

NW Natural Water of Oregon, LLC	Oregon
Sunstone Water, LLC	Oregon
Sunstone Infrastructure, LLC	Oregon
Sunriver Water LLC (dba Sunriver Utilities Company)	Oregon
Sunriver Environmental LLC	Oregon
Bents Court Water Company, LLC	Oregon
Emerald Valley Wastewater Company, LLC	Oregon
Lakeshore Water Company, LLC	Oregon
OMSID Infrastructure Holdings Company, LLC	Oregon
Seavey Loop Water Company, LLC	Oregon
South Coast Water Company, LLC	Oregon
NW Natural Water of Washington, LLC	Washington
Cascadia Water, LLC	Washington
Cascadia Infrastructure, LLC	Washington
Suncadia Water Company, LLC	Washington
Suncadia Environmental Company, LLC	Washington
NW Natural Water of Idaho, LLC	Idaho
Avimor Water Reclamation Company, LLC	Idaho
Falls Water Co., Inc.	Idaho
Gem State Water Company, LLC	Idaho
Gem State Infrastructure, LLC	Idaho
Quigley Recycled Water Company, LLC	Idaho
NW Natural Water of Texas, LLC	Texas
Blue Topaz Water, LLC	Texas
Blue Topaz Infrastructure, LLC	Texas
T & W Water Service Company (dba Blue Topaz Utilities)	Texas

NW Natural Water of Arizona, LLC	Oregon
Foothills Water & Sewer, LLC (dba Foothills Utilities)	Arizona
Rose Valley Water Company, Inc.	Arizona
Turquoise Infrastructure, LLC	Oregon
NW Natural Water of California, LLC	Oregon
Blue Diamond Infrastructure, LLC	Oregon
NW Natural Water Services, LLC (dba King Water Company (WA); dba Hiland Water (OR))	Oregon
Puttman Infrastructure Services Company, LLC	Oregon
Mines Park Infrastructure Holdings Company, LLC	Colorado

(1) Subsidiary of Northwest Natural Gas Company

CONSENT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

We hereby consent to the incorporation by reference in the Registration Statements on Form S-8 (Nos. 333-187005-01, 333-180350-01, 333-134973-01, 333-139819-01, 333-221347-01, 333-227687, 333-234539, 333-266517, 333-275346 and 333-275341) and Form S-3 (No. 333-281437) of Northwest Natural Holding Company of our report dated February 28, 2025 relating to the financial statements, financial statement schedules and the effectiveness of internal control over financial reporting, which appears in this Form 10-K.

/s/ PricewaterhouseCoopers LLP
Portland, Oregon
February 28, 2025

CONSENT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

We hereby consent to the incorporation by reference in the Registration Statements on Form S-8 (Nos. 333-214425 and 333-275344) and Form S-3 (No. 333-281437-01) of Northwest Natural Gas Company of our report dated February 28, 2025 relating to the financial statements and financial statement schedule which appears in this Form 10-K.

/s/ PricewaterhouseCoopers LLP
Portland, Oregon
February 28, 2025

CERTIFICATION

I, David H. Anderson, certify that:

1. I have reviewed this annual report on Form 10-K for the year ended December 31, 2024 of Northwest Natural Gas Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: February 28, 2025

/s/ David H. Anderson

David H. Anderson
Chief Executive Officer

CERTIFICATION

I, Raymond Kaszuba III, certify that:

1. I have reviewed this annual report on Form 10-K for the year ended December 31, 2024 of Northwest Natural Gas Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: February 28, 2025

/s/ Raymond Kaszuba III

Raymond Kaszuba III
Senior Vice President and Chief Financial Officer

CERTIFICATION

I, David H. Anderson, certify that:

1. I have reviewed this annual report on Form 10-K for the year ended December 31, 2024 of Northwest Natural Holding Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: February 28, 2025

/s/ David H. Anderson

David H. Anderson
Chief Executive Officer

CERTIFICATION

I, Raymond Kaszuba III, certify that:

1. I have reviewed this annual report on Form 10-K for the year ended December 31, 2024 of Northwest Natural Holding Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: February 28, 2025

/s/ Raymond Kaszuba III
Raymond Kaszuba III
Senior Vice President and Chief Financial Officer

NORTHWEST NATURAL GAS COMPANY

**Certificate Pursuant to Section 906
of Sarbanes – Oxley Act of 2002**

Each of the undersigned, DAVID H. ANDERSON, Chief Executive Officer, and RAYMOND KASZUBA III, the Chief Financial Officer, of NORTHWEST NATURAL GAS COMPANY (the Company), DOES HEREBY CERTIFY that:

1. The Company's Annual Report on Form 10-K for the year ended December 31, 2024 (the Report) fully complies with the requirements of section 13(a) or 15(d) of the Securities Exchange Act of 1934, as amended; and
2. Information contained in the Report fairly presents, in all material respects, the financial condition and results of operations of the Company.

IN WITNESS WHEREOF, each of the undersigned has caused this instrument to be executed this twenty-eighth day of February 2025.

/s/ David H. Anderson
David H. Anderson
Chief Executive Officer

/s/ Raymond Kaszuba III
Raymond Kaszuba III
Senior Vice President and Chief Financial Officer

A signed original of this written statement required by Section 906 of the Sarbanes-Oxley Act of 2002 has been provided to Northwest Natural Gas Company and will be retained by Northwest Natural Gas Company and furnished to the Securities and Exchange Commission or its staff upon request.

NORTHWEST NATURAL HOLDING COMPANY

**Certificate Pursuant to Section 906
of Sarbanes – Oxley Act of 2002**

Each of the undersigned, DAVID H. ANDERSON, Chief Executive Officer, and RAYMOND KASZUBA III, the Chief Financial Officer, of NORTHWEST NATURAL HOLDING COMPANY (the Company), DOES HEREBY CERTIFY that:

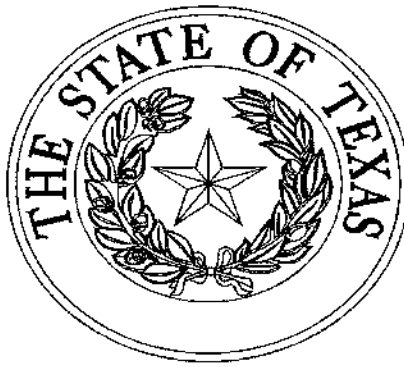
1. The Company's Annual Report on Form 10-K for the year ended December 31, 2024 (the Report) fully complies with the requirements of section 13(a) or 15(d) of the Securities Exchange Act of 1934, as amended; and
2. Information contained in the Report fairly presents, in all material respects, the financial condition and results of operations of the Company.

IN WITNESS WHEREOF, each of the undersigned has caused this instrument to be executed this twenty-eighth day of February 2025.

/s/ David H. Anderson
David H. Anderson
Chief Executive Officer

/s/ Raymond Kaszuba III
Raymond Kaszuba III
Senior Vice President and Chief Financial Officer

A signed original of this written statement required by Section 906 of the Sarbanes-Oxley Act of 2002 has been provided to Northwest Natural Holding Company and will be retained by Northwest Natural Holding Company and furnished to the Securities and Exchange Commission or its staff upon request.



WATER AND SEWER INVESTOR-OWNED UTILITIES

CLASS B ANNUAL FINANCIAL REPORT

OF

T & W Water Service Company dba Blue Topaz U

TO THE

PUBLIC UTILITY COMMISSION OF TEXAS

FOR THE

12 Months Ending December 31, 2023

Check one:

This is an original submission ☒ [X]

This is a revised submission ☐ []

Date of submission: mm/d/yr

PUBLIC UTILITY COMMISSION OF TEXAS
1701 N. CONGRESS AVE., PO BOX 13326, AUSTIN, TX 78711-3326

Schedule I

Annual Report for Class B Water and Sewer Utilities

Under the provisions of TWC § 13.136 and 16 Texas Administrative Code §§ 24.127 and 24.129

UTILITY INFORMATION

(Attach additional pages as necessary)

A. Utility Name: T & W Water Service Company dba Blue Topaz Utilities

List all assumed names or dba names: Blue Topaz Utilities

B. Street Address, City or Town & Zip code: P. O. Box 2927, Conroe, TX 77305

County: Montgomery CCN #s: 12892
21127

C. List All PWS System names and numbers:
(attach a separate list if necessary) 1700700 - Deer Run, 1700895-Deer Pines, 1700777-Emerald Lakes
1460187 - Encino Estates, 1700673-Falls of Wildwood, 1700643-Grand Harbor, 1700682-Harborside,
1013180-Hydies Crossing, 1700675-Millers Crossing, 1460156-Oaks of Trinity, 1700662 Old Mill Lake,
1700604-Riverwalk, 1700778-Rio Vista, 1460153-Splendor Woods, 1460157-Spring Oaks,
1700686-Sunrise Ranch, 1460154-The Ranch, 1700635-Thousand Oaks, 1810143 - Claire,
1810123 - Corbett, 1000061 - Countrywood, 1000065 - Dairyland, 1000037 - Enchanted Forest,
1810125 - Riverbend, 1810170 - Timer, 100038 - Whispering Pines, 1810150 - Yeager,
1000060 - Northwoods, 1000069 - Breakaway Trails, 1000062 - New Forest, 1810059, Kinard Estates,
1700328 - Caney Creek, 1230075 - The Coves, 1700911-Rose Hill

D. List All WQ Permitted system names and numbers:
(attach a separate list if necessary)

E. Type of Ownership:
Corporation: ☒ Partnership: ☐ Individual: ☐ Other: ☐

F. Name of entity and type of form filed for federal tax purposes (1120, 1065, etc).
T & W Water Service Company; Form 1120 included as member of Northwest Natural Holding & Subsidiaries consolidated gr

G. If a corporation, list names of the officers. If an individual or partnership, list the name of the individual or each partner.

Justin Palfreyman	President
Brody Wilson	Treasurer
Shawn Filippi	Secretary
Jeremy Aird	Director of Accounting & Finance
Deanna Degeyter	General Manager

H. If the controlling ownership of this utility changed during the last twelve (12) months, state the date of ownership change and the name and address of the prior owner.

March 2, 2020

I. Date the utility was formed or incorporated: 1/19/1979

T&W 000711

- J. Is the utility commonly owned or controlled by another corporation? Yes
If yes, by whom?
Northwest Natural Water of Texas

Schedule I (cont.)

- K. List all entities under common control or ownership with this utility by entity name, CCN number, Public Water System (PWS) numbers and names of water systems owned, Water Quality (WQ) Discharge Permit numbers and names of wastewater systems owned and contact information.

- L. If the utility owner has multiple CCNs, please list all CCN numbers owned:

PERSON TO CONTACT REGARDING THE INFORMATION SUPPLIED ON THESE FORMS

- A. Name and Title: Deanna Degeyter, General Manager
Karla Langreder, Office Manager
- B. Street Address, city, zip code PO Box 2927, Conroe, TX 77305-2927
- C. Telephone Number with Area Code: 936-756-7400
- Cell Phone Number with Area Code: 281-455-5676
- Fax Number with Area Code: 866-422-8519

BALANCE SHEET

(Except for blue cells, the values in this table will populate)

(Attach additional pages as necessary)

	End of Year 12/31/2023	End of Prior Year 12/31/2022
<u>ASSETS</u>		
101 Utility Plant in Service	\$22,499,428	\$19,638,643
103 Property held for Future Use	0	0
105 Construction Work In Progress	4,057,099	1,408,535
114, 115 Net Utility Plant Acquisition Adjustment	0	0
TOTAL UTILITY PLANT	\$26,556,527	\$21,047,178
108 Less: Accumulated Depreciation	6,592,375	5,782,348
110 Less: Accumulated Amortization		
NET UTILITY PLANT	\$19,964,152	\$15,264,830
<u>CURRENT ASSETS</u>		
131-135 Cash	\$1,996,866	\$896,668
141-143 Accounts Receivable	457,207	454,157
144 Notes Receivable	0	0
144-145 Accounts Receivable-Affiliates/Common Ownership	37,631	37,631
151 Plant Materials and Supply	201,563	292,952
162 Prepayments	131,808	72,779
171-174 Other Current Assets	16,010,278	15,954,854
TOTAL CURRENT ASSETS	\$18,835,353	\$17,709,041
<u>OTHER ASSETS and DEFERRED CHARGES</u>		
181 Deferred Debt Expense	\$33,916	\$33,916
182-186 Deferred Charges/fees	0	0
190 Accum. Deferred Income Taxes	0	0
OTHER ASSETS and DEFERRED CHARGES	\$33,916	\$33,916
<u>TOTAL ASSETS</u>	\$38,833,421	\$33,007,787
<u>LIABILITIES & EQUITY</u>		
<u>STOCKHOLDERS' EQUITY</u>		
201 Common Stock	\$23,063,107	\$23,694,561
211 Other paid in capital	5,212,315	2,114,223
215 Retained Earnings	3,488,113	1,243,374
TOTAL STOCKHOLDERS' EQUITY	\$31,763,534	\$27,052,158
<u>LONG-TERM DEBT</u>		
224 Long-term debt, excluding current portion	1,376,007	1,129,931
<u>CURRENT LIABILITIES</u>		
Current Portion of Long-term Debt	0	0
231 Accounts Payable	772,072	419,542
232 Notes Payable	0	0
233, 234 Payables to Affiliates/Common Ownership	2,108,021	1,413,883
236 Accrued Taxes	0	0
237 Accrued Interest	4,317	3,541
241.0 Other Current Liabilities	2,809,469	3,056,862
TOTAL CURRENT LIABILITIES	\$5,693,880	\$4,893,827
<u>OTHER LIABILITIES and DEFERRED CREDITS</u>		
252 Advances for Construction	0	0
253 Other Deferred Credits	0	0
255 Deferred Investment Tax Credits	0	0
271-272 Net Contributions in Aid of Construction	0	0
281-283 Accumulated Deferred Income Taxes	0	0
TOTAL OTHER LIABILITIES and DEFERRED CREDITS	\$0	\$0
<u>TOTAL LIABILITIES & EQUITY</u>	\$38,833,421	\$33,075,916

Add National Association of Regulatory Utility Commissioners (NARUC) accounts as needed, and if not shown above.

STATEMENT OF REVENUES

(Except for blue cells, the values in this table will populate)

(Attach additional pages as necessary)

Water <u>CUSTOMER CLASS</u>	(Actual Revenues for the report year)			
	Prior Year Reported 2022	Current Reporting Year 2023	Earnings Report adjustments	Adjusted
	(a)	(b)	(c)	(d)
Metered Sales:				
5/8"	\$535,490	\$1,107,145	(\$35,255)	\$1,071,890
3/4"	0	0	0	\$0
1"	3,592,013	3,943,633	(125,578)	\$3,818,055
1 1/2"	14,776	16,277	(518)	\$15,759
2"	1,480	5,826	(186)	\$5,640
List all additional meter sizes:	0	0	0	\$0
3"	6,922	7,142	(227)	\$6,915
	0	0	0	\$0
	0	0	0	\$0
SUB-TOTAL	\$4,150,681	\$5,080,023	(\$161,764)	\$4,918,259

Unmetered Sales:

	\$0	\$0	\$0	\$0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
List and explain if any rates are set on a basis other than meter size.	0	0	0	0
	0	0	0	0
SUB-TOTAL	\$0	\$0	\$0	\$0

470.0 Late fees - Water

30,570

33,420

0

33,420

471-474 Other Revenue

42,166

20,314

0

20,314

TOTAL WATER REVENUE

\$4,223,417

\$5,133,757

(\$161,764)

\$4,971,993

To Statement of Income

Sewer <u>CUSTOMER CLASS</u>	Prior Year Reported yyyy	Current Reporting Year yyyy	Earnings Report adjustments	Adjusted
	(1)	(2)	(3)	(4)
Metered (measured) Sales (if any):				
	\$39,073	\$86,988	(\$2,716)	\$84,272
	0	0	0	0
	0	0	0	0
	0	0	0	0
TOTAL-METERED SALES	\$39,073	\$86,988	(\$2,716)	\$84,272
Unmetered (flat rate) Sales:				
	\$0	\$0	\$0	\$0
	0	0	0	0
	0	0	0	0
	0	0	0	0
TOTAL-UNMETERED SALES	\$0	\$0	\$0	\$0
470.0 Late fees - Sewer	\$0	\$0	\$0	\$0
536 Other Revenue	0	0	0	0
TOTAL SEWER REVENUE	\$39,073	\$86,988	(\$2,716)	\$84,272
TOTAL REVENUE	\$4,262,490	\$5,220,745	(\$164,480)	\$5,056,265
				To Statement of Income

STATEMENT OF INCOME

(Except for blue cells, the values in this table will populate)

(Attach additional pages as necessary)

	Water Test Year 2023 (a)	Sewer Test Year 2023 (b)	Total - Water and Sewer (c)	Earnings Report adjustments (d)	Adjusted for Earnings Report (e)
1 Total Revenue: 1	\$5,133,757	\$86,988	\$5,220,745	(\$326,244)	\$5,056,265
Operating Expenses:					
2 601.1/701.1 O & M Salaried Labor	\$322,526	\$75,746	\$398,272	\$0	\$398,272
3 604/704 Employee Benefits	225,820	0	225820	0	225820
4 6/731, 6/735, 6/736 O & M Contract labor	100,864	0	100864	0	100864
5 620/720 Operating/Maint Supplies	0	0	0	0	0
6 610/710 Purchased Water	50,117	0	50117	0	50117
7 615/715 Purchased Power	322,797	0	322797	0	322797
8 635/735 Testing Expense	82,863	0	82863	0	82863
9 618/718 Chemicals	229,730	0	229730	0	229730
10 656-659/756-759 Insurance	67,633	0	67633	0	67633
11 601.2/701.2 General Office Salaries	445,799	0	445799	0	445799
12 650/750 Transportation	78,732	0	78732	0	78732
13 675 General Office Expenses	40,693	0	40693	0	40693
14 632, 633, 634 Contract Acctg, legal, Mgnt	38,996	0	38996	0	38996
15 666 Amortization- Rate Case Expense	0	0	0	0	0
16 403 Depreciation Expense	810,027	0	810027	0	810027
17 667-675 Other Misc. Expenses	663,609	0	663609	0	663609
Taxes:					
18 409 Federal Income Tax	293,317	0	293317	0	293317
19 409 State Franchise Tax/Reg Assess.	103,982	0	103982	0	103982
20 408 All Other Taxes	106,295	0	106295	0	106295
21 Total Expenses	\$3,983,801	\$75,746	\$4,059,547	\$0	\$4,059,547
22 Net Operating Income	\$1,149,956	\$11,242	\$1,161,198	(\$326,244)	\$996,718
23 421, 433 Non-Operating Income	0	0	0	0	0
24 Non-Operating Deductions:					
25 426 Other	40,096	0	40096	0	40096
26 427 Interest	0	0	0	0	0
27 Net Income	\$1,109,860	\$11,242	\$1,121,102	(\$326,244)	\$956,622

1. Carried over from Statements of Revenues

WATER PLANT IN SERVICE

(Except for blue cells, the values in this table will populate)

1. Report the original cost of utility plant in service value by prescribed accounts, and the additions and retirements of such plant during the year. (Attach additional pages as necessary.)
2. Do not include as adjustments, corrections to additions and retirements for the current or preceding year. Corrections for the current year should be included in appropriate Column (c) or (d).
3. Credit adjustments in Column (e) should be shown in red, or in black enclosed in parentheses.
4. Complete the explanation, with individual amounts, for each adjustment included Column (e).

Account No. and Title	Balance Previous Year	Additions	Retirements	Adjustments (+ or -)	Total change during report year	Report year Ending Balance
(a)	(b)	(c)	(d)	(e)	(f)=(c)-(d)+(e)	(g)=(b)+(f)
101.1 INTANGIBLE PLANT	\$23,435	\$768,816	\$0	\$0	\$768,816	\$792,251
101.2 SOURCE OF SUPPLY AND PUMPING PLANT	2,656,477	100,134	0	0	100134	2756611
101.3 WATER TREATMENT EQUIPMENT	24,215	10,712	0	0	10712	34927
101.4 TRANSMISSION AND DISTRIBUTION PLANT	10,853,111	1,082,818	0	0	1082818	11935928
101.5 GENERAL PLANT	6,081,405	554,414	0	0	554414	6635819
TOTAL	\$19,638,643	\$2,516,893	\$0	\$0	\$2,516,893	\$22,155,535

Explanation of adjustments in column (e):

SEWER PLANT IN SERVICE

(Except for blue cells, the values in this table will populate)

1. Report the original cost of utility plant in service value by prescribed accounts, and the additions and retirements of such plant during the year. (Attach additional pages as necessary.)
2. Do not include as adjustments, corrections to additions and retirements for the current or preceding year. Corrections for the current year should be included in appropriate Column (c) or (d).
3. Credit adjustments in Column (e) should be shown in red, or in black enclosed in parentheses.
4. Complete the explanation, with individual amounts, for each adjustment included Column (e).

Account No. and Title	Balance Previous Year	Additions	Retirements	Adjustments (+ or -)	Total change during report year	Report year Ending Balance
(a)	(b)	(c)	(d)	(e)	(f)=(c)-(d)+(e)	(g)=(b)+(f)
101.1 INTANGIBLE PLANT	\$0	\$0	\$0	\$0	\$0	\$0
101.2 COLLECTION SYSTEM	0		0	0	0	0
101.4 TREATMENT and DISPOSAL FACILITIES	0	0	0	0	0	0
101.6 RECLAIMED WATER DISTRIBUTION PLANT	0	0	0	0	0	0
101.7 GENERAL PLANT	77,684	266,208	0	0	266,208	343,892
TOTAL	\$77,684	\$266,208	\$0	\$0	\$266,208	\$343,892

Explanation of adjustments in column (e):

CAPITAL STRUCTURE

(Except for blue cells, the values in this table will populate)
(Attach additional pages as necessary)

	Per Books	Adjustments for Earnings Report	Adjusted	Ratio
232.00 Short-Term Debt	\$5,693,880	\$0	\$5,693,880	0%
224.0 Long-Term Debt	1,376,007	0	1,376,007	19%
Common Equity:				
201.0 Common Stock	23,063,196	0	0	0%
218.0 Proprietary Capital	0	0	0	0%
211.0 Misc. Paid-in-Capital	5,212,315	0	0	0%
215.0 Retained Earnings	3,488,113	0	0	0%
216.0 Recquired Stock	0	0	0	0%
Total Equity	\$31,763,624	\$0	\$0	0%
Total Capital	\$38,833,511	\$0	\$7,069,887	19%

Debt Detail

Type	Principal Amount	Cost Rates	Interest Expense
232.0 Short Term Debt:			
(Lender name A)	\$0	0%	\$0
(Lender name B)	0	0%	0
(Lender name C)	0	0%	0
Total Short-Term Debt	\$0	0%	\$0
224.0 Long-Term Debt:			
(Lender name D)	\$0	0%	\$0
(Lender name E)	0	0%	0
(Lender name F)	0	0%	0
Total Long-Term Debt	\$0	0%	\$0

Schedule VIb RATE BASE AND EARNINGS CALCULATION

RATE BASE SUMMARY

Description	Water (a)	Sewer (b)	Total (c)=(a) + (b)	Reference (schedule)
1 Additions:				
2 Utility plant	\$22,155,535	\$343,892	\$22,499,427	Va & Vb
3 Materials and supplies	0	0	0	II
4 Working cash (capital) (attach schedule)	0	0	0	
5 Prepayments	0	0	0	II
6 Other (attach schedule or itemize)	0	0	0	
7 TOTAL ADDITIONS (Add Lines 2 through 6)	\$22,155,535	\$343,892	\$22,499,427	
8 Deductions:				
9 Reserve for depreciation (Accumulated)	0	0	0	II
10 Advances for construction	0	0	0	II
11 Contributions in aid of construction	0	0	0	II
12 Accumulated deferred income taxes	0	0	0	II
13 Accumulated deferred investment tax credits	0	0	0	II
14 Other (attach schedule or itemize)	0	0	0	II
15 TOTAL DEDUCTIONS (Add lines 9 through 14)	\$0	\$0	\$0	
16 RATE BASE (Line 7, less Line 15)	\$22,155,535	\$343,892	\$22,499,427	

EARNINGS CALCULATION

17 Return (Note 1)	\$996,718
18 Rate of Return (Line 17/Line 16)	4.43%
19 Earned Return on Ending Equity (Notes 2, 3)	4.41%

Note 1: Schedule 4, *Statements of Income*, line 26 plus line 27.

Note 2: Based on reported capital structure in Schedule 6, *Capital Structure_Earnings*.

Note 3: Line 19 (above) will automatically calculate correctly only after Schedule 4, *Statements of Income*, Schedule 7, *Rate of Return*, and the above portions of this schedule (tab) have been completed.

*If the company currently has an authorized return on equity (ROE), enter that ROE in column (c) and provide the docket number in which that ROE was granted here ==>>>

RATE OF RETURN

(Except for blue cells, the values in this table will populate)

(Attach additional pages as necessary)

	Balance	Capital Structure %	Cost Rates	Weighted Cost of Capital
	(a)	(b)	(c)	(c)=(a) x (b)
224.0 Long-Term Debt	\$1,376,007	5.63%	4.80%	0.27%
Common Equity*	\$23,063,106	94.37%	10.47%	9.88%
Total	\$24,439,113	100.00%		10.15%

*Company's most recent PUC-authorized rate of return on equity (ROE): 0.00%

Docket number in which PUC authorized the ROE: XXXXX

If company has no authorized ROE, provide estimate of required ROE: 0.00%

CONNECTION COUNT

(Except for blue cells, the values in this table will populate)

METERED CUSTOMERS BY METER SIZE

(Attach additional pages as necessary)

Number of Customers						
(a) Line	(b) Meter	(c) End of	(d) Additions	(e) End of	(f) Meter	(g) Meter
No.	Size	Prior Year	or change	Report Year (c + d)	Ratios	Equivalencies (e x f)
Water						
	Metered					
1	5/8"	1,961	(53)	1,908	1	1,908
2	3/4"	0	0	0	1.5	0
3	1"	3,650	151	3,801	2.5	9,503
4	1 1/2"	7	0	7	5	35
5	2"	3	(1)	2	8	16
6	3"	1	0	1		0
7		0	0	0		0
8		0	0	0		0
9	Unmetered	0	0	0		0
10	Total Water	5,622	97	5,719		11,462
Sewer						
11		98	59	157	1	157
12		0	0	0	1	0
13		0	0	0	1	0
14		0	0	0	1	0
15	Total Sewer	98	59	157		157

Attach a schedule if any customers are charged on any basis other than meter size.

VOLUMETRIC INFORMATION

(Except for blue cells, the values in this table will populate)

	(Report in 1,000 gallons)	Report Year
1	Water Pumped	766,631
2	Purchased Water	7,338
3	Total Water Produced (1 + 2)	773,969
4	Total Water Sold	716,493
5	Water Lost (3 - 4)	57,476
6	Water Line Lost (percentage)	7.43%

AFFILIATED TRANSACTIONS

(Except for blue cells, the values in this table will populate)

Charges by an Affiliate to the Reporting Utility

Name of Affiliated company:___ NWN Holdings

(Attach additional pages as necessary)

NARUC Account and type of service		Total Affiliated Company (Dollars transacted)	Total Texas (Dollars transacted)	Total for reporting entity (Dollars transacted)
Account #	Account name or type of service			
8098	Shared Services	\$0	\$284,680	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0

Charges by an Reporting Utility to Affiliates

Name of Affiliated company:_____

NARUC Account and type of service		Total Affiliated Company (Dollars transacted)	Total Texas (Dollars transacted)	Total for reporting entity (Dollars transacted)
Account #	Account name or type of service			
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0
		\$0	\$0	\$0

SYSTEM IMPROVEMENT CHARGE—WATER

Did the reporting entity collect a System Improvement Charge (SIC) in the monitoring period? no

(a) provide the amount of the Commission-approved SIC, Docket No., and date of implementation.

(b) provide the amount of annual revenues collected through the SIC for the reporting period.

(c) provide the amount of the annual revenues stated in the most recent annual report that was filed in the docket approving the SIC.

(d) provide the amount of the revenues collected through the SIC during the current monitoring period stated as a percentage of the annual revenues referenced in (c) above.

(e) provide the cumulative amount of revenues collected through the SIC since implementation as a percentage of the annual revenues referenced in (c) above.

SYSTEM IMPROVEMENT CHARGE—SEWER

Did the reporting entity collect a System Improvement Charge (SIC) in the monitoring period? no

(a) provide the amount of the Commission-approved SIC, Docket No., and date of implementation.

(b) provide the amount of revenues collected through the SIC for the reporting period.

(c) provide the amount of the annual revenues stated in the most recent annual report that was filed in the docket approving the SIC.

(d) provide the amount of the revenues collected through the SIC during the current monitoring period stated as a percentage of the annual revenues referenced in (c) above.

(e) provide the cumulative amount of revenues collected through the SIC since implementation as a percentage of the annual revenues referenced in (c) above.

SIGNATURE PAGE--PUC CLASS B ANNUAL REPORT

I certify that I am the responsible official of the above-named company and that I have examined the foregoing report; that to the best of my knowledge, information, and belief, all statements of fact contained in the said report are true and correct and the said report is a correct statement of the business and affairs of the above-named company with respect to each and every matter set forth therein for the 12 Months Ending December 31, 2023 .

####

Date

Deanna Degeyter

Signature

General Manager

Title

APPLICATION OF T&W WATER	§	BEFORE THE PUBLIC UTILITY
SERVICE COMPANY DBA BLUE	§	
TOPAZ UTILITIES AND INLINE	§	COMMISSION OF TEXAS
UTILITIES, LLC FOR SALE,	§	
TRANSFER OR MERGER OF	§	
FACILITIES AND CERTIFICATE	§	
RIGHTS IN HARRIS COUNTY	§	

AFFIDAVIT OF MEETING THE PUCT FINANCIAL OBLIGATION

THE STATE OF OREGON:

COUNTY OF [MULTNOMAH]:

BEFORE ME, the undersigned official on this day personally appeared Brody J. Wilson who is personally known to me and first being duly sworn according to law, upon his oath deposed and said:

1) My name is Brody J. Wilson. I am over the age of 18 years and reside in Clackamas County, Oregon. I am of sound mind and fully competent to make this affidavit. I have personal knowledge of the facts stated herein, and they are true and correct.

2) I am the VP, Treasurer and Chief Accounting Officer of Northwest Natural Holding Company ("NW Natural Holding").

3) In my capacity as VP, Treasurer and Chief Accounting Officer of NW Natural Holding, I am authorized to make this affidavit on behalf of T&W Water Service Company dba Blue Topaz Utilities ("T&W"), the Applicant in this case.

4) I have reviewed 16 Texas Administrative Code (TAC) § 24.11(e), which includes what I understand to be a "Financial Test" employed by the Public Utility Commission of Texas (the "Commission") Staff as part of the Commission's sale, transfer, or merger application review process. The Financial Test has several prongs that the Commission uses to evaluate whether an owner or operator of a retail public utility has the financial resources to operate and manage the

utility and to provide continuous and adequate service to the current and proposed utility service area. See 16 TAC § 24.11(a). These prongs consist of the Leverage test at 16 TAC § 24.11(e)(2), the Operations test at 16 TAC § 24.11(e)(3), and the Capital Commitment test at 16 TAC § 24.11(e)(5). This Affidavit relates to the Capital Commitment test, which reads as follows:

If the applicant is proposing service to a new CCN area or a substantial addition to its current CCN area requiring capital improvements in excess of \$100,000, the applicant must provide the following:

- (A) The owner must submit loan approval documents indicating funds are available for the purchase of an existing system plus any improvements necessary to provide continuous and adequate service to the existing customers if the application is a sale, transfer, or merger; or
- (B) The owner must submit loan approval documents or firm capital commitments affirming funds are available to install:
 - (i) the plant and equipment necessary to serve projected customers in the first two years of projections; or
 - (ii) a new water system or substantial addition to an existing water system if the applicant is proposing service to a new CCN area or a new subdivision

5) Based upon my training and education, experience at NW Natural Holding, knowledge of the relationship between NW Natural Holding and T&W, and my experience with the operation of regulated water and wastewater retail utility operations in Texas, I have the following professional opinions regarding T&W's satisfaction of the firm Capital Commitment test.

a) Based upon my personal knowledge, professional experience, and review of the records of T&W and NW Natural Holding, the relationship between T&W and NW Natural Holding a common parent-subsidiary relationship for both private and public companies whereby the subsidiary's allocation of debt and equity from the corporate parent is governed by intercompany arrangements. Any debt or equity infusion for T&W is pushed down from its corporate parent.

All transactions between T&W and NW Natural Holding are via intercompany journal entry for appropriate booking, and the financial structure of the T&W operating subsidiary is dependent on the corporate parent's capitalization.

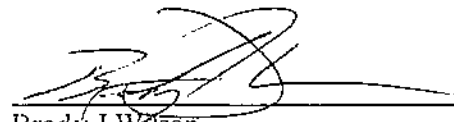
b) Based upon my personal knowledge and review of the records of T&W, and knowledge of the corporate relationship of T&W with its parent affiliate entity, T&W's financing relationship satisfies the need for assurance of capital commitments from NW Natural Holding as contemplated by 16 TAC § 24.11(e)(5). For additional information regarding capital commitments by NW Natural Holding, see **Exhibit A – Surety Bond**.

c) T&W is proposing service through a substantial addition to its current CCN area, it may satisfy the Capital Commitment test in 16 TAC § 24.11(e)(5)(a) by demonstrating "funds are available for the purchase of an existing system plus any improvements necessary to provide continuous and adequate service to the existing customers." The Surety Bond constitutes a firm capital commitment by NW Natural Holding to T&W "indicating funds are available" to fund acquisition of Inline Utilities, LLC contemplated by this project.

d) Based upon my personal knowledge and review of the records of T&W and NW Natural Holding, T&W routinely works closely with NW Natural Holding to report its current financial standing and inform NW Natural Holding of any future T&W debt/equity needs monthly.

6) Affiant's statements in paragraphs 1) through 5) above, inclusive, and including the attached Exhibit A, are true and correct, and within Affiant's personal knowledge.

Further Affiant sayeth not.



Brody J. Wilson
VP, Treasurer and Chief Accounting Officer
NW Natural Holdings

SUBSCRIBED AND SWORN TO BEFORE ME on this the 14 day of April, 2025, to which witness my hand and official seal.



Cassia Renn Carpio
Notary Public in and for
The State of Oregon

PERFORMANCE BOND

Bond No. 023230260

KNOW ALL BY THESE PRESENTS, That we, **Northwest Natural Holding Company**, as Principal, and **Liberty Mutual Insurance Company**, organized and existing under the laws of the State of **Massachusetts**, as Surety, are held and firmly bound unto **Public Utility Commission of Texas**, as Obligee, in the just and full sum of **Seven Million Seven Hundred Thousand and No/100 Dollars (\$7,700,000.00)**, lawful money of the United States of America, for the payment of which, well and truly to be made, we bind ourselves, our heirs, administrators, executors, successors and assigns, jointly and severally, firmly by these presents.

WHEREAS, the principal(s) has submitted an application to the Obligee for the Sale, Transfer, or Merger of a Retail Public Utility.

WHEREAS, as a condition of said application and pursuant to Texas Administrative Code §24.11 requires the Principal to provide a Bond guaranteeing that the Principal as owner or operator of a retail public utility will continue to operate and manage the utility and to provide continuous and adequate service to the utility service areas known as Cottage Gardens and Sugarberry Subdivisions located in Harris County, Texas.

THE CONDITION OF THIS OBLIGATION IS SUCH, That if Principal shall complete or cause to be completed said improvements in accordance with the above referenced permits, then this obligation shall be null and void, otherwise it shall remain in full force and effect.

PROVIDED, HOWEVER, That:

1. It shall be a condition precedent to any right of recovery hereunder, that in event of any default on the part of the Principal, a written statement of the particular facts of such default shall be forwarded to the Surety, within thirty (30) days of the occurrence of such default, delivered by registered mail to Surety at:

Liberty Mutual Surety Claims
P.O. Box 34526
Seattle, WA 98124

2. That no action, lawsuit or proceeding shall be had or maintained against the Surety on this Bond unless the same be filed and properly served upon the Surety within one year from the effective date of the cancellation of the Bond.
3. That no right of action shall accrue under this Bond to or for the use of a person or entity other than the Obligee, and its successors and assigns.
4. This Bond shall become effective **April 11, 2025** and expire on **April 11, 2026**, and may be extended by the Surety by Continuation Certificate. However, neither non-renewal by the Surety, nor the failure or inability of the Principal to file a replacement bond in the event of non-renewal, shall itself constitute a loss to the obligee recoverable under this bond or any renewal or continuation

thereof. The liability of the Surety under this bond and all continuation certificates issued in connection therewith shall not be cumulative and shall in no event exceed the amount as set forth in this bond or in any additions, riders, or endorsements properly issued by the Surety as supplements thereto. In no event shall Surety's aggregate liability exceed the penal sum of this bond.

5. The aggregate liability of the surety is limited to the penal sum stated herein regardless of the number or amount of claims brought against this bond and regardless of the number of years this bond remains in force.

IN WITNESS WHEREOF, The said Principal and Surety have signed and sealed this instrument on this 11th day of April, 2025.



Principal

Northwest Natural Holding Company

By: 

Brody Wilson, VP CAO,
Treasurer & Controller

Name/Title

Surety

Liberty Mutual Insurance Company

By: 

Kathleen K. Freund

Attorney-in-Fact

Acknowledged and Accepted this _____ day of _____, 2025.

By: _____

Public Utility Commission of Texas

Name: _____

Title: _____



POWER OF ATTORNEY

Certificate No: 8204866

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company

KNOWN ALL PERSONS BY THESE PRESENTS: That The Ohio Casualty Insurance Company is a corporation duly organized under the laws of the State of New Hampshire, that Liberty Mutual Insurance Company is a corporation duly organized under the laws of the State of Massachusetts, and West American Insurance Company is a corporation duly organized under the laws of the State of Indiana (herein collectively called the "Companies"), pursuant to and by authority herein set forth, does hereby name, constitute and appoint,

Kathleen K. Freund

all of the city of Denver, state of CO each individually if there be more than one named, its true and lawful attorney-in-fact to make, execute, seal, acknowledge and deliver, for and on its behalf as surety and as its act and deed, any and all undertakings, bonds, recognizances and other surety obligations, in pursuance of these presents and shall be as binding upon the Companies as if they have been duly signed by the president and attested by the secretary of the Companies in their own proper persons.

IN WITNESS WHEREOF, this Power of Attorney has been subscribed by an authorized officer or official of the Companies and the corporate seals of the Companies have been affixed thereto this 1st day of July, 2024.

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company



By: [Signature]
Nathan J. Zangerle, Assistant Secretary

STATE OF PENNSYLVANIA ss
COUNTY OF MONTGOMERY

On this 1st day of July, 2024, before me personally appeared Nathan J. Zangerle, who acknowledged himself to be the Assistant Secretary of Liberty Mutual Insurance Company, The Ohio Casualty Company, and West American Insurance Company, and that he, as such, being authorized so to do, execute the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my notarial seal at Plymouth Meeting, Pennsylvania, on the day and year first above written.



Commonwealth of Pennsylvania - Notary Seal
Teresa Pastella, Notary Public
Montgomery County
My commission expires March 29, 2029
Commission number 126044
Member, Pennsylvania Association of Notaries

By: Teresa Pastella
Teresa Pastella, Notary Public

This Power of Attorney is made and executed pursuant to and by authority of the following By-laws and Authorizations of The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company which resolutions are now in full force and effect reading as follows:

ARTICLE IV - OFFICERS: Section 12. Power of Attorney.

Any officer or other official of the Corporation authorized for that purpose in writing by the Chairman or the President, and subject to such limitation as the Chairman or the President may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Corporation to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Corporation by their signature and execution of any such instruments and to attach thereto the seal of the Corporation. When so executed, such instruments shall be as binding as if signed by the President and attested to by the Secretary. Any power or authority granted to any representative or attorney-in-fact under the provisions of this article may be revoked at any time by the Board, the Chairman, the President or by the officer or officers granting such power or authority.

ARTICLE XIII - Execution of Contracts: Section 5. Surety Bonds and Undertakings.

Any officer of the Company authorized for that purpose in writing by the chairman or the president, and subject to such limitations as the chairman or the president may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Company by their signature and execution of any such instruments and to attach thereto the seal of the Company. When so executed such instruments shall be as binding as if signed by the president and attested by the secretary.

Certificate of Designation - The President of the Company, acting pursuant to the Bylaws of the Company, authorizes Nathan J. Zangerle, Assistant Secretary to appoint such attorneys-in-fact as may be necessary to act on behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations.

Authorization - By unanimous consent of the Company's Board of Directors, the Company consents that facsimile or mechanically reproduced signature of any assistant secretary of the Company, whenever appearing upon a certified copy of any power of attorney issued by the Company in connection with surety bonds, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

I, Renee C. Llewellyn, the undersigned, Assistant Secretary, of Liberty Mutual Insurance Company, The Ohio Casualty Insurance Company, and West American Insurance Company do hereby certify that this power of attorney executed by said Companies is in full force and effect and has not been revoked.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seals of said Companies this 11th day of April, 2025.



By: Renee C. Llewellyn
Renee C. Llewellyn, Assistant Secretary

Attachment 10

Capital Improvement Plan
filed confidentially in this
docket

PWS_1000037_CP_20220823_INVESTIGATION
Texas Commission on Environmental Quality
Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oee@tceq.texas.gov

Customer: Water Necessities, Inc.
Customer Number: CN602444515

Regulated Entity Name: ENCHANTED FOREST

Regulated Entity Number: RN101435956

Investigation # 1840694

Incident Numbers

Investigator: VANESSA STANSBURY

Site Classification GW 51-250 CONNECTION

Conducted: 08/23/2022 -- 08/23/2022

SIC Code: 4941

Program(s): PUBLIC WATER SYSTEM/SUPPLY

Investigation Type: Compliance Investigation

Location: OFF FM 418, WEST OF SILSBEE

Additional ID(s): 1000037

Address: ,

Local Unit: REGION 10 - BEAUMONT

Activity Type(s): PWSCCIGWCD - CCI
GROUNDWATER PURCHASE -
COMMUNITY DISCRETIONARY

Principal(s):

Role

Name

RESPONDENT

WATER NECESSITIES INC

Contact(s):

Role

Title

Name

Phone

REGULATED
ENTITY
CONTACT

OPERATOR

MR KELLY BREWER

Phone (409) 791-2104
Work (409) 769-9030
Fax (409) 769-1176
Work (409) 769-9030

REGULATED
ENTITY MAIL
CONTACT

PRESIDENT

MR LARRY BREWER

Fax (409) 769-1176
Phone (409) 769-9030
Work (409) 769-9030
Work (409) 769-9030

PARTICIPATED
IN

OPERATOR

MRS CHANDA HALL

Cell (409) 782-7019

NOTIFIED

OPERATOR

MRS CHANDA HALL

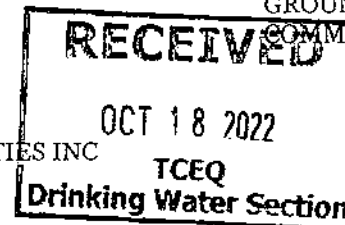
Cell (409) 782-7019

REGULATED
ENTITY
CONTACT

OPERATOR

MRS CHANDA HALL

Cell (409) 782-7019



MAR 07 2023

TCEQ
CENTRAL FILE ROOM

OFFICE TO

OCT 14 2022

POSTAL

ENCHANTED FOREST - VIDOR

8/23/2022 Inv. # - 1840694

Page 2 of 10

Other Staff Member(s):

Role	Name
Investigator	JILL PICKETT
Supervisor	RONALD HEBERT JR
QA Reviewer	LOREN WHITMAN
Investigator	SAMANTHA MCINNIS

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
PWS STANDARD FIELD	PWS
WATER EQUIPMENT	EQ

Investigation Comments:

INTRODUCTION

Enchanted Forest was investigated by Ms. Vanessa Stansbury and Ms. Jill Pickett, Environmental Investigators, on August 23, 2022 to determine compliance with applicable public water system regulations. Ms. Chanda Hall, Operator, was contacted on August 10, 2022, to schedule the Comprehensive Compliance Investigation (CCI) for August 23, 2022. An investigative request was e-mailed to Ms. Hall on August 10, 2022. (See Attachment No. 1 - Investigative Request Letter.)

A copy of the TCEQ Exit Interview Form and a link to the TCEQ Customer Survey Form was emailed to the water system on August 30, 2022. (See Attachment No. 2 for Exit Interview Form.)

A Notice of Violation (NOV) Letter was mailed to the water system.

GENERAL FACILITY AND PROCESS INFORMATION

- System Type: Community
- Retail Connections: 107 total connections
- Maximum Daily Population: Approximately 321 People (Based on data provided by the water system)
- Wholesale Connections: 0
- Wholesale Population: 0
- Average daily usage: 0.142 Million-Gallons Daily (MGD) from January 1, 2021 through December 31, 2021

The water system consists of two water treatment plants that supply one pressure plane. Well No. 1 (G1000037A) was tested to produce 78 gallons per minute (gpm), and Well No. 3 (G1000037C) was tested to produce 29 gpm. Please note that Well No. 2 (G1000037B) is plugged. Plant No. 1 consists of Well No. 1, polyphosphate for sequestration, gas chlorine for disinfection, two 0.022 MG ground storage tanks, one 0.005 MG pressure tank, and two 190 gpm service pumps. Plant No. 2 consists of Well No. 3, hypochlorination for disinfection, and one 0.0009 MG pressure tank.

For additional facility information see Attachment No. 3 - Water System Schematic, SDWIS Printout, Capacity Sheet, and Water System Data Sheet.

On July 11, 2000, the water system was granted an exception to the rule requiring sanitary control easements for all the land within 150-feet of "Well A" (G1000037A, Well No. 1). The exception is contingent upon the submission of one raw bacteriological sample per month from Well No. 1 in addition to the normally required distribution system monthly samples, and Well No. 2 was required to be plugged.

By letter dated February 11, 2002, the water system was granted an exception to the rule requiring the volume of water treated each day. The water system may record the amount of water treated each week.

By letter dated June 1, 2011, the water system was granted an exception to the rule requiring an office within 20 miles of the utilities service area.

The water system employs the following operators:

ENCHANTED FOREST - VIDOR

8/23/2022 Inv. # - 1840694

Page 3 of 10

Kelly Brewer, Class C Water, License No. WG0009000, Expires May 11, 2025.
Chanda Hall, Class C Water, License No. WG0011492, Expires February 18, 2024.

BACKGROUND

The last Comprehensive Compliance Investigation (CCI) for this water system was conducted on January 16, 2020, and the following alleged violations were noted as a result of the investigation: failure to have an adequate plant operation manual; failure to provide an adequate well vent for Well No. 1; failure to provide the right side 0.022 million gallons (MG) ground storage tank roof vent to prevent entry of animals, birds, insects and heavy air contaminants into the ground storage tank by use of corrosion-resistant material that is 16-mesh or finer; failure to provide a readable sight glass on the 900-gallon pressure tank at Well No. 3; and failure to maintain the intruder resistant fence. All of the alleged violations were resolved prior to the completion of the report. A General Compliance Letter was mailed to the water system on March 11, 2020.

No File Record Reviews have been conducted since the last CCI.

No alleged violations remain outstanding at this time.

A search of the Consolidated Compliance and Enforcement Data System (CCEDS) showed that no complaints have been filed against the water system since the last CCI.

A search of CCEDS showed one open enforcement case for this water system. All of the alleged violations noted within Case No. 3044 (Docket No. 96-09200) have been resolved; however, the case remains active at this time.

ADDITIONAL INFORMATION

On August 23, 2022, the investigators met with Ms. Hall to conduct the CCI.

The following records were reviewed: connection counts, plant operations manual, American National Standards Institute (ANSI)/National Sanitation Foundation (NSF) certification for all chemicals, customer service agreement, customer service inspections, monthly operating reports, records for the amount of chemicals used, monthly flushing records, disinfectant residual sampling records, a distribution map, drought contingency plan, annual tank inspection forms, monitoring plan, the Revised Total Coliform Rule (RTCR) Sample Siting Plan and Map, and the bacteriological sampling records for the previous twelve months.

During the investigation, it was noted that the water system's plant operations manual did not have protocols for natural and manmade disasters. The water system stated that they turned in their Emergency Preparedness Plan on September 27, 2022; however, the Emergency Preparedness Plans (EPP) that have been provided to the Beaumont Regional Office by other water systems for review only included protocols in regard to power loss and did not include flooding events, plant breakings and potential contamination of the water source, and other natural and manmade disasters that are not caused by electrical outages or issues. Because of this, this alleged violation will remain outstanding until the water system has provided protocols for natural and manmade disasters in the plant operations manual.

During the investigation, it was noted that the water system was not writing the exact date of when each tank inspection is conducted and the exact date of the last inspection of the pressure tank interior for the 5,000-Gallon Pressure Tank. It is suggested that the water system record the dates of when tank inspections are conducted, including the date of the last interior pressure tank inspection. On September 27, 2022, the water system submitted a statement noting that they will begin to write the exact date of tank inspections on the tank inspection forms, including the month, day, and year. This will be noted as an additional issue.

During the investigation, it was noted that the 2019, 2020, and 2021 tank inspection forms for the 5,000-Gallon Pressure Tank stated that the interior of the tank was last inspected during 2018; however, the 2018 tank inspection form for the 5,000-Gallon Pressure Tank noted "N/A" for the Interior of Tank section. Please note that the 2018 tank inspection form for the 5,000-Gallon Pressure Tank stated that the last interior pressure tank inspection was noted to be in 2013, which was five years prior to 2018. On September 27, 2022, the water system submitted a statement noting that the interior of the pressure tank was inspected on December 8, 2019 and that the water system mistakenly noted "N/A" for the Water Quality and Protective Coating items under the Interior of

ENCHANTED FOREST - VIDOR

8/23/2022 Inv. # - 1840694

Page 4 of 10

Tank section. On September 27, 2022, the water system submitted revised copies of the December 2019 Tank Inspection Form for the 5,000-Gallon Pressure Tank at Plant No. 1 that noted "O.K." for both the Water Quality and Protective Coating items under the Interior of Tank section.

During the investigation, it was noted that the Sabine River Authority's lab did not record the E. coli results for the bacteriological samples that were collected at 111 Sherwood, G1000037A, and G1000037C on the August 2021 bacteriological sample form. Please note that the water system noted G1000037C as G1000037B; however, G1000037B is a plugged well. On September 27, 2022, the water system submitted a revised copy of the August 2021 bacteriological sample form that had been completed by the Sabine River Authority. Please note that G1000037C was still noted to be G1000037B. It is suggested that the water system ensures that all bacteriological sample forms are completely filled out. It is also suggested that the water system ensures they record the correct Well ID Numbers for the wells they collect samples from. This will be noted as an additional issue.

During the investigation, it was noted that the water system's accuracy check records noted 0.61 mg/L for Standard No. 2 on August 2, 9, 16, 23, and 30, 2021 while Standard No. 2's expected value was noted to actually be 0.92 mg/L. Please note that the margin of error for Standard No. 2 in Hach DPD Low Range Chlorine Secondary Standards are plus or minus 0.10 mg/L. The water system stated that they believed that these values were incorrectly recorded. During the investigation, it was noted that all disinfection accuracy check records were noted to be recorded within range since September 2021. The water system also submitted a revised copy of the Daily Calibration Log dated August 2021, which revised results so that 0.91 mg/L was noted for Standard No. 2 on August 2, August 9, August 16, August 23, and August 30, 2021.

Operation and maintenance- During the investigation, an evaluation of the water production and distribution system was conducted.

During the investigation, it was noted that the water system covered the overflow pipes of both 0.022 MG Ground Storage Tanks at Plant No. 1 with a 16-mesh corrosive-resistant screening material instead of having a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device. Please note that 16-mesh screens can become clogged with rust and debris, which can impede the flow of water from the overflow pipe. The water system submitted a statement on September 27, 2022 that alleged that the water system was approved to cover the end of the overflow pipes with 16-mesh; however, no documentation was submitted to show that they were granted approval to cover the end of overflow pipes with 16-mesh. The water system also noted that they have ordered a gravity hinged weighted cover and will submit photographic documentation of it once it has been received.

During the investigation, it was noted that there was a leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1, there were at least two noted leaks on the inlet and outlet piping for the blue service pump located directly to the right inside the pump room. On September 27, 2022, the water system submitted documentation that stated that they have ordered the part needed to repair the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1 and that they will submit photographic documentation once the leak has been repaired. They also stated, "Outlet pipe on blue service pump; All lines have been resealed and tightened to stop any leaks." The water system did not mention if "all pipes" also included the leak on the inlet pipe or if they only meant the piping that makes up the outlet pipe. October 4, 2022, the water system clarified that all of the piping for the inlet and outlet were tightened and that they had repaired all of the leaks for the service pump waterlines. This alleged violation will remain outstanding until the water system submits photographic documentation showing that the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1 has been repaired.

During the investigation, it was noted that the Green 0.022 MG Ground Storage Tank at Plant No. 1 did not have a functional liquid level indicator. The floating liquid level indicator was not functional, and the water system did not provide a liquid level indicator gauge on the tank. On September 27, 2022, the Beaumont Regional Office received photographic documentation showing that a liquid level indicator gauge had been installed on the Green 0.022 MG Ground Storage Tank.

During the investigation, it was noted that the two 5-gallon sodium hypochlorite containers at Plant No. 2 did not have a label that identified the tank's contents. On September 27, 2022, the Beaumont Regional Office received documentation from the water system that stated that NAPCO was going to send the water system a proper label for their sodium hypochlorite tank and that they would submit photographic documentation once the label was on the tank. Please note that all sodium hypochlorite containers maintained at Plant No. 2 will need to have a label

ENCHANTED FOREST - VIDOR**8/23/2022 Inv. # - 1840694****Page 5 of 10**

that identifies each tank's contents.

During the investigation, it was noted that there was a small hole in the top of the sodium hypochlorite solution container where the space between the container's top and the chemical injection line was not fully sealed. On September 27, 2022, the Beaumont Regional Office received photographic documentation showing that the water system has resealed the opening between the top of the sodium hypochlorite container and the chemical injection line.

During the investigation, it was noted that the water system was using a clear hose that was being used as a sight glass on the 900-Gallon Pressure Tank at Plant No. 2; however, the water system could not provide any documentation regarding if it is a hose that is made specifically to be used for drinking water. Please also note that all water system components are required to be National Sanitation Foundation/American National Standards Institute (NSF/ANSI) Standard 61, including hoses. On September 27, 2022, the water system stated they had no documentation regarding the source of the hose to submit to the Beaumont Regional Office. The water system also submitted photographic documentation showing that the clear hosing had been removed from the pressure tank. Please note that sight glasses are only required for pressure tanks that are greater than 1,000-gallons. If the water system chooses to install another sight glass on the 900-Gallon Pressure Tank at Plant No. 2, it is suggested that the water system ensures that they install a sight glass that is NSF/ANSI Standard 61. This may result in future alleged violations. This will be noted as an additional issue.

Capacity- During the investigation, the water system's capacity was evaluated (See Attachment No. 3- Water System Schematic, SDWIS Printout, Capacity Sheet, and Water System Data Sheet).

The water system is required to provide 0.6 gpm multiplied by (x) 107 connections equals (=) 64.2 gpm for total well production while the water system provides 107 gpm. The water system provides 0.044 MG of total storage capacity while 0.0214 MG is required. The water system provides 0.0059 MG of pressure capacity while 0.00214 MG is required. The water system provides 280 gpm of service pump capacity while 214 gpm is required.

Sampling- During the investigation, a disinfectant residual and a pressure test were conducted in the distribution system. A free chlorine residual of 0.77 milligrams per liter (mg/L) and a pressure reading of 56.5 psi were documented at 110 Songwood Dr after flushing for three to five minutes.

List of Attachments:

Attachment No. 1- Investigative Request Letter

Attachment No. 2- Exit Interview Form

Attachment No. 3- Water System Schematic, SDWIS Printout, Capacity Sheet, and Water System Data Sheet

Attachment No. 4- Investigation Photographs

Attachment No. 5- Water System Documentation

NOV Date 08/23/2022 **Method** AREA OF CONCERN**NOV Date** 10/14/2022 **Method** WRITTEN**OUTSTANDING ALLEGED VIOLATION(S)
ASSOCIATED TO A NOTICE OF VIOLATION****Track Number:** 825057**Compliance Due Date:** 01/12/2023**Violation Start Date:** 8/23/2022**30 TAC Chapter 290.43(c)(3)****Alleged Violation:****Investigation:** 1840694**Comment Date:** 10/07/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to cover the discharge opening of all overflow pipes with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device.

ENCHANTED FOREST - VIDOR

8/23/2022 Inv. # - 1840694

Page 6 of 10

During the investigation, it was noted that the water system covered the overflow pipes of both 0.022 MG Ground Storage Tanks at Plant No. 1 with a 16-mesh corrosive-resistant screening material instead of having a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device. Please note that 16-mesh screens can become clogged with rust and debris, which can impede the flow of water from the overflow pipe. The water system submitted a statement on September 27, 2022 that alleged that the water system was approved to cover the end of the overflow pipes with 16-mesh; however, no documentation was submitted to show that they were granted approval to cover the end of overflow pipes with 16-mesh. The water system also noted that they have ordered a gravity hinged weighted cover and will submit photographic documentation of it once it has been received.

Recommended Corrective Action: Cover the discharge opening of all overflow pipes with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device. Submit photographic documentation for each 0.022 MG Ground Storage Tanks to the Beaumont Regional Office.

Track Number: 825058

Compliance Due Date: 01/12/2023

Violation Start Date: 8/23/2022

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain all water treatment units, storage units and pressure maintenance facilities, distribution system lines, and related appurtenances in a watertight condition.

During the investigation, it was noted that there was a leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1, there were at least two noted leaks on the inlet and outlet piping for the blue service pump located directly to the right inside the pump room. On September 27, 2022, the water system submitted documentation that stated that they have ordered the part needed to repair the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1 and that they will submit photographic documentation once the leak has been repaired. They also stated, "Outlet pipe on blue service pump; All lines have been resealed and tightened to stop any leaks." The water system did not mention if "all pipes" also included the leak on the inlet pipe or if they only meant the piping that makes up the outlet pipe. On October 4, 2022, the water system clarified that all of the piping for the inlet and outlet were tightened and that they had repaired all of the leaks for the service pump waterlines. This alleged violation will remain outstanding until the water system submits photographic documentation showing that the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1 has been repaired.

Recommended Corrective Action: Repair the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1. Submit photographic documentation for each of the noted leaks to the Beaumont Regional Office.

Track Number: 825060

Compliance Due Date: 01/12/2023

Violation Start Date: 8/23/2022

30 TAC Chapter 290.42(f)(1)(C)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/04/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to have a label on every chemical storage facility that identifies the tank's contents.

ENCHANTED FOREST - VIDOR

8/23/2022 Inv. # - 1840694

Page 7 of 10

During the investigation, it was noted that the two 5-gallon sodium hypochlorite containers at Plant No. 2 did not have a label that identified the tank's contents. On September 27, 2022, the Beaumont Regional Office received documentation from the water system that stated that NAPCO was going to send the water system a proper label for their sodium hypochlorite tank and that they would submit photographic documentation once the label was on the tank. Please note that all sodium hypochlorite containers maintained at Plant No. 2 will need to have a label that identifies each tank's contents.

Recommended Corrective Action: Provide a label on each sodium hypochlorite container at Plant No. 2 that identifies the tanks' contents. Submit photographic documentation to the Beaumont Regional Office.

Track Number: 825062 **Compliance Due Date:** 01/12/2023

Violation Start Date: 8/23/2022

30 TAC Chapter 290.42(l)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/07/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain a complete plant operations manual.

During the investigation, it was noted that the water system's plant operations manual did not have protocols for natural and manmade disasters. The water system stated that they turned in their Emergency Preparedness Plan on September 27, 2022; however, the Emergency Preparedness Plans (EPP) that have been provided to the Beaumont Regional Office by other water systems for review only included protocols in regard to power loss and did not include flooding events, plant breakings and potential contamination of the water source, and other natural and manmade disasters that are not caused by electrical outages or issues. Because of this, this alleged violation will remain outstanding until the water system has provided protocols for natural and manmade disasters in the plant operations manual.

Recommended Corrective Action: Revised the plant operations manual to include protocols for natural and manual disasters. Submit a copy of the revised plant operations manual to the Beaumont Regional Office.

AREA OF CONCERN

Track Number: 825059 **Resolution Status Date:** 10/4/2022

Violation Start Date: 8/23/2022 **Violation End Date:** 9/27/2022

30 TAC Chapter 290.46(m)

Alleged Violation:

Investigation: 1840694

Comment Date: 09/20/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain all plant equipment in a good working condition and appearance.

During the investigation, it was noted that the Green 0.022 MG Ground Storage Tank at Plant No. 1 did not have a functional liquid level indicator. The floating liquid level indicator was not functional, and the water system did not provide a liquid level indicator gauge on the tank.

Recommended Corrective Action: Either repair the floating liquid level indicator or install a liquid level

ENCHANTED FOREST - VIDOR

8/23/2022 Inv. # - 1840694

Page 8 of 10

indicator gauge on the Green 0.022 MG Ground Storage Tank.

Resolution: On September 27, 2022, the Beaumont Regional Office received photographic documentation showing that a liquid level indicator gauge had been installed on the Green 0.022 MG Ground Storage Tank.

Track Number: 825061

Resolution Status Date: 10/5/2022

Violation Start Date: 8/23/2022

Violation End Date: 9/27/2022

30 TAC Chapter 290.42(e)(5)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to completely cover the top of hypochlorination solution containers to prevent the entrance of dust, insects, and other contaminants.

During the investigation, it was noted that there was a small hole in the top of the sodium hypochlorite solution container where the space between the container's top and the chemical injection line was not fully sealed.

Recommended Corrective Action: Seal the hole in the top of the sodium hypochlorite solution container that is located in the space between the container's top and the chemical injection line.

Resolution: On September 27, 2022, the Beaumont Regional Office received photographic documentation showing that the water system has resealed the opening between the top of the sodium hypochlorite container and the chemical injection line.

Track Number: 825063

Resolution Status Date: 10/5/2022

Violation Start Date: 8/23/2022

Violation End Date: 8/23/2022

30 TAC Chapter 290.46(f)(3)(B)(iv)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest to maintain accurate calibration records for all laboratory equipment.

During the investigation, it was noted that the water system's accuracy check records noted 0.61 mg/L for Standard No. 2 on August 2, 9, 16, 23, and 30, 2021 while Standard No. 2's expected value was noted to actually be 0.92 mg/L. Please note that the margin of error for Standard No. 2 in Hach DPD Low Range Chlorine Secondary Standards are plus or minus 0.10 mg/L. The water system stated that they believed that these values were incorrectly recorded.

Recommended Corrective Action: Maintain accurate calibration records for all laboratory equipment.

Resolution: During the investigation, it was noted that all disinfection accuracy check records were noted to be recorded within range since September 2021.

Track Number: 825606

Resolution Status Date: 10/5/2022

Violation Start Date: 8/23/2022

Violation End Date: 9/27/2022

30 TAC Chapter 290.46(f)(3)(D)(ii)

ENCHANTED FOREST - VIDOR

8/23/2022 Inv. # - 1840694

Page 9 of 10

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest to maintain a complete record of the results of inspections for all water storage and pressure maintenance facilities.

During the investigation, it was noted that the 2019, 2020, and 2021 tank inspection forms for the 5,000-Gallon Pressure Tank stated that the interior of the tank was last inspected during 2018; however, the 2018 tank inspection form for the 5,000-Gallon Pressure Tank noted "N/A" for the Interior of Tank section. Please note that the 2018 tank inspection form for the 5,000-Gallon Pressure Tank stated that the last interior pressure tank inspection was noted to be in 2013, which was five years prior to 2018. On September 27, 2022, the water system submitted a statement noting that the interior of the pressure tank was inspected on December 8, 2019 and that the water system mistakenly noted "N/A" for the Water Quality and Protective Coating items under the Interior of Tank section.

Recommended Corrective Action: Ensure that the water system records the correct date of the last pressure tank inspection.

Resolution: On September 27, 2022, the water system submitted revised copies of the December 2019 Tank Inspection Form for the 5,000-Gallon Pressure Tank at Plant No. 1 that noted "O.K." for both the Water Quality and Protective Coating items under the Interior of Tank section.

Additional Issues

Description Item #7

Additional Comments

During the investigation, it was noted that the water system was not writing the exact date of when each tank inspection is conducted and the exact date of the last inspection of the pressure tank interior for the 5,000-Gallon Pressure Tank. It is suggested that the water system record the dates of when tank inspections are conducted, including the date of the last interior pressure tank inspection. On September 27, 2022, the water system submitted a statement noting that they will begin to write the exact date of tank inspections on the tank inspection forms, including the month, day, and year.

Description Item #9

Additional Comments

During the investigation, it was noted that the Sabine River Authority's lab did not record the E. coli results for the bacteriological samples that were collected at 111 Sherwood, G1000037A, and G1000037C on the August 2021 bacteriological sample form. Please note that the water system noted G1000037C as G1000037B; however, G1000037B is a plugged well. On September 27, 2022, the water system submitted a revised copy of the August 2021 bacteriological sample form that had been completed by the Sabine River Authority. Please note that G1000037C was still noted to be G1000037B. It is suggested that the water system ensures that all bacteriological sample forms are completely filled out. It is also suggested that the water system ensures they record the correct Well ID Numbers for the wells they collect samples from.

Description Item #11

Additional Comments

During the investigation, it was noted that the water system was using a clear hose that was being used as a sight glass on the 900-Gallon Pressure Tank at Plant No. 2; however, the water system could not provide any documentation regarding if it is a hose that is made specifically to be used for drinking water. Please also note that all water system components are required to be National Sanitation Foundation/American National Standards Institute (NSF/ANSI) Standard 61, including hoses. On September 27, 2022, the water system stated they had no documentation regarding the source of the hose to submit to the Beaumont Regional Office. The water system also submitted photographic documentation showing that the clear hosing had been removed from the pressure tank. Please note that sight glasses are only required for pressure tanks that are greater than 1,000-gallons. If the water system chooses to install another sight glass on the 900-Gallon Pressure Tank at Plant No. 2, it is suggested that the water system ensures that they install a sight glass that is NSF/ANSI Standard 61. This may result in future alleged violations.

Signed

AS Vint for Vanessa Stangley
Environmental Investigator

Date

10/14/2022

Signed

AS Vint for Ronald
Supervisor Hebert

Date

10/14/2022

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : NOV

☐ Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ Notice of Registration

☒ Maps, Plans, Sketches

☒ Photographs

☒ Correspondence from the facility

☒ Other (specify) :

see attachments

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 14, 2022

CERTIFIED MAIL - {7011 2000 0000 8637 9563}
RETURN RECEIPT REQUESTED

Mr. Larry Brewer, President
Water Necessities Inc
P.O. Box 62
Vidor, Texas 77670-0062

Re: Notice of Violation for Public Water Supply Comprehensive Compliance Investigation at:
Enchanted Forest, Silsbee (Hardin County), Texas;
Regulated Entity No. 101435956; PWS ID No. 1000037; Investigation No. 1840694

Dear Mr. Brewer:

On August 23, 2022, Ms. Vanessa Stansbury and Ms. Jill Pickett of the Texas Commission on Environmental Quality (TCEQ) Beaumont Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for public water supply. Enclosed is a summary which lists the investigation findings. During the investigation, some concerns were noted which were alleged noncompliances that have been resolved as Areas of Concern based on subsequent corrective action. In addition, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by **January 12, 2023**, a written description of corrective actions taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI-032) are located on our agency website at <http://www.tceq.state.tx.us> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Beaumont Region Office at 409-898-3838 or the Central Office Publications Ordering Team at 512-239-0028.

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 Beaumont Region Office within 10 days from the date of this letter. At that time, Mr. Ronald Hebert will schedule a violation review meeting to be conducted within 21 days from the date of this letter.

Mr. Larry Brewer
Page 2
October 14, 2022

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 enclosed 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. Stansbury in the Beaumont Region Office at 409-898-3838.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Hebert', with a stylized flourish at the end.

Mr. Ronald Hebert
Water Section Manager
Beaumont Region Office
Texas Commission on Environmental Quality

RH/VS/sm

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

ENCHANTED FOREST

Investigation #

1840694

Investigation Date: 08/23/2022

, HARDIN COUNTY,

Additional ID(s): 1000037

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 825057 Compliance Due Date: 01/12/2023

30 TAC Chapter 290.43(c)(3)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/07/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to cover the discharge opening of all overflow pipes with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device.

During the investigation, it was noted that the water system covered the overflow pipes of both 0.022 MG Ground Storage Tanks at Plant No. 1 with a 16-mesh corrosive-resistant screening material instead of having a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device. Please note that 16-mesh screens can become clogged with rust and debris, which can impede the flow of water from the overflow pipe. The water system submitted a statement on September 27, 2022 that alleged that the water system was approved to cover the end of the overflow pipes with 16-mesh; however, no documentation was submitted to show that they were granted approval to cover the end of overflow pipes with 16-mesh. The water system also noted that they have ordered a gravity hinged weighted cover and will submit photographic documentation of it once it has been received.

Recommended Corrective Action: Cover the discharge opening of all overflow pipes with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device. Submit photographic documentation for each 0.022 MG Ground Storage Tanks to the Beaumont Regional Office.

Track No: 825058 Compliance Due Date: 01/12/2023

30 TAC Chapter 290.46(m)(4)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain all water treatment units, storage units and pressure maintenance facilities, distribution system lines, and related appurtenances in a watertight condition.

During the investigation, it was noted that there was a leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1, there were at least two noted leaks on the inlet and outlet piping for the blue service pump located directly to the right inside the pump room. On September 27, 2022, the water system submitted documentation that stated that they have ordered the part needed to repair the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1 and that they will submit photographic documentation once the leak has been repaired. They also stated, "Outlet pipe on blue service pump; All lines have been resealed and tightened to stop any leaks." The water system did not mention if "all pipes" also included the leak on the inlet pipe or if they only meant the piping that makes up the outlet pipe. On October 4, 2022, the water system clarified that all of the piping for the inlet and outlet were tightened and that they had repaired all of the leaks for the service pump waterlines. This alleged violation will remain outstanding until the water system submits photographic documentation showing that the leak on the

outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1 has been repaired.

Recommended Corrective Action: Repair the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1. Submit photographic documentation for each of the noted leaks to the Beaumont Regional Office.

Track No: 825060 **Compliance Due Date:** 01/12/2023
30 TAC Chapter 290.42(f)(1)(C)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/04/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to have a label on every chemical storage facility that identifies the tank's contents.

During the investigation, it was noted that the two 5-gallon sodium hypochlorite containers at Plant No. 2 did not have a label that identified the tank's contents. On September 27, 2022, the Beaumont Regional Office received documentation from the water system that stated that NAPCO was going to send the water system a proper label for their sodium hypochlorite tank and that they would submit photographic documentation once the label was on the tank. Please note that all sodium hypochlorite containers maintained at Plant No. 2 will need to have a label that identifies each tank's contents.

Recommended Corrective Action: Provide a label on each sodium hypochlorite container at Plant No. 2 that identifies the tanks' contents. Submit photographic documentation to the Beaumont Regional Office.

Track No: 825062 **Compliance Due Date:** 01/12/2023
30 TAC Chapter 290.42(l)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/07/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain a complete plant operations manual.

During the investigation, it was noted that the water system's plant operations manual did not have protocols for natural and manmade disasters. The water system stated that they turned in their Emergency Preparedness Plan on September 27, 2022; however, the Emergency Preparedness Plans (EPP) that have been provided to the Beaumont Regional Office by other water systems for review only included protocols in regard to power loss and did not include flooding events, plant breakings and potential contamination of the water source, and other natural and manmade disasters that are not caused by electrical outages or issues. Because of this, this alleged violation will remain outstanding until the water system has provided protocols for natural and manmade disasters in the plant operations manual.

Recommended Corrective Action: Revised the plant operations manual to include protocols for natural and manual disasters. Submit a copy of the revised plant operations manual to the Beaumont Regional Office.

AREA OF CONCERN

Track No: 825059
30 TAC Chapter 290.46(m)

Alleged Violation:

Investigation: 1840694

Comment Date: 09/20/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain all plant equipment in a good working condition and appearance.

During the investigation, it was noted that the Green 0.022 MG Ground Storage Tank at Plant No. 1 did not have a functional liquid level indicator. The floating liquid level indicator was not functional, and the water system did not provide a liquid level indicator gauge on the tank.

Recommended Corrective Action: Either repair the floating liquid level indicator or install a liquid level indicator gauge on the Green 0.022 MG Ground Storage Tank.

Resolution: On September 27, 2022, the Beaumont Regional Office received photographic documentation showing that a liquid level indicator gauge had been installed on the Green 0.022 MG Ground Storage Tank.

Track No: 825061

30 TAC Chapter 290.42(e)(5)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest Subdivision to completely cover the top of hypochlorination solution containers to prevent the entrance of dust, insects, and other contaminants.

During the investigation, it was noted that there was a small hole in the top of the sodium hypochlorite solution container where the space between the container's top and the chemical injection line was not fully sealed.

Recommended Corrective Action: Seal the hole in the top of the sodium hypochlorite solution container that is located in the space between the container's top and the chemical injection line.

Resolution: On September 27, 2022, the Beaumont Regional Office received photographic documentation showing that the water system has resealed the opening between the top of the sodium hypochlorite container and the chemical injection line.

Track No: 825063

30 TAC Chapter 290.46(f)(3)(B)(iv)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest to maintain accurate calibration records for all laboratory equipment.

During the investigation, it was noted that the water system's accuracy check records noted 0.61 mg/L for Standard No. 2 on August 2, 9, 16, 23, and 30, 2021 while Standard No. 2's expected value was noted to actually be 0.92 mg/L. Please note that the margin of error for Standard No. 2 in Hach DPD Low Range Chlorine Secondary Standards are plus or minus 0.10 mg/L. The water system stated that they believed that these values were incorrectly recorded.

Recommended Corrective Action: Maintain accurate calibration records for all laboratory equipment.

Resolution: During the investigation, it was noted that all disinfection accuracy check records were noted to be recorded within range since September 2021.

Track No: 825606

30 TAC Chapter 290.46(f)(3)(D)(ii)

Alleged Violation:

Investigation: 1840694

Comment Date: 10/05/2022

Failure by Water Necessities Inc - Enchanted Forest to maintain a complete record of the results of inspections for all water storage and pressure maintenance facilities.

During the investigation, it was noted that the 2019, 2020, and 2021 tank inspection forms for

the 5,000-Gallon Pressure Tank stated that the interior of the tank was last inspected during 2018; however, the 2018 tank inspection form for the 5,000-Gallon Pressure Tank noted "N/A" for the Interior of Tank section. Please note that the 2018 tank inspection form for the 5,000-Gallon Pressure Tank stated that the last interior pressure tank inspection was noted to be in 2013, which was five years prior to 2018. On September 27, 2022, the water system submitted a statement noting that the interior of the pressure tank was inspected on December 8, 2019 and that the water system mistakenly noted "N/A" for the Water Quality and Protective Coating items under the Interior of Tank section.

Recommended Corrective Action: Ensure that the water system records the correct date of the last pressure tank inspection.

Resolution: On September 27, 2022, the water system submitted revised copies of the December 2019 Tank Inspection Form for the 5,000-Gallon Pressure Tank at Plant No. 1 that noted "O.K." for both the Water Quality and Protective Coating items under the Interior of Tank section.

ADDITIONAL ISSUES

Description

Item #7

Additional Comments

During the investigation, it was noted that the water system was not writing the exact date of when each tank inspection is conducted and the exact date of the last inspection of the pressure tank interior for the 5,000-Gallon Pressure Tank. It is suggested that the water system record the dates of when tank inspections are conducted, including the date of the last interior pressure tank inspection. On September 27, 2022, the water system submitted a statement noting that they will begin to write the exact date of tank inspections on the tank inspection forms, including the month, day, and year.

Item #9

During the investigation, it was noted that the Sabine River Authority's lab did not record the E. coli results for the bacteriological samples that were collected at 111 Sherwood, G1000037A, and G1000037C on the August 2021 bacteriological sample form. Please note that the water system noted G1000037C as G1000037B; however, G1000037B is a plugged well. On September 27, 2022, the water system submitted a revised copy of the August 2021 bacteriological sample form that had been completed by the Sabine River Authority. Please note that G1000037C was still noted to be G1000037B. It is suggested that the water system ensures that all bacteriological sample forms are completely filled out. It is also suggested that the water system ensures they record the correct Well ID Numbers for the wells they collect samples from.

Item #11

During the investigation, it was noted that the water system was using a clear hose that was being used as a sight glass on the 900-Gallon Pressure Tank at Plant No. 2; however, the water system could not provide any documentation regarding if it is a hose that is made specifically to be used for drinking water. Please also note that all water system components are required to be National Sanitation Foundation/American National Standards Institute (NSF/ANSI) Standard 61, including hoses. On September 27, 2022, the water system stated they had no documentation regarding the source of the hose to submit to the Beaumont Regional Office. The water system also submitted photographic documentation showing that the clear hosing had been removed from the pressure tank. Please note that sight glasses are only required for pressure tanks that are greater than 1,000-gallons. If the water system chooses to install another sight glass on the 900-Gallon Pressure Tank at Plant No. 2, it is suggested that the water system ensures that they install a sight glass that is NSF/ANSI Standard 61. This may result in future alleged violations.

Texas Commission on Environmental Quality



Attachment 1

Enchanted Forest
PWS ID No. 1000037
Investigation No. 1840694

Investigative Request Letter

Vanessa Stansbury

From: Vanessa Stansbury
Sent: Wednesday, August 10, 2022 11:01 AM
To: kelly brewer
Subject: Enchanted Forrest (PWS ID No. 1000037)
Attachments: 1000037_Enchanted Forest_1818562_Investigation Request Form.pdf

Good morning,

This email is in regard to the Comprehensive Compliance Investigation that is currently scheduled for Enchanted Forest (PWS ID No. 1000037) on Tuesday, August 23, 2022 at 9:00 AM. Attached to this email is a copy of the TCEQ Investigation Request Form, which includes a summary of the last investigation and all of the records that will need to be available during the investigation.

Please let me know if you have any questions.

Vanessa Stansbury
Environmental Investigator, Public Water Supply
TCEQ Region 10 (Beaumont)



Texas Commission on Environmental Quality
3870 Eastex Freeway, Beaumont, TX 77703
Office: 409-898-3838 / Fax: 409-899-8778
vanessa.stansbury@tceq.texas.gov
How are we doing? [Comment on our service.](#)



FAX/E-MAIL TRANSMITTAL

DATE: 08/10/2022

NUMBER OF PAGES (including this cover sheet):

4

TO:

Name

Kelly Brewer and Chanda Hall

Organization

Enchanted Forest (PWS ID No. 1000037)

Email/ Fax

water necessities@yahoo.com

FROM:

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Name

Vanessa Stansbury

Division/Region

Beaumont / 10

Telephone Number

(409) 898-3838

FAX Number

(409) 899-8778

NOTES:

1. Please have the applicable records from the attached list available for the inspection of your water system scheduled for:

Date: Tuesday, August 23, 2022

Time: Approximately 9:00 AM

Location: Main Office

2. We highly encourage you to do a self-inspection of your system, paying special attention to items noted in the last inspection report.

The last Comprehensive Compliance Investigation (CCI) for this water system was conducted on January 16, 2020, and the following alleged violations were noted as a result of the investigation: failure to have an adequate plant operation manual; failure to provide an adequate well vent for Well No. 1; failure to provide the right side 0.022 million gallons (MG) ground storage tank roof vent to prevent entry of animals, birds, insects and heavy air contaminants into the ground storage tank by use of corrosion-resistant material that is 16-mesh or finer; failure to provide a readable sight glass on the 900-gallon pressure tank at Well No. 3; and failure to maintain the intruder resistant fence.

No alleged violations remain outstanding at this time.

3. In addition, the elimination of easily fixed minor deficiencies, such as missing vent screens, hatch locks, wellhead caulking, etc. prior to the inspection will reduce your administrative load since the correction of each item in our reports must be documented with some proof, such as photographs of the corrected item or copies of documents.

**RECORDS REQUIRED TO BE AVAILABLE
AT TIME OF INSPECTIONS**

**OF
PUBLIC WATER SYSTEMS**

I. Water System Information

a. General Information

- i. Legally Responsible Official (President, Owner, etc.)
- ii. Contact Information for Responsible Official(s)
- iii. Physical Location of plant
- iv. Mailing Address

II. Records

a. Groundwater Systems

- 1. Number of total connections, total number of meters in the ground (active or inactive), population served
 - a. Please refer to additional information regarding connection counts
 - b. Number of pressure planes (with connection counts per pressure plane)
- 2. Wholesale and purchase water contract(s)
 - a. Specify maximum purchase rate
- 3. Certified Operator list
 - a. Include Legal Name, Type of License, Expiration Date
 - b. Include Operators, Customer Service Inspectors, and Backflow Testers
- 4. Well completion Information
 - a. Sanitary control easement(s)
 - b. Deed and map(s)
 - c. Interim approval letter for well(s)
- 5. TCEQ Plan Review Approval Letters
 - a. Including, but not limited to: new wells, booster stations, ground storage tanks, pressure tanks, pumps, etc.
- 6. Verification of ANSI/NSF Standard 60 and 61 for direct and indirect additives
- 7. Plant Operations and Maintenance Manual
- 8. Copies of Exceptions or approved Alternative Capacity Requirements (ACR)
- 9. Annual Tank Inspection Forms (three years)
- 10. Distribution System map (showing flush valves/ mains)
- 11. Customer complaint records

12. Copy of Customer Service Agreement/ Plumbing Code Ordinance
13. Customer Service Inspection forms
14. Backflow Test and Maintenance forms
 - a. Information regarding backflow assemblies will need to include physical location
 - b. Three years of records for backflow devices
15. Well Meter calibration records
16. Equipment Records
 - a. Including but not limited to:
 - i. dates of replacement of pumps (with gallon per minute)
 - ii. Chlorine meter calibration records
 - iii. Equipment capacities
 1. Well pumps (gallons per minute)
 2. Service/filter/transfer pumps
 3. Ground and elevated storage
 4. Pressure tanks
17. Copy of Public Notices
 - a. Including but not limited to Boil Water Notices
18. Operational Records:
 - a. Disinfection Residual Monitoring records
 - b. Flushing records
 - c. Amount of chemicals used
 - d. Ground water rule compliance records
 - e. Chloramine Effectiveness Sampling records
19. Monthly Reports of Monthly Water Works Operation
 - a. Average Amount of daily water usage for past twelve-month period (include period of record).
 - b. Maximum day water usage from past twelve-month period (include the maximum daily usage and corresponding date).
20. Monitoring Plan
 - a. Including but not limited to:
 - i. RTCR Sample Siting Plan & Map
 - ii. Nitrification Action Plan (for systems distributing chloraminated water)
21. Last twelve months of Bacteriological sample results

22. Drought Contingency Plan

III. Field (physical) Inspection

- a. A plant walk through will occur on the inspection. During this time, the investigator will conduct a physical inspection from the point source(s) to treatment of the water, and the distribution system. For surface water plants, be advised a filter backwash cycle may be requested during the inspection.

*****This information will be useful in determining connection counts for community public water systems.*****

§290.38(14) Connection—A single family residential unit or each commercial or industrial establishment to which drinking water is supplied from the system. As an example, the number of service connections in an apartment complex would be equal to the number of individual apartment units. When enough data is not available to accurately determine the number of connections to be served or being served, the population served divided by three will be used as the number of connections for calculating system capacity requirements. Conversely, if only the number of connections is known, the connection total multiplied by three will be the number used for population served.

-Apartments will count as multiple connections based on the number of apartment units that make up the apartment complex.

-Nursing homes will count as one commercial connection.

-Motels and hotels will count as one connection regardless of the number of rooms.

-An RV Park will count as multiple commercial connections based on the total number of RV spots.

-Each mobile home would count as a connection because it is a single-family residence.

-Correctional facilities (prisons). The number of connections will equal the number of prisoners and employees and dividing by three.

Texas Commission on Environmental Quality



Attachment 2

Enchanted Forest
PWS ID No. 1000037
Investigation No. 1840694

Exit Interview Form

Vanessa Stansbury

From: Vanessa Stansbury
Sent: Tuesday, August 30, 2022 11:28 AM
To: kelly brewer
Subject: Enchanted Forest (PWS ID No. 1000037) Exit Interview Form
Attachments: 1000037_Enchanted Forest_1840694_Exit Interview Form.pdf

Good morning,

I have attached a copy of the Enchanted Forest (PWS ID No. 1000037) Exit Interview Forms to this email, which includes information regarding the alleged violations, additional issues, and records requests noted during the CCI. There are also an item noted in green (Item No. 8) that may require additional clarification from the water system. **Please confirm that you have received the Exit Interview Forms.**

The following is a link to the TCEQ Customer Satisfaction Survey: <https://www.tceq.texas.gov/customersurvey>. I would really appreciate it if you would take a moment to let us know how I did during my investigation. The comment section towards the end is also a useful tool that the TCEQ uses to help the investigator and organization improve, so please also feel free to include any comments you may have about my performance or the TCEQ in general.

Please let me know if you have any questions.

Vanessa Stansbury

Environmental Investigator, Public Water Supply
TCEQ Region 10 (Beaumont)



Texas Commission on Environmental Quality
3870 Eastex Freeway, Beaumont, TX 77703
Office: 409-898-3838 / Fax: 409-899-8778
vanessa.stansbury@tceq.texas.gov
How are we doing? Comment on our service.

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	Enchanted Forest			TCEQ Add. ID No.	1000037	
Investigation Type	CCI	Contact Made In-House (Y/N)	N	Purpose of Investigation		
Regulated Entity Contact				Telephone No.		Date Contacted
				FAX #/Email address		FAX/Email date

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 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.	
No.	Type ¹	Rule Citation (if known)	Description of Issue
1	AV	290.43(c)(3)	Failure by Water Necessities Inc - Enchanted Forest Subdivision to cover the discharge opening of all overflow pipes with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device. During the investigation, it was noted that the water system covered the overflow pipes of the both 0.022 MG Ground Storage Tanks at Plant No. 1 with a 16-mesh corrosive-resistant screening material. Please note that 16-mesh screens can become clogged with rust and debris, which can impede the flow of water from the overflow pipe.
2	AV	290.46(m)(4)	Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain all water treatment units, storage units and pressure maintenance facilities, distribution system lines, and related appurtenances in a watertight condition. During the investigation, it was noted that there was a leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1, there were at least two noted leaks on the inlet and outlet piping for the blue service pump located directly to the right inside the pump room.
3	AV	290.46(m)	Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain all plant equipment in a good working condition and appearance. During the investigation, it was noted that the Green 0.022 MG Ground Storage Tank at Plant No. 1 did not have a functional liquid level indicator. The floating liquid level indicator was not functional, and the water system did not provide a liquid level indicator gauge on the tank.

Note 1: Issue 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 type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.		
Vanessa Stansbury	8/30/2022	
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)
		Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	Enchanted Forest			TCEQ Add. ID No.	1000037	
				RN No. (optional)		
Investigation Type	CCI	Contact Made In-House (Y/N)	N	Purpose of Investigation		
Regulated Entity Contact				Telephone No.		Date Contacted
				FAX #/Email address		FAX/Email date

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 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.	
No.	Type ¹	Rule Citation (if known)	Description of Issue
4	AV	290.42(f)(1)(C)	Failure by Water Necessities Inc - Enchanted Forest Subdivision to have a label on every chemical storage facility that identifies the tank's contents. During the investigation, it was noted that the two 5-gallon sodium hypochlorite containers at Plant No. 2 did not have a label that identified the tank's contents.
5	AV	290.42(e)(5)	Failure by Water Necessities Inc - Enchanted Forest Subdivision to completely cover the hypochlorination solution top to prevent the entrance of dust, insects, and other contaminants. During the investigation, it was noted that there was a small hole in the top of the sodium hypochlorite solution container where the space between the container's top and the chemical injection line was not fully sealed.
6	AV	290.42(l)	Failure by Water Necessities Inc - Enchanted Forest Subdivision to maintain a complete plant operations manual. During the investigation, it was noted that the water system's plant operations manual did not have protocols for natural and manmade disasters.
7	AI	Additional Issue	During the investigation, it was noted that the water system was not writing the exact date of when each tank inspection is conducted on the exact date of the last inspection of the pressure tank interior for the 5,000-Gallon Pressure Tank. It is suggested that the water system record the dates of when tank inspections are conducted, including the date of the last interior pressure tank inspection.

Note 1: Issue 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 type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.		
Vanessa Stansbury	8/30/2022	
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)
		Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	Enchanted Forest			TCEQ Add. ID No.	1000037
				RN No (optional)	
Investigation Type	CCI	Contact Made In-House (Y/N)	N	Purpose of Investigation	
Regulated Entity Contact				Telephone No.	
				FAX #/Email address	
				Date Contacted	
				FAX/Email date	

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 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.			
No.	Type ¹	Rule Citation (if known)	Description of Issue		
8	AV	Either 290.46(m)(1)(B) or 290.46(f)(3)(D)(ii)	<p>Either "Failure by Water Necessities Inc - Enchanted Forest to inspect the interior of all pressure tanks equipped with an inspection port at least once every five years." -OR- "Failure by Water Necessities Inc - Enchanted Forest to maintain a complete record of the results of inspections for all water storage and pressure maintenance facilities." During the investigation, it was noted that the 2019, 2020, and 2021 tank inspection forms for the 5,000-Gallon Pressure Tank stated that the last inspected during 2018; however, the 2018 tank inspection form for the 5,000-Gallon Pressure Tank noted "N/A" for the Interior of Tank section. Please note that the 2018 tank inspection form for the 5,000-Gallon Pressure Tank stated that the last interior pressure tank inspection was noted to be in 2013, which was five years prior to 2018. The water system was unable to clarify during the investigation if the interior of the tank was inspected and that the results were just not correctly noted on the 2018 tank inspection form or if the 5,000-Gallon Pressure Tank's interior was not actually inspected during December 2018, according to the 2018 tank inspection form.</p>		
9	AI	Additional Issue	<p>During the investigation, it was noted that the Sabine River Authority's lab did not record the E. coli results for the bacteriological samples that were collected at 111 Sherwood, G1000037A, and G1000037C on the August 2021 bacteriological sample form. Please note that the water system noted G1000037C as G1000037B; however, G1000037B is a plugged well. It is suggested that the water system ensures that all bacteriological sample forms are completely filled out. It is also suggested that the water system ensures they record the correct Well ID Numbers for the wells they collect samples from.</p>		

Note 1: Issue 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 type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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

Vanessa Stansbury	8/30/2022		
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	Enchanted Forest			TCEQ Add. ID No. RN No (optional)	1000037
Investigation Type	CCI	Contact Made In-House (Y/N)	N	Purpose of Investigation	
Regulated Entity Contact				Telephone No.	
				FAX #/Email address	
				Date Contacted	
				FAX/Email date	

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 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.	
No.	Type ¹	Rule Citation (if known)	Description of Issue
10	AV	290.46(f)(3)(B)(iv)	Failure by Water Necessities Inc - Enchanted Forest to maintain accurate calibration records for all laboratory equipment. During the investigation, it was noted that the water system's accuracy check records noted 0.61 mg/L for Standard No. 2 on August 2, 9, 16, 23, and 30, 2021 while Standard No. 2's expected value was noted to actually be 0.92 mg/L. Please note that the margin of error for Standard No. 2 in Hach DPD Low Range Chlorine Secondary Standards are plus or minus 0.10 mg/L. When asked about this, the water system stated that they believed that these values were incorrectly recorded. During the investigation, it was noted that all disinfection accuracy check records were noted to be recorded within range since September 2021.
11	RR	Records Request	Submit the following information to the Beaumont Regional Office within 14 days from today: the average water usage data from August 1, 2021 to July 31, 2022 and information regarding the source of the hose that is being used as a sight glass on the 900-Gallon Pressure Tank at Plant No. 2, including if it is a hose that is made specifically to be used for drinking water.

Note 1: Issue 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 type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.		
Vanessa Stansbury	8/30/2022	
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)
		Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

Texas Commission on Environmental Quality



Attachment 3

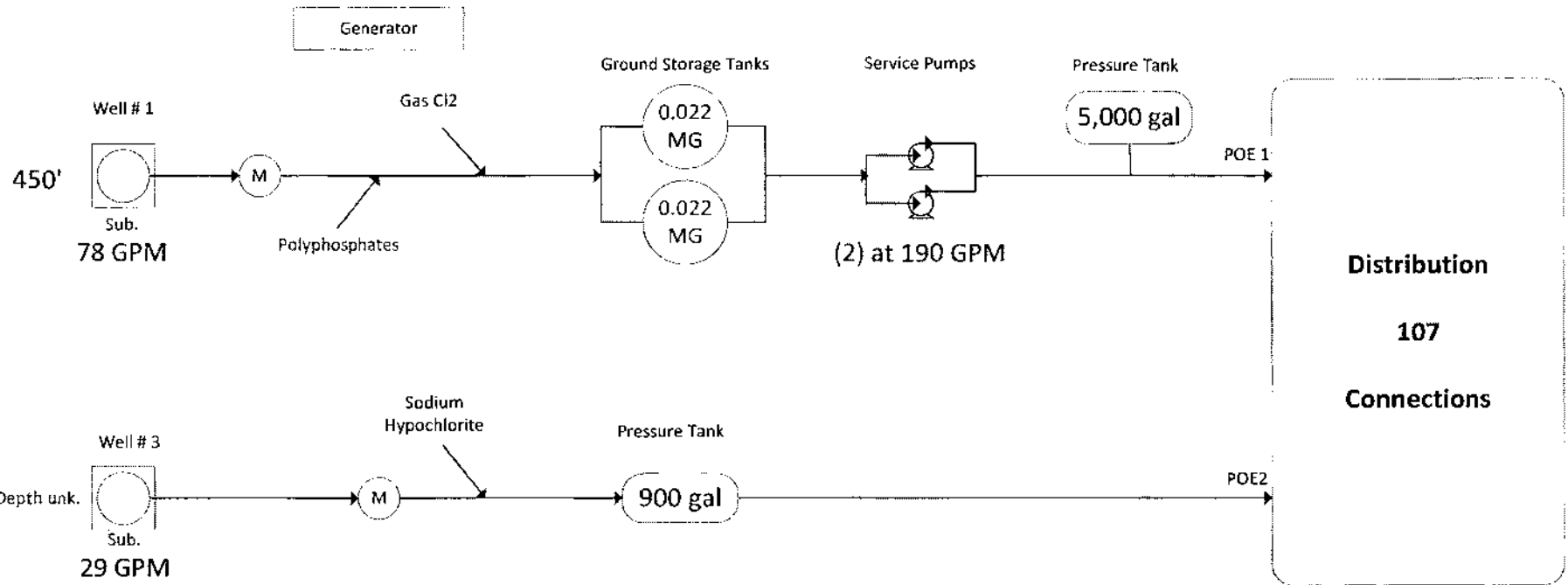
Enchanted Forest
PWS ID No. 1000037
Investigation No. 1840694

*Water System Schematic, SDWIS Printout, Capacity Sheet, and
Water System Data Sheet*

Enchanted Forest Subdivision
PWS ID#: 1000037

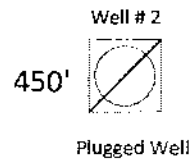
Vanessa Stansbury 08/23/2022

G1000037A



G1000037C

G1000037B



<u>TOTAL PRODUCT</u>	<u>AVG DAILY USG</u>	<u>MAX DAILY DMD</u>	<u>TOT STORG MSR</u>
0.154	0.142		0.044
<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>
MGD	MGD		MG
<u>TOTL ELEV STORG</u>	<u>SERV PUMP CAP</u>	<u>MAX PURCH CAP FLOW RATE</u>	<u>TOTAL PRES TANK CAP</u>
	0.547		0.006
<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>
	MGD		MG

Number of Treatment Plants

2

ACTIVE SOURCES

<u>Source Number</u>	<u>SOURCE NAME</u>	<u>Activity Status</u>	<u>Oprtnl Status</u>	<u>SOURCE TYPE</u>	<u>WELL DEPTH</u>	<u>TESTED FLOW RATE</u>	<u>RATED FLOW RATE</u>
G1000037C	3 - SHERWOOD TRAIL / PLANT 2	A	P	G	500	29 GPM	36 GPM
<u>Drill Date</u>	<u>SOURCE SUMMATION</u>				<u>Plant Num</u>	<u>TYPE</u>	<u>CODE</u>
01/01/1913	EVANGELINE				TP5046	WL	
<u>GPS Latitude</u>	<u>GPS Longitude</u>	<u>GPS ELEVATION</u>		<u>GPS DATE</u>	<u>SELLER PWS ID</u>		
30.387464	-94.220433	59		10/14/2013	Not Purchasing		

TREATMENT PLANT

<u>ENTRY PNT</u>	<u>EP Name, Source, Status</u>	<u>Plant Name & Status</u>	<u>Plant Num</u>
EP002	TRT-TAP / Ground Water / A	PLANT 2 - SHERWOOD TRL (A)	TP5046
parts in red are hard coded			
<u>Chemical Mon Type</u>	<u>Chemical Sample Point</u>	<u>Distribution Mon Type</u>	<u>Distribution Sample Point</u>
NO		NO	

TREATMENTS

<u>TRAIN</u>		Unnamed		<u>PLANT NUM</u>	TP5046
<u>Disinfection Zone</u>	<u>Treatment Sequence</u>	<u>OBJ CD</u>	<u>OBJECTIVE</u>	<u>Process</u>	<u>Treatment</u>
null	null	D	DISINFECTION	423	HYPOCHLORINATION, PRE

ACTIVE SOURCES

<u>Source Number</u>	<u>SOURCE NAME</u>	<u>Activity Status</u>	<u>Oprtnl Status</u>	<u>SOURCE TYPE</u>	<u>WELL DEPTH</u>	<u>TESTED FLOW RATE</u>	<u>RATED FLOW RATE</u>
G1000037A	1 - LAURA LN / PLANT 1	A	P	G	450	78 GPM	84 GPM
<u>Drill Date</u>	<u>SOURCE SUMMATION</u>				<u>Plant Num</u>	<u>TYPE</u>	<u>CODE</u>
01/01/1913	EVANGELINE				TP5047	WL	
<u>GPS Latitude</u>	<u>GPS Longitude</u>	<u>GPS ELEVATION</u>		<u>GPS DATE</u>	<u>SELLER PWS ID</u>		
30.388411	-94.230433	79		10/14/2013	Not Purchasing		

10/4/2022

TCEQ DWW Water System Summary Sheet

PWS IDPWS NameCentral Reg RN

TX1000037

ENCHANTED FOREST

RN101435956

Organization / CustomerCentral Reg CN

WATER NECESSITIES INC

CN602444515

TX1000037

All Water System Contacts

WATER NECESSITIES INCADDR1 PO BOX 62JOBTITLEVIDOR

TX

77670-0062

POCTYPEPURPOSE CODEPHONE NUMBEREXT

OW

BREWER, LARRYADDR1 PO BOX 62JOBTITLE

PRESIDENT

VIDOR

TX

77670-0062

POCTYPEPURPOSE CODEPHONE NUMBEREXT

AC

BUS

409-769-9030

BREWER, KELLY, GADDR1 PO BOX 1409JOBTITLE

OPERATOR

VIDOR

TX

77670-1409

POCTYPEPURPOSE CODEPHONE NUMBEREXT

PWS

MOB

409-791-2104

PWS

FAX

409-769-1176

PWS

BUS

409-769-9030

BREWER, KELLY, GADDR1 PO BOX 1409JOBTITLE

OPERATOR

VIDOR

TX

77670-1409

POCTYPEPURPOSE CODEPHONE NUMBEREXT

EC

FAX

409-769-1176

EC

MOB

409-791-2104

EC

BUS

409-769-9030

HALL, CHANDA, CADDR1 PO BOX 62JOBTITLE

OPERATOR

VIDOR

TX

77670-0062

POCTYPEPURPOSE CODEPHONE NUMBEREXT

ECS

BUS

409-782-7019

OWNER TYPE

Investor Owned

TX1000037

INTERCONNECTIONS

TX1000037

Purchases (Buys From)Wholesales (Sells To)Population TypePopulation Served# of Connections

Residential

321

107

TOTAL

321

107

WATERTYPE

GW

PURCHASEFLAGSYSTEM TYPE

COMMUNITY

ACTIVITY STATUS

A

TREATMENT PLANT

<u>ENTRY PNT</u>	<u>EP Name, Source, Status</u>	<u>Plant Name & Status</u>	<u>Plant Num</u>
EP001	TRT-TAP / Ground Water / A	PLANT 1 - LAURA LN (A)	TP5047
parts in red are hard coded			
<u>Chemical Mon Type</u>	<u>Chemical Sample Point</u>	<u>Distribution Mon Type</u>	<u>Distribution Sample Point</u>
	NO		NO

TREATMENTS

<u>TRAIN</u>		Unnamed		<u>PLANT NUM</u>	TP5047
<u>Disinfection Zone</u>	<u>Treatment Sequence</u>	<u>OBJ CD</u>	<u>OBJECTIVE</u>	<u>Process</u>	<u>Treatment</u>
null	null	D	DISINFECTION	403	GASEOUS CHLORINATION, PRE
null	null	C	CORROSION CONTROL	447	INHIBITOR, POLYPHOSPHATE

INACTIVE / OFFLINE SOURCES

<u>SOURCE ID</u>	<u>SOURCE NAME</u>	<u>TYPE</u>	<u>STATUS</u>	<u>AVAIL - ABILITY</u>	<u>FACID</u>	<u>WATER TYPE</u>
G1000037B	2 - LAURA LN / PLUGGED	WL	I	P		GW

PUMPS

<u>PUMP ID</u>	<u>PUMP NAME</u>	<u>FACILITY TYPE</u>	<u>ACTIVITY STATUS</u>	<u>AVAIL ABILITY</u>	<u>FLOW RATE NAME</u>	<u>TESTED FLOW</u>	<u>TESTED UOM</u>
PF5934	PLANT 1 - 190 GPM - SP	PF	A	P	SPCP	190	GPM
PF5935	PLANT 1 - 190 GPM - SP	PF	A	P	SPCP	190	GPM

STORAGE TANKS

<u>TANK ID</u>	<u>TANK NAME</u>	<u>TANK TYPE</u>	<u>ACTIVITY STATUS</u>	<u>AVAIL ABILITY CODE</u>	<u>STOR AGE TYPE</u>	<u>CON STR MATL TP</u>	<u>MEASURE QUANTITY</u>	<u>UOM</u>	<u>MEASURE NAME</u>
ST6382	PLANT 2 - 0.0009 MG - HD	ST	A	P	HD	ST	900.000	GAL	CAP
ST6383	PLANT 1 - 0.005 MG - HD	ST	A	P	HD	ST	0.005	GAL	CAP
ST6384	PLANT 1 - 0.022 MG - GR	ST	A	P	GR	ST	0.022	MG	STC
ST6385	PLANT 1 - 0.022 MG - GR	ST	A	P	GR	ST	0.022	MG	STC

END OF REPORT

Community Systems (Groundwater)
Fill in green cells only
System Name: Enchanted Forest

PWS ID: 1000037

Inv. No.: 1840694

Community (Y/N) ☐ Y

MHP (≥ 8 units/ac) or Apts? (Y/N) ☐ Y

CCN? (Y/N) ☐ Y

Number of Connections 107

Population 321

Maximum Daily Demand (MDD): N/A MGD

Average Daily Demand (ADD): 290.38(41)

MDD Date (mm/dd/yyyy): N/A

ADD Dates (mm/dd/yyyy): to

	Rate	Units	Conn.	Required	Units	Provided	85% Rule	% Short	Sufficient?(Y/N)
Prod. Capacity:	0.6	gpm/conn	107	64.2	gpm	107	60%	N/A	Y
Production ACR:		gpm/conn							
Pressure Storage (HD):	20	gal/conn	107	0.00214	MG	0.0059	36%	N/A	Y
HD ACR:		gal/conn							
Elevated Storage (EL):	0	gal/conn	107	0	MG	0	N/A	N/A	Meets HD req.
EL ACR:		gal/conn							
Ground Storage (GR):						0.044			
Total Storage*:	200	gal/conn	107	0.0214	MG	0.044	49%	N/A	Y
Tot. Storage ACR:		gal/conn							
*Total Storage = GR + EL + ST									
SP Capacity:	2	gpm/conn	107	214	gpm	380	56%	N/A	Y
SP ACR:		gpm/conn							
SP Capacity:	(w/largest pump out of service)				gpm				
SP Peaking Factor:	N/A	-	107	0	gph	0	N/A		N/A

Bacti Samples:

Wholesale Contract? (Y/N) ☐ N

Maximum Purchase Rate? N/A MGD

	Required	Submitted
Distribution	1	1
Raw	1	2

Revised 07/23/2015

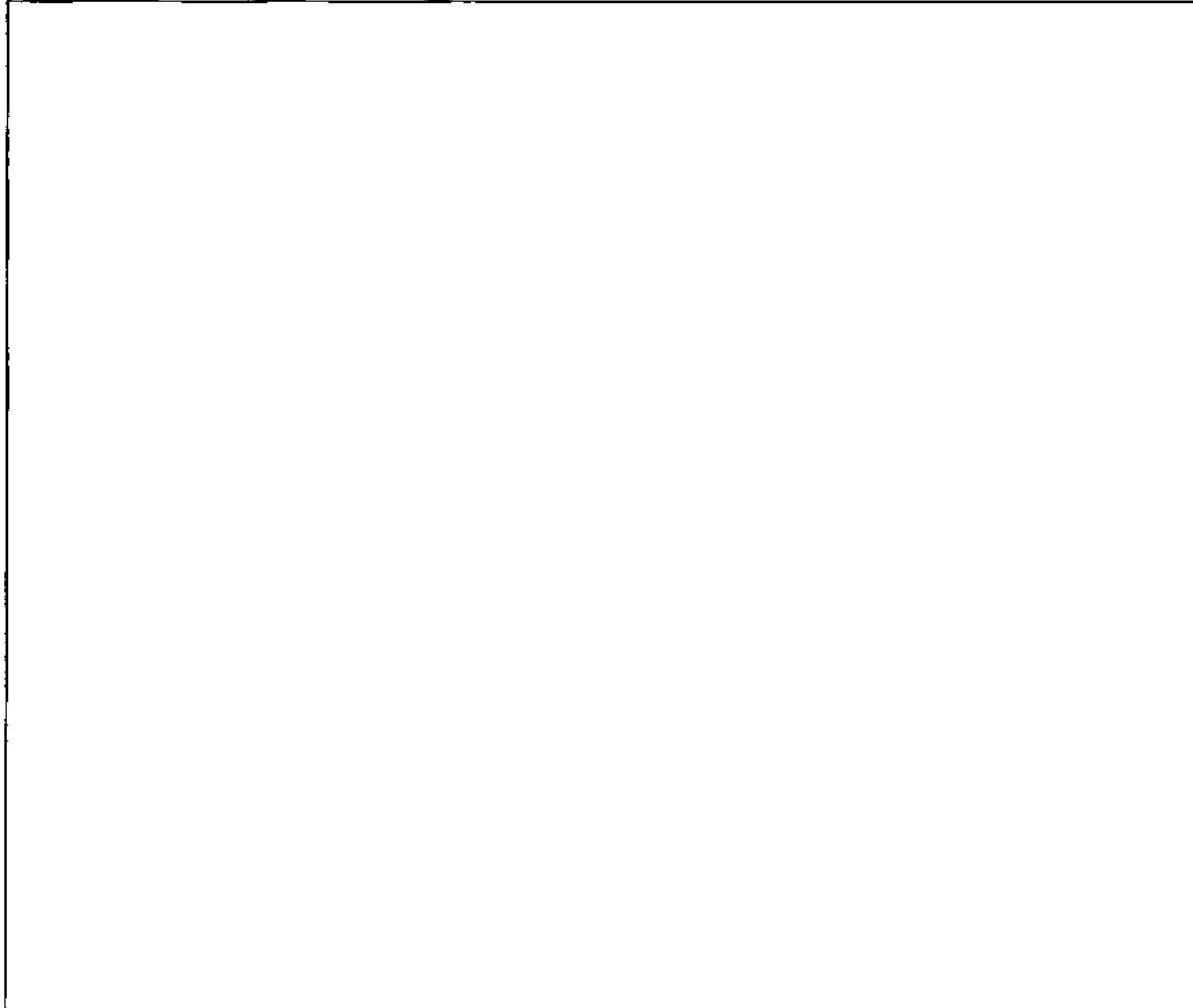
T&W 000767

System Name: Enchanted Forest

PWS ID: 1000037

Inv. No.: 1840694

Additional Comments:

A large, empty rectangular box with a black border, intended for additional comments. It occupies the central portion of the page below the header information.

Revised 07/23/2015

T&W 000768

Texas Commission on Environmental Quality	Office of Water	Public Drinking Water Section
County Map of TX	Water System Search	Office of Compliance and Enforcement

08/23/2022
07:08:26

Texas Commission on Environmental Quality
DWW Water System Summary Sheet

PWS ID	PWS Name	Central Registry RN
TX1000037	ENCHANTED FOREST	RN101435956

Organization/Customer *	Central Registry CN
WATER NECESSITIES INC	CN602444515

*Regulatory mail will be addressed to this organization/person

All Water System Contacts			
Type	Contact	Communication	
AC - Administrative Contact - PRESIDENT	BREWER, LARRY PO BOX 62 VIDOR, TX 77670-0062	Electronic Type	Value
		Phone Type	Value
		BUS - Business	409-769-9030
EC - Emergency Contact - OPERATOR	BREWER, KELLY, G PO BOX 1409 VIDOR, TX 77670-1409	Electronic Type	Value
		Phone Type	Value
		BUS - Business	409-769-9030
		FAX - Facsimile	409-769-1176
ECS - Emergency Contact - Secondary - OPERATOR	HALL, CHANDA, C PO BOX 62 VIDOR, TX 77670-0062	Electronic Type	Value
		Phone Type	Value
		BUS - Business	409-782-7019
OW - Owner	WATER NECESSITIES INC PO BOX 62 VIDOR, TX 77670-0062		
PWS - Public Water System Contact - OPERATOR	BREWER, KELLY, G PO BOX 1409 VIDOR, TX 77670-1409	Electronic Type	Value
		Phone Type	Value
		BUS - Business	409-769-9030
		FAX - Facsimile	409-769-1176
		MOB - Mobile	409-791-2104

Operator Grade	Number
GROUND WATER TREATMENT OPERATOR Grade C	2

Water Operator Licenses

License Holder:	BREWER, KELLY	
CURRENT	Class: C - GROUND WATER TREATMENT OPERATOR	WG0009000
License Holder:	HALL, CHANDA C	
CURRENT	Class: C - GROUND WATER TREATMENT OPERATOR	WG0011492

Owner Type	Owner Type Options: COUNTY, DISTRICT, FEDERAL GOVERNMENT, INVESTOR OWNED, MUNICIPALITY, NATIVE AMERICAN, PRIVATE, STATE GOVERNMENT, WATER SUPPLY CORPORATION
Investor Owned	

System Type	System Type Options: COMMUNITY, TRANSIENT/NON-COMMUNITY, NON-PUBLIC, NON-TRANSIENT/NON-COMMUNITY
C - Community	

Population Type	Population Served	# of Connect	# I/C w/other PWS
Residential	339	113	0

Total Product (MGD)	Average Daily Consump.	Max Daily Demand (MGD)	Total Storage (MG)	Elev. Storage (MG)	Service Pump Cap.	Max.Purchase Cap. (MGD/GPM)	Pressure Tank Cap. (MG)
0.1670 MGD	0.0190 MGD	0.0290 MGD Occurred on 10/15/2019	.044 MG		.403 MGD		0.006 MG

Activity Status	Inactivation Date
A - ACTIVE	

Last Survey Date	Surveyor	Survey Type	Region	County
01/16/2020	CATHY, A LANDRY	Sanitary Survey	BEAUMONT	HARDIN
01/16/2020	PAIGE PRITCHARD	Sanitary Survey	BEAUMONT	HARDIN
01/16/2020	KHADIJA FRASER	Sanitary Survey	BEAUMONT	HARDIN

(Treatment Plant)							
Entry Point	EP Name/Source Summation (Activity Status)	Plant Name (Activity Status)	Plant Num	Chemical Mon Type	Chem Sample Point	Distribution Mon Type	Dist Sample Point

EP002	TRT-TAP / Ground Water(A)	PLANT 2 - SHERWOOD TRL(A)	TP5046		NO		NO
-------	---------------------------	---------------------------	--------	--	----	--	----

Train:		Unnamed		
(Treatments)				
Disinfection Zone	Treatment Sequence	Objective	Process	Treatment
null	null	D	423	HYPOCHLORINATION, PRE

(Active Sources)							
Source Number	Source Name (Activity Status)		Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G1000037C	3 - SHERWOOD TRAIL / PLANT 2 (A)		P	G	500	36 GPM	36 GPM
Drill Date		Source Summary					
01/01/1913		EVANGELINE					
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	Seller			
30.387464	-94.220433	59	10/14/2013	Not Purchasing			

(Inactive/Offline Sources)			
SourceNumber	Name	Status	Depth

(Treatment Plant)							
Entry Point	EP Name/Source Summation (Activity Status)	Plant Name (Activity Status)	Plant Num	Chemical Mon Type	Chem Sample Point	Distribution Mon Type	Dist Sample Point
EP001	TRT-TAP / Ground Water(A)	PLANT 1 - LAURA LN(A)	TP5047		NO		NO

Train:		Unnamed		
(Treatments)				
Disinfection Zone	Treatment Sequence	Objective	Process	Treatment
null	null	D	403	GASEOUS CHLORINATION, PRE
null	null	C	447	INHIBITOR, POLYPHOSPHATE

(Active Sources)						
Source Number	Source Name (Activity Status)	Operational Status	Source Type	Depth	Tested GPM	Rated GPM
G1000037A	1 - LAURA LN / PLANT 1 (A)	P	G	450	80 GPM	84 GPM
Drill Date		Source Summary				
01/01/1913		EVANGELINE				
GPS Latitude (decimal)	GPS Longitude (decimal)	GPS Elevation	GPS Date	Seller		
30.388411	-94.230433	79	10/14/2013	Not Purchasing		

(Inactive/Offline Sources)			
SourceNumber	Name	Status	Depth

Code Explanations
Monitoring Type Codes: (GW) GROUNDWATER , (GUP) GROUNDWATER UNDER THE INFLUENCE - PURCHASED , (SWP) SURFACE WATER - PURCHASED , (GU) GROUNDWATER UNDER THE INFLUENCE OF SURFACE WATER , (N) NO SOURCES , (SW) SURFACE WATER
Activity Status Codes: (A) ACTIVE , (D) DELETED/DISSOLVED , (I) INACTIVE , (P) PROPOSED ,
Operational Status Codes: (E) EMERGENCY , (I) INTERIM/PEAK (O) OTHER , (P) PERMANENT , (S) SEASONAL
Source Types: (G) GROUND WATER , (S) SURFACE WATER , (U) GROUND WATER UNDER THE INFLUENCE

- End of Report -

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

Texas Commission on Environmental Quality



Attachment 4

Enchanted Forest
PWS ID No. 1000037
Investigation No. 1840694

Investigation Photographs

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the 16-mesh screening material that covered the end of the overflow pipe for the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1. Please note that there was no gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device equipped on this tank's overflow pipe.



Photograph documenting the 16-mesh screening material that covered the end of the overflow pipe for the Green 0.022 MG ground Storage Tank at Plant No. 1. Please note that there was no gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device equipped on this tank's overflow pipe.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1.



Photograph documenting the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leaks on the inlet and outlet waterlines for the blue service pump at Plant No. 1.



Photograph documenting the leak on the inlet waterline for the blue service pump at Plant No. 1.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leak on the inlet waterline for the blue service pump at Plant No. 1.



Photograph documenting the leaks on the outlet waterline for the blue service pump at Plant No. 1.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leaks on the outlet waterline for the blue service pump at Plant No. 1.



Photograph documenting the lack of a liquid level indicator on the Green 0.022 MG Ground Storage Tank. Please note that there was a liquid level indicator on the Galvanized 0.022 MG Ground Storage Tank.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the pressure reading that was noted at 110 Songwood Dr.



Photograph documenting the free chlorine residual that was noted 110 Songwood Dr after flushing for three to five minutes.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the clear hose that was being used as a sight glass for the 900-Gallon Pressure Tank at Plant No. 2.



Photograph documenting the top (left) and bottom (right) ends of the clear hose that was being used as a sight glass for the 900-Gallon Pressure Tank at Plant No. 2.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the lack of a chemical label on the two 5-gallon sodium hypochlorite containers at the Plant No. 2.



Photograph documenting the hole in the small hole in the top of the sodium hypochlorite solution container at Plant No. 2.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the 16-mesh screening material that covered the end of the overflow pipe for the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1. Please note that there was no gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device equipped on this tank's overflow pipe.



Photograph documenting the 16-mesh screening material that covered the end of the overflow pipe for the Green 0.022 MG ground Storage Tank at Plant No. 1. Please note that there was no gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device equipped on this tank's overflow pipe.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1.



Photograph documenting the leak on the outlet pipe to the Galvanized 0.022 MG Ground Storage Tank at Plant No. 1.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leaks on the inlet and outlet waterlines for the blue service pump at Plant No. 1.



Photograph documenting the leak on the inlet waterline for the blue service pump at Plant No. 1.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leak on the inlet waterline for the blue service pump at Plant No. 1.



Photograph documenting the leaks on the outlet waterline for the blue service pump at Plant No. 1.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the leaks on the outlet waterline for the blue service pump at Plant No. 1.



Photograph documenting the lack of a liquid level indicator on the Green 0.022 MG Ground Storage Tank. Please note that there was a liquid level indicator on the Galvanized 0.022 MG Ground Storage Tank.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the pressure reading that was noted at 110 Songwood Dr.



Photograph documenting the free chlorine residual that was noted 110 Songwood Dr after flushing for three to five minutes.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the clear hose that was being used as a sight glass for the 900-Gallon Pressure Tank at Plant No. 2.



Photograph documenting the top (left) and bottom (right) ends of the clear hose that was being used as a sight glass for the 900-Gallon Pressure Tank at Plant No. 2.

Regulated Entity: Enchanted Forest

PWS ID: 1000037



Photograph documenting the lack of a chemical label on the two 5-gallon sodium hypochlorite containers at the Plant No. 2.



Photograph documenting the hole in the small hole in the top of the sodium hypochlorite solution container at Plant No. 2.

Texas Commission on Environmental Quality



Attachment 5

Enchanted Forest
PWS ID No. 1000037
Investigation No. 1840694

Water System Documentation

STATE OF TEXAS,

KNOW ALL MEN BY THESE PRESENTS:

COUNTY OF HARDIN

That VAL D. HICKMAN, dba RAMPARTS DEVELOPMENT COMPANY,
P.O. BOX 456 Silsbee, Texas 77656

of the County of Hardin State of Texas, for and in consideration of

the sum of ===TEN DOLLARS & OTHER CONSIDERATIONS===

DOLLARS,

to me in hand paid by SCOTT MICHAEL NIELAND
205 E. Ave J
Silsbee, Texas 77656

have Granted, Sold and Conveyed, and by these presents do Grant, Sell and Convey unto the said

Scott Michael Nieland

of the County of Hardin, State of Texas, all that certain

tract, lot or parcel of land described in attached EXHIBIT "A"
and being a 1.84 acre parcel out of the Thomas Simmons Survey,
Abstract 452, and identified as TRACT or LOT 22 of ENCHANTED
FOREST, SECTION IV, a proposed subdivision.

THIS CONVEYANCE is made subject to any and all reservations,
easements, attached restrictive covenants, conditions of
record affecting subject property and especially a sanitation
controll easement, prohibiting the operation of stock pens,
feed lots, privies, tile or concrete sanitation sewers, cess
pools, septic tanks, septic tank drain fields within a
seventy five (75) ft. radius of an existing Public Water Well
situated in the North end of Sherwood Trail Street.

TO HAVE AND TO HOLD the above described premises, together with all and singular, the rights
and appurtenances thereto in anywise belonging unto the said

Scott Michael Nieland

heirs and assigns forever; and I do hereby bind myself

heirs, executors and administrators, to Warrant and Forever Defend all and singular the said premises.

tract, lot or parcel of land described in attached EXHIBIT "A" and being a 1.84 acre parcel out of the Thomas Simmons Survey, Abstract 452, and identified as TRACT or LOT 22 of ENCHANTED FOREST, SECTION IV, a proposed subdivision.

THIS CONVEYANCE is made subject to any and all reservations, easements, attached restrictive covenants, conditions of record affecting subject property and especially a sanitation controll easement, prohibiting the operation of stock pens, feed lots, privies, tile or concrete sanitation sewers, cess pools, septic tanks, septic tank drain fields within a seventy five (75) ft. radius of an existing Public Water Well situated in the North end of Sherwood Trail Street.

TO HAVE AND TO HOLD the above described premises, together with all and singular, the rights and appurtenances thereto in anywise belonging unto the said

Scott Michael Nieland

heirs and assigns forever; and I do hereby bind myself

heirs, executors and administrators, to Warrant and Forever Defend all and singular the said premises unto the said Scott Michael Nieland

heirs and assigns, against every person whomsoever lawfully claiming, or to claim the same or any part thereof.

Witness my hand at Silsbee, Texas

this 3rd day of August, A. D. 19 93.

Witnesses at Request of Grantor:

Val D. Hickman, dba Ramparts
Development Company

EXHIBIT "A"

BEING a 1.84 acre parcel of land out of the North one/half of the SALLIE BROWN 57.5 acre tract out of the THOMAS SIMMONS SURVEY, ABSTRACT 452. Said North one/half of the Sallie Brown tract described in that certain partition deed dated Sept. 21, 1984 and recorded in Volume 800, Page 780 of the Hardin County Deed Records.

Said 1.84 acre tract is more fully described as follows:

BEGINNING at the NORTH EAST CORNER of said 57.5 acre tract;

THENCE S 59-56 W along the northwest line of said 57.5 acre tract a distance of 300.0 ft. to corner in the East edge of Plantation Drive;

THENCE S 29 42 13 E along the East edge of Plantation Drive a distance of 267.60 ft. to a corner in the north line of Sherwood Trail Street;

THENCE N 59 56 E along the north edge of Sherwood Trail street a distance of 300.0 ft. to corner in the East line of said 57.5 acre tract;

THENCE N 29 42 13 W along the East line of said tract a distance of 267.60 ft. to THE PLACE OF BEGINNING and containing 1.84 acres of land, and identified as Tract or Lot 22 of ENCHANTED FOREST, SECTION IV, a proposed subdivision.

Enchanted Forest ID # 1000037

1. no log available for either well
2. see drawing
3. Petroleum pipeline near well #1
4. see attached
5. see attached
6. raw samples have been taken since ~~we~~ before we began operating
7. n/a

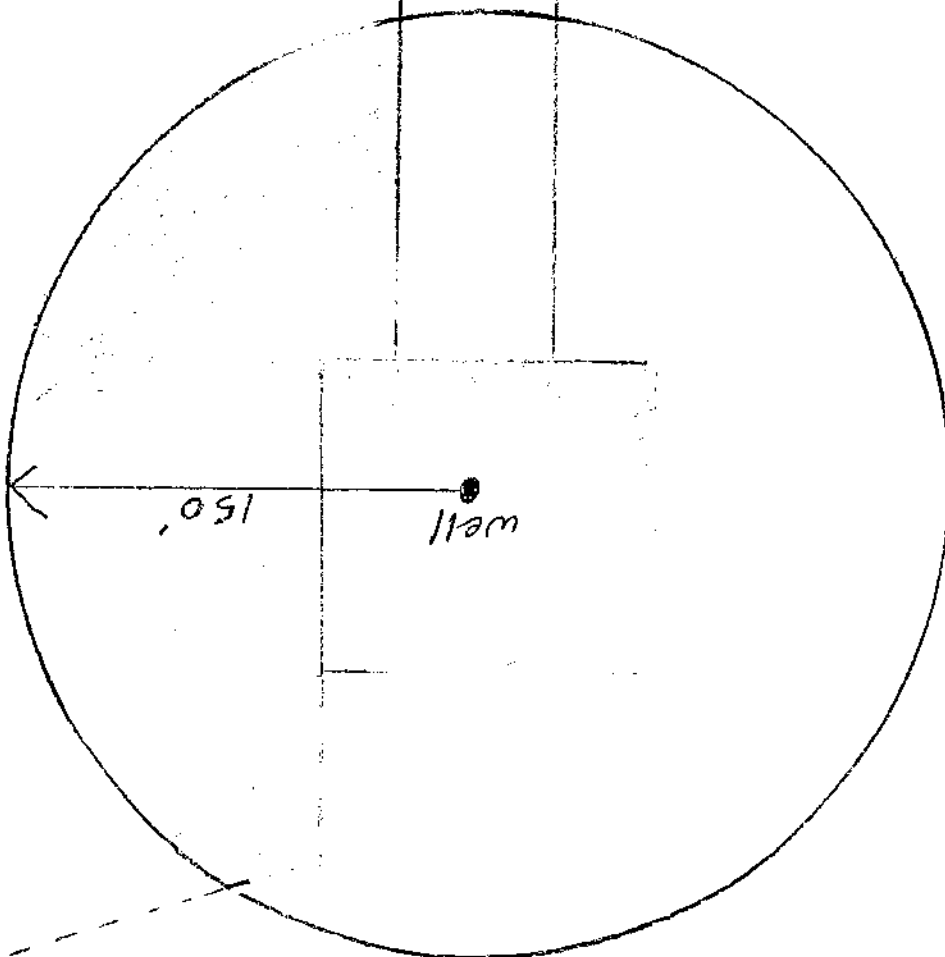
Plantation Dr.

known roller

woods
(development)

woods

House



Shaded area indicates
Reserved secondary easement

woods
(no development)

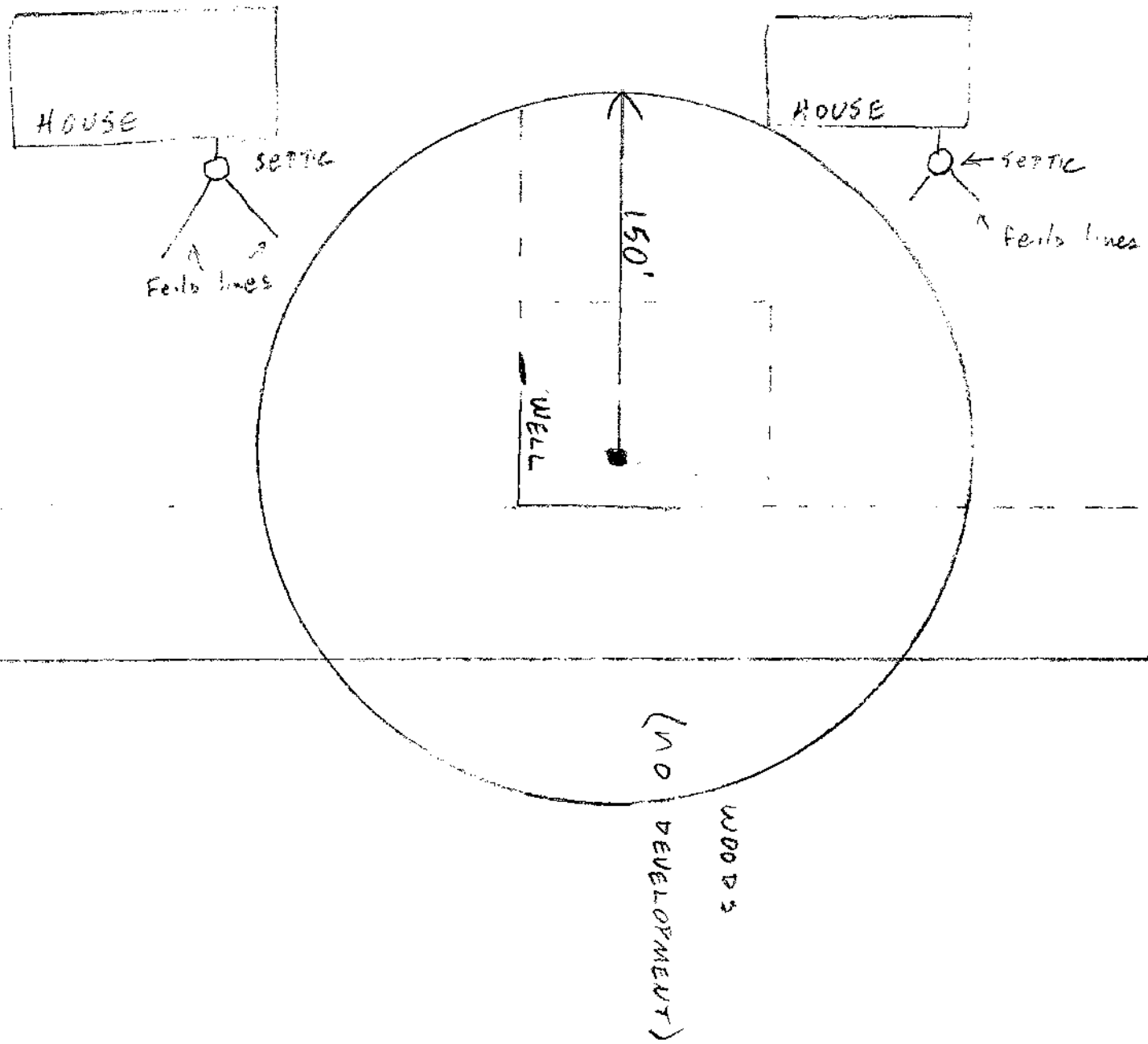
Shaded Forest
Well #100037
#2

enchanted forest

D. # 1000037 well #1

this system submits all monthly samples.

shared area indicates required sanitary assessment



T. Jones
D. Kilgore

79256

Appendix C: Sample Sanitary Control Easement Document for a Public Water Well

SANITARY CONTROL EASEMENTDATE: 11/20 19 98GRANTOR: Larry BrewerGRANTOR'S ADDRESS: POB 62 Vidor Tx 77670GRANTEE: Larry BrewerGRANTEE'S ADDRESS: POB 62 Vidor Tx 77670

SANITARY CONTROL EASEMENT:

Purpose, Restrictions, and Uses of Easement:

1. The purpose of this easement is to protect the water supply of the well described and located below by means of sanitary control.
2. The construction and operation of underground petroleum and chemical storage tanks and liquid transmission pipelines, stock pens, feedlots, dump grounds, privies, cesspools, septic tank or sewage treatment drainfields, improperly constructed water wells of any depth, and all other construction or operation that could create an insanitary condition within, upon, or across the property subject to this easement are prohibited within this easement. For the purpose of the easement, improperly constructed water wells are those wells which do not meet the surface and subsurface construction standards for a public water supply well.
3. The construction of tile or concrete sanitary sewers, sewer appurtenances, septic tanks, storm sewers, and cemeteries is specifically prohibited within a 50-foot radius of the water well described and located below.
4. This easement permits the construction of homes or buildings upon the Grantor's property as long as all items in Restrictions Nos. 2 and 3 are recognized and followed.
5. This easement permits normal farming and ranching operations, except that livestock shall not be allowed within 50 feet of the water well.

The Grantor's property subject to this Easement is described in the documents recorded at:

Garney Court House
 Volume 1167 Pages 355 of the Real Property Records of Hardin County, Texas.

RECORDED JAN 20

Property Subject to Easement:

Well site(Enchanted Forest)(See Attached)

All of that area within a 150 foot radius of the water well located _____ feet at a radial of _____ degrees from the _____ corner of Lot _____ of _____ a Subdivision of Record in Book _____ Page _____ of the _____ County Plat Records, _____ County, Texas.

RM:

This easement shall run with the land and shall be binding on all parties and persons claiming under the Grantor for a period of two years from the date that this easement is recorded; after which time, this easement shall be automatically extended until the use of the subject water well as a source of water for public water systems ceases.

FORCEMENT:

VOL. 1167 PAGE 356

Enforcement of this easement shall be proceedings at law or in equity against any person or persons violating or attempting to violate the restrictions in this easement, either to restrain the violation or to recover damages.

INVALIDATION:

Invalidation of any one of these restrictions or uses (covenants) by a judgement or court order shall not affect any of the other provisions of this easement, which shall remain in full force and effect.

FOR AND IN CONSIDERATION, of the sum of One Dollar (\$1.00) and for other good and valuable consideration paid by the Grantee to the Grantor, the receipt of which is hereby acknowledged, the Grantor does hereby grant and convey to Grantee and to its successors and assigns the sanitary control easement described in this easement.

GRANTOR

By: [Signature]

HUSBAND AND WIFE ACKNOWLEDGEMENT

STATE OF TEXAS

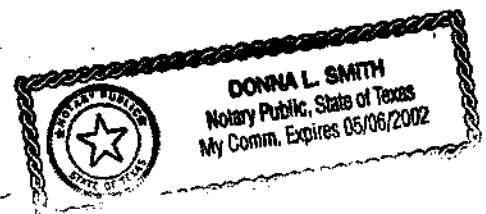
COUNTY OF Orange

§
§
§

BEFORE ME, the undersigned authority, on the 20 day of Nov 19 98, personally appeared Larry Brewer and wife, known to me to be the persons whose names are subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Donna L. Smith
Notary Public in and for
The State of Texas
My Commission Expires: 5/6/2002

DONNA L. SMITH
Typed or Printed Name of Notary



Witnessed in _____ Courthouse, _____, Texas on _____, 19__.

RECORDERS MEMORANDUM
AT THE TIME OF RECORDATION, THIS INSTRUMENT WAS FOUND TO BE INADEQUATE FOR THE BEST PHOTOGRAPHIC REPRODUCTION BECAUSE OF ILLEGIBILITY, CARBON OR PHOTOCOPY, DISCOLORED PAPER, ETC.