

NATIVE CHAOS HOLDINGS

Independent Transparency Initiative

Pre-Release Courtesy Distribution | Independent Compliance Research

July 10, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
Region 6 — Water Programs (SDWA)
1201 Elm Street, Suite 500
Dallas, Texas 75270

Re: Pre-Release Courtesy Copy — Water System and Cross-Connection Findings, City of Chandler, Texas

Dear Region 6 Public Information Officer:

Native Chaos Holdings, an independent transparency initiative publishing independent compliance research, is pleased to provide a courtesy pre-release copy of a Non-Compliance Findings Report concerning the City of Chandler, Texas Code of Ordinances, with particular focus on water system and cross-connection provisions in Chapter 6 (Health and Sanitation) and Chapter 13 (Utilities). The research reviews publicly available provisions of the City Code against applicable federal Safe Drinking Water Act and EPA implementing regulations.

The findings within EPA's water program jurisdiction are as follows:

- HIGH — §13.03.137: Damaging/tampering with sewer system provision requires review for consistency with federal SDWA standards and statutory authority.
- HIGH — §13.06.009: Use of sanitary sewer system provision requires review for consistency with federal SDWA standards and statutory authority.
- MEDIUM — §13.04.009: Drought Contingency Plan update overdue. See TCEQ routing (Texas is the primary implementing agency for SDWA in this jurisdiction).
- MEDIUM — §6.04.003: Well-protection buffer zones extend into the ETJ. The general-law police-power authority does not extend into the ETJ absent specific statutory grant. The provisions have Safe Drinking Water Act implications for sanitary control.
- MEDIUM — Chapter 13 (Utilities) cross-references: Cross-connection control and water/wastewater systems should be reviewed for continued SDWA compliance.
- LOW — §6.04.004: Unqualified 'right of entry' for inspections lacks 'reasonable time,' notice, and credentials requirements.
- LOW — §13.03.077, §13.03.128: Cross-connection control and stormwater provisions should be cross-checked against current SDWA and EPA rules.

Findings Routed to EPA-6

Ordinance	Category	Severity	Description
§13.03.137	CONFLICT	HIGH	Damaging sewer system (SDWA implications)
§13.06.009	AUTHORITY GAP/CONFLICT	HIGH	Use of sanitary sewer system
§13.04.009	CONFLICT (TCEQ RULE)	MEDIUM	Drought Contingency Plan overdue

§6.04.003	AUTHORITY (ETJ)	MEDIUM	Well-protection buffer zones
Ch.13 Cross-Ref	CROSS-CHAPTER	MEDIUM	Cross-connection control (SDWA)
§6.04.004	CONSTITUTIONAL	LOW	Unqualified right of entry
§13.03.077	OUTDATED	LOW	Cross-connection control program
§13.03.128	OUTDATED	LOW	Stormwater/unpolluted drainage

Native Chaos Holdings intends to make the full audit report publicly available no earlier than 30 days from the date of this letter. Native Chaos Holdings respectfully requests confirmation that the water system and cross-connection provisions are consistent with applicable federal law. Any inquiries may be directed to Native Chaos Holdings using the contact information set forth above.

Respectfully submitted,

Native Chaos Holdings

Independent Transparency Initiative

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Email: Chandler@NativeChaosHolding.com

Enclosure: Independent Non-Compliance Findings Report (Full Text)

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APPENDIX — AGENCY PROFILE & DISTRIBUTION TRACKING

Agency Contact Information

Field	Value
Agency	U.S. Environmental Protection Agency
Region	Region 6 — Dallas, TX (serves Texas, Oklahoma, Louisiana, Arkansas, New Mexico, and 67 tribal nations)
Address	1201 Elm Street, Suite 500, Dallas, TX 75270
Main Phone	(214) 665-2760 / 1-800-621-8431
Public Information	(214) 665-2200
SDWA	Safe Drinking Water Act Programs
Web	https://www.epa.gov/aboutepa/epa-region-6-south-central
Email	R6press@epa.gov

Distribution Tracking

Field	Value
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Native Chaos Holdings	Independent research initiative; not affiliated with or representing the City of Chandler, its City Council, or any City official

Reviewer Notes (for Agency Use)

Native Chaos Holdings welcomes written comments and guidance from your office within 30 days of this distribution. Comments may be returned via email to Chandler@NativeChaosHolding.com with subject line including the Distribution Tracking Code above. All feedback will be incorporated into a supplemental findings annotation before public release of the full audit. This packet is provided for informational purposes only and does not represent, coordinate with, or request action by the City of Chandler, Texas, its City Council, or any other City official.

STATUTE CITATION UPDATE (July 10, 2026)

All statutory citations in this letter have been verified against the current text on statutes.capitol.texas.gov. Key precise citations include:

- LGC §54.001(b): General ordinance fine cap is \$500 (Class C misdemeanor per Penal Code §12.23); \$2,000 only for fire safety, zoning, or public health and sanitation (other than dumping or refuse).
- HS §822.042(b): Owner has 15 days to appeal a dangerous-dog determination ("Notwithstanding any other law, including a municipal ordinance"). Destruction order is stayed for 10 calendar days during appeal.
- LGC §229.001(b): Municipality may not regulate possession of a firearm or air gun in a park or public meeting place owned or leased by a political subdivision (including the city itself).
- HS §388.003: Statewide energy code (current IECC edition) is mandatory.
- Tax Code §351.101: Hotel occupancy tax revenue is strictly limited to tourism, convention, and advertising purposes — no unrestricted diversion to the general fund is permitted.
- NRC §81.0523(b)–(c): Railroad Commission has exclusive jurisdiction over oil and gas operations; subsurface well construction, casing, cementing, and pipeline permitting are preempted unless strictly limited to aboveground activity.

These updates strengthen the findings. The full updated report is enclosed.