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PUBLIC UTILITY COMMISSION

JOINT APPLICATION OF WIND §
ENERGY TRANSMISSION TEXAS, §
LLC AND ONCOR ELECTRIC §
DELIVERY COMPANY LLC TO §
AMEND THEIR CERTIFICATES OF §
CONVENIENCE AND NECESSITY FOR §
THE BEARCAT SWITCHING §
STATION-TO-LONGHORN §
SWITCHING STATION 345-KV §
TRANSMISSION LINE IN §
GLASSCOCK AND HOWARD §
COUNTIES §

PUBLIC UTILITY COMMISSION
OF TEXAS

**APACHE CORPORATION'S
MOTION TO INTERVENE**

Apache Corporation ("Apache") files this Motion to Intervene ("Motion") in the above-styled proceeding under 16 Tex. Admin. Code ("TAC") §§ 22.103-22.104. In support thereof, Apache respectfully shows as follows:

I. AUTHORIZED REPRESENTATIVES

The contact information for Apache's authorized representatives is as follows:

S. Brett Cupit
Assistant General Counsel
Apache Corporation
2000 Post Oak Boulevard, Suite 100
Houston, Texas 77056
(713) 296-6000
brett.cupit@apachecorp.com

Apache requests that all documents in this proceeding be served upon its authorized representatives.

II. APACHE'S INTEREST

On January 14, 2020, Wind Energy Transmission Texas, LLC ("WETT") and Oncor Electric Delivery Company LLC ("Oncor") filed an application to amend their certificates of convenience and necessity ("CCN") for the Bearkat Switching Station-to-Longhorn Switching Station 345-kilovolt ("kV") transmission line in Glasscock and Howard Counties. The proposed

LCI

project is called the Bearkat Switching Station-to-Longhorn Switching Station 345-kV Transmission Line Project ("Project").

Apache has received notice from WETT and Oncor that one or more of the proposed routing segments and corresponding routes cross property that Apache is developing for oil and gas operations. The placement of the transmission line will impact the ability to pursue existing and planned development on these leases. Accordingly, Apache has a justiciable interest in the outcome of this proceeding and should be admitted as an intervenor.

III. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Apache respectfully requests that this Motion be granted and that Apache be granted party status in this proceeding.

Respectfully submitted,



S. Brett Cupit
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Telephone: (713)296-6000
brett.cupit@apachecorp.com

Counsel for Apache Corporation

February 28, 2020

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding by U.S. mail, postage prepaid, facsimile, or hand delivery this 28 day of February, 2020.



S. Brett Cupit