

Control Number: 37956



Item Number: 309

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## July 28, 2010

Filing Clerk Public Utility Commission of Texas 1701 N. Congress Avenue PO Box 13326 Austin, Texas 78711-3326

RE:

SOAH DOCKET NO. 473-10-1406

PUC DOCKET NO. 37956

APPLICATION OF CROSS TEXAS TRANSMISSION, LLC FOR A

CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE GRAY TO TESLA 345KV TRANSMISSION LINE (FORMERLY PANHANDLE BB TO

TESLA) IN GRAY, WHEELER, DONLEY, COLLINGWORTH, HALL

AND/OR CHILDRESS COUNTIES

Vall

Dear Public Utility Commission of Texas:

Attached please find the original and 4 copies of Minco Oil and Gas, LP's response to Cross Texas Transmission, LLC's first request for information in the above case.

Sincerely yours,

Minco Oil and Gas, LP

S. Gene Hall, Partner

# RESPONSES TO REQUEST FOR INFORMATION

1-1 Please list each route or link that you oppose or contest in this proceedings

RESPONSE: Proposed Link P&O

1-2 Please provide the general factual bases for why you contest each route and link that you oppose or contest

RESPONSE: See S. Gene Hall's Testimony, dated 6/30/10.

1-3 Please list route or link that you support in this proceeding

RESPONSE: None. If the Commission approves Link P we have proposed that it be rerouted along the east boundary line of our property.

1-4 Please list and describe all Structures that exist on any property you own that will be crossed by one of Cross Texas' proposed transmission line routes. In this description of each Structure, please provide the following detail: (1) the date the Structure was installed or constructed; (2) the height of each Structure; (3) the material(s) the Structure is made of; (4) the location of each Structure; (5) the location of each Structure in relation to the proposed transmission line; and (6) the distance from the Structure to the proposed transmission line.

RESPONSE: Double-wide Mobil Home located on Section 28, Blk. 24, H&GN Survey. Cross Texas Link P goes within 165.7 feet of the Mobil Home. It is a 1978 Model and weighs 12,000 pounds. The trailer house is 20 feet tall. It is made of wood and has 1,680 sq. feet.

Six Windmills approximately 30 feet high. These were installed from 1978 to 1980. See their location on the map given to the Staff of the Public Utility Commission with a letter dated 6/22/2010.

Four miles of fence built from 1978 to 1980. See soil conservation map attached to 6/22/2010 letter to the Staff of the Public Utility Commission.

1-5 Please list and describe all Improvements that exist on any property you own that will be crossed by one of Cross Texas' proposed transmission line routes. In the description of each Improvement, please provide the following detail: (1) the date the Improvement was installed or constructed; (2) the dimensions of each Improvement; (3) the material(s) the Improvement is made of: (4) the location of each Improvement; (5) the location of each Improvement in relation to the proposed transmission line; and (6) the distance from the Improvement to the proposed transmission line.

RESPONSE: 20 acre lake on Section 28, Blk. 24, H&GN Survey, Wheeler County, Texas. You can see it on the aerial map. It was constructed in 1976. This lake is 667 hundred feet from Cross Texas proposed Link P.

1-6 Please provide a copy of any documents concerning communications or correspondence you have had with any other Intervenor related to this docket or the issues arising in this docket.

RESPONES: Minco has not been furnished with anything that Cross Texas has not also received.

- 1-7 Is any witness on your behalf testifying as an expert in this docket? If so, please provide the following:
  - a. the expert's name, address and telephone number;
  - b. the subject matter on which the expert will testify;
  - c. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this docket regardless of which and how the factual information was acquired;
  - d. the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them;
  - e. all documents, tangible things, reports, models or data compilations that have been provided to, reviewed by or prepared by or for the expert in anticipation of a testifying expert's testimony;
  - f. the expert's current resume and bibliography;
  - g. a listing of cases in which the expert has submitted testimony. Further, provide the docket number, jurisdiction, the company for whom testimony was submitted and the topics addressed in his testimony.
  - h. a complete copy of all prior testimonies submitted by the expert relating to the topic the expert will address in this docket. This should include all exhibits and rebuttal testimony; and
  - i. all articles, speeches, published materials and peer-reviewed material written by the expert.

#### RESPONSE: No

- 1-8 If in response to RFI 1-6 above, you identified a testifying expert witness in this docket, please provide the following for any consulting expert in this docket employed by you whose mental impressions or opinions have been reviewed by a testifying expert:
  - a. the expert's name, address and telephone number;
  - b. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this docket regardless of which and how the factual information was acquired;
  - c. the experts mental impressions and opinions formed or made in connection with this docket and any methods used to derive them;
  - d. all documents, tangible things, reports, models or data compilations that have been provided to, reviewed by or prepared by or for the expert in anticipation of a testifying expert's testimony; and
  - e. the consulting expert's current resume and bibliography.

RESPONSE: We don't have an expert witness.

- 1-9 For any non-expert witness testifying on your behalf in this docket, please provide the following:
  - a. the witness' name, address and telephone number;
  - b. the witness's resume and work history;
  - c. the subject matter on which the witness will testify;
  - d. copies of all articles, speeches, published materials created by or attributed to the witness; and
  - e. a list of all dockets in which the witness has submitted testimony and/or testified.

RESPONSE: S. Gene Hall, Partner of Minco Oil and Gas, LP. His address is PO Box 2317, Pampa, Texas, 79066. His telephone number is 806-669-6805.

Mr. Hall has a business degree from the University of Texas. He had a real estate license and sold farming and grassland until 1957. He became a C.P.A. then. He formed Minco Oil and Gas, Co. in 1965 and has been active in oil and gas production and exploration from that date. Mr. Hall started Minco with \$1,500.00 capital. Minco now operates fifty oil and gas wells. It has non-operating interest in over 100 deep wells in Wheeler and Hemphill County. It also has over 2000 acres of minerals and royalties in the same two counties. In 1972 Minco also went into the farming and cattle business. Mr. Hall since 1972 has purchased 11,537 acres of ranch and farm land for Minco.

Mr. Hall has worked with and testified before County Appraisal Boards in Moore, Carson, Gray, Wheeler and Hemphill Counties in Texas each year since 1989. It's been necessary for him to do this so Minco would be taxed at the "fair market" valued for advalorem taxes.

Mr. Hall is well qualified to determine that Cross Texas' proposed Link P & O will decrease the market value of Minco's property.

1-10 For any witness testifying in this docket on you behalf, please describe each individual witness' professional and/or practical experience associated with electric transmission line certification, construction, operation, or maintenance. If a witness has no experience in these areas, please state this fact.

RESPONSE: Minco does not have a witness with experience with electrical transmission lines.

Respectfully Submitted,

S. Gene Hall, Partner of Minco Oil and Gas, LP

#### **VERIFICATION**

#### STATE OF TEXAS

### **COUNTY OF GRAY**

BEFORE ME, the undersigned authority, a Notary Public, in and for said county and state, on this day personally appeared S. Gene Hall, who, after being duly sworn, upon his oath stated;

"My name is S. Gene Hall. I am an Intervenor for Minco Oil and Gas, LP in the above styled and numbered cause. I have read and examined the attached Cross Texas Transmission, LLC's First Request for Information, and all responses contained herein are true and correct".

S. Gene Hall, Partner

SUBSCRIBED AND SWORN to me by the said S. Gene Hall to certify which witness my hand and seal of office this -29 day of July, 2010.

Notary Public, State of Texas

LYNETTE J. DEAN
NOTARY PUBLIC,
STATE OF TEXAS
Alv Commission Expires 11-01-2012