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March 6, 2020

Ms. Jennifer Cook  
Administrative Law Judge  
Mr. John Moore  
Technical Examiner  
c/o Docket Services  
Hearings Division  
Railroad Commission of Texas  
1701 North Congress Avenue  
Austin, Texas 78701

Via efile: [Hearingsdivision.efile@rrc.texas.gov](mailto:Hearingsdivision.efile@rrc.texas.gov)

Re: Application of ConocoPhillips Company (172232) for an exception to Statewide Rule 32 for various wells and leases, Andrews and Ector Counties, Texas

Dear Judge Cook and Examiner Moore:

Attached please find a revised list of wells and leases (tables a - d) that are the subject of the referenced application and reflect the application amendment filed yesterday by ConocoPhillips Company.

Sincerely,



Jamie Nielson  
Attorney for ConocoPhillips Company

attachments

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing letter and attachments have been served on this 6th day of March 2020 to the person(s) below via email:


Jeffery Morgan ([Jeffery.Morgan@rrc.texas.gov](mailto:Jeffery.Morgan@rrc.texas.gov))

Joe Stasulli ([Joe.stasulli@rrc.texas.gov](mailto:Joe.stasulli@rrc.texas.gov))

Terry Edwards ([Terry.Edwards@rrc.texas.gov](mailto:Terry.Edwards@rrc.texas.gov))

Paul Dubois ([Paul.Dubois@rrc.texas.gov](mailto:Paul.Dubois@rrc.texas.gov))

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\_\_\_\_\_  
Jamie Nielson

**a. Individual Flare Points Serving An Individual Lease**

| Facility Name        | Lease No.                  | Flare Permit No. | Field                     | County | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9) | Commingling Permits |
|----------------------|----------------------------|------------------|---------------------------|--------|--|--|------------------------------------|---------------------------|---------------------|
| Carter               | 43547                      | 41096            | Spraberry (Trend Area)    | Ector  | 16,463                                 | 43,482                                       | 2,904                              | 10,394 - (88980)          | None                |
| Edwards Battery      | 21592                      | 41105            | Edwards West (Canyon)     | Ector  | 37,287                                 | 33,529                                       | 3,267                              | 575 (48161)               | None                |
| Hogan Battery        | 44291                      | 41124            | Spraberry (Trend Area)    | Ector  | 32,598                                 | 156,046                                      | 10,490                             | 10,394 (65398)            | None                |
| JF Cowden            | Drilling Permit No. 839382 | 41125            | Andector (Wichita Albany) | Ector  | 12,564                                 | 10,008                                       | 0                                  | 80 (110873)               | None                |
| Klink Battery        | 42806                      | 41126            | Spraberry (Trend Area)    | Ector  | 36,446                                 | 225,049                                      | 12,404                             | 3,000 (65500)             | None                |
| SFBU Battery         | 27818                      | 41128            | Andector (Ellenburger)    | Ector  | 79,178                                 | 49,228                                       | 2,268                              | 48157                     | None                |
| Worker Bee D Battery | 38670                      | 41135            | Embar (Devonian)          | Ector  | 8,560                                  | 121,626                                      | 8,511                              | 0 (53212)                 | None                |

**b. Multiple Flare Points Serving An Individual Lease**

**\*gas is separately measured at each lease**

| Facility Name     | Lease No. | Flare Permit No. | Field                     | County | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9) | Commingling Permits |
|-------------------|-----------|------------------|---------------------------|--------|--|--|------------------------------------|---------------------------|---------------------|
| Clyde Cowden 1    | 38628     | 41097            | Goldsmith (Clear Fork)    | Ector  | 33,335                                 | 33,122                                       | 4,260                              | 15,775 (048162)           | None                |
| Clyde Cowden 2    | 38628     | 41098            | Goldsmith (Clear Fork)    | Ector  | Production sent Clyde 1 or Clyde 7     | 96,442                                       | 4,204                              | 48,000 (63906)            | None                |
| Clyde Cowden 4    | 38628     | 41099            | Goldsmith (Clear Fork)    | Ector  | Production sent Clyde 1 or Clyde 7     | 50,959                                       | 1,442                              | 48,000 (63906)            | None                |
| Clyde Cowden 5    | 38628     | 41100            | Goldsmith (Clear Fork)    | Ector  | 131,677                                | 116,070                                      | 3,980                              | 48,000 (63906)            | None                |
| Clyde Cowden 6    | 38628     | 41101            | Goldsmith (Clear Fork)    | Ector  | 35,460                                 | 133,141                                      | 4,409                              | 48,000 (63906)            | None                |
| Clyde Cowden 7    | 38628     | 41102            | Goldsmith (Clear Fork)    | Ector  | 56,952                                 | 86,685                                       | 6,206                              | 48,000 (63906)            | None                |
| Cole 12 Battery   | 48686     | 41103            | Andector (Wichita Albany) | Ector  | 297,335                                | 891,271                                      | 69,074                             | 2,000 (094219)            | None                |
| Cole 13 Battery   | 48686     | 41104            | Andector (Wichita Albany) | Ector  | 87,964                                 | 259,340                                      | 11,163                             | 2,000 (094219)            | None                |
| GANDU Satellite 1 | 21193     | 41112            | Goldsmith (Clear Fork)    | Ector  | Goes to CTB (334,286 GANDU Total)      | 290,610                                      | 15,507                             | 5,000 (43683)             | 8896*               |

| Facility Name      | Lease No. | Flare Permit No. | Field                  | County | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9) | Commingled Permits |
|--------------------|-----------|------------------|------------------------|--------|--|--|------------------------------------|---------------------------|--------------------|
| GANDU Satellite 8  | 21193     | 41113            | Goldsmith (Clear Fork) | Ector  | Goes to CTB (334,286 GANDU Total)      | 151,613                                      | 14,861                             | 5,000 (43683)             | 8896*              |
| GANDU Btry 19      | 21193     | 41114            | Goldsmith (Clear Fork) | Ector  | Goes to CTB (334,286 GANDU Total)      | 117,306                                      | 15,144                             | 5,000 (43683)             | 8896*              |
| GANDU Satellite 21 | 21193     | 41115            | Goldsmith (Clear Fork) | Ector  | Goes to CTB (334,286 GANDU Total)      | 208,599                                      | 19,590                             | 5,000 (43683)             | 8896*              |
| GANDU Satellite 26 | 21193     | 41117            | Goldsmith (Clear Fork) | Ector  | Goes to CTB (334,286 GANDU Total)      | 255,403                                      | 5,207                              | 5,000 (43683)             | 8896*              |
| GANDU Satellite 31 | 21193     | 41118            | Goldsmith (Clear Fork) | Ector  | Goes to CTB (334,286 GANDU Total)      | 81,726                                       | 6,936                              | 5,000 (43683)             | 8896*              |
| GANDU Satellite 33 | 21193     | 41119            | Goldsmith (Clear Fork) | Ector  | Goes to CTB (334,286 GANDU Total)      | 120,652                                      | 8,430                              | 5,000 (43683)             | 8896*              |
| GANDU Satellite 34 | 21193     | 41120            | Goldsmith (Clear Fork) | Ector  | Goes to CTB (334,286 GANDU Total)      | 768,341                                      | 86,921                             | 5,000 (43683)             | 8896*              |

| Facility Name | Lease No. | Flare Permit No. | Field                  | County | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9) | Commingled Permits |
|---------------|-----------|------------------|------------------------|--------|--|--|------------------------------------|---------------------------|--------------------|
| GANDU Btry 36 | 21193     | 41122            | Goldsmith (Clear Fork) | Ector  | 86,115                                 | 610,520                                      | 49,142                             | 5,000 (43683)             | 8896*              |

c. Multiple Leases Serving An Individual (Central Facility) Flare Point

\*gas is separately measured at each lease

| Facility Name      | Lease No. | Flare Permit No. | Field                       | County | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9)        | Commingled Permits |
|--------------------|-----------|------------------|-----------------------------|--------|--|--|------------------------------------|----------------------------------|--------------------|
| GANDU Satellite 25 | 21193     | 41116            | Goldsmith (Clear Fork)      | Ector  | Goes to CTB (334,286 GANDU Total)      | 807,145                                      | 64,810                             | 5,000 (43683)                    | 8896*              |
|                    | 277002    |                  | Goldsmith (Clear Fork)      |        |  |  |                                    |                                  |                    |
|                    | 276993    |                  | Goldsmith (Clear Fork)      |        |  |  |                                    |                                  |                    |
| GANDU Satellite 35 | 21193     | 41121            | Goldsmith (Clear Fork)      | Ector  | Goes to CTB (334,286 GANDU Total)      | 317,343                                      | 30,518                             | 5,000 (43683)                    | 8896*              |
|                    | 277008    |                  | Goldsmith (Clear Fork)      |        |  |  |                                    |                                  |                    |
|                    | 276995    |                  | Goldsmith (Clear Fork)      |        |  |  |                                    |                                  |                    |
| GANDU Satellite 37 | 21193     | 41123            | Goldsmith (Clear Fork)      | Ector  | Goes to CTB (334,286 GANDU Total)      | 363,558                                      | 33,615                             | 5,000 (43683)                    | 8896*              |
|                    | 153073    |                  | Goldsmith (Clear Fork)      |        |  |  |                                    |                                  |                    |
|                    | 153075    |                  | Goldsmith (Clear Fork)      |        |  |  |                                    |                                  |                    |
| South Cowden       | 36738     | 41129            | Cowden, South (Canyon 8900) | Ector  | 44,832                                 | 0  | 0                                  | 39,190 (48157)<br>75,000 (87670) | None               |
|                    | 19297     |                  | Cowden, South               |        |  |  |                                    |                                  |                    |

**d. Commingled Leases Serving An Individual (Central Facility) Flare Point**

| Facility Name | Lease No. | Flare Permit No. | Field                            | County  | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9) | Commingled Permits |
|---------------|-----------|------------------|----------------------------------|---------|--|--|------------------------------------|---------------------------|--------------------|
| Bum -A-       | 02123     | 41095            | Goldsmith (Clear Fork)           | Andrews | 90,320                                 | 631,155                                      | 34,117                             | 4000 - (66494)            | 7550, 6272         |
|               | 47514     |                  | Embar (Permian)                  | Ector   |  |  |                                    |                           |                    |
| Embar 6       | 168966    | 41106            | Loretta (Glorietta)              | Ector   | 30,435                                 | 73,122                                       | 3,304                              | 7,264 (048172)            | 2728, 8975         |
|               | 18589     |                  | Goldsmith, N. (San Andres, Con.) |         |  |  |                                    |                           |                    |
|               | 36899     |                  | Goldsmith (Clear Fork)           |         |  |  |                                    |                           |                    |
|               | 46182     |                  | Goldsmith (Holt)                 |         |  |  |                                    |                           |                    |
| Embar B-1     | 01267     | 41107            | Embar (Devonian)                 | Andrews | 72,651                                 | 1,199,973                                    | 58,696                             | 12,034 (48193)            | 5877               |
|               | 38003     |                  | Goldsmith (Clear Fork)           |         |  |  |                                    |                           |                    |
|               | 01269     |                  | Embar (Permian)                  |         |  |  |                                    |                           |                    |
|               | 37930     |                  | Embar (Devonian)                 |         |  |  |                                    |                           |                    |



| Facility Name                     | Lease No. | Flare Permit No. | Field                            | County  | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9) | Commingled Permits |
|-----------------------------------|-----------|------------------|----------------------------------|---------|--|--|------------------------------------|---------------------------|--------------------|
| Embar B-2                         | 19710     | 41108            | Goldsmith (Clear Fork)           | Andrews | 105,571                                | 1,451,800                                    | 144,064                            | 14,000 (63907)            | 2238, 7178         |
|                                   | 38003     |                  | Goldsmith (Clear Fork)           |         |  |  |                                    |                           |                    |
|                                   | 033072    |                  | Goldsmith, N (San Andres, Con.)  |         |  |  |                                    |                           |                    |
|                                   | 030885    |                  | Goldsmith, N (San Andres, Con.)  |         |  |  |                                    |                           |                    |
|                                   | 01269     |                  | Embar (Permian)                  |         |  |  |                                    |                           |                    |
| Embar WCAB                        | 46261     | 41109            | Andector (Wichita Albany)        | Ector   | 135,268                                | 1,228,956                                    | 110,451                            | 31,000 (90567)            | 2728               |
|                                   | 36899     |                  |                                  |         |  |  |                                    |                           |                    |
|                                   | 049985    |                  |                                  |         |  |  |                                    |                           |                    |
| Frank A Battery                   | 25483     | 41110            | Goldsmith, N. (San Andres, Con.) | Ector   | 20,553                                 | 85,359                                       | 5,466                              | 25,280 (48192)            | 2846               |
|                                   | 38003     |                  | Goldsmith (Clear Fork)           |         |  |  |                                    |                           |                    |
| Frank -B- Clearfork Battery       | 46119     | 41111            | Andector (Wichita Albany)        | Ector   | 73,842                                 | 306,415                                      | 11,024                             | 11,159 (48191)            | 7372               |
|                                   | 00221     |                  | Andector (Ellenburger)           |         |  |  |                                    |                           |                    |
|                                   | 36889     |                  | Goldsmith (Clear Fork)           |         |  |  |                                    |                           |                    |
|                                   | 37161     |                  | Goldsmith                        |         |  |  |                                    |                           |                    |
|                                   | 47355     |                  | Embar (Permian)                  |         |  |  |                                    |                           |                    |
| McEntire Battery                  | 28901     | 41127            | Goldsmith, N. (San Andres, Con.) | Ector   | 6,892                                  | 76,710                                       | 4,003                              | 25,150 (48190)            | 2108               |
|                                   | 35839     |                  |                                  |         |  |  |                                    |                           |                    |
| University Andrews 1E/11T Battery | 01270     | 41130            | Embar (Permian)                  | Andrews | 214,767                                | 1,594,984                                    | 112,557                            | 1,938 (48187)             | 6858, 6742         |
|                                   | 036400    |                  | Goldsmith, N. (San Andres Cons.) |         |  |  |                                    |                           |                    |
|                                   | 152974    |                  | Embar (Permian)                  |         |  |  |                                    |                           |                    |

| Facility Name                 | Lease No. | Flare Permit No. | Field                            | County  | 1 Year Production (Oil) 9/1/18-8/31/19 | 1 Year Production (Total Gas) 9/1/18-8/31/19 | 1 Year Flare Volume 9/1/18-8/31/19 | H <sub>2</sub> S PPM (H9) | Commingled Permits |
|-------------------------------|-----------|------------------|----------------------------------|---------|--|--|------------------------------------|---------------------------|--------------------|
| University Andrews 7T Battery | 01270     | 41131            | Embar (Permian)                  | Andrews | 93,110                                 | 1,649,629                                    | 85,433                             | 48187<br>1,938<br>(48187) | 6858, 6094         |
|                               | 178521    |                  | Tenacity (Glorieta)              |         |  |  |                                    |                           |                    |
|                               | 36270     |                  | Tenacity (Glorieta)              |         |  |  |                                    |                           |                    |
|                               | 167292    |                  | Goldsmith, N. (San Andres, Con.) |         |  |  |                                    |                           |                    |
| University 12T                | 01270     | 41132            | Embar (Permian)                  | Andrews | 77,405                                 | 452,847                                      | 31,238                             | 48188<br>180<br>(48188)   | 6859               |
|                               | 36270     |                  | Tenacity (Glorieta)              |         |  |  |                                    |                           |                    |
| University 14T                | 01270     | 41133            | Embar (Permian)                  | Andrews | 80,160                                 | 246,157                                      | 14,413                             | 48187                     | 1053               |
|                               | 50602     |                  |                                  |         |  |  |                                    |                           |                    |
|                               | 50603     |                  |                                  |         |  |  |                                    |                           |                    |
| University UA1                | 37642     | 41134            | Martin (Consolidated)            | Andrews | 19,132                                 | 118,636                                      | 6,808                              | 1,938<br>(48187)          | 6094               |
|                               | 02170     |                  |                                  |         |  |  |                                    |                           |                    |

**David Cornett**

---

**From:** Jamie Nielson <jamie@nielsonlegal.com>  
**Sent:** Friday, March 6, 2020 12:23 PM  
**To:** Hearingsdivision.efile  
**Cc:** Jeffery Morgan; Joe Stasulli; Terry Edwards; Paul Dubois; docketervices; Megan Schimcek  
**Subject:** Application of ConocoPhillips Company (172232) for an exception to Statewide Rule 32 for various wells and leases, Andrews and Ector Counties, Texas  
**Attachments:** ConocoPhillips Company's revised list of wells and leases Statewide Rule 32 exception application Andrews and Ector Counties 3 6 2020.pdf

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Attached is ConocoPhillips Company's revised list of wells and leases that make up its amended application for an exception to Statewide Rule 32, Andrews and Ector Counties, Texas

Jamie Nielson  
  
P.O. Box 30530  
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**From:** Jamie Nielson <jamie@nielsonlegal.com>  
**Date:** Thursday, March 5, 2020 at 1:51 PM  
**To:** RRC efile hearings division <Hearingsdivision.efile@rrc.texas.gov>  
**Cc:** Jeffery Morgan <Jeffery.Morgan@rrc.texas.gov>, Joe Stasulli <Joe.Stasulli@rrc.texas.gov>, Terry Edwards <Terry.Edwards@rrc.texas.gov>, Paul Dubois <Paul.Dubois@rrc.texas.gov>, Docket Services

<docketservices@rrc.texas.gov>, Megan Schimcek <megan.schimcek@rrc.texas.gov>

**Subject:** Application of ConocoPhillips Company (172232) for an exception to Statewide Rule 32 for various wells and leases, Andrews and Ector Counties, Texas

Attached is ConocoPhillips Company's amendment to its application for an exception to Statewide Rule 32 for various wells and leases, Andrews and Ector Counties, Texas

Jamie Nielson

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---

**From:** Megan Schimcek <megan.schimcek@rrc.texas.gov>

**Date:** Thursday, February 27, 2020 at 8:28 AM

**To:** Jamie Nielson <jamie@nielsonlegal.com>

**Cc:** Jeffery Morgan <Jeffery.Morgan@rrc.texas.gov>, Joe Stasulli <Joe.Stasulli@rrc.texas.gov>, Terry Edwards <Terry.Edwards@rrc.texas.gov>, Paul Dubois <Paul.Dubois@rrc.texas.gov>, Docket Services <docketservices@rrc.texas.gov>

**Subject:** ConocoPhillips Request for Clarification

**Application of ConocoPhillips Company for an Exception to Statewide Rule 32 for Various Wells and Leases, Andrews and Ector Counties, Texas**

Good morning:

Attached is a Request for Clarification for the above-referenced application.

Megan Schimcek  
Paralegal, Hearings Division  
Railroad Commission of Texas  
(512) 463-6793

