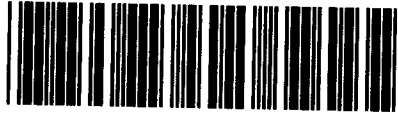




Control Number: 38290



Item Number: 374

Addendum StartPage: 0



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was provided to counsel for Sharyland Utilities, L.P. by hand delivery, email, facsimile, and/or First Class Mail, on this 13th day of September, 2010.

  
MELISSA A. LONG

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-1**

Please provide copies of all documents on which Mary Corrigan relied in connection with preparing her Direct Testimony or which formed the basis for her opinions and recommendations set forth in that Direct Testimony.

**RESPONSE:**

Mary Corrigan relied upon her many years of personal experience in owning, managing and taking care of her property. She did not rely on any documents in preparing her testimony.

Prepared by: Mary Corrigan

Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-2**

Please identify each area in which Ms. Corrigan is proffered as an expert.

**RESPONSE:**

Mary Corrigan will not be proffered as an expert in this proceeding.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-3**

(Direct Testimony of Ms. Corrigan, Page 5, lines 5-7) -- Please state whether any of Sharyland's proposed alternative transmission line routes cross the Elkins Ranch. If any routes do cross the Elkins Ranch, please indicate the approximate locations of the lines on the map requested by SU-PNPDC 1-5 below.

**RESPONSE:**

The proposed routes do not cross the Elkins Ranch.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-4**

Please state when PNPDC was formed and identify the principal organizer or organizers of the group.

**RESPONSE:**

PNPDC was formed in September of 2009. Susan Rogers, David Currie, and Bob Currie were the principal organizers.

Prepared by: Susan Rogers  
Sponsored by: Susan Rogers

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-5**

(Direct Testimony of Ms. Corrigan, Page 4, lines 12-19) -- Please provide an accurate scaled map with compass directions showing the boundaries of the Elkins Ranch on an aerial or U.S.G.S. topographic base map.

**RESPONSE:**

Ms. Corrigan does not have the type of map requested. However, please see attached Potter Randall Appraisal District Map included as Attachment SU-PNPDC 1-5. All properties on the map listed under Reeves Ellen Louise Trust are part of the Elkins Ranch. The ownership of Sections 90, 91, 92, 69, and the southern halves of 70 and 71, Block 6, I&GN RR Co. Survey, Randall County, Texas are held in the name of Reeves Ellen Louise Trust.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan



**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-6**

(Direct Testimony of Ms. Corrigan, Page 4, lines 12-19) -- Please provide the total size of the Elkins Ranch in acres.

**RESPONSE:**

The total size of the Elkins Ranch is approximately 3,200 acres.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-7**

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through Page 9, line 7) -- Please provide a location map and a written description of all roads and jeep trails used for the jeep tours and other activities described in Ms. Corrigan's Direct Testimony, including but not limited to the "Black Hawk Tour," "Hidden Spring Tour," "Spirit of Palo Duro Tour," "Cowboy Morning" breakfast, "Chuck Wagon Supper," and "Old West Shows."

**RESPONSE:**

The Elkins Ranch does not have any maps showing the location of the jeep tours at this time. However, a description of the routes of the jeep tours is provided below.

The "Black Hawk Tour" goes from Elkins Ranch headquarters to a "plateau level," which is about halfway to the bottom of the canyon. The trail then travels north along the plateau level.

The "Hidden Spring Tour" goes into Cooley Draw, which is called "Hidden Spring Canyon," across from the Elkins Ranch headquarters. Then it heads west and north, through Cooley Draw, before travelling out into the main canyon. The trail then heads north along the plateau level.

The "Spirit of the Palo Duro Tour" leaves from the southeast canyon rim on the Elkins Ranch and makes its way to a plateau to the north. The trail then heads north and takes a road down to the canyon floor. The trail then crosses the river and travels along the east side of the river, heading north. Then the tour passes east into the area that goes toward the east canyon wall.

The "Cowboy Morning," "Old West Shows," and "Chuckwagon Supper" events take place close to Elkins Ranch headquarters on the plateau just north of the headquarters and near the area where the cow camp is located.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-8**

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through Page 9, line 7) – Are roads and jeep trails for all jeep tours described in Ms. Corrigan's Direct Testimony located entirely on the Elkins Ranch?

**RESPONSE:**

Yes.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-9**

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through Page 9, line 7) – Are any roads within Palo Duro Canyon State Park used for all or portions of any of the jeep tours described in Ms. Corrigan's Direct Testimony? If so, please describe which roads within the State Park are utilized and the frequency of utilization by the jeep tours.

**RESPONSE:**

No. All of the tours are conducted on the Elkins Ranch property.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

**SU-PNPDC 1-10**

(Direct Testimony of Ms. Corrigan, Page 7, line 14 through Page 9, line 7) – Please provide a listing and all documents pertaining to the formal educational experience or training in any of the biological sciences for Ms. Corrigan and all Elkins Ranch tour guides and staff.

**RESPONSE:**

To her knowledge, Mary Corrigan and the staff of Elkins Ranch do not have formal education, experience, or training in any of the biological sciences.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan

**PNPDC AND ELKIN RANCH'S  
RESPONSE TO SHARYLAND'S  
FIRST REQUEST FOR INFORMATION**

**REQUEST:**

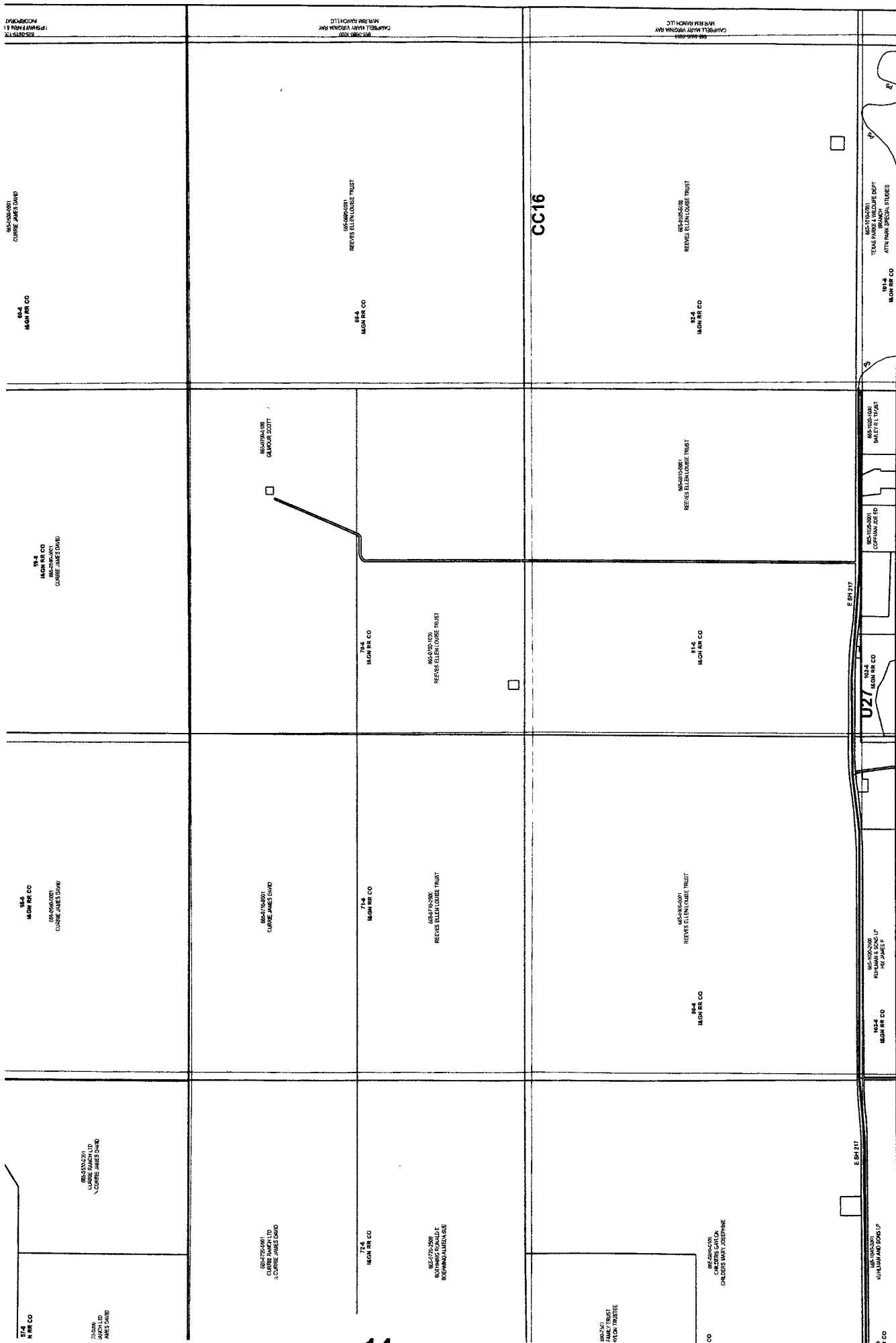
**SU-PNPDC 1-11**

Please state the approximate distance that the Elkins Ranch is located from the two links that cross the Canyon (Links V and AA).

**RESPONSE:**

Mary Corrigan does not know the distance. The lines that cross the canyon along Link AA would be within the visual sight of the jeep tours as described in her testimony.

Prepared by: Mary Corrigan  
Sponsored by: Mary Corrigan



Attachment  
PNPDC Response to  
SU-PNPDC-1-05