



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT
5151 FLYNN PARKWAY, SUITE 306
CORPUS CHRISTI, TEXAS 78411-4318

CESWG-RDR

26 August 2025

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Pre-2015 Regulatory Regime
Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322
(2023),¹ SWG-2011-00661²

BACKGROUND. An Approved Jurisdictional Determination (AJD) is a Corps document stating the presence or absence of waters of the United States on a parcel or a written statement and map identifying the limits of waters of the United States on a parcel. AJDs are clearly designated appealable actions and will include a basis of JD with the document.³ AJDs are case-specific and are typically made in response to a request. AJDs are valid for a period of five years unless new information warrants revision of the determination before the expiration date or a District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.⁴ For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),⁵ the Clean Water Act (CWA) implementing regulations published by the Department of the Army in 1986 and amended in 1993 (references 2.a. and 2.b. respectively), the 2008 *Rapanos-Carabell* guidance (reference 2.c.), and other applicable guidance, relevant case law and longstanding practice, (collectively the pre-2015 regulatory regime), and the *Sackett* decision (reference 2.d.) in evaluating jurisdiction.

This Memorandum for Record (MFR) constitutes the basis of jurisdiction for a Corps AJD as defined in 33 CFR §331.2. The features addressed in this AJD were evaluated consistent with the definition of “waters of the United States” found in the pre-2015 regulatory regime and consistent with the Supreme Court’s decision in *Sackett*. This AJD did not rely on the 2023 “Revised Definition of ‘Waters of the United States,’” as

¹ While the Supreme Court’s decision in *Sackett* had no effect on some categories of waters covered under the CWA, and no effect on any waters covered under RHA, all categories are included in this Memorandum for Record for efficiency.

² When documenting aquatic resources within the review area that are jurisdictional under the Clean Water Act (CWA), use an additional MFR and group the aquatic resources on each MFR based on the TNW, interstate water, or territorial seas that they are connected to. Be sure to provide an identifier to indicate when there are multiple MFRs associated with a single AJD request (i.e., number them 1, 2, 3, etc.).

³ 33 CFR 331.2.

⁴ Regulatory Guidance Letter 05-02.

⁵ USACE has authority under both Section 9 and Section 10 of the Rivers and Harbors Act of 1899 but for convenience, in this MFR, jurisdiction under RHA will be referred to as Section 10.

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

amended on 8 September 2023 (Amended 2023 Rule) because, as of the date of this decision, the Amended 2023 Rule is not applicable in Texas due to litigation.

1. SUMMARY OF CONCLUSIONS.

- a. Provide a list of each individual feature within the review area and the jurisdictional status of each one (i.e., identify whether each feature is/is not a water of the United States and/or a navigable water of the United States).

			PEM		-	non-	non-
PEM1A_001	0.034	ACRE	Wetland	27.83055800	97.21784100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM1A_002	0.033	ACRE	Wetland	27.83073100	97.21747100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM1Fx_001	0.868	ACRE	Wetland	27.82507300	97.21365300	adjacent	jurisdictional
			PEM		-	non-	non-
PUBF_001	0.493	ACRE	Wetland	27.82889300	97.21209300	adjacent	jurisdictional
			PEM		-	non-	non-
PUBF_002	1.349	ACRE	Wetland	27.83644600	97.21210200	adjacent	jurisdictional
			PEM		-	non-	non-
PUSC_001	0.263	ACRE	Wetland	27.82713100	97.21096900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_001	0.049	ACRE	Wetland	27.83261600	97.20955200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_002	0.043	ACRE	Wetland	27.83091400	97.20911200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_003	0.019	ACRE	Wetland	27.83385100	97.21228300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_004	0.059	ACRE	Wetland	27.83221100	97.21025700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_005	0.053	ACRE	Wetland	27.83633900	97.20889200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_006	0.024	ACRE	Wetland	27.83042300	97.21299900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_007	0.093	ACRE	Wetland	27.83241900	97.20745000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_008	0.03	ACRE	Wetland	27.83222400	97.20824300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_009	0.017	ACRE	Wetland	27.83583400	97.20747200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_010	0.047	ACRE	Wetland	27.83225600	97.20932600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_011	0.019	ACRE	Wetland	27.83524000	97.20665500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_012	0.072	ACRE	Wetland	27.83402100	97.20875700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_013	0.048	ACRE	Wetland	27.83188900	97.20850500	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM		-	non-	non-
PEM_014	0.059	ACRE	Wetland	27.83150600	97.21200800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_015	0.02	ACRE	Wetland	27.83244100	97.21270800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_016	0.099	ACRE	Wetland	27.83556200	97.20977600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_017	0.024	ACRE	Wetland	27.83094900	97.21034600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_018	0.038	ACRE	Wetland	27.83155100	97.20964300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_019	0.035	ACRE	Wetland	27.83725200	97.21021300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_020	0.023	ACRE	Wetland	27.83080100	97.20956000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_021	0.026	ACRE	Wetland	27.83608600	97.21015400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_022	0.049	ACRE	Wetland	27.83129400	97.21318700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_023	0.045	ACRE	Wetland	27.83475800	97.20784200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_024	0.049	ACRE	Wetland	27.83615000	97.20853200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_025	0.016	ACRE	Wetland	27.83370000	97.20704100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_026	0.029	ACRE	Wetland	27.82852500	97.21393800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_027	0.043	ACRE	Wetland	27.83475200	97.21046800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_028	0.042	ACRE	Wetland	27.83581000	97.21066500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_029	0.062	ACRE	Wetland	27.83140700	97.21559700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_030	0.069	ACRE	Wetland	27.83292300	97.20774300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_031	0.02	ACRE	Wetland	27.83044200	97.21449300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_032	0.03	ACRE	Wetland	27.83228700	97.21309500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_033	0.032	ACRE	Wetland	27.82975700	97.21411100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_034	0.021	ACRE	Wetland	27.83448300	97.20717300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_035	0.057	ACRE	Wetland	27.82894300	97.20977000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_036	0.056	ACRE	Wetland	27.83339600	97.20811500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_037	0.018	ACRE	Wetland	27.83317500	97.21058700	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM		-	non-	non-
PEM_038	0.022	ACRE	Wetland	27.83585000	97.20780900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_039	0.027	ACRE	Wetland	27.83287800	97.21401900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_040	0.044	ACRE	Wetland	27.83713600	97.20534600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_041	0.052	ACRE	Wetland	27.83434300	97.21049700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_042	0.046	ACRE	Wetland	27.83130300	97.20935200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_043	0.05	ACRE	Wetland	27.83554200	97.20717900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_044	0.035	ACRE	Wetland	27.83290000	97.21051400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_045	0.031	ACRE	Wetland	27.83625300	97.20749000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_046	0.052	ACRE	Wetland	27.83324700	97.20988100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_047	0.022	ACRE	Wetland	27.82785200	97.21052200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_048	0.023	ACRE	Wetland	27.83111900	97.21375800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_049	0.137	ACRE	Wetland	27.82930500	97.21008100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_050	0.025	ACRE	Wetland	27.83081800	97.21256400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_051	0.032	ACRE	Wetland	27.83436700	97.20796100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_052	0.029	ACRE	Wetland	27.83493800	97.20674700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_053	0.024	ACRE	Wetland	27.82922800	97.21509600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_054	0.02	ACRE	Wetland	27.82994300	97.21338400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_055	0.033	ACRE	Wetland	27.83703900	97.20824400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_056	0.034	ACRE	Wetland	27.83281500	97.21157400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_057	0.016	ACRE	Wetland	27.83599800	97.20706700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_058	0.038	ACRE	Wetland	27.83504400	97.20815100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_059	0.05	ACRE	Wetland	27.83004900	97.21045600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_060	0.025	ACRE	Wetland	27.83289200	97.21269000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_061	0.028	ACRE	Wetland	27.83453900	97.20737800	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM		-	non-	non-
PEM_062	0.047	ACRE	Wetland	27.82891500	97.21012800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_063	0.025	ACRE	Wetland	27.83731300	97.20574700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_064	0.054	ACRE	Wetland	27.83044900	97.21424500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_065	0.031	ACRE	Wetland	27.83162300	97.20869400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_066	0.021	ACRE	Wetland	27.83239400	97.21187900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_067	0.032	ACRE	Wetland	27.83124000	97.21142300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_068	0.073	ACRE	Wetland	27.83171000	97.20942700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_069	0.073	ACRE	Wetland	27.83613600	97.20779900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_070	0.044	ACRE	Wetland	27.83371200	97.21011400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_071	0.025	ACRE	Wetland	27.83649800	97.20684000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_072	0.03	ACRE	Wetland	27.83503900	97.21192000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_073	0.125	ACRE	Wetland	27.83298400	97.20903100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_074	0.024	ACRE	Wetland	27.83050200	97.21159400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_075	0.046	ACRE	Wetland	27.82890200	97.21049300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_076	0.023	ACRE	Wetland	27.82927100	97.21362800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_077	0.03	ACRE	Wetland	27.83260600	97.21132400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_078	0.053	ACRE	Wetland	27.83172500	97.21228500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_079	0.045	ACRE	Wetland	27.83666000	97.20768600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_080	0.072	ACRE	Wetland	27.83363200	97.20791300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_081	0.202	ACRE	Wetland	27.83525000	97.20865600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_082	0.052	ACRE	Wetland	27.83622500	97.20975300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_083	0.027	ACRE	Wetland	27.83132200	97.20854200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_084	0.03	ACRE	Wetland	27.83403100	97.21025500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_085	0.032	ACRE	Wetland	27.83514900	97.20977300	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM		-	non-	non-
PEM_086	0.044	ACRE	Wetland	27.83224800	97.20995600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_087	0.048	ACRE	Wetland	27.83077000	97.21397100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_088	0.043	ACRE	Wetland	27.82914300	97.20950500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_089	0.023	ACRE	Wetland	27.83316200	97.21033500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_090	0.021	ACRE	Wetland	27.83163000	97.21299400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_091	0.023	ACRE	Wetland	27.83443700	97.21225100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_092	0.025	ACRE	Wetland	27.82877800	97.21390000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_093	0.032	ACRE	Wetland	27.83025000	97.20866000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_094	0.049	ACRE	Wetland	27.83535900	97.20811700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_095	0.02	ACRE	Wetland	27.82806400	97.21277300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_096	0.04	ACRE	Wetland	27.83048200	97.20893500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_097	0.031	ACRE	Wetland	27.83518100	97.21310700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_098	0.026	ACRE	Wetland	27.83383200	97.21297400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_099	0.026	ACRE	Wetland	27.83097700	97.21349200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_100	0.059	ACRE	Wetland	27.83088500	97.21146300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_101	0.017	ACRE	Wetland	27.83246100	97.20852700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_102	0.046	ACRE	Wetland	27.83714900	97.20993000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_103	0.016	ACRE	Wetland	27.83446400	97.20864800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_104	0.04	ACRE	Wetland	27.83017900	97.21393100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_105	0.03	ACRE	Wetland	27.83511400	97.21037900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_106	0.078	ACRE	Wetland	27.83361000	97.20965800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_107	0.065	ACRE	Wetland	27.83009000	97.20931100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_108	0.045	ACRE	Wetland	27.83242700	97.21237300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_109	0.028	ACRE	Wetland	27.82870300	97.21462000	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM		-	non-	non-
PEM_110	0.034	ACRE	Wetland	27.83650900	97.20749200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_111	0.121	ACRE	Wetland	27.83544500	97.20930000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_112	0.052	ACRE	Wetland	27.83545900	97.21038000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_113	0.026	ACRE	Wetland	27.83047100	97.21264400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_114	0.042	ACRE	Wetland	27.83129100	97.21497500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_115	0.064	ACRE	Wetland	27.83104400	97.21185800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_116	0.079	ACRE	Wetland	27.83507700	97.20937800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_117	0.034	ACRE	Wetland	27.82956500	97.20961400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_118	0.03	ACRE	Wetland	27.83528400	97.21002300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_119	0.025	ACRE	Wetland	27.83492700	97.20623700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_120	0.029	ACRE	Wetland	27.83616400	97.20651700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_121	0.124	ACRE	Wetland	27.83188200	97.20997100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_122	0.015	ACRE	Wetland	27.83741600	97.20558200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_123	0.022	ACRE	Wetland	27.83764800	97.21054000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_124	0.022	ACRE	Wetland	27.83428800	97.20911300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_125	0.019	ACRE	Wetland	27.83325600	97.21216200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_126	0.019	ACRE	Wetland	27.83630300	97.20675300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_127	0.04	ACRE	Wetland	27.83056100	97.20990800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_128	0.039	ACRE	Wetland	27.83251800	97.20916200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_129	0.036	ACRE	Wetland	27.82944300	97.20979100	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_130	0.051	ACRE	Wetland	27.82936400	97.21061400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_131	0.033	ACRE	Wetland	27.82955300	97.21498300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_132	0.024	ACRE	Wetland	27.83617100	97.20580800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_133	0.023	ACRE	Wetland	27.83414600	97.21223900	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM		-	non-	non-
PEM_134	0.032	ACRE	Wetland	27.83632500	97.21048200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_135	0.039	ACRE	Wetland	27.83212800	97.21055400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_136	0.033	ACRE	Wetland	27.83292700	97.20984300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_137	0.059	ACRE	Wetland	27.83686100	97.20977200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_138	0.039	ACRE	Wetland	27.83502200	97.20896700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_139	0.028	ACRE	Wetland	27.83253900	97.21000000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_140	0.039	ACRE	Wetland	27.83649200	97.20960700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_141	0.023	ACRE	Wetland	27.83138900	97.21168200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_142	0.019	ACRE	Wetland	27.83643700	97.20653300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_143	0.019	ACRE	Wetland	27.83709000	97.20571800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_144	0.047	ACRE	Wetland	27.83264300	97.21036900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_145	0.027	ACRE	Wetland	27.83002100	97.21142400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_146	0.071	ACRE	Wetland	27.83732900	97.20702700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_147	0.031	ACRE	Wetland	27.83420700	97.20979000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_148	0.025	ACRE	Wetland	27.83611000	97.21038900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_149	0.047	ACRE	Wetland	27.83259200	97.21399500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_150	0.034	ACRE	Wetland	27.82794000	97.21164800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_151	0.015	ACRE	Wetland	27.82862400	97.21432300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_152	0.035	ACRE	Wetland	27.83288900	97.21232700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_153	0.09	ACRE	Wetland	27.83105600	97.21063900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_154	0.016	ACRE	Wetland	27.83400000	97.20989000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_155	0.038	ACRE	Wetland	27.83616600	97.20619700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_156	0.055	ACRE	Wetland	27.83200500	97.21363200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_157	0.024	ACRE	Wetland	27.83632500	97.20563100	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM			-	non-	non-
PEM_158	0.015	ACRE	Wetland	27.83597700	97.20726500	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_159	0.036	ACRE	Wetland	27.83066600	97.20873100	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_160	0.016	ACRE	Wetland	27.83316000	97.20823700	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_161	0.076	ACRE	Wetland	27.83060000	97.21026300	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_162	0.033	ACRE	Wetland	27.83113300	97.21240500	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_163	0.027	ACRE	Wetland	27.83647300	97.20624100	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_164	0.038	ACRE	Wetland	27.83050500	97.21513400	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_165	0.021	ACRE	Wetland	27.82977200	97.21581400	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_166	0.027	ACRE	Wetland	27.83078400	97.21305900	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_167	0.049	ACRE	Wetland	27.83402700	97.20684500	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_168	0.025	ACRE	Wetland	27.83527900	97.20732500	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_169	0.03	ACRE	Wetland	27.82993800	97.20865600	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_170	0.021	ACRE	Wetland	27.83465400	97.20678700	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_171	0.036	ACRE	Wetland	27.83501300	97.20701500	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_172	0.042	ACRE	Wetland	27.83208300	97.20873400	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_173	0.082	ACRE	Wetland	27.83593500	97.20950300	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_174	0.024	ACRE	Wetland	27.83299200	97.21521400	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_175	0.03	ACRE	Wetland	27.83474800	97.20949400	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_176	0.038	ACRE	Wetland	27.83015100	97.20968800	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_177	0.022	ACRE	Wetland	27.83497700	97.20869400	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_178	0.107	ACRE	Wetland	27.83299800	97.20732500	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_179	0.028	ACRE	Wetland	27.83184500	97.21328400	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_180	0.028	ACRE	Wetland	27.83540000	97.21384100	adjacent	jurisdictional	non-
			PEM			-	non-	non-
PEM_181	0.028	ACRE	Wetland	27.83273000	97.20811900	adjacent	jurisdictional	non-

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

			PEM		-	non-	non-
PEM_182	0.021	ACRE	Wetland	27.83228300	97.21219900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_183	0.038	ACRE	Wetland	27.83579600	97.20615200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_184	0.019	ACRE	Wetland	27.83104400	97.20982800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_185	0.044	ACRE	Wetland	27.82956700	97.20925900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_186	0.024	ACRE	Wetland	27.83499700	97.20648200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_187	0.026	ACRE	Wetland	27.83542100	97.21266200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_188	0.023	ACRE	Wetland	27.83422200	97.20853400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_189	0.026	ACRE	Wetland	27.82801800	97.21204000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_190	0.058	ACRE	Wetland	27.83672600	97.21039500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_191	0.057	ACRE	Wetland	27.83456600	97.20988200	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_192	0.022	ACRE	Wetland	27.82972700	97.21021800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_193	0.069	ACRE	Wetland	27.83060900	97.21226800	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_194	0.021	ACRE	Wetland	27.83498100	97.20838600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_195	0.041	ACRE	Wetland	27.83710000	97.20769000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_196	0.064	ACRE	Wetland	27.83615400	97.20929300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_197	0.028	ACRE	Wetland	27.83409800	97.21203300	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_198	0.022	ACRE	Wetland	27.82989800	97.20897700	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_199	0.038	ACRE	Wetland	27.83173200	97.21184000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_200	0.099	ACRE	Wetland	27.83262300	97.21193400	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_201	0.02	ACRE	Wetland	27.82783500	97.21386500	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_202	0.03	ACRE	Wetland	27.83301600	97.21356000	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_203	0.032	ACRE	Wetland	27.83422000	97.21290600	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_204	0.028	ACRE	Wetland	27.82803300	97.21359900	adjacent	jurisdictional
			PEM		-	non-	non-
PEM_205	0.026	ACRE	Wetland	27.83572200	97.21317700	adjacent	jurisdictional

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

PEM_206	0.12	ACRE	Wetland PEM	27.83546700	97.20786300	- adjacent	non- jurisdictional
PEM_207	0.049	ACRE	Wetland PEM	27.83095500	97.21218800	- adjacent	non- jurisdictional
PEM_208	0.067	ACRE	Wetland PEM	27.83036900	97.20919200	- adjacent	non- jurisdictional
PEM_209	0.031	ACRE	Wetland PEM	27.83379600	97.21200500	- adjacent	non- jurisdictional
PEM_210	0.032	ACRE	Wetland PEM	27.83361500	97.20748500	- adjacent	non- jurisdictional
PEM_211	0.023	ACRE	Wetland PEM	27.83608100	97.20681100	- adjacent	non- jurisdictional
PEM_212	0.033	ACRE	Wetland PEM	27.83180200	97.21039700	- adjacent	non- jurisdictional
PEM_213	0.049	ACRE	Wetland PEM	27.83435900	97.21163500	- adjacent	non- jurisdictional
PEM_214	0.033	ACRE	Wetland PEM	27.83422000	97.20756000	- adjacent	non- jurisdictional
PEM_215	0.027	ACRE	Wetland PEM	27.83153500	97.21373200	- adjacent	non- jurisdictional
PEM_216	0.083	ACRE	Wetland PEM	27.83117000	97.20892500	- adjacent	non- jurisdictional
PEM_217	0.461	ACRE	Wetland PEM	27.83623100	97.21229700	- adjacent	non- jurisdictional
PEM_218	0.039	ACRE	Wetland PEM	27.83235800	97.20806800	- adjacent	non- jurisdictional
PEM_219	0.03	ACRE	Wetland PEM	27.83449800	97.20658200	- adjacent	non- jurisdictional
PEM_220	0.022	ACRE	Wetland PEM	27.83200200	97.21264200	- adjacent	non- jurisdictional
PEM_221	0.04	ACRE	Wetland PEM	27.83696800	97.20643000	- adjacent	non- jurisdictional
PEM_222	0.03	ACRE	Wetland PEM	27.83167200	97.21346300	- adjacent	non- jurisdictional
PEM_223	0.049	ACRE	Wetland PEM	27.83172400	97.20896700	- adjacent	non- jurisdictional
PEM_224	0.045	ACRE	Wetland	27.83480500	97.21009000	- adjacent	non- jurisdictional

2. REFERENCES.

- a. Final Rule for Regulatory Programs of the Corps of Engineers, 51 FR 41206 (November 13, 1986).
- b. Clean Water Act Regulatory Programs, 58 FR 45008 (August 25, 1993).

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

- c. U.S. EPA & U.S. Army Corps of Engineers, Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in *Rapanos v. United States & Carabell v. United States* (December 2, 2008)
 - d. *Sackett v. EPA*, 598 U.S. 651, 143 S. Ct. 1322 (2023)
 - e. 12 March 2025 Memorandum to the Field Between the U.S. Department of Army, U.S. Army Corps of Engineers, and the U.S. Environmental Protection Agency Concerning the Proper Implementation of "Continuous Surface Connection" Under the Definition of "Waters of the United States" Under the Clean Water Act.
3. REVIEW AREA. The 350-acre review area is located along the Corpus Christi Ship Channel, between the community of Ingleside on the Bay and Moda's existing facilities, and south of Farm-to-Market (FM) 1069, San Patricio County, Texas.
- LATITUDE/LONGITUDE (Decimal Degrees).
Latitude: 27.8301° N; Longitude: 97.2133° W (Central Coordinates)
4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), INTERSTATE WATER, OR THE TERRITORIAL SEAS TO WHICH THE AQUATIC RESOURCE IS CONNECTED. N/A⁶
5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS. N/A
6. SECTION 10 JURISDICTIONAL WATERS⁷: Describe aquatic resources or other features within the review area determined to be jurisdictional in accordance with Section 10 of the Rivers and Harbors Act of 1899. Include the size of each aquatic resource or other feature within the review area and how it was determined to be jurisdictional in accordance with Section 10.⁸ N/A

⁶ This MFR should not be used to complete a new stand-alone TNW determination. A stand-alone TNW determination for a water that is not subject to Section 9 or 10 of the Rivers and Harbors Act of 1899 (RHA) is completed independently of a request for an AJD. A stand-alone TNW determination is conducted for a specific segment of river or stream or other type of waterbody, such as a lake, where upstream or downstream limits or lake borders are established.

⁷ 33 CFR 329.9(a) A waterbody which was navigable in its natural or improved state, or which was susceptible of reasonable improvement (as discussed in § 329.8(b) of this part) retains its character as "navigable in law" even though it is not presently used for commerce, or is presently incapable of such use because of changed conditions or the presence of obstructions.

⁸ This MFR is not to be used to make a report of findings to support a determination that the water is a navigable water of the United States. The district must follow the procedures outlined in 33 CFR part 329.14 to make a determination that water is a navigable water of the United States subject to Section 10 of the RHA.

7. SECTION 404 JURISDICTIONAL WATERS: Describe the aquatic resources within the review area that were found to meet the definition of waters of the United States in accordance with the pre-2015 regulatory regime and consistent with the Supreme Court's decision in *Sackett*. List each aquatic resource separately, by name, consistent with the naming convention used in section 1, above. Include a rationale for each aquatic resource, supporting that the aquatic resource meets the relevant category of "waters of the United States" in the pre-2015 regulatory regime. The rationale should also include a written description of, or reference to a map in the administrative record that shows, the lateral limits of jurisdiction for each aquatic resource, including how that limit was determined, and incorporate relevant references used. Include the size of each aquatic resource in acres or linear feet and attach and reference related figures as needed.

- a. TNWs (a)(1): N/A
- b. Interstate Waters (a)(2): N/A
- c. Other Waters (a)(3): N/A
- d. Impoundments (a)(4): N/A
- e. Tributaries (a)(5): N/A
- f. The territorial seas (a)(6): N/A
- g. Adjacent wetlands (a)(7): N/A

8. NON-JURISDICTIONAL AQUATIC RESOURCES AND FEATURES

- a. Describe aquatic resources and other features within the review area identified as "generally non-jurisdictional" in the preamble to the 1986 regulations (referred to as "preamble waters").⁹ Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA as a preamble water.

Wetland PEM1Fx (0.868 ac): LiDAR, topographical map, aerial photographs, and the applicant-provided plans were utilized as part of the desktop analysis to identify that this water feature is an agricultural pond that was excavated from uplands sometime prior to 1985. This excavated pond does not have any continuous surface connection to a RPW or TNW. This feature is best described in the preamble for 33 CFR 328.3, published in the Federal Register Volume 51,

⁹ 51 FR 41217, November 13, 1986.

Number 219, November 13, 1986 (page 41217), which states “For clarification, it should be noted that we generally do not consider the following waters to be Waters of the United States...(c), artificial, constructed lakes and ponds created in dry land such as farm and stock watering ponds, irrigation ponds, settling basins, fields flooded for rice growing, are generally not considered waters of the US.”

- b. Describe aquatic resources and features within the review area identified as “generally not jurisdictional” in the *Rapanos* guidance. Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA based on the criteria listed in the guidance. N/A
- c. Describe aquatic resources and features identified within the review area as waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA. Include the size of the waste treatment system within the review area and describe how it was determined to be a waste treatment system. N/A
- d. Describe aquatic resources and features within the review area determined to be prior converted cropland in accordance with the 1993 regulations (reference 2.b.). Include the size of the aquatic resource or feature within the review area and describe how it was determined to be prior converted cropland. N/A
- e. Describe aquatic resources (i.e. lakes and ponds) within the review area, which do not have a nexus to interstate or foreign commerce, and prior to the January 2001 Supreme Court decision in “*SWANCC*,” would have been jurisdictional based solely on the “Migratory Bird Rule.” Include the size of the aquatic resource or feature, and how it was determined to be an “isolated water” in accordance with *SWANCC*. N/A
- f. Describe aquatic resources and features within the review area that were determined to be non-jurisdictional because they do not meet one or more categories of waters of the United States under the pre-2015 regulatory regime consistent with the Supreme Court’s decision in *Sackett* (e.g., tributaries that are non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water).

Wetlands PEM1A 001 and PEM1A 002 (0.067 ac): LiDAR, topo, aerial photographs, the applicant-provided delineation report, and a site visit were utilized as part of the desktop analysis to identify that these temporarily flooded palustrine wetlands reside in small depressional areas entirely within the review area that collect rainwater from the surrounding countryside. There is no

presence of any swales, erosional features, ditches, or culverts that would potentially serve as surface connections. There is no presence of a continuous surface connection, with no more than overland sheet flow exiting from these wetlands to an RPW or TNW.

Wetlands PUBF 001 and 002 (1.842 ac): LiDAR, topo, aerial photographs, the applicant-provided delineation report, and a site visit were utilized as part of the desktop analysis to identify that these semi-permanently flooded palustrine wetlands reside in small depressional areas entirely within the review area that collect rainwater from the surrounding countryside. There is no presence of any swales, erosional features, ditches, or culverts that would potentially serve as surface connections. There is no presence of a continuous surface connection, with no more than overland sheet flow exiting from these wetlands to an RPW or TNW.

Wetland PUSC 001 (0.263 ac): LiDAR, topo, aerial photographs, the applicant-provided delineation report, and a site visit were utilized as part of the desktop analysis to identify that this seasonally flooded palustrine wetland resides in a small depressional area entirely within the review area that collects rainwater from the surrounding countryside. There is no presence of any swales, erosional features, ditches, or culverts that would potentially serve as surface connections. There is no presence of a continuous surface connection, with no more than overland sheet flow exiting from this wetland to an RPW or TNW.

Wetlands PEM 001 through 224 (9.43 ac): LiDAR, topo, aerial photographs, the applicant-provided delineation report, and a site visit were utilized as part of the desktop analysis to identify that these palustrine wetlands reside in small depressional areas entirely within the review area that collect rainwater from the surrounding countryside. There is no presence of any swales, erosional features, ditches, or culverts that would potentially serve as surface connections. There is no presence of a continuous surface connection, with no more than overland sheet flow exiting from these wetlands to an RPW or TNW.

9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.
 - a. Desktop Assessment Report: *U.S. Army Corps of Engineers Site Assessment & Request for Approved Jurisdictional Determination*, prepared by Belaire Environmental, Inc., October 8, 2021.
 - b. Google Earth Aerials dated: 2022, 2017, 2011, 2009, 2003, 1995

CESWG-RDR

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWG-2011-00661

- c. USGS Topographic Map/Scale: Port Ingleside; 1:24,000 (2022)
- d. ORM2 Database: Prior determinations have been made for tracts with similar topography adjacent to the current review area (SWG-2019-00400 and SWG-2019-00855). SWG-2019-00400 determined the 70-acre area adjacent to the east contained both uplands and wetlands. The wetlands were located in an "isolated" landscape position and lacked any known nexus to interstate commerce and were determined to be non-jurisdictional. SWG-2019-00855 determined a 170-acre located east of the current review area contained both uplands and wetlands, but that the wetlands did not abut a water of the U.S., were located in landscape positions that would not be flooded by as water of the US in a typical year, and were separated from waters of the U.S. by more than a single natural or man-made barrier, and were therefore considered non-adjacent wetland not subject to Section 404 of the Clean Water Act.
- e. Site visit conducted 5 June 2025

10. OTHER SUPPORTING INFORMATION. N/A

11. NOTE: The structure and format of this MFR were developed in coordination with the EPA and Department of the Army. The MFR's structure and format may be subject to future modification or may be rescinded as needed to implement additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.

PREPARED BY:

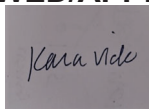
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Mark Pattillo
Regulatory Project Manager

REVIEWED/APPROVED BY:



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Kara Vick
Team Lead/Technical Expert, Corpus Christi Field Office
Regulatory Division, Galveston District

USGS Topographic Map
Moda Ingleside Oil Terminal, LLC
Ingleside, San Patricio County, Texas



Notes:

- Prepared by Belaire Environmental, Inc., October 8, 2021 (CRB).
- Base Map Source: USGS Quadrangle Map: Port Ingleside, TX (2019).
- For planning and permitting purposes only, not for construction.

0 1,000 2,000 4,000
Feet



La Quinta
Channel

Caruthers
Cove Colonia

Old Ingleside
Colonia

Approximate 350-acre Property

Ingleside
Cove

Quinta
land

Ingleside
Point

Cooks Island

Ingleside
On-the-Bay

McGlains
Bluff

Corpus
Christi
Channel

Legend

 Property Boundary

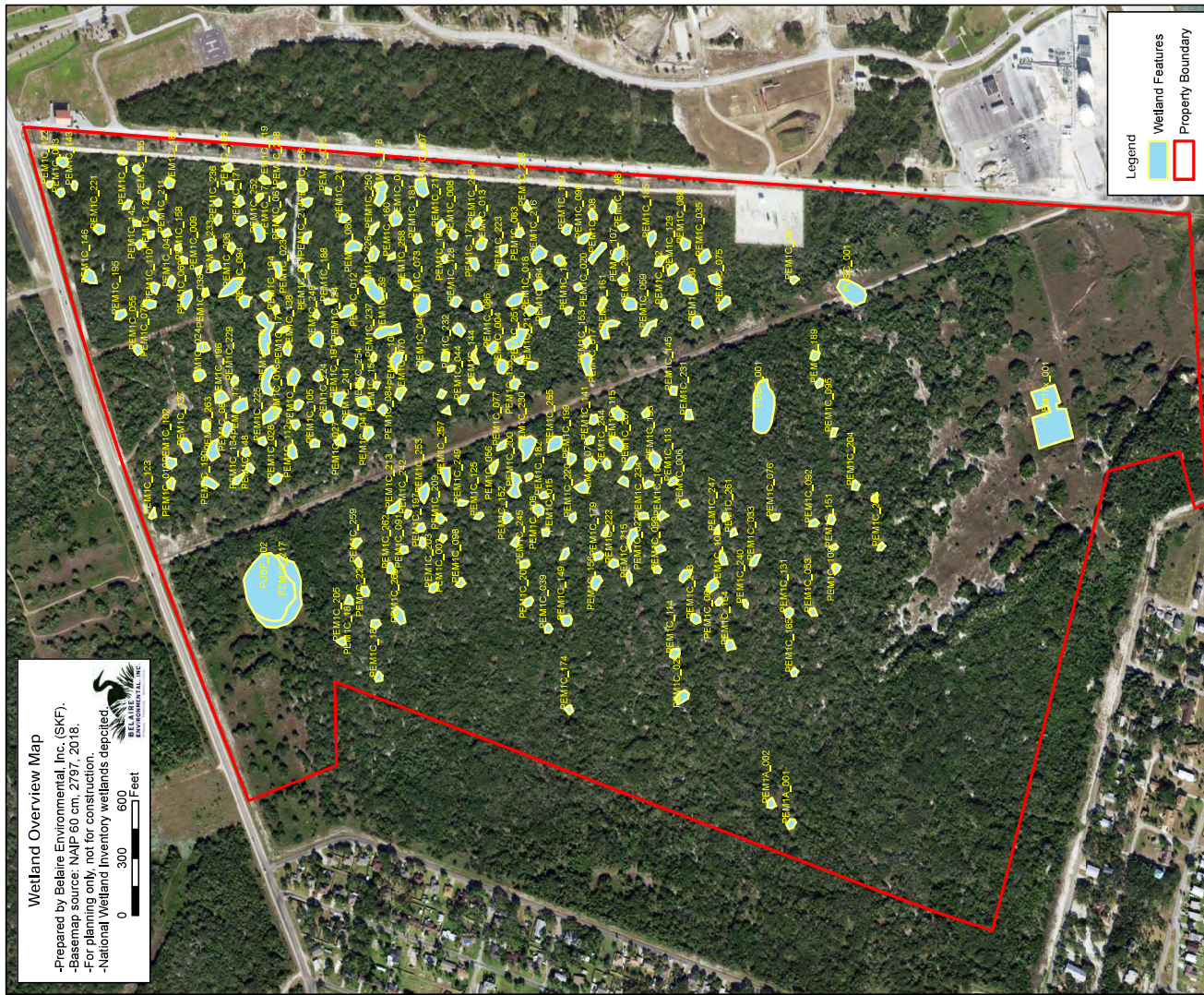
Moda Ingleside Oil Terminal, LLC
Request for USACE AJD
Ingleside, San Patricio County, Texas



PREPARED BY:
BELAIRE ENVIRONMENTAL, INC.
PO BOX 741, ROCKORT, TX 78381
October 8, 2021
page ____ of ____

ID	ATTRIBUTE	ACRES	LATITUDE	LONGITUDE
PEM149	PEMVC	0.047	27.83292	-97.21995
PEM150	PEMVC	0.084	27.83290	-97.21948
PEM151	PEMVC	0.015	27.83264	-97.21943
PEM152	PEMVC	0.035	27.83289	-97.21927
PEM153	PEMVC	0.000	27.83156	-97.21939
PEM154	PEMVC	0.016	27.83400	-97.21980
PEM155	PEMVC	0.038	27.83406	-97.21959
PEM156	PEMVC	0.055	27.83376	-97.21932
PEM157	PEMVC	0.034	27.83597	-97.21961
PEM158	PEMVC	0.015	27.83597	-97.21961
PEM159	PEMVC	0.035	27.83597	-97.21961
PEM160	PEMVC	0.016	27.83597	-97.21961
PEM161	PEMVC	0.076	27.83440	-97.21943
PEM162	PEMVC	0.033	27.83113	-97.21943
PEM163	PEMVC	0.037	27.83673	-97.21943
PEM164	PEMVC	0.038	27.83673	-97.21943
PEM165	PEMVC	0.021	27.83772	-97.21954
PEM166	PEMVC	0.027	27.83772	-97.21954
PEM167	PEMVC	0.025	27.83407	-97.21954
PEM168	PEMVC	0.025	27.83407	-97.21954
PEM169	PEMVC	0.025	27.83407	-97.21954
PEM170	PEMVC	0.025	27.83407	-97.21954
PEM171	PEMVC	0.025	27.83407	-97.21954
PEM172	PEMVC	0.025	27.83407	-97.21954
PEM173	PEMVC	0.025	27.83407	-97.21954
PEM174	PEMVC	0.025	27.83407	-97.21954
PEM175	PEMVC	0.025	27.83407	-97.21954
PEM176	PEMVC	0.025	27.83407	-97.21954
PEM177	PEMVC	0.025	27.83407	-97.21954
PEM178	PEMVC	0.025	27.83407	-97.21954
PEM179	PEMVC	0.025	27.83407	-97.21954
PEM180	PEMVC	0.025	27.83407	-97.21954
PEM181	PEMVC	0.025	27.83407	-97.21954
PEM182	PEMVC	0.025	27.83407	-97.21954
PEM183	PEMVC	0.025	27.83407	-97.21954
PEM184	PEMVC	0.025	27.83407	-97.21954
PEM185	PEMVC	0.025	27.83407	-97.21954
PEM186	PEMVC	0.025	27.83407	-97.21954
PEM187	PEMVC	0.025	27.83407	-97.21954
PEM188	PEMVC	0.025	27.83407	-97.21954
PEM189	PEMVC	0.025	27.83407	-97.21954
PEM190	PEMVC	0.025	27.83407	-97.21954
PEM191	PEMVC	0.025	27.83407	-97.21954
PEM192	PEMVC	0.025	27.83407	-97.21954
PEM193	PEMVC	0.025	27.83407	-97.21954
PEM194	PEMVC	0.025	27.83407	-97.21954
PEM195	PEMVC	0.025	27.83407	-97.21954
PEM196	PEMVC	0.025	27.83407	-97.21954
PEM197	PEMVC	0.025	27.83407	-97.21954
PEM198	PEMVC	0.025	27.83407	-97.21954
PEM199	PEMVC	0.025	27.83407	-97.21954
PEM200	PEMVC	0.025	27.83407	-97.21954

ID	ATTRIBUTE	ACRES	LATITUDE	LONGITUDE
PEM201	PEMVC	0.030	27.83539	-97.21950
PEM202	PEMVC	0.030	27.83539	-97.21950
PEM203	PEMVC	0.030	27.83539	-97.21950
PEM204	PEMVC	0.030	27.83539	-97.21950
PEM205	PEMVC	0.030	27.83539	-97.21950
PEM206	PEMVC	0.030	27.83539	-97.21950
PEM207	PEMVC	0.030	27.83539	-97.21950
PEM208	PEMVC	0.030	27.83539	-97.21950
PEM209	PEMVC	0.030	27.83539	-97.21950
PEM210	PEMVC	0.030	27.83539	-97.21950
PEM211	PEMVC	0.030	27.83539	-97.21950
PEM212	PEMVC	0.030	27.83539	-97.21950
PEM213	PEMVC	0.030	27.83539	-97.21950
PEM214	PEMVC	0.030	27.83539	-97.21950
PEM215	PEMVC	0.030	27.83539	-97.21950
PEM216	PEMVC	0.030	27.83539	-97.21950
PEM217	PEMVC	0.030	27.83539	-97.21950
PEM218	PEMVC	0.030	27.83539	-97.21950
PEM219	PEMVC	0.030	27.83539	-97.21950
PEM220	PEMVC	0.030	27.83539	-97.21950
PEM221	PEMVC	0.030	27.83539	-97.21950
PEM222	PEMVC	0.030	27.83539	-97.21950
PEM223	PEMVC	0.030	27.83539	-97.21950
PEM224	PEMVC	0.030	27.83539	-97.21950



LiDAR Overview Map
Moda Ingleside Oil Terminal, LLC
Ingleside, San Patricio County, Texas



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0 500 1,000 2,000
 Feet



Approximate 350-acre Property

Legend

 Property Boundary

Feet NAVD 88

	0.0 - 5.0
	5.1 - 6.0
	6.1 - 7.0
	7.1 - 8.0
	8.1 - 10.0
	10.1 - 12.0
	12.1 - 14.0
	14.1 - 18.0
	18.1 - 22.0
	22.1 - 26.0
	26.1 - 30.0
	30.1 - 35.0

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