSTIN	χĹ	78701
Sandersview Subdivision PWS						
	i	CITY OF CLEBURNE	10917 PO ROX 677		۲	76033
		CITY OF KEENE	10905 PO BOX 547	KEENE	ΧĽ	76059
	•	JOHNSON COUNTY SUD	10081 PO BOX 509	CLEBURNE	ΧŢ	76033
		AQUA TEXAS INC	13201 1106 CLAYTON LN STE 400W	AUSTIN	¥	78723
		CREST WATER COMPANY	12037 PO BOX 460	KEENE	፫	76059
		BETHESDA WSC	10089 PO BOX 130	BURLESON	X	76097
		JOHNSON COUNTY	I.N. MAIN ST	CLEBURNE	ΧĽ	76033
		BRA20S RIVER AUTHORITY	PO BOX 7555	WACO	Ϋ́	76714
			•			

EXHIBIT F SYSTEM DESCRIPTION INFORMATION

Chuck Bell #12190

Descriptions

Bear Creek (Tarrant County):

The proposed utility service area is located approximately 14.5 miles southwest of downtown Fort Worth, TX; and is generally bounded on the north by Ben Day Murrin Rd; on the east by Mustang Wells; on the south by 550' south of Bear Creek Dr. East; and on the west by 1200' west of Bear Creek Dr. East. The total area being requested includes approximately 53.7 acres and 20 current customers. (Includes amending/adding 29.2 acres decertifying 14.4 acres.)

Bell Manor Estates (Johnson County):

The proposed utility service area is located approximately <u>6</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>350' north of Sparks Ln</u>; on the <u>east</u> by <u>FM 1902</u>; on the <u>south</u> by <u>CR 920</u>; and on the <u>west</u> by <u>500' east of Valley View Rd</u>.

The total area being requested includes approximately <u>63</u> acres and <u>23</u> customer connections.

Buffalo Creek Estates (Johnson County):

The proposed utility service area is located approximately <u>4</u> miles <u>northeast</u> of downtown <u>Cleburne</u>, TX; and is generally bounded on the <u>north</u> by <u>700' north of Steinway Ln</u>; on the <u>east and south</u> by <u>CR 801A</u>;; and on the <u>west</u> by <u>East Buffalo Creek</u>.

The total area being requested includes approximately $\underline{129.8}$ acres and $\underline{49}$ customer connections. (Includes amending / adding approximately $\underline{5}$ acres.)

Crowley Two Acres Addition (Johnson County):

The proposed utility service area is located approximately <u>7.5</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>½ mile north of CR 920</u>; on the <u>east and south</u> by <u>CR 1015</u>; and on the <u>west</u> by <u>E. Chisholm Ct.</u>

The total area being requested includes approximately 162 acres and 81 customer connections.

John Dame Addition (Johnson County):

The proposed utility service area is located approximately <u>7.5</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>.56 mile north of CR 920</u>; on the <u>east</u> by <u>940' east of Creekview St.</u>; on the <u>south</u> by <u>CR 920</u>; and on the <u>west</u> by <u>450' west of Frazier Ln</u>.

The total area being requested includes approximately <u>158</u> acres and <u>48</u> customer connections. (Includes amending/adding approximately <u>49</u> acres and decertifying approximately <u>62</u> acres.)

Martin Creek Estates (Johnson County):

The proposed utility service area is located approximately <u>5.7</u> miles <u>northwest</u> of downtown <u>Cleburne</u>, TX; and is generally bounded on the <u>north</u> by <u>½ mile north of CR 902</u>; and on the <u>east</u> by <u>.38 mile east of Martin Creek Dr.</u>; on the <u>south</u> by <u>CR 902</u>; and on the <u>west</u> by <u>Martin Creek</u>.

The total area being requested includes 67.5 acres and 23 customer connections.

Rock Creek Estates (Johnson County):

The proposed utility service area is located approximately <u>7.2</u> miles <u>west</u> of downtown <u>Burleson</u>, TX; and is generally bounded on the <u>north</u> by <u>260' north of Rock Creek Rd</u>; on the <u>east</u> by <u>Rock Creek</u>; on the <u>south</u> by <u>640' south of Overview Dr</u>.; and on the <u>west</u> by <u>.35 mi west of Sunrise Dr</u>.

The total area being requested includes approximately 101.4 acres and 36 customer connections.

(Includes amending / adding approximately 12.4 acres.)

Sanders View Addition (Johnson County):

The proposed utility service area is located approximately <u>4</u> miles <u>northeast</u> of downtown <u>Cleburne</u>, TX; and is generally bounded on the <u>north</u> by <u>430' north of Sanders Rd</u>.; on the <u>east and south</u> by <u>CR 701</u>; and on the <u>west</u> by <u>Hopewell Rd</u>.

The total area being requested includes approximately <u>101</u> acres and <u>25</u> customer connections. (Includes amending / adding approximately <u>22</u> acres.)

EXHIBIT G <u>DIGITAL DATA</u>

C)