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**Monarch
Utilities I L.P.**

A SouthWest Water Company

12535 Reed Road
Sugar Land, TX 77478
TXCustomerCare@swwc.com
www.swwc.com

July 22, 2021

Public Utility Commission of Texas
Attention: Filing Clerk
1701 Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

Re: Docket 52035 – Application of Monarch Utilities I L.P. to Amend Its Certificate of Convenience and Necessity in Parker County

To the Commission:

The Commission Staff's First Request for Information issued on July 20, 2021 requires question(s) shall be answered with sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit.

Attached is Monarch's response to Question Nos. Staff 1-1 through 1-2.

Please contact me if any additional information is required at this time.

Sincerely,

/s/ George Freitag

George Freitag, P.E.
Texas Regulatory Manager
SouthWest Water Company
Monarch Utilities I L.P.
(512) 219-2288
gfreitag@swwc.com



DOCKET NO. 52035

**MONARCH UTILITIES I L.P.'S RESPONSE TO COMMISSION STAFF'S FIRST
REQUEST FOR INFORMATION**

Staff 1-1

Question: Provide the approval letter from the Texas Commission on Environmental Quality (TCEQ) for the public water system that will provide service to the customers in the requested area.

Response: Attached are the two most recent TCEQ plan approval letters for Western Lake Estates (Public Water System ID Number 1840014), which is the system that will serve customers in the requested area.

Sponsor: George Freitag, P.E.

Staff 1-2

Question: Provide the approval letter from the TCEQ for the new distribution system that will provide service to the customers in the requested area.

Response: The distribution system that will serve customers in the requested area is part of the Western Lake Estates system. Please refer to the plan approval letter dated May 11, 2021 provided in response to Question 1-1.

Sponsor: George Freitag, P.E.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



PWS_1840014_CO_20210511_Plan Ltr

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 11, 2021

Mr. Glenn Breisch, P.E.
Wasteline Engineering, Inc.
208 South Front Street
Aledo, TX 76008

Re: Western Lake Estates - Public Water System ID No. 1840014
Proposed Ground Water Treatment Plant No. 4 and 2 Wells
Engineer Contact Telephone: (817) 441-1300
Plan Review Log No. P-03122021-101
Parker County, Texas

CN602740706; RN101220275

Dear Mr. Breisch:

On March 12, 2021, the Texas Commission on Environmental Quality (TCEQ) received planning material with your letter dated March 12, 2021 for the proposed Ground Water Treatment Plant No. 4 and 2 Wells. Based on our review of the information submitted, the project generally meets the minimum requirements of Title 30 Texas Administrative Code (TAC) Chapter 290 - Rules and Regulations for Public Water Systems and is **approved for construction**.

Corrosive indices) will be used to calculate corrosivity of the water from new source(s). Corrosive or aggressive water could result in aesthetic problems, increased levels of toxic metals, and deterioration of household plumbing and fixtures. **If the water appears to be corrosive**, the system will be required to conduct a study and submit an engineering report that addresses corrosivity issues or may choose to install corrosion control treatment **before use may be granted**. All changes in treatment require submittal of plans and specifications for approval by TCEQ.

Texas Water Code Section 36.0015 allows for the creation of groundwater conservation districts (GCDs) as the preferred method of groundwater management. GCDs manage groundwater in many counties and are authorized to regulate production and spacing of water wells. **Public water systems drilling wells within an existing GCD are responsible for meeting the GCD's requirements**. The authorization provided in this letter does not affect GCD authority to manage groundwater or issue permits.

The design engineer or water system representative is required to notify the Plan Review Team in writing by fax at (512) 239-6972 or emailing David Smith at david.smith@tceq.texas.gov and cc: vera.poe@tceq.texas.gov at least 48 hours before the well casing pressure cementing begins. If pressure cementing is to begin on Monday, then they must give notification on the preceding Thursday. If pressure cementing is to begin on Tuesday, then they must give notification on the preceding Friday.

The TCEQ does not approve this well for use as a public water supply at this time. We have enclosed a copy of the *"Public Well Completion Data Checklist for Approval to Use (Step 2)"*. We provide this checklist to help you in obtaining approval to use this well.

The submittal consisted of 13 sheets of engineering drawings, technical specifications, and an engineering summary. The proposed project consists of:

Well No. 1

- One (1) public water supply well drilled to 400 feet with 330 linear feet (lf) of 12-inch outside diameter (od) steel surface casing, with 330 linear feet (lf) of 6.25-inch outside diameter (od) steel casing and pressure-cemented 330 lf;
- 70 lf of 6-inch od stainless steel slot screen, 10 lf of 6-inch od blank steel liner, with 70 lf gravel pack;
- The well is rated for 60 gallons per minute (gpm) yield with a 15 horsepower, submersible pump. The design capacity of the pump is 60 gpm at 442 feet total dynamic head;

Well No. 2

- One (1) public water supply well drilled to 430 feet with 330 linear feet (lf) of 12-inch outside diameter (od) steel surface casing, with 330 linear feet (lf) of 6.25-inch outside diameter (od) steel casing and pressure-cemented 330 lf;
- 100 lf of 6-inch od stainless steel slot screen, 10 lf of 6-inch od blank steel liner, with 100 lf gravel pack;
- The well is rated for 60 gallons per minute (gpm) yield with a 15 horsepower, submersible pump. The design capacity of the pump is 60 gpm at 442 feet total dynamic head;

Water Plant 4 (Both Wells) and distribution system:

- Two (2) 15 horsepower, 250 gallon per minute service pumps;
- One (1) 5,000-gallon American Society of Mechanical Engineers (ASME) Section VIII, Division 1 Codes and Construction Regulations hydropneumatic pressure tank;
- One (1) 53,000-gallon American Water Works Association (AWWA) Standard D103, epoxy coated, bolted steel ground storage tank;
- All weather access drive and intruder resistant fence;
- Approximately 2,060 lf of 2-inch Schedule 40 polyvinyl chloride (PVC) pipe;
- Approximately 3,720 lf of 3-inch Schedule 40 polyvinyl chloride (PVC) pipe;
- Approximately 10,320 lf of 6-inch AWWA Standard C900 DR 25 PVC pipe;
- All necessary valves, fittings, yard piping, and appurtenances.

Mr. Glenn Breisch, P.E.
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May 11, 2021

The authorization provided in this letter does not relieve a Public Water System from the need to comply with other applicable state and federal regulations.

This approval is for the construction of the above listed items only. Any wastewater components contained in this design were not considered.

The Western Lake Estates public water supply system provides water treatment.

The project is located approximately 1,000 feet north of the intersection of Tin Top Road and Elevation Trail in Parker County, Texas.

An appointed engineer must notify the TCEQ's Region 4 Office in Dallas/Fort Worth at (817) 588-5800 when construction will start. Please keep in mind that upon completion of the water works project, the engineer or owner will notify the commission's Water Supply Division, in writing, as to its completion and attest to the fact that the completed work is substantially in accordance with the plans and change orders on file with the commission as required in 30 TAC §290.39(h)(3).

Please refer to the Plan Review Team's Log No. **P-03122021-101** in all correspondence for this project.

Please complete a copy of the most current Public Water System Plan Review Submittal form for any future submittals to TCEQ. Every blank on the form must be completed to minimize any delays in the review of your project. The document is available on TCEQ's website at the address shown below. You can also download the most current plan submittal checklists and forms from the same address.

<https://www.tceq.texas.gov/drinkingwater/udpubs.html>

For future reference, you can review part of the Plan Review Team's database to see if we have received your project. This is available on TCEQ's website at the following address:

<https://www.tceq.texas.gov/drinkingwater/planrev.html/#status>

You can download the latest revision of 30 TAC Chapter 290 - [Rules and Regulations for Public Water Systems](#) from this site.

Mr. Glenn Breisch, P.E.
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May 11, 2021

If you have any questions concerning this letter or need further assistance, please contact David Smith at 512-239-4703 or by email at David.Smith@Tceq.Texas.Gov or by correspondence at the following address:

Plan Review Team, MC-159
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Sincerely,



David T. Smith, P.E.
Plan Review Team
Plan and Technical Review Section
Water Supply Division
Texas Commission on Environmental Quality



Vera Poe, P.E., Team Leader
Plan Review Team
Plan and Technical Review Section
Water Supply Division
Texas Commission on Environmental Quality

VP/DS/av

Enclosure: *"Public Well Completion Data Checklist for Approval to Use (Step 2)"*

cc: Western Lake Estates, Attn: Mr. Chuck Barry, 1620 Grand Avenue Parkway, Pflugerville,
Texas 78660-2185

Public Well Completion Data Checklist for Approval to Use (Step 2)

Texas Commission on Environmental Quality
Water Supply Division
Plan Review Team MC-159
P.O. Box 13087, Austin, Texas 78711-3087

Public Water System I.D. No. _____
TCEQ Log No. P- _____

The following list is a brief outline of the "Rules for Public Water Systems", 30 TAC Chapter 290 regarding proposed Water Supply Well Completion. Failure to submit the following items may delay project approval. Copies of the rules may be obtained from Texas Register, 1019 Brazos St, Austin, TX, 78701-2413, Phone: (512) 463-5561 or downloaded from the website: <http://www.tceq.texas.gov/rules/indxpdf.html>

Any well proposed as a source of water for a public water supply must have plans approved for construction by TCEQ. Please include the well construction approval letter with your submittal of well completion data listed below for TCEQ evaluation. Based on review of this submitted data, approval may be given for use of the well.

1. Site map(s) at appropriate scales showing the following: [§290.41(c)(3)(A)]
 - (i) Final location of the well with coordinates;
 - (ii) Named roadways;
 - (iii) All property boundaries within 150 feet of the final well location and the property owners' names;
 - (iv) Concentric circles with the final well location as the center point with radii of 10 feet, 50 feet, 150 feet, and ¼ mile;
 - (v) Any site improvements and existing buildings;
 - (vi) Any existing or potential pollution hazards; and
 - (vii) Map must be scalable with a north arrow.
2. A copy of the recorded deed of the property on which the well is located showing the Public Water System (PWS) as the landowner, and/or any of the following: [§290.41(c)(1)(F)(iv)]
 - (i) Sanitary control easements (filed at the county courthouse and bearing the county clerk's stamp) covering all land within 150 feet of the well not owned by the PWS (for a sample easement see TCEQ Form 20698);
 - (ii) For a political subdivision, a copy of an ordinance or land use restriction adopted and enforced by the political subdivision which provides an equivalent or higher level of sanitary protection to the well as a sanitary control easement; and/or
 - (iii) A copy of a letter granting an exception to the sanitary control easement rule issued by TCEQ's Technical Review and Oversight Team.
3. Construction data on the completed well: [§290.41(c)(3)(A)]
 - (i) Final installed pump data including capacity in gallons per minute (gpm), total dynamic head (tdh) in feet, motor horsepower, and setting depth;
 - (ii) Bore hole diameter(s) (must be 3" larger than casing OD) and total well depth;
 - (iii) Casing size, length, and material (e.g. 200 lf of 12" PVC ASTM F480 SDR-17);
 - (iv) Length and material of any screens, blanks, and/or gravel packs utilized;
 - (v) Cementing depth and pressure method (one of the methods in latest revision of AWWA Standard A-100, Appendix C, excluding the dump bailer and tremie methods);
 - (vi) Driller's geologic log of strata penetrated during the drilling of the well;
 - (vii) Cementing certificate; and

Public Well Completion Data Checklist for Approval to Use (Step 2)

- (viii) Copy of the official State of Texas Well Report (some of the preceding data is included on the Well Report).
4. A U.S. Geological Survey 7.5-minute topographic quadrangle map (include quadrangle name and number) or a legible copy showing the location of the completed well; [§290.41(c)(3)(A)]
5. Record of a 36-hour continuous pump test on the well showing stable production at the well's rated capacity. Include the following: [§290.41(c)(3)(G)]
- (i) Test pump capacity in gpm, tdh in feet, and horsepower of the pump motor;
 - (ii) Test pump setting depth;
 - (iii) Static water level (in feet); and
 - (iv) Draw down (in feet).
6. Three bacteriological analysis reports for samples collected on three successive days showing raw well water to be free of coliform organisms. Reports must be for samples of raw (untreated) water from the disinfected well and submitted to a laboratory accredited by TCEQ, accredited to perform these test; and [§290.41(c)(3)(F)(i)]
7. Chemical analysis reports for well water samples showing the water to be of acceptable quality for the most problematic contaminants listed below. Reports must come from a laboratory accredited by TCEQ; accredited to perform these tests. Maximum contaminant level (MCL) and secondary constituent level (SCL) units are in milligrams per liter (except arsenic which is in micrograms per liter). [§290.41(c)(3)(G) and §290.104 and §290.105]

Table 1: Primary Constituents with Maximum Contaminant Level (MCL)

PRIMARY	MCL
Nitrate	10 (as N)
Nitrite	1 (as N)
Arsenic	10
Fluoride	4.0

Table 2: Secondary Constituents with Secondary Contaminant Level (SCL)

SECONDARY	SCL
Aluminum	0.2
Copper	1.0
Iron	0.3
Manganese	0.05
Zinc	5.0
Total Dissolved Solids	1,000
Fluoride	2.0
Sulfate	300
Chloride	300
pH	> 7.0

Public Well Completion Data Checklist for Approval to Use (Step 2)

Table 3: Water Quality Parameters

PARAMETER	UNITS
Alkalinity as CaCO ₃	mg/L
Calcium as CaCO ₃	mg/L
Sodium	mg/L
Lead*	mg/L

Lead is regulated by the lead and copper rule. This analyte is to document the amount of lead in the source water. The level shall be less than 0.010 mg/L for approval to use.

All systems located in a high-risk county (see page 3) shall submit radiological analysis reports for water samples showing the water to be of acceptable quality for the contaminants listed below. Reports must come from a TCEQ accredited laboratory for approval to use of the well.

Table 4: Radionuclides with Maximum Contaminant Level (MCL)

CONTAMINANT	MCL
Gross alpha	15 pCi/L
Radium-226/228	5 pCi/L
Beta particle	50 pCi/L
Uranium	30 µg/L

WHERE: pCi/L = pico curies per liter, µg/L = micrograms per liter

Please be aware when you review your radiological data that if the report has gross alpha over 15 pCi/L and individual uranium isotopes are not reported, you will have to resample or reanalyze and resubmit radionuclide results. If you see gross alpha plus radium-228 over 5 pCi/L, and don't have radium-226, you will have to resample or reanalyze and resubmit complete results.

List of Counties Where Radionuclide Testing Is required

Please be aware that we have added the requirement for analysis for radionuclides for high risk counties. For elevated levels of any contaminants found in a test well, treatment or blending may be required.

Table 5: List of Counties where Radionuclide Testing is required

COUNTY				
Atascosa	Bandera	Bexar	Bosque	Brazoria
Brewster	Burnet	Concho	Culberson	Dallam
Dawson	Erath	Fort Bend	Frio	Garza
Gillespie	Gray	Grayson	Harris	Hudspeth
Irion	Jeff Davis	Jim Wells	Kendall	Kent
Kerr	Kleberg	Liberty	Llano	Lubbock
McCulloch	Mason	Matagorda	Medina	Midland
Montgomery	Moore	Parker	Pecos	Polk
Presidio	Refugio	San Jacinto	San Saba	Tarrant
Travis	Tyler	Upton	Val Verde	Victoria
Walker	Washington	Wichita	Williamson	Zavala

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



PWS_1840014_CO_20200622_Plan Ltr

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 22, 2020

Mr. Douglas C. Hearn, P.E.
Hearn Engineering, Inc.
P.O. Box 1104
Cameron, Texas 76520

Re: Western Lake Estates - Public Water System ID No. 1840014
Proposed Ground Storage Tank Replacement and Corrosion Control Treatment -
Treatment Objective = C: Treatment process = 446 Inhibitor, Blended Phosphate (NAPCO
214)
Engineer Contact Telephone: (512) 310-0176
Plan Review Log No. P-04202020-123
Parker County, Texas

CN602740706; RN101220275

Dear Mr. Hearn:

On April 20, 2020, the Texas Commission on Environmental Quality (TCEQ) received planning material with your letter dated April 14, 2020 for the proposed Ground Storage Tank (GST) Replacement and Corrosion Control Treatment. Based on our review of the information submitted, the project generally meets the minimum requirements of Title 30 Texas Administrative Code (TAC) Chapter 290 - Rules and Regulations for Public Water Systems and is **conditionally approved for construction** if the project plans and specifications meet the following requirement(s):

Please note that even though a specific chemical is mentioned in the below approval, the system may switch to a different blended phosphate provided the proportion of the orthophosphate to polyphosphate remains the same. If the proportions differ from the original approved chemical, a new plan submittal is required.

The submittal consisted of 7 sheets of engineering drawings and technical specifications. The approved project consists of:

Spur Water Plant (TP11396)

- Remove one (1) existing 43,000 gallon GST;
- Install one (1) 41,000 gallon American Waterworks Association (AWWA) D103 Factory-coated Carbon Steel GST;

Mr. Douglas C. Hearn, P.E.

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- Install one (1) Corrosion Control Treatment System consisting of:
 - One (1) 5 gallon per day (gpd) diaphragm metering pump to inject a blended phosphate (NAPCO 214)
 - One (1) 55 gallon mixing tank with containment;

Cedar Hill Drive Water Plant (TP19830)

- Install one (1) Corrosion Control Treatment System consisting of:
 - One (1) 5 gpd diaphragm metering pump to inject a blended phosphate (NAPCO 214)
 - One (1) 55 gallon mixing tank with containment;
- One (1) spare 5 gpd diaphragm metering pump; and,
- Various valves, fittings and related appurtenances.

This approval is for the construction of the above listed items only. Any wastewater components contained in this design were not considered. The authorization provided in this letter does not relieve a Public Water System from the need to comply with other applicable state and federal regulations.

The Western Lake Estates public water supply system provides water treatment.

The project is located 4941 Spur Road and 4741 Cedar Hill Drive in Parker County, Texas.

An appointed engineer must notify the TCEQ's Region 4 Office in Dallas/Fort Worth at (817) 588-5800 when construction will start. Please keep in mind that upon completion of the water works project, the engineer or owner will notify the commission's Water Supply Division, in writing, as to its completion and attest to the fact that the completed work is substantially in accordance with the plans and change orders on file with the commission as required in 30 TAC §290.39(h)(3).

Please refer to the Plan Review Team's Log No. P-04202020-123 in all correspondence for this project.

Please complete a copy of the most current Public Water System Plan Review Submittal form for any future submittals to TCEQ. Every blank on the form must be completed to minimize any delays in the review of your project. The document is available on TCEQ's website at the address shown below. You can also download the most current plan submittal checklists and forms from the same address.

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You can download the latest revision of 30 TAC Chapter 290 - Rules and Regulations for Public Water Systems from this site.

Mr. Douglas C. Hearn, P.E.

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bcc: TCEQ Central Records PWS File 1840014 (P-04202020-123/Western Lake Estates)
TCEQ Region No. 4 Office - Dallas/Fort Worth
TCEQ PWSINV, MC-155