

**RAILROAD COMMISSION OF TEXAS
HEARINGS DIVISION**

OIL AND GAS DOCKET NO. 01-0308609

**APPLICATION OF EXCO OPERATING COMPANY, LP FOR AN EXCEPTION TO
STATEWIDE RULE 32 FOR SIXTY-NINE FLARE POINTS ON VARIOUS LEASES,
BRISCOE RANCH (EAGLEFORD) FIELD, DIMMIT AND ZAVALA COUNTIES, TEXAS**

FINAL ORDER

The Commission finds that after statutory notice in the above-numbered docket heard on May 23 and 24, 2018, the presiding Technical Examiner and Administrative Law Judge (collectively, "Examiners") have made and filed a proposal for decision containing findings of fact and conclusions of law, for which service was required; that the proposed application of EXCO Operating Company, LP is in compliance with all statutory and regulatory requirements; and that this proceeding was duly submitted to the Railroad Commission of Texas at a conference held in its offices in Austin, Texas.

The Commission, after review and due consideration of the Examiners' proposal for decision ("PFD") and the findings of fact and conclusions of law contained therein, hereby adopts as its own the findings of fact and conclusions of law contained therein, and incorporates said findings of fact and conclusions of law as if fully set out and separately stated herein.

Therefore, it is **ORDERED** by the Railroad Commission of Texas that EXCO Operating Company, LP ("EXCO") is hereby **GRANTED** an exception to Statewide Rule 32 (16 Tex. Admin. Code § 3.32) for 69 Flare Points on Various Leases, Briscoe Ranch (Eagleford) Field, Dimmitt and Zavala Counties, Texas. EXCO is authorized to flare casinghead gas from various dates listed in Appendix 1, Attachment A of this Order to March 11, 2020, a period of approximately 2 years, at the volumes list in Attachment A of Appendix 1 of this Order.

The authority is granted, provided all production is reported on the appropriate Commission forms. EXCO Operating Company, LP shall file the Statewide Rule 32 Exception Data Sheet and, shall file at the same time, the appropriate Commission required administrative Statewide Rule 32 Exception gas flaring fee for all wells.

Each exception to the Examiners' proposal for decision not expressly granted herein is overruled. All requested findings of fact and conclusions of law which are not expressly adopted herein are denied. All pending motions and requests for relief not previously granted or granted herein are denied.

It is further **ORDERED** by the Commission that this order shall not be final and effective until 25 days after the 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

prior to its being overruled by operation of law is hereby extended until 100 days from the date the parties are notified of this order in accordance with Tex. Gov't Code § 2001.144.

SIGNED August 6, 2019.

RAILROAD COMMISSION OF TEXAS

CHAIRMAN WAYNE CHRISTIAN

Christi Craddick

COMMISSIONER CHRISTI CRADDICK

Ryan Sitton

COMMISSIONER RYAN SITTON

ATTEST:

Sharon Walter

Deputy SECRETARY

The seal of the Railroad Commission of Texas is visible in the background, featuring a star and the text "RAILROAD COMMISSION OF TEXAS".

Appendix 1 Attachment A

Flare Exception Authority

Flare Permit No.	Lease Name & Well Number	Lease ID	Permit Start Date	Permit End Date	Proposed Maximum Flare Volume (MCFD)	Casinghead Gas or Gas Well Gas	H2S (ppm)	H-9 Cert. No.
25667	Allee Unit A #1H*	15313	3/12/2018	3/11/2020	130	Casinghead	5	078725
24782	Berdoll DIM #A1H*	16620	3/12/2018	3/11/2020	932	Casinghead	2	078728
24786	Berdoll DIM #B1H*	16620	3/12/2018	3/11/2020	278	Casinghead	2	078728
32582	Coleman Unit ZAV #C1H	18315	4/13/2018	3/11/2020	65	Casinghead	8,759	085801
32583	Coleman ZAV B #1H & Coleman Unit ZAV A #5H	17910 & 17776	4/13/2018	3/11/2020	65	Casinghead	4,379	087242
32584	Coleman ZAV #D2H & #D3H	17448	4/13/2018	3/11/2020	80	Casinghead	6,494	083811
25668	Flying G Unit DIM #2H*	17478	3/12/2018	3/11/2020	112	Casinghead	8	081723
24785	Gonzalez Unit A Dim #1H*	15689	3/12/2018	3/11/2020	506	Casinghead	2	078740
24894	Howett ZAV #A3H & #B1H*	18015	3/12/2018	3/11/2020	183	Casinghead	20,000	087547
24895	Kim DIM #B1H*	16447	3/12/2018	3/11/2020	204	Casinghead	3	078741
25665	KM North ZAV #A1H & #A5H*	15963	3/12/2018	3/11/2020	117	Casinghead	2,253	081136
25656 (33295)	KM South ZAV #B3H & #B5H & Bauerle Unit ZAV 1H*	17123 & 19189	3/12/2018	3/11/2020	275	Casinghead	2,628	081108
32585	KM-Miller Unit ZAV #1H & #2H	18398	4/13/2018	3/11/2020	185	Casinghead	4,228	089596
32586	KM-Miller Unit ZAV #3H & #4H*	18398	4/13/2018	3/11/2020	550	Casinghead	4,228	089596
24630	LLM ZAV #E3H & #E6H*	15624	3/12/2018	3/11/2020	405	Casinghead	200	Submitted
32581	Old River Ranch DIM #C1H*	15560	4/13/2018	3/11/2020	150	Casinghead	4	Submitted
25719	Pena Creek I #1H*	15375	3/12/2018	3/11/2020	505	Casinghead	6	078743
25718	Pena Creek I #4H*	15375	3/12/2018	3/11/2020	196	Casinghead	6	078743
24783	Pena Creek I #5H*	15375	3/12/2018	3/11/2020	204	Casinghead	6	078743
25720	Pena Creek I #6H*	15375	3/12/2018	3/11/2020	223	Casinghead	6	078743
32587	Robert Walker Unit ZAV A #7H & Robert Walker Unit ZAV B #1H	17819 & 17827	4/13/2018	3/11/2020	75	Casinghead	3,171 & 4,983	086810 & 086811
25660	Silva Unit DIM #1H*	16555	3/12/2018	3/11/2020	105	Casinghead	3	078752
25662	Tauber Unit C DIM #3H*	16639	3/12/2018	3/11/2020	164	Casinghead	2	078754
30131	Tidwell East ZAV #A1H & #A3H*	16636	12/21/2017	3/11/2020	250	Casinghead	11,437	081143
30089	Tidwell East ZAV #D1H & #D3H*	16636	12/21/2017	3/11/2020	250	Casinghead	11,437	081143
32593	Traylor South ZAV #G1H & #G2H	15766	4/13/2018	3/11/2020	95	Casinghead	32,842	078255
30129	Traylor North #A2H, #A3H & #A4H*	15412	12/21/2017	3/11/2020	250	Casinghead	5,572	079495
32930	Traylor North #C1H*	15412	3/12/2018	3/11/2020	160	Casinghead	5,572	079495
32588	Traylor North #D1H & Traylor Unit ZAV L #4H*	15412 & 18230	4/13/2018	3/11/2020	145	Casinghead	5,572 & 20,000	079495 & 082627
32589	Traylor North #D2H, #D3H & #D5H*	15412	4/13/2018	3/11/2020	145	Casinghead	5,572	079495
32956	Traylor North #F3H*	15412	3/12/2018	3/11/2020	150	Casinghead	5,572	079495
32937	Traylor North #I1H, #I3H, #I4H & #I5H*	15412	3/12/2018	3/11/2020	150	Casinghead	5,572	079495
32932	Traylor South ZAV #A3H & #A4H*	15766	3/12/2018	3/11/2020	150	Casinghead	32,842	078255
32933	Traylor South ZAV #B1H, #B2H, #B3H & #B4H*	15766	3/12/2018	3/11/2020	250	Casinghead	32,842	078255
32590	Traylor South ZAV #C1H & #C2H*	15766	4/13/2018	3/11/2020	145	Casinghead	32,842	078255
32591	Traylor South ZAV #C3H, #C4H & #C5H*	15766	4/13/2018	3/11/2020	200	Casinghead	32,842	078255

Flare Permit No.	Lease Name & Well Number	Lease ID	Permit Start Date	Permit End Date	Proposed Maximum Flare Volume (MCFD)	Casinghead Gas or Gas Well Gas	H2S (ppm)	H-9 Cert. No.
32935	Traylor South ZAV #CGH & Traylor Unit ZAV L #1H*	15766 & 18230	3/12/2018	3/11/2020	200	Casinghead	32,842 & 20,000	078255 & 082627
32592	Traylor South ZAV #F1H & #F5H	15766	4/13/2018	3/11/2020	115	Casinghead	32,842	078255
32594	Traylor South ZAV #G3H, #G4H & #G5H*	15766	4/13/2018	3/11/2020	150	Casinghead	32,842	078255
30130	Traylor South ZAV #H1H, #H2H, #H3H*	15766	12/21/2017	3/11/2020	200	Casinghead	32,842	078255
30088	Traylor South ZAV #H4H & #H5H*	15766	12/21/2017	3/11/2020	300	Casinghead	32,842	078255
32595	Traylor South ZAV #I1H, #I2H & #I3H*	15766	4/13/2018	3/11/2020	270	Casinghead	32,842	078255
32934	Traylor South ZAV #J1H	15766	3/12/2018	3/11/2020	75	Casinghead	32,842	078255
32596	Traylor Unit ZAV L #2H & #3H	18230	4/13/2018	3/11/2020	100	Casinghead	20,000	082627
32597	Traylor Unit ZAV M #2H	17867	4/13/2018	3/11/2020	65	Casinghead	2,718	087548
32598	Traylor Unit ZAV M #4H & #6H*	17867	4/13/2018	3/11/2020	140	Casinghead	2,718	087548
32599	Traylor Unit ZAV N #4H, #5H & #6H*	17653	4/13/2018	3/11/2020	100	Casinghead	4,077	087549
32936	Traylor Unit ZAV N #1H, #2H & #3H	17653	3/12/2018	3/11/2020	300	Casinghead	4,077	087549
25659	Traylor West ZAV #C1H & #C4H*	15993	3/12/2018	3/11/2020	111	Casinghead	5,714	081142
24784	Von Rosenberg Unit A DIM #1H*	15612	3/12/2018	3/11/2020	842	Casinghead	10	066669
25658	Votaw Unit A DIM #1H*	16642	3/12/2018	3/11/2020	139	Casinghead	3	075163
32940	Winterbotham ZAV #U1H & #U2H*	15744	3/12/2018	3/11/2020	200	Casinghead	5,288	082150
30086	Winterbotham ZAV #A1H, #A2H, #A3H & #A4H*	15744	12/21/2017	3/11/2020	200	Casinghead	5,288	082150
30087	Winterbotham ZAV #B1H & #B2H*	15744	12/21/2017	3/11/2020	250	Casinghead	5,288	082150
32600	Winterbotham ZAV #B3H, #B4H & #D1H	15744	4/13/2018	3/11/2020	160	Casinghead	5,288	082150
32939	Winterbotham ZAV #D2H, #S1H & #S2H*	15744	3/12/2018	3/11/2020	300	Casinghead	5,288	082150
32938	Winterbotham ZAV #F1H & #F2H*	15744	3/12/2018	3/11/2020	200	Casinghead	5,288	082150
32601	Winterbotham ZAV #G2H, #V1H & #V2H*	15744	4/13/2018	3/11/2020	185	Casinghead	5,288	082150
32602	Winterbotham ZAV #G3H & #N1H*	15744	4/13/2018	3/11/2020	110	Casinghead	5,288	082150
32603	Winterbotham ZAV #H2H, #H3H & #I1H*	15744	4/13/2018	3/11/2020	120	Casinghead	5,288	082150
32604	Winterbotham ZAV #I2H & #I3H	15744	4/13/2018	3/11/2020	100	Casinghead	5,288	082150
32605	Winterbotham ZAV #J1H & #J2H	15744	4/13/2018	3/11/2020	135	Casinghead	5,288	082150
32941	Winterbotham ZAV #K1H & #J3H*	15744	3/12/2018	3/11/2020	175	Casinghead	5,288	082150
32606	Winterbotham ZAV #K2H	15744	4/13/2018	3/11/2020	70	Casinghead	5,288	082150
25666 (33294)	Winterbotham ZAV #M1H & #M5H & Miller Unit ZAV 2H*	15744 & DP # 818285	3/12/2018	3/11/2020	325	Casinghead	5,288	082150
32607	Winterbotham ZAV #N2H & #N3H	15744	4/13/2018	3/11/2020	80	Casinghead	5,288	082150
32608	Winterbotham ZAV #O1H, #O2H, #O3H & #O5H	15744	4/13/2018	3/11/2020	190	Casinghead	5,288	082150
32609	Winterbotham ZAV #Q1H & #Q2H	15744	4/13/2018	3/11/2020	160	Casinghead	5,288	082150
32610	Winterbotham ZAV #R1H	15744	4/13/2018	3/11/2020	65	Casinghead	5,288	082150

* Currently Equipped with a Flare Stack

Appendix 1 Attachment B

Previously Approved Flare Exception Authorities

Previous Flare Permit No.	Lease Name & Well Number	Lease ID	Previous Exception Type	Previous Permit or Authority End Date	Previous Maximum Flare Volume (MCFD)	Casinghead Gas or Gas Well Gas
25667	Allee Unit A #1H*	15313	Docket No. 01-0299832	3/11/2018	130	Casinghead
24782	Berdoll DIM #A1H*	16620	Docket No. 01-0299832	3/11/2018	932	Casinghead
24786	Berdoll DIM #B1H*	16620	Docket No. 01-0299832	3/11/2018	278	Casinghead
32582	Coleman Unit ZAV #C1H	18315	Admin.	4/12/2018	65	Casinghead
32583	Coleman ZAV B #1H & Coleman Unit ZAV A #5H	17910 & 17776	Admin.	4/12/2018	65	Casinghead
32584	Coleman ZAV #D2H & #D3H	17448	Admin.	4/12/2018	80	Casinghead
25668	Flying G Unit DIM #2H*	17478	Docket No. 01-0299832	3/11/2018	112	Casinghead
24785	Gonzalez Unit A Dim #1H*	15689	Docket No. 01-0299832	3/11/2018	506	Casinghead
24894	Howett ZAV #A3H & #B1H*	18015	Docket No. 01-0299832	3/11/2018	183	Casinghead
24895	Kim DIM #B1H*	16447	Docket No. 01-0299832	3/11/2018	204	Casinghead
25665	KM North ZAV #A1H & #A5H*	15963	Docket No. 01-0299832	3/11/2018	117	Casinghead
25656 (33295)	KM South ZAV #B3H & #B5H & Bauerle Unit ZAV 1H*	17123 & 19189	Docket No. 01-0299832 and Admin.	3/11/2018	300	Casinghead
32585	KM-Miller Unit ZAV #1H & #2H	18398	Admin.	4/12/2018	185	Casinghead
32586	KM-Miller Unit ZAV #3H & #4H*	18398	Admin.	4/12/2018	550	Casinghead
24630	LLM ZAV #E3H & #E6H*	15624	Docket No. 01-0299832	3/11/2018	405	Casinghead
32581	Old River Ranch DIM #C1H*	15560	Admin.	4/12/2018	150	Casinghead
25719	Pena Creek I #1H*	15375	Docket No. 01-0299832	3/11/2018	505	Casinghead
25718	Pena Creek I #4H*	15375	Docket No. 01-0299832	3/11/2018	196	Casinghead
24783	Pena Creek I #5H*	15375	Docket No. 01-0299832	3/11/2018	204	Casinghead
25720	Pena Creek I #6H*	15375	Docket No. 01-0299832	3/11/2018	223	Casinghead
32587	Robert Walker Unit ZAV A #7H & Robert Walker Unit ZAV B #1H	17819 & 17827	Admin.	4/12/2018	75	Casinghead
25660	Silva Unit DIM #1H*	16555	Docket No. 01-0299832	3/11/2018	105	Casinghead
25662	Tauber Unit C DIM #3H*	16639	Docket No. 01-0299832	3/11/2018	164	Casinghead
30131	Tidwell East ZAV #A1H & #A3H*	16636	Admin.	12/7/2017	250	Casinghead
30089	Tidwell East ZAV #D1H & #D3H*	16636	Admin.	12/6/2017	250	Casinghead
32593	Traylor South ZAV #G1H & #G2H	15766	Admin.	4/12/2018	95	Casinghead
30129	Traylor North #A2H, #A3H & #A4H*	15412	Admin.	12/10/2017	250	Casinghead
32930	Traylor North #C1H*	15412	Admin.	3/11/2018	160	Casinghead
32588	Traylor North #D1H & Traylor Unit ZAV L #4H*	15412 & 18230	Admin.	4/12/2018	145	Casinghead
32589	Traylor North #D2H, #D3H & #D5H*	15412	Admin.	4/12/2018	145	Casinghead
32956	Traylor North #F3H*	15412	Admin.	3/11/2018	150	Casinghead
32937	Traylor North #I1H, #I3H, #I4H & #I5H*	15412	Admin.	3/11/2018	150	Casinghead
32932	Traylor South ZAV #A3H & #A4H*	15766	Admin.	3/11/2018	150	Casinghead
32933	Traylor South ZAV #B1H, #B2H, #B3H & #B4H*	15766	Admin.	3/11/2018	250	Casinghead
32590	Traylor South ZAV #C1H & #C2H*	15766	Admin.	4/12/2018	145	Casinghead
32591	Traylor South ZAV #C3H, #C4H & #C5H*	15766	Admin.	4/12/2018	200	Casinghead

Previous Flare Permit No.	Lease Name & Well Number	Lease ID	Previous Exception Type	Previous Permit or Authority End Date	Previous Maximum Flare Volume (MCFD)	Casinghead Gas or Gas Well Gas
32935	Traylor South ZAV #C6H & Traylor Unit ZAV L #1H*	15766 & 18230	Admin.	3/11/2018	200	Casinghead
32592	Traylor South ZAV #F1H & #F5H	15766	Admin.	4/12/2018	115	Casinghead
32594	Traylor South ZAV #G3H, #G4H & #G5H*	15766	Admin.	4/12/2018	150	Casinghead
30130	Traylor South ZAV #H1H, #H2H, #H3H*	15766	Admin.	12/10/2017	200	Casinghead
30088	Traylor South ZAV #H4H & #H5H*	15766	Admin.	12/5/2017	300	Casinghead
32595	Traylor South ZAV #I1H, #I2H & #I3H*	15766	Admin.	4/12/2018	270	Casinghead
32934	Traylor South ZAV #J1H	15766	Admin.	3/11/2018	75	Casinghead
32596	Traylor Unit ZAV L #2H & #3H	18230	Admin.	4/12/2018	100	Casinghead
32597	Traylor Unit ZAV M #2H	17867	Admin.	4/12/2018	65	Casinghead
32598	Traylor Unit ZAV M #4H & #6H*	17867	Admin.	4/12/2018	140	Casinghead
32599	Traylor Unit ZAV N #4H, #5H & #6H*	17653	Admin.	4/12/2018	100	Casinghead
32936	Traylor Unit ZAV N #1H, #2H & #3H	17653	Admin.	3/11/2018	300	Casinghead
25659	Traylor West ZAV #C1H & #C4H*	15993	Docket No. 01-0299832	3/11/2018	111	Casinghead
24784	Von Rosenberg Unit A DIM #1H*	15612	Docket No. 01-0299832	3/11/2018	842	Casinghead
25658	Votaw Unit A DIM #1H*	16642	Docket No. 01-0299832	3/11/2018	139	Casinghead
32940	Winterbotham ZAV #U1H & #U2H*	15744	Admin.	3/11/2018	200	Casinghead
30086	Winterbotham ZAV #A1H, #A2H, #A3H & #A4H*	15744	Admin.	12/6/2017	200	Casinghead
30087	Winterbotham ZAV #B1H & #B2H*	15744	Admin.	12/6/2017	250	Casinghead
32600	Winterbotham ZAV #B3H, #B4H & #D1H	15744	Admin.	4/12/2018	160	Casinghead
32939	Winterbotham ZAV #D2H, #S1H & #S2H*	15744	Admin.	3/11/2018	300	Casinghead
32938	Winterbotham ZAV #F1H & #F2H*	15744	Admin.	3/11/2018	200	Casinghead
32601	Winterbotham ZAV #G2H, #V1H & #V2H*	15744	Admin.	4/12/2018	185	Casinghead
32602	Winterbotham ZAV #G3H & #N1H*	15744	Admin.	4/12/2018	110	Casinghead
32603	Winterbotham ZAV #H2H, #H3H & #I1H*	15744	Admin.	4/12/2018	120	Casinghead
32604	Winterbotham ZAV #I2H & #I3H	15744	Admin.	4/12/2018	100	Casinghead
32605	Winterbotham ZAV #J1H & #J2H	15744	Admin.	4/12/2018	135	Casinghead
32941	Winterbotham ZAV #K1H & #J3H*	15744	Admin.	3/11/2018	175	Casinghead
32606	Winterbotham ZAV #K2H	15744	Admin.	4/12/2018	70	Casinghead
25666 (33294)	Winterbotham ZAV #M1H	15744	Docket No. 01-0299832	3/11/2018	124	Casinghead
32607	Winterbotham ZAV #N2H & #N3H	15744	Admin.	4/12/2018	80	Casinghead
32608	Winterbotham ZAV #O1H, #O2H, #O3H & #OSH	15744	Admin.	4/12/2018	190	Casinghead
32609	Winterbotham ZAV #Q1H & #Q2H	15744	Admin.	4/12/2018	160	Casinghead
32610	Winterbotham ZAV #R1H	15744	Admin.	4/12/2018	65	Casinghead

* Currently Equipped with a Flare Stack