

**RAILROAD COMMISSION OF TEXAS
HEARINGS DIVISION**

**SURFACE MINING DOCKET NO. C17-0017-SC-11-F
APPLICATION BY SAN MIGUEL ELECTRIC COOPERATIVE, INC.
RELEASE OF PHASE III RECLAMATION OBLIGATIONS FOR 457.0 ACRES
PERMIT NO. 11G, SAN MIGUEL LIGNITE MINE
ATASCOSA AND McMULLEN COUNTIES, TEXAS**

**ORDER APPROVING PHASE III OF RECLAMATION OBLIGATIONS
FOR 457.0 ACRES**

Statement of the Case

San Miguel Electric Cooperative, Inc. (San Miguel), P.O. Box 280, Jourdanton, Texas 78026 applied to the Railroad Commission of Texas (Commission), Surface Mining and Reclamation Division, for the release of Phase III reclamation obligations for 457.0 acres within Permit No. 11G, San Miguel Lignite Mine, Atascosa and McMullen Counties, Texas. The application is made pursuant to the Texas Surface Coal Mining and Reclamation Act, Tex. Nat. Res. Code Ann. Ch. 134 (Vernon Supp. 2018) (Act), and the "Coal Mining Regulations," Tex. R.R. Comm'n, 16 Tex. Admin. Code Ch.12 (Thomson West 2018) (Regulations). No new bond instrument has been filed, and San Miguel does not request reduction of the bond at this time.

Permit No. 11G currently authorizes surface coal mining operations at the San Miguel Lignite Mine. Copies of the application for release were filed in the required county and Commission offices and notice was mailed to landowners of the areas requested for release and to adjoining landowners. After public notice, no comments or requests for hearing were filed. The only parties to the proceeding are San Miguel and the Commission's Surface Mining and Reclamation Division (SMRD or Staff). There remain no outstanding issues between the parties. Based on the information provided by the application, Staff analyses and the inspection of the area, Staff recommends the approval of the release with which San Miguel concurs. The parties have filed waivers of preparation and circulation of a proposal for decision.

Based upon the evidence in the record, reclamation requirements have been met for the acreage requested for release. The Commission approves the request as set out in this Order. San Miguel is eligible to reduce the bond by an amount attributable to the 457.0 acres when an adjustment to the bond is requested in the future.

FINDINGS OF FACT

Based on the evidence in the record, the following Findings of Fact are made:

1. By letter dated June 7, 2017, San Miguel Electric Cooperative, Inc. (San Miguel) filed its application (Application) with the Railroad Commission of Texas' (Commission) Surface Mining and Reclamation Division (SMRD or Staff) for release of Phase III reclamation obligations for 457.0 acres within the San Miguel Lignite Mine, Permit No. 11G, located in Atascosa and McMullen Counties, Texas. San Miguel submitted Supplement No. 1 to the Application by letter dated September 5, 2017, in which it revised the groundwater and surface water evaluation. Staff declared the Application administratively complete by

letter dated December 14, 2018 and filed its Technical Analysis (TA) in the docket by letter dated January 15, 2019.

2. The Application is made pursuant to Texas Surface Coal Mining and Reclamation Act, Tex. Nat. Res. Code Ann. Ch. 134 (Vernon Supp. 2018) (Act), and the Coal Mining Regulations, Tex. R.R. Comm'n, 16 Tex. Admin. Code Ch.12 (Thomson West 2018) (Regulations). The Application was properly certified in accordance with §12.312(a)(3).
3. The current reclamation performance bond is a self-bond with third-party guarantee and indemnity agreement in the amount of \$70,000,000 that was accepted by Commission Order dated March 22, 2011 [Docket No. C11-0016-SC-11-E].
4. Notice of the application was published once each week for four consecutive weeks in the *Pleasanton Express*, a newspaper of general circulation in the vicinity of the San Miguel Lignite Mine in Atascosa and McMullen Counties, the locality of the surface mine. Dates of publication were March 21 and 28, 2018 and April 4 and 11, 2018. The notice of application contains all information required by §134.129 of the Act and §12.312(a)(2) of the Regulations for notice of application for release of reclamation obligations. The notice contains a statement that the applicant does not seek a reduction in the approved bond, but that an eligible bond reduction amount may be determined. The published notice is adequate notification of the request for release. The notice included the name of the permittee, the precise location of the land affected, the number of acres, permit number at the time of application and date approved, the amount of approved bond, the type and appropriate dates reclamation work was performed, and a description of the results achieved as they relate to the approved reclamation plan. The notices contained information concerning the applicant, the location and boundaries of the permit area, the availability of the application for inspection and the address to which comments should be sent. The notice included a map showing sufficient notice of the boundaries of the areas requested for release. San Miguel submitted affidavits of publication with news clippings by letter dated May 22, 2018.
5. No adverse comments or written objections were filed regarding the request for release pursuant to the notification. No requests for hearing or informal conference were filed pursuant to §12.313(d).
6. Copies of the Application were filed for public review in the offices of the County Clerk of Atascosa and McMullen Counties, Texas and in the offices of the Surface Mining and Reclamation Division, Railroad Commission of Texas at 1701 North Congress Avenue, William B. Travis Building, Austin, Texas.
7. By letter dated December 7, 2018, San Miguel submitted copies of letters notifying adjoining landowners and lessees, the McMullen County Soil and Water Conservation District, Atascosa County Soil and Water Conservation District, Evergreen Underground Water Conservation District, Texas General Land Office, U.S. Army Corps of Engineers, Texas Commission on Environmental Quality, Nueces River Authority, Natural Resources Conservation Service, Environmental Protection Agency, McMullen County Water, Atascosa Rural Water Supply and the Atascosa and McMullen County Judges and Clerk's Offices of the application for release in accordance with §12.312(a)(2) of the Regulations. The area proposed for release is not located within the boundary of any municipality that would be notified pursuant to §12.313(c) of the Regulations.

8. SMRD notified the Atascosa and McMullen County Judges of the Application as required by §134.133 of the Act by certified letters dated March 5, 2018.
9. Pursuant to §12.312(b) of the Regulations, Staff notified owners of interests in lands and lessees within the requested release area of the Application and the Office of Surface Mining Reclamation and Enforcement, Tulsa Field Office (OSM) by letters dated June 12, 2017, of the date and time of Staff's field inspection scheduled for June 27, 2017. The notification stated that the subject release had been requested and, pursuant to §12.312(b)(1), advised them of the opportunity to participate in the on-site inspection. Staff provided copies of the letters in Appendix II within Attachment III (Inspection Report) of the TA.
10. The inspection occurred on June 27, 2017 as scheduled. Following a pre-inspection meeting with a representative from San Miguel, SMRD Inspection and Enforcement staff, accompanied by the representative from San Miguel, conducted its inspection of the area requested for release. No landowners were present for the inspection. Except for the demonstrations addressed in Findings of Fact Nos. 17 and 18, *infra*, the field report found that the proposed release area was eligible for the requested releases, pending Staff review.
11. The permit area is comprised of approximately 10,389 acres located roughly 16 miles south of Jourdanton, Texas and six miles south of Christine, Texas on FM 3387. The 457.0 acres proposed for release are located in the B Area of the mine in the northeastern portion of the permit area. A general location map of the permit area, with the 457.0 acres proposed for release distinguished, is found in Appendix I of Staff's Inspection Report. The area is depicted in photographs taken during Staff's inspection that occurred in June 2017 [Appendix IV; Inspection Report (Attachment III; TA)]. The application, photographic evidence and Staff's Inspection Report and TA provide support for release of Phase III reclamation obligations for the subject 457.0 acres.
12. The approved postmining land use for the 457.0 acres proposed for release is pastureland.
13. The Commission previously approved Phase I and II release of reclamation liability for the subject acreage by Orders dated October 22, 2009 [Docket No. C9-0014-SC-11-F] and December 8, 2015 [Docket No. C13-0009-SC-11-F], respectively.
14. The 457.0 acres proposed for release from Phase III requirements meet the revegetation success requirements of §12.395(b)(1) and completion of the five-year extended responsibility period of §12.395(c)(2).
 - (a) The postmine land use of the acreage requested for release is pastureland. The area was planted with Coastal bermudagrass, Common Bermudagrass, Kleingrass, Plains bristlegrass, Sideoats grama, Green sprangletop, Old World bluestem, WW-B dahl bluestem, Wilman lovegrass, and Buffalo grass, species appropriate to the postmine land use as required by §12.391, from 2002 to 2009. The subject acreage is comprised of land management unit (LMU) BX-4 that was placed in the extended responsibility area (ERA) on November 3, 2010.

- (b) San Miguel has met the vegetation requirements of §12.395 for pastureland in accordance with approved standards for ground cover and productivity. San Miguel submitted 2012 and 2013 groundcover and productivity data for the BX-4 LMU by letters dated March 27, 2013 and January 29, 2015, respectively. SMRD determined that the ground cover and productivity data exceeded 90% of the approved standards for the land use of pastureland for this LMU during the 2012 and 2013 growing seasons by letters dated June 17, 2014 and June 27, 2016, respectively.
 - (c) In accordance with the approved soil-testing plan for Permit No. 11G, San Miguel submitted a random ten percent resampling of the soil grids in the BX-4 LMU by letter dated August 3, 2016. By letter dated October 25, 2016, Staff determined the data from the resampling does not reflect postmine soil degradation and is acceptable for the November 3, 2010 ERA.
 - (d) The five-year period of extended responsibility applicable to this permit area having at least 26 inches of rainfall annually has been met for the BX-4 ERA [§12.395(c)(2)].
15. Surface mining activities were conducted according to San Miguel's reclamation plan so that earth materials and runoff were handled to minimize acidic, toxic, or other harmful infiltration to groundwater systems and by operations conducted in a manner to prevent or control the discharge of pollutants into the groundwater. Groundwater quantity has been protected by restoring approximate premining recharge capacity of the reclaimed area as a whole. Operations were conducted in accordance with the requirements of §12.348 of the Regulations. Reclamation methods were used to minimize acid-forming and toxic-forming materials from adversely affecting groundwater, appropriate monitoring has occurred, and monitoring results indicate that the groundwater has been protected.
- (a) Mining in Area B commenced in the mid-1990s. For proposed release area BX-4, mining took place between 2001 and 2007. In 2004, the following three monitoring wells were installed in Area B spoil, near the BX-4 area: B-MW-1, B-MW-2 and B-MW-3. Well B-MW-1 was replaced with well B-MW-1R in April 2011 because the original well was damaged. Wells B-MW-2 and B-MW-3 show that the spoil mass has not saturated in the vicinity of these wells. Water levels reported from the combined B-MW-1/B-MW-1R rose approximately 13 feet between 2004 and 2016 to approximately 220 feet above mean sea level; however, this elevation is still 30 feet below the surface. The Commission approved well B-MW-4, located to the south and east of the main reclaimed blocks comprising the proposed release area, as a part of the LTGM plan in June 2017. Staff notes that data for this well were not included in the application but, since the second quarter of 2017 when monitoring commenced, through the same quarter in 2018, the well has been dry. This lack of water further strengthens the case that groundwater is unlikely to manifest as surface water seeps.
 - (b) The reclaimed overburden is not considered a groundwater resource and, as stated in the approved probable hydrologic consequences determination for the permit, "[a]ny downward migration of overburden groundwater will be intercepted

by these [Unit 22 sand having elevated total dissolved solids (TDS) of 11,900 mg/L] other intervening non-potable aquifers." An analysis of the groundwater chemistry shows that TDS concentration has risen due to sodium and chloride components, not the sulfate. This increase in TDS concentration does not affect the adequacy of the reclamation because the spoil saturated zone is not considered an aquifer and is hydrologically separated from the first potable water below the lowest mined seam by another water-bearing unit, the Unit 22 sand. As described above, the Unit 22 sand has poor water quality due to elevated TDS. Based on data and analysis contained in the Application and Staff's TA, no negative impacts to the groundwater hydrologic balance have occurred and no negative impacts are expected to occur in the future.

16. The 457.0 acres proposed for release from Phase III requirements meet the surface water protection requirements of §12.349 as shown by an examination of discharges to receiving streams. La Parita and Metate Creeks drain the areas proposed for release; these creeks flow southeast to the Gulf of Mexico via the Atascosa River and the Nueces River system. Mining activities were conducted to minimize the formation of acidic or toxic drainage and to prevent additional contributions of suspended solids to streamflow outside the permit area and to otherwise prevent water pollution. Based upon the application, as supplemented with Supplement No. 1 providing additional surface water information, Commission records, and Staff review, surface water quality and quantity have been protected.
 - (a) Staff reviewed baseline surface water monitoring records for stations upstream and downstream of the areas requested for release for differing periods of record and compared these records to records of long-term surface water monitoring (LTSM) stations downstream of the areas requested for release on La Parita Creek. The records of LTSM downstream stations were then compared with the TCEQ Stream Segment Standard for Stream Segment 2107 of the Atascosa River in the Nueces River Basin to determine any effects from mining.
 - (i) Premine data from downstream monitoring station MK002, collected from 1991 to 1992, was compared to data at the same station from 2006 to 2017. LTSM data for upstream station MK001A was compared to downstream station MK002 and these stations were compared to the TCEQ limitations for Stream Segment 2107. The ranges for pH for the upstream [6.9 – 9.3 standard units (s.u.)], and downstream (6.8 – 9.2 s.u.) stations were nearly always compliant with the TCEQ stream segment standard, 6.5-9.0 s.u.; with the highest pH value at the disturbed station occurring in February 2009 and remaining within the stream segment criterion since. Further, the average pH value observed at the downstream station, 7.9 s.u., is within the stream segment criterion. Though the average and range for TDS observed at the downstream LTSM station are higher than those recorded during the baseline period, the flow-weighted average TDS concentration at the downstream station (810.2 mg/L) is less than the maximum annual average TDS concentration criterion for Stream Segment No. 2107 (1,500.0 mg/L) and significantly lower than the flow-weighted average TDS concentration at upstream LTSM station (5,000.8 mg/L). The high flow-weighted average for the upstream station, undisturbed by mining activities, is influenced by

- discharges from a saline artesian well, Peeler Flowing Well No. 1, located upstream of the station. Despite the high TDS concentrations at the upstream LTSM station that Staff analysis determines is due to the flowing artesian well, the flow-weighted average observed at the downstream LTSM station for the period of record 1994-2017 (810.2 mg/L) is within the TCEQ stream segment standard for TDS.
- (ii) Flow at the downstream station MK002 is reduced somewhat; however, the flow rate observed at the downstream station typically exceeded the flow rate at the upstream station, meaning water quantity has not been negatively impacted by mining activities.
 - (iii) Staff's Cumulative Hydrologic Impact Assessment (CHIA) for the San Miguel Lignite Mine (Permit No. 11G), San Miguel Lignite Mine, Area C (Permit No. 52A), and San Miguel Lignite Mine, Area F, G, and H (Permit No. 60), contained in the May 10, 2017, Technical Analysis (Docket No. C14-0020-SC-00-A, Permit No. 60), establishes material damage criteria for the defined cumulative impact area which are based on baseline surface water information contained in the permit, stream-segment criteria, public drinking-water supply standards, and Federal and State wastewater discharge permits. In its CHIA, Staff indicates that the greatest potential increase in TDS concentration is anticipated at Mass-Balance Point No. 2 (USGS Gauging Station No. 08208000, located on the Atascosa River downstream of Metate Creek and La Parita Creek). The greatest potential increase in TDS concentration is expected to be approximately 8.2%, from approximately 567 mg/L to 613 mg/L. While not insignificant, the resultant value remains within acceptable drinking-water standards and well below the maximum for the applicable TDS standard of 1,500 mg/L for TCEQ Stream Segment No. 2107. The flow-weighted average TDS concentrations at downstream LTSM Station Nos. MK002 (810.2 mg/L) somewhat exceed the TDS concentrations predicted in the CHIA, but are less than the maximum annual average concentration for Stream Segment Nos. 2107 (1,500 mg/L).
- (b) Staff reviewed baseline surface water monitoring records for stations upstream and downstream of the areas requested for release for differing periods of record and compared these records to records of long-term surface water monitoring (LTSM) stations downstream of the areas requested for release on Metate Creek. The records of LTSM downstream stations were then compared with the TCEQ Stream Segment Standard for Stream Segment 2107 of the Atascosa River in the Nueces River Basin to determine any effects from mining.
- (i) A comparison of the average and range of pH values for LTSM upstream stations SM005 (period of record 2004 – 2018) and downstream LTSM station MK004 (period of record 1999 – 2018) are similar and levels observed at the downstream station have been below the applicable stream segment criterion (9.0 s.u.) since February 2009, except for five occurrences from March 2011 to July 2012. The TDS averages and ranges at the upstream and downstream stations are similar over the period of record. The highest TDS concentration (6,307.0 mg/L) for

downstream LTSM station occurred March 2003. However, the flow-weighted average TDS concentration at this station (1,054.5 mg/L) is less than the maximum annual average TDS concentration for Stream Segment No. 2107 (1,500 mg/L) and significantly lower than the flow-weighted average TDS concentration at upstream station (1,747.4 mg/L). Staff analysis agrees with San Miguel's conclusion that adequate flow from upstream artesian wells Metate Creek Well, Ranch Well #1 and Ranch Well #2 may exist to negatively affect the TDS concentration downstream that has been measured at LTSM station MK004.

- (ii) The average flow rate observed at the downstream station MK004 is only slightly lower (0.04 millions of gallons per day) than the upstream station. According to the approved PHC in the permit, the areas disturbed by mining represent a small percentage of the La Parita and Metate Creek watersheds (less than 5%), meaning a minimal change in runoff quantity will likely be imperceptible as it is dispersed over a wider floodplain.
 - (iii) As discussed in Finding of Fact No. 16(a)(iii), *supra*, Staff's CHIA for the mine is contained in its Technical Analysis dated May 10, 2017 for Permit No. 60. The flow-weighted average TDS concentrations at downstream LTSM Station Nos. MK004 (1,054.5 mg/L) somewhat exceed the TDS concentrations predicted in the CHIA, but are less than the maximum annual average concentration for Stream Segment Nos. 2107 (1,500 mg/L).
17. One permanent structure, Ditch HP-1, is located within the proposed release area. Ditch HP-1 has a certified length of 4,494 feet; however, only a portion, approximately 600 feet, is within the proposed release area. As noted in Staff's Inspection Report, the portions of the ditch that are not located within the proposed release area are to be maintained in accordance with all applicable requirements; similar to other structures located in areas that have not been released by the Commission (TA; Attachment III). Ditch HP-1 was approved as a permanent structure by Staff letter dated August 6, 2015. A copy of the approval letter was provided in Section 4 of the Application.
18. Two small area depressions are located within the proposed release areas. By letter dated December 18, 2017, San Miguel submitted Revision No. 14 to request approval of the two small depressions in accordance with SMRD Advisory Notice EN-PS-385(c). The application for Revision No. 14 included a signed statement from Harrison Interests Ltd, landowner of the area containing the small depressions, accepting the retention of the features located on its tracts. Revision No. 14 was approved by letter dated January 12, 2018. Per the advisory notice, San Miguel should have requested approval of the small depressions six months prior to the submittal of the Phase III release application (Advisory Notice EN-PS-385(c) at IV.B.). However, Staff did not note this issue in its TA and the Application was declared administratively complete on December 14, 2018, almost a year after approval was sought. Section 12.385(c) of the Regulations does not stipulate when Commission approval of small depressions must be sought in relation to submittal of an application for Phase III release; accordingly, the timing of Revision No. 14 is not an impediment to release. During Staff's inspection of the area on June 27, 2017, three other areas were observed that could classify as small area depressions. Subsequently, Staff noted in its TA that the three areas were filled in,

- alleviating the need for San Miguel to seek approval of the areas as small depressions under §12.385(c).
19. The area requested for release of reclamation obligations is capable of sustaining the approved postmine land use. Monthly inspections and Staff's inspection on June 27, 2017 demonstrate that the land has been reclaimed to and managed in accordance with the requirements for pastureland.
 20. Pursuant to §12.313(a)(3), the Commission may release the remaining portion of the bond attributable to the subject 457.0 acres upon a determination that reclamation has been successfully completed in accordance with the terms of the approved permit and the requirements of the Act and the Regulations. As a result of being granted Phase III release, San Miguel is eligible to reduce the bond amount for Permit No. 11G. Given San Miguel does not request an adjustment to the approved bond in the Application, the amount of the reduction was not calculated by Staff in its TA and is not determined in this Order. Traditionally, when considering applications for Phase III release, the Commission has specified the amount of the eligible reduction as calculated based on the most recently approved reclamation cost estimate for the permit. However, the actual amount of any reduction, if and when requested by San Miguel, would be calculated based on the costs for reclamation at the time such reduction is requested. By letter dated January 16, 2019, the administrative law judge (ALJ) requested Staff to explain its reasons for declining to specify an eligible bond reduction amount attributable to the 457.0 acres recommended for release. By letter dated January 25, 2019, Staff stated it chose to not provide a calculated eligible reduction amount because any amount would be based on the most recent reclamation cost estimate that was approved by the SMRD Director on July 26, 2017. Staff further stated that as a matter of practice, reclamation costs for remaining activities approved under the permit would certainly be calculated by Staff when an application for bond reduction is submitted; therefore, ensuring the proposed bond amount is sufficient to cover the cost of outstanding reclamation work. Given Staff's approach in this docket deviates from past Commission practice, the ALJ afforded San Miguel the opportunity to respond to Staff's explanation; however, no response was filed. As any eligible reduction amount based on the current reclamation cost estimate would be superseded once the costs for reclamation are calculated at a future date when San Miguel requests a reduction of the bond, and since the Commission is not required under the Act or the Regulations to determine an eligible bond reduction amount when approving an application for release, this Order prescribes San Miguel is eligible to reduce the amount of bond attributable to the 457.0 acres granted Phase III release, but does not specify the amount of the reduction.
 21. No reduction of the \$70,000,000 self-bond with third-party guarantee and indemnity agreement that was accepted by Commission Order dated March 22, 2011 is requested in this Application.
 22. All acres requested for release were marked in the field to distinguish them from active mining and reclamation areas.
 23. San Miguel and Staff, the only parties to the proceeding, filed waivers of the preparation and circulation of a proposal for decision. The proposed order was circulated to the parties with opportunity for comment. No exceptions to the proposed order were filed.

24. Open meeting notice has been posted for Commission consideration of this Application in accordance with TEX GOV'T CODE §551.048.

CONCLUSIONS OF LAW

Based on the Findings of Fact, the following Conclusions of Law are made:

1. Proper notice of application and notice of consideration by the Commission has been provided for this request for release of reclamation obligations.
2. A public hearing on the request is not warranted.
3. San Miguel has complied with all applicable provisions of the Act and the Regulations regarding notice for Commission jurisdiction to attach to allow consideration of the matter.
4. San Miguel has complied with all applicable provisions of the Act and the Regulations for the release of Phase III reclamation obligations for 457.0 acres of land within the San Miguel Lignite Mine.
5. The Commission may approve a release of Phase III reclamation obligations for the 457.0 acres as set out in the above Findings of Fact and Conclusions of Law.
6. San Miguel is eligible to reduce the bond for the permit by the amount that is attributable to the subject 457.0 acres in future bond adjustments.

IT IS THEREFORE ORDERED BY THE RAILROAD COMMISSION OF TEXAS that the above Findings of Fact and Conclusions of Law are adopted;

IT IS FURTHER ORDERED that a release of Phases III reclamation obligations for 457.0 acres is hereby approved;

IT IS FURTHER ORDERED San Miguel is eligible to reduce the amount of bond for the permit by the amount that is attributable to the 457.0 acres granted full release in this Order;

IT IS FURTHER ORDERED that all areas released from reclamation obligations shall remain clearly marked in the field with permanent boundary markers to distinguish these areas from other reclamation areas in accordance with this Order;

IT IS FURTHER ORDERED that the current bond remains in effect according to its terms until otherwise ordered by the Commission;

IT IS FURTHER ORDERED that the Commission may vary the total amount of bond required from time to time as affected land acreages are increased or decreased or where the cost of reclamation changes; and

IT IS FURTHER ORDERED by the Commission that this order shall not be final and effective until 25 days after the Commission's Order is signed, unless the time for filing a motion for rehearing has been extended under Tex. Gov't Code §2001.142, by agreement under Tex. Gov't Code §2001.147, or by written Commission Order issued pursuant to Tex. Gov't Code §2001.146(e). If a timely motion for rehearing is filed by any party at interest, this order shall not become final and effective until such motion is overruled, or if such motion is granted, this order shall be subject to further action by the Commission. Pursuant to Tex. Gov't Code §2001.146(e), the time allotted for Commission action on a motion for rehearing in this case is 100 days from the date the Commission Order is signed.

SIGNED this February 26, 2019.

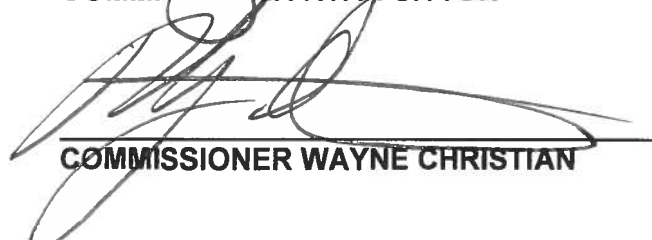
RAILROAD COMMISSION OF TEXAS



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ATTEST



Secretary
Railroad Commission of Texas

