



Control Number: 38324



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SOAH DOCKET NO. 473-10-4789
PUC DOCKET NO. 38324

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APPLICATION OF ONCOR ELECTRIC § BEFORE THE STATE OFFICE
DELIVERY COMPANY LLC TO AMEND §
A CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
WILLOW CREEK-HICKS 345 Kv CREZ §
TRANSMISSION LINE IN DENTON, §
PARKER, TARRANT AND WISE §
COUNTIES, TEXAS § ADMINISTRATIVE HEARINGS

**RESPONSE OF CARRIZO OIL & GAS, INC. TO ONCOR ELECTRIC DELIVERY'S
FIRST REQUEST FOR INFORMATION FROM CARRIZO OIL & GAS, INC.**

Carrizo Oil & Gas, Inc. ("Carrizo") files this Response to the aforementioned requests for information.

**I.
Written Responses**

Attached hereto and incorporated herein by reference are Carrizo's written responses to the aforementioned requests for information. Each such response is set forth on a separate page upon which the request has been restated. Such responses are also made without waiver of Carrizo's right to contest the admissibility of such matters upon hearing Carrizo hereby stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

Respectfully submitted,

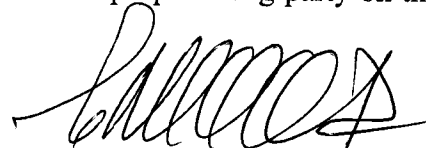
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C. Medferd Owen, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded by fax, U.S first class mail, hand-delivery or courier service to the propounding party on the 16th day of September, 2010.



C. Medferd Owen, Jr.

REQUESTS FOR INFORMATION

1-1 Please list each Route or Link that you contest in this proceeding.

Response:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

Segment PPP

1-2 Please provide the general factual bases for why you contest each Route and link that you contest.

Response:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

Carrizo has an existing well on an existing oil and gas lease crossed by Segment PPP that is being prepared for production. Coordinates of existing well are: lat. 32.866957, long. - 97.551239. Production facilities are in place and pipeline ROW has been secured to transport gas to market.

The centerline of the proposed project is approximately 100' from Carrizo's well pad, with portions of the tower 63' away. Production facilities are located on the southwest corner of Carrizo's existing pad, about 20' from the proposed right-of-way. The pipeline right of way, starting in the southwest corner of our location, heads south, parallel to ONCOR's proposed right of way, before turning west and crossing ONCOR's proposed right of way.

Carrizo also has potential plans for drilling additional wells from the existing well pad, and will have periodic requirements to move in drilling or service rigs. Drilling rigs can extend as high as 120', similar in height to the proposed towers for power lines. The close proximity of ONCOR's structure to existing gas production facilities and future drilling or workover rigs constitutes a hazard to safe operation of Carrizo's lease production. A potential source of ignition 63' from Carrizo's existing tanks is clearly not acceptable.

Safe operations and future development would require ONCOR's proposed structures to be farther from Carrizo's production facilities, pipelines, and future drilling or workover operations. Carrizo believes towers located 300' from its production pad to be a safe distance.

1-3 Please list and describe all Structures that exist on any property you own that will be crossed by one of Oncor's proposed transmission line routes and provide the date the structures were installed or constructed and the height of each structure and describe where each structure is located, where each structure is located in relation to the proposed transmission line and its distance from the proposed transmission line.

Response:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

Carrizo does not own the property crossed by Segment PPP and has constructed no Structures on the property. See response to Request 1-2 above for information regarding the remainder of this request.

1-4 Please provide a copy of any documents concerning communications or correspondence that you have had with any other Intervenor related to this docket or the issues arising in this docket.

Response:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

A copy of a letter dated June 18, 2010 from Arthur L. Cheney, Trustee of The Cheney Revocable Trust to Carrizo will be provided in response to this request.

1-5 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 mental impressions or 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 or bibliography;
- g. a listing of cases in which the expert 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:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

Information regarding Daniel Petri's qualifications and experience is contained in the Written Testimony of Daniel Petri on file in this docket. A copy of the testimony is attached hereto as Exhibit A. Mr. Petri's telephone number is 713-358-6478. The testimony also contains his opinion as well as the factual basis therefore. A copy of the documents considered by Mr. Petri are attached hereto. Mr. Petri does not have a current resume. Mr. Petri has not testified in any other dockets.

A copy of a partial map of Segment PPP that was obtained from counsel for Oncor will be produced with this response. A copy of the maps of the proposed routes obtained from Oncor's data room that were examined by Mr. Petri will be available for inspection at the offices of Carrizo's counsel during normal business hours.

1-6 In response to RFI 1-5 above you identified an testifying expert witness in this docket, please provide the following or 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 expert's 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 consulting expert in anticipation of a testifying expert's testimony; and
- e. the consulting expert's current resume and bibliography.

Response:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

Carrizo has not retained any consulting experts.

1-7 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 witnesses' 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:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

To the extent that Daniel Petri will testify as a non-expert witness, please see the copy of his Written Testimony attached hereto as Exhibit A and the response to RFI 1-4. Mr. Petri's telephone number is 713-358- 6478.

1-8 If you are not the only owner of your property affected by Oncor's proposed transmission line, please identify the other owner(s).

Response:

The following response was prepared by or under the direct supervision of Daniel Petri, the sponsoring witness for this response.

Carrizo is the owner of an oil and gas lease on the property crossed by the proposed transmission line. The owner of the underlying real property is The Cheney Revocable Trust, Arthur Lloyd Cheney and Sheila Joan Cheney, Co-trustees, 333 Melrose Drive #22A, Richardson, Texas 75080-4627. Phone: 972-437-1933.

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WRITTEN TESTIMONY OF DANIEL PETRI IN SUPPORT OF
INTERVENOR CARRIZO OIL & GAS, INC.

Q: What is your name?

A: Daniel Petri

Q: Where do you reside?

A: 20603 Shillington Ct., Katy, Texas

Q: What is your educational background?

A: Bachelor of Science Mechanical Engineering from the University of Nebraska.

Q: By whom are you employed?

A: Carrizo Oil & Gas, Inc.

Q: What is your position with Carrizo Oil & Gas, Inc. and how long have you been employed by the company?

A: Recently Manager of Production -- Barnett Shale, currently Manager Compliance & HSE.

Q: What is the business of Carrizo Oil & Gas, Inc.?

A: Exploration, development and production of oil & gas

Q: Is Carrizo's oil and gas operations affected by a proposed route for the Willow Creek – Hicks 345 kv Transmission Line?

A: Yes.

Q: Which proposed segment affects Carrizo's operations?

A: Segment PPP.

Q: Are you familiar with the types of operations that Carrizo plans to conduct on the site crossed by the proposed transmission line?

A: Yes.

Q: How would the building of the transmission line along Segment PPP affect Carrizo's oil and gas operations?

A: Carrizo has an existing well on an existing oil and gas lease crossed by Segment PPP that is being prepared for production. Coordinates of existing well are: lat. 32.866957, long. - 97.551239. Production facilities are in place and pipeline ROW has been secured to transport gas to market.

The centerline of the proposed project is approximately 100' from our well pad, with portions of the tower 63' away. Production facilities are located on the southwest corner of our existing pad, about 20' from the proposed right-of-way. The pipeline right of way, starting in the southwest corner of our location, heads south, parallel to ONCOR's proposed right of way, before turning west and crossing ONCOR's proposed right of way.

Carrizo also has potential plans for drilling additional wells from the existing well pad, and will have periodic requirements to move in drilling or service rigs. Drilling rigs can extend as high as 120', similar in height to the proposed towers for power lines. The close proximity of ONCOR's structure to existing gas production facilities and future drilling or workover rigs

constitutes a hazard to safe operation of our lease production. A potential source of ignition 63' from our existing tanks is clearly not acceptable.

Safe operations and future development would require ONCOR's proposed structures to be farther from our production facilities, pipelines, and future drilling or workover operations. Carrizo believes towers located 300' from our production pad to be a safe distance.

Q: What is the primary use for Carrizo's property and, in your opinion, will this use be impacted by the proposed transmission line?

A: The primary use of Carrizo's oil and gas lease is the exploration for and production of oil, gas and other minerals. The proposed route which encroaches Carrizo's well pad at an unsafe distance, poses significant health and safety issues for Carrizo and near-by property and property owners. It would prohibit or hinder future operations on the well location and cause economic damages to Carrizo. During the productive life of the well or wells that will be drilled on the current location, Carrizo will likely be required to conduct drilling and/or reworking operations that will involve use of either a drilling rig or a workover rig. Those rigs can stand as much as 120 feet high and would present safety issues if utilized in close proximity to power lines. Existing tank batteries are also approximately 63 feet from the proposed power line, not an acceptable distance. This means the ONCOR power line and ROW need to be moved farther from our location.

If Carrizo's well location is in close proximity to the final location of the electric transmission easement, Carrizo would be precluded from conducting necessary operations in the future which could cause early termination of the lease or alternate operations resulting in added expenses for the well.

Q: Does Carrizo have a habitable structure, as defined by P.U.C. SUBST. R. 25. 101 (a)(3), near Segment PPP?

A: No.

Q: Did Carrizo receive notice of the proposed transmission line along Segment PPP of the proposed Willow Creek – Hicks transmission line?

A: No direct notice was received. The owner of the land on which Carrizo's lease is located advised Carrizo of the pending project.

Q: Did Carrizo attend any public meeting concerning the Willow Creek – Hicks route?

A: No.

Q: Are the boundaries of Carrizo's oil and gas lease represented accurately on the maps provided by Oncor or in its Application at Appendix E of Attachment No. 1 (Figure 6-97)?

A: No. A map depicting the boundaries of the lease is attached hereto as Exhibit 1.

Q: What is Carrizo's request to the Public Utilities Commission?

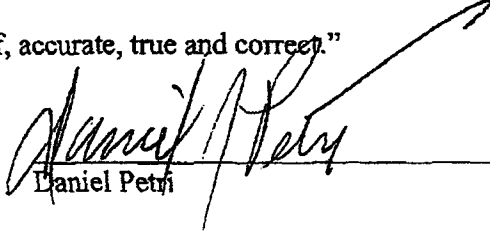
A: Carrizo requests that the transmission line should be routed around its existing well pad so that the well pad is located at least 300 feet outside of the right of way and the line also not impact Carrizo's gathering line right of way and access road.


Daniel Petri

OATH

Before me the undersigned authority, on this day personally appeared Daniel Petri, who having been placed under oath by me did depose as follows:

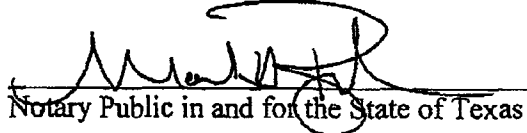
“My name is Daniel Petri. I am of legal age and a resident of the State of Texas. The foregoing testimony and exhibits offered by me are true and correct and the opinions stated therein are to the best of my knowledge and belief, accurate, true and correct.”


Daniel Petri

SUBSCRIBED AND SWORN TO BEFORE ME on this 1st day of September 2010, to certify which witness my hand and official seal.

Print or Stamp Notary's Name
And Date Commission Expires:




Notary Public in and for the State of Texas

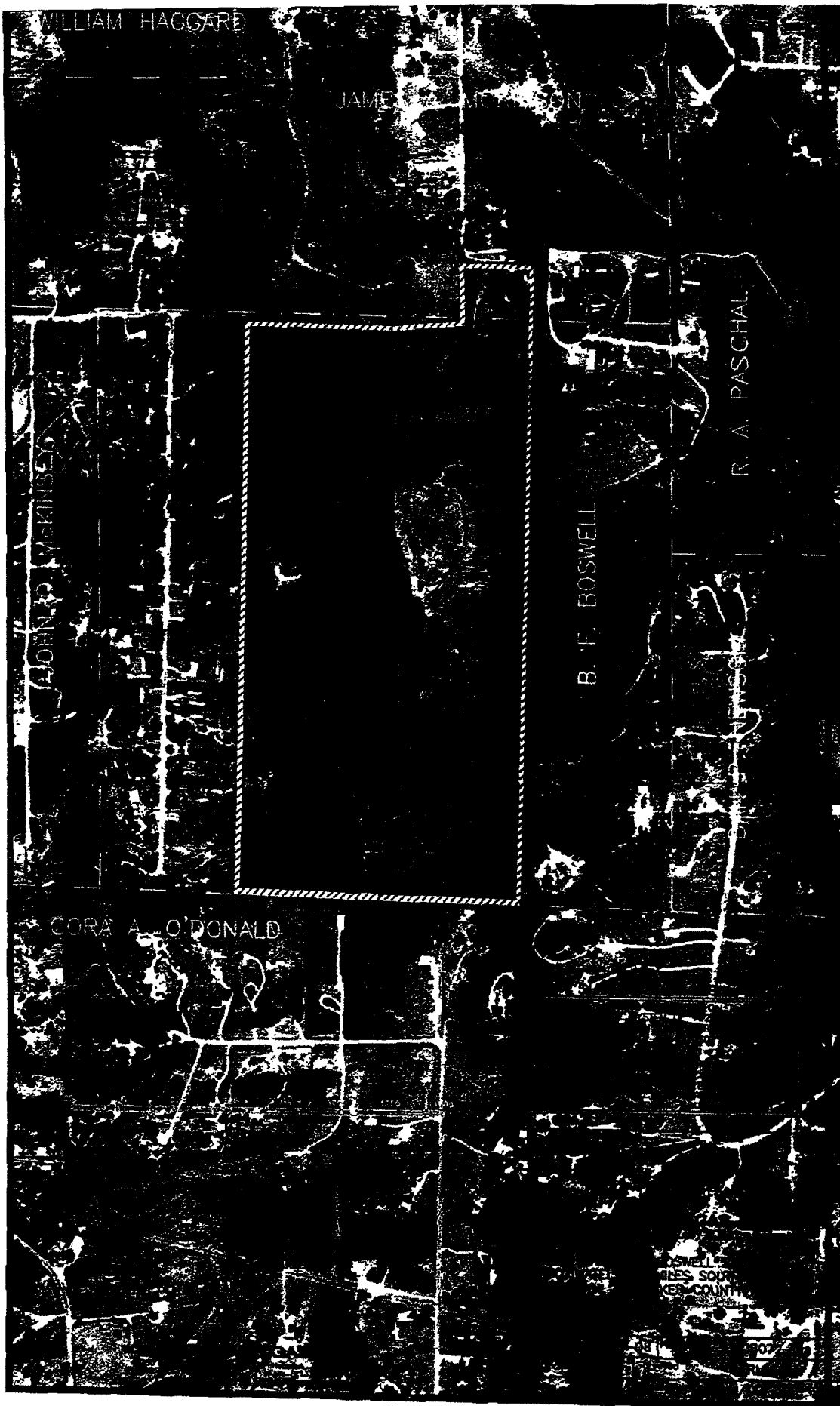
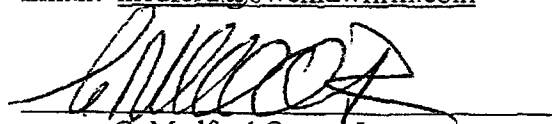


EXHIBIT 1

Respectfully submitted,

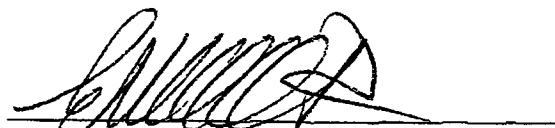
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C. Medferd Owen, Jr.

CERTIFICATE OF SERVICE

I hereby certify that I have complied with the service requirements in SOAH
Order No. 4.



C. Medferd Owen, Jr.