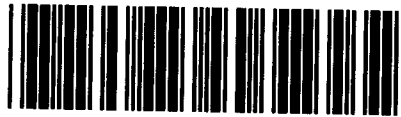


Control Number: 38295



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Addendum StartPage: 0

SOAH DOCKET NO. 473-10-4788
PUC DOCKET NO. 38295

APPLICATION OF WIND ENERGY
TRANSMISSION TEXAS, LLC FOR A
CERTIFICATE OF CONVENIENCE AND
NECESSITY FOR THE PANHANDLE AD
TO CENTRAL B (COTTONWOOD TO
DERMOTT) 345 KV CREZ
TRANSMISSION LINE IN DICKENS,
KENT, AND SCURRY COUNTIES

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

RECEIVED
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PUBLIC UTILITY COMMISSION
FILING CLERK

**SPUR RANCH LLC'S FIRST REQUEST FOR INFORMATION TO
OCCIDENTAL PERMIAN, LTD., PERMIAN BASIN LIMITED PARTNERSHIP
AND OXY USA WTP LP**

SPUR RANCH, LLC ("Spur Ranch") submits the attached Requests for Information ("RFIs") to Occidental Permian, Ltd., Permian Basin Limited Partnership and Oxy USA WTP LP (collectively "Occidental"), by and through its counsel of record.

Instructions

1. Occidental's response to the attached discovery requests should be filed and served upon Spur Ranch within ten (10) calendar days from receipt by Occidental or its counsel. These RFIs are continuing in nature, and, should there be a change or modification necessary in your answers, a supplement to your original answer should be filed in accordance with P.U.C. PROC. R. § 22.144(i). Please identify at the end of each answer the person or persons most knowledgeable about such response and the person or persons responsible for the preparation of such response.

2. Spur Ranch requests that Occidental answer these RFIs under oath or stipulate in writing that its RFI responses can be treated exactly as if the responses were filed under oath.

3. In producing documents pursuant to these RFIs, Occidental should number each document and indicate the specific question(s) or request(s) in response to which the document is being produced. To the extent that any document falls within the scope of multiple requests, multiple productions are not contemplated; one production referencing the multiple requests will be sufficient.

4. When a request asks for the production of a study, report, or supporting inputs for assumptions, such data should be provided in useable PC-based electronic format when available.

5. With respect to any document that you deem privileged, please provide a statement, setting forth as to each:

- (a) The type of document involved;
- (b) The date appearing on the document, or if no date appears, the date on which the document was prepared;
- (c) The name of the person(s) to whom the document was addressed;
- (d) The name of the person(s) who signed the document or, if not signed, the name of the person(s) who prepared it; and
- (e) The specific ground(s) upon which the claim of privilege rests.

6. For any information that you claim is unavailable, state why it is unavailable.

7. A request for "all documents" or "any documents" contemplates a complete production of materials relating to the referenced subject matter but is not intended to seek a duplicative or cumulative production of documents. To the extent that the production of one set of documents is fully responsive to the information requested, Spur Ranch does not seek (and Occidental need not produce) duplicate sets of hard-copy documents that also address the same matters. This instruction does not excuse

Occidental of its obligation to produce documents in both written and electronic format where available, pursuant to instruction #4.

8. Service on Spur Ranch should be made in person, by email, or by facsimile to:

Lawrence S. Smith
Dineen J. Majcher
Smith & Majcher
816 Congress Avenue, Suite 1270
Austin, Texas 78701
Phone: (512) 322-9044
Fax: (512) 322-9020

Definitions

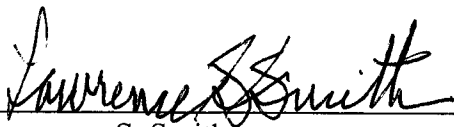
For purposes of these discovery requests, the terms set forth below shall have the following meanings:

1. "Commission" means the Public Utility Commission of Texas.
2. "Document" or "Documents" mean(s) any written, recorded or graphic matter, however produced or reproduced, on any medium of any description in your actual or constructive possession, custody, or control upon which intelligence or information is recorded or from which intelligence or information can be retrieved; and every copy of such writing or record where the original is not in your possession, custody, or control.
3. "Identify," when used in connection with an act, shall mean to state a description of the act, including the place, date, and time of its occurrence, and the identity of the person, persons, or entities that engaged in and/or witnessed the act.
4. "Identify," when used with reference to a "document," shall mean to state the type of document (e.g., book, magazine, article, circular, ledger, letter, memoranda, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author/addresser, addressee, indicated or blind copies, subject matter, volume and page number or other means of general identification, approximate size and number of pages, any attachments or appendices, and the date on which it was made or prepared.

5. "Identify," when used with reference to a natural person, shall mean to state the full name, present business address, and the occupation of that person during the time period indicated by these requests for information, and the relationship, if any, of that person to your company.
6. "Person" means any natural person, firm, corporation, association, partnership, or other organization or form of legal entity.
7. "Relate, mention or pertain" means documents containing, showing, relating, mentioning, referring or pertaining in any way, directly, or indirectly to, or in legal, logical or factual way or connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by such request.
8. "You" or "Your" means Occidental and includes all officers, agents, employees, representatives, or consultants.

Respectfully submitted,

SMITH & MAJCHER
816 Congress Avenue, Suite 1270
Austin, Texas 78701
512/322-9044
512/322-9020 facsimile

By: 
Lawrence S. Smith
State Bar No. 18639000

Dineen J. Majcher
State Bar No. 12851236

ATTORNEYS FOR SPUR RANCH, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing First Request for Information was served on Occidental Permian, Ltd., Permian Basin Limited Partnership and Oxy USA WTP LP (collectively "Occidental") by facsimile, hand-delivery, or electronic mail, on the 2nd day of August, 2010.


Lawrence S. Smith

**SPUR RANCH'S FIRST REQUEST FOR INFORMATION TO
OCCIDENTAL PERMIAN, LTD., PERMIAN BASIN LIMITED PARTNERSHIP
AND OXY USA WTP LP (COLLECTIVELY "OCCIDENTAL")**

- 1-1: Several of Wind Energy Transmission Texas' (WETT's) maps show the existence of an existing 138 kV transmission line crossing what appears to be the Salt Creek Field Unit mentioned in your Motion to Intervene. WETT's maps also show what appear to be several 69 kV lines and two substations as being located on the Unit. Are these maps correct as to these features? Are all of transmission level lines and substations which are present on the Unit shown on the WETT map?
- 1-2: Are there also above ground distribution level electrical facilities present in the Salt Creek Field Unit?
- 1-3: Is it correct that the transmission and distribution facilities inquired of in the preceding two questions are indispensable to your operation of the Salt Creek Field Unit?
- 1-4: Please describe in complete detail how the existing 138 kV and 69 kV transmission lines interfere with your "operations and oil production business" (motion to intervene, para. 3) in the Salt Creek Field Unit.
- 1-5: Please describe in detail how a 345 kV transmission line, placed as shown on WETT's maps, would interfere with your operations and oil production business in the Salt Creek Field Unit. Please provide a complete and specific answer.
- 1-6: Please provide a list of all pieces of oil field equipment (wells, pumps, compressors or other stationary equipment or property used in your oil field operations) which lie within 500 feet of the 138 kV transmission line which traverses the Salt Creek Field Unit.
- 1-7: For each piece of equipment listed in response to the previous question, please describe how the presence of the 138 kV transmission line directly impacts and interferes with the operation of that equipment, or state that the line does not interfere with the equipment or its operation.
- 1-8: Please provide a list of all pieces of oil field equipment (wells, pumps, compressors or other stationary equipment or property used in your oil field operations) which you anticipate would lie within 500 feet of the centerline of WETT's 345 kV transmission line, if built along the intended route of link GG.
- 1-9: For each piece of equipment listed in response to the previous question, please describe how the presence of the proposed 345 kV transmission line would directly impact or interfere with the operation of that equipment, or state that the line would not interfere with the equipment or its operation.