



1206 San Antonio Street  
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May 15, 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 Email: [docketservices@rrc.texas.gov](mailto:docketservices@rrc.texas.gov)

2020 MAY 18 AM 8:07  
DOCKET SERVICES  
RAILROAD COMMISSION  
OF TEXAS  
FILED

RE: **O&G Docket No. OG-20-00002131**: APPLICATION OF CONOCOPHILLIPS COMPANY PURSUANT TO STATEWIDE RULE 32 FOR AN EXCEPTION TO FLARE GAS FOR THE CARTER (43547) LEASE, FLARE PERMIT NO. 41096, SPRABERRY (TREND AREA) FIELD, ECTOR COUNTY, TEXAS; DISTRICT 08

**O&G Docket No. OG-20-00002141**: CONOCOPHILLIPS COMPANY PURSUANT TO STATEWIDE RULE 32 FOR AN EXCEPTION TO FLARE GAS FOR THE COWDEN, CLYDE (38628) LEASE, FLARE PERMIT NO. 41097, GOLDSMITH (CLEAR FORK) FIELD; ECTOR COUNTY, TEXAS; DISTRICT 08

**O&G Docket No. OG-20-00002142**: CONOCOPHILLIPS COMPANY PURSUANT TO STATEWIDE RULE 32 FOR AN EXCEPTION TO FLARE GAS FOR THE COWDEN, CLYDE (38628) LEASE, FLARE PERMIT NO. 41098, GOLDSMITH (CLEAR FORK) FIELD; ECTOR COUNTY, TEXAS; DISTRICT 08

**O&G Docket No. OG-20-00002143**: CONOCOPHILLIPS COMPANY PURSUANT TO STATEWIDE RULE 32 FOR AN EXCEPTION TO FLARE GAS FOR THE COWDEN, CLYDE (38628) LEASE, FLARE PERMIT NOS. 41099, GOLDSMITH (CLEAR FORK) FIELD; GOLDSMITH (CLEAR FORK) FIELD; ECTOR COUNTY, TEXAS; DISTRICT 08

**O&G Docket No. OG-20-00003529**: CONOCOPHILLIPS COMPANY (OPERATOR NO. 172232) PURSUANT TO STATEWIDE RULE 32 FOR AN EXCEPTION TO FLARE GAS FOR THE BUM -A- (02123) AND (47514) LEASES; BUM -A- FACILITY; FLARE PERMIT NO. 41095; GOLDSMITH (CLEAR FORK) AND EMBAR (PERMIAN) FIELDS, ANDREWS AND ECTOR COUNTIES, TEXAS; DISTRICT 08.

Dear Judge Cook and Examiner Moore:

On behalf of Texas Campaign for the Environment, Environment Texas, and the Sierra Club, we respectfully request to be added to the Notice List in the above-referenced dockets. We further request to be admitted as a Party-Intervenor in the above referenced docket.

Our interest in this matter is the protection of the health and welfare of our organizations' members who are directly affected by the flaring exceptions being requested. If we are admitted as a party, we will demonstrate to you that granting the requested flaring exceptions will cause and contribute to impermissible degradation of air quality. We will also show you that the Railroad Commission lacks the legal authority to grant the requested flaring exceptions, absent a demonstration that this application meets federal Clean Air Act requirements.

Due to the Covid pandemic, please serve all notices via E-mail if at all humanly possible.

Sincerely,



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Ilan Levin  
Environmental Integrity Project  
1206 San Antonio Street  
Austin, Texas 78701  
[ilevin@environmentalintegrity.org](mailto:ilevin@environmentalintegrity.org)  
Phone (512) 619-7287

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing has been served on this 15<sup>th</sup> day of May, 2020, to the persons below via email:

Jamie Nielson, Attorney for ConocoPhillips, [jamie@nielsonlegal.com](mailto:jamie@nielsonlegal.com)

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)

Docket Services, [docketservices@rrc.texas.gov](mailto:docketservices@rrc.texas.gov)



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Ilan Levin

**Melissa Stovall**

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**From:** Ilan Levin <ilevin@environmentalintegrity.org>  
**Sent:** Friday, May 15, 2020 7:06 PM  
**To:** docketservices  
**Cc:** jamie@nielsonlegal.com; Jeffery Morgan; Joe Stasulli; Terry Edwards; Paul Dubois  
**Subject:** Docket Nos. OG-20-00002131, 2141, 2142, 2143, 3529  
**Attachments:** Environmental Groups Notification re Request for Party Status\_OG  
Docket\_ConocoPhillips\_SWR32\_05152020.pdf

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Dear Judge Cook, Examiner Moore, and Parties:  
Please find attached our letter regarding ConocoPhillips' application for flaring exceptions pursuant to Statewide Rule 32.

Respectfully,

Ilan Levin  
Environmental Integrity Project  
512-619-7287

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