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# RAILROAD COMMISSION OF TEXAS

## HEARINGS DIVISION

### **OIL AND GAS DOCKET NO. 08-0319130**

**APPLICATION OF SHELL WESTERN E&P (774719) TO CONSIDER AMENDING FIELD RULES FOR THE PHANTOM (WOLFCAMP) FIELD, OR IN THE ALTERNATIVE, FOR AN EXCEPTION TO STATEWIDE RULE 13 FOR VARIOUS WELLS, PHANTOM (WOLFCAMP) FIELD, CULBERSON, LOVING, PECOS, REEVES, STERLING, WARD AND WINKLER COUNTIES, TEXAS**

### **OIL AND GAS DOCKET NO. 08-0319479**

**APPLICATION OF SHELL WESTERN E&P (774719) TO CONSIDER AMENDING FIELD RULES FOR THE SANDBAR (BONE SPRING) FIELD, OR IN THE ALTERNATIVE, A BLANKET FIELD WIDE EXCEPTION TO STATEWIDE RULE 13, SANDBAR (BONE SPRING) FIELD, CULBERSON, LOVING, PECOS, REEVES, WARD AND WINKLER COUNTIES, TEXAS**

### **OIL AND GAS DOCKET NO. 08-0319480**

**APPLICATION OF SHELL WESTERN E&P (774719) TO CONSIDER AMENDING FIELD RULES FOR THE TWO GEORGES (BONE SPRING) FIELD, OR IN THE ALTERNATIVE FOR A BLANKET FIELD WIDE EXCEPTION TO STATEWIDE RULE 13, TWO GEORGES (BONE SPRING) FIELD, CULBERSON, LOVING, REEVES, WARD AND WINKLER COUNTIES, TEXAS**

### **EXAMINERS' REPORT AND RECOMMENDATION**

**HEARD BY:** Robert Musick, P.G. - Technical Hearings Examiner  
Kristi M. Reeve - Administrative Law Judge

**HEARING DATE:** July 23, 2019

**CONFERENCE DATE:** June 16, 2020

### **APPEARANCES:**

#### **APPLICANT:**

Kelli Kenney, Attorney  
George Mullen, Regulatory Specialist  
Michael Boutwell, Regulatory Specialist  
Tyler Smith, Drilling Engineer

#### **REPRESENTING:**

Shell Western E&P

**OBSERVERS:**

Ana Maria Marsland, Attorney  
Jessica H. Mendoza, Staff Attorney  
Baldemar Navejar, Chief Engineer

**REPRESENTING:**

Anadarko E&P Onshore, LLC  
Railroad Commission of Texas  
Railroad Commission of Texas

**STATEMENT OF THE CASE**

Shell Western E&P (774719) (“Shell” or “Applicant”) seeks to amend the current oil and gas field rules in effect for the Phantom (Wolfcamp) Field, Sandbar (Bone Spring) Field, and the Two Georges (Bone Spring) Field (“Subject Fields”) in various counties, Texas, or, in the alternative, an exception to Statewide Rule 13(b)(4)(A)<sup>1</sup> for various Shell wells located in the Subject Fields. Shell’s desired outcome is for the Field Rules for the Subject Fields to be amended to establish a blanket field-wide exception to Statewide Rule 13(b)(4)(A), which pertains to end-of-tubing depth requirements for deviated or horizontal wells, through an alternate program. Notice was given to operators in the Subject Fields. The application was not protested.

Shell is requesting relief from the tubing requirement for deviated or horizontal wells if a flowing oil well meets a set of pre-established criteria outlined in a proposed program that takes several factors into consideration: well design, well operating conditions, an evaluation of the well’s casing cement, and the Field’s correlative interval/geology. The amended Field rule changes will prevent waste and protect correlative rights.

The Technical Examiner and Administrative Law Judge (collectively, “Examiners”) recommend approval of the amended field rules for the Subject Fields as set out in the Final Orders.

**DISCUSSION OF THE EVIDENCE**

Shell requested a hearing on March 15, 2019, to consider amending the Field Rules for the Subject Fields, or, in the alternative, an exception to Statewide Rule 13(d)(1) for various Shell wells located in the Subject Fields. A Notice of Hearing (“Notice”) was issued by the Commission on June 26, 2019, for the hearing on July 23, 2019. The Notice contains (1) a statement of the time, place, and nature of the hearing; (2) a statement of the legal authority and jurisdiction under which the hearing is to be held; (3) a reference to the particular sections of the statutes and rules involved; and (4) a short and plain statement of the matters asserted. In addition to Notice sent to the Service List on June 26, 2019, a supplemental notice was provided to Rio Oil and Gas (Permian) II, LLC (“Rio”) by the Hearings Division on August 12, 2019, providing Rio with ten days to file a protest or request a hearing. No response was received. The supplemental notice was provided because Rio was not on the initial Notice dated June 26, 2019. Therefore, all operators in the Subject Fields were notified of the amended Subject Field Rules and were given at least ten days to protest. No protest was received for any of the captioned dockets.

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<sup>1</sup> 16 Tex. Admin. Code §3.13(b)(4)(A) is referred to as Statewide Rule 13(b)(4)(A).

**Statewide Rule 13(b)(4)(A) states in part:**

All flowing oil wells shall be equipped with and produced through tubing. When tubing is run inside casing in any flowing oil well, the bottom of the tubing shall be at a point not higher than 100 feet (vertical depth) above the top of the producing interval nor more than 50 feet (vertical depth) above the top of the liner, if a liner is used, or 100 feet (vertical depth) above the kickoff point in a deviated or horizontal well.<sup>2</sup>

Shell is requesting relief for the end-of-tubing depth requirement for horizontal wells in the Subject Fields. Specifically, Shell is requesting relief from the 100 feet (vertical depth) above the kickoff point in a deviated or horizontal well.

Shell is requesting relief from the tubing requirement for deviated or horizontal wells if a flowing oil well meets a set of pre-established criteria outlined in a proposed alternate program that takes several factors into consideration: well design, well operating conditions, an evaluation of the well's casing cement, and the Field's correlative interval/geology. Therefore, Shell is proposing an alternate program as an amendment to the field rules for the Subject Fields. Shell asserts the amended Field rule changes will prevent waste and protect correlative rights by reducing the regulatory burden, establishing well completion procedures and maximizing production.

**Subject Fields and Proposed Language**

Shell is seeking to amend the Field Rules for the following Subject Fields to address the requirements of Statewide Rule 13(b)(4)(A).

**i. Phantom (Wolfcamp) Field (Field No. 71052900)**

The Phantom (Wolfcamp) Field was discovered in 1983 by initially drilling vertical wells in the Bone Spring formation. The majority of the wells in the Field are horizontal wells, with the average depth being about 11,000 feet. The correlative interval for the Phantom (Wolfcamp) Field is from 9,515 feet to 12,447 feet. Initial flowing pressure in the Field is as high as 4,000 pounds per square inch ("psi"). The Field was designated an unconventional fracture treatment ("UFT") Field on May 10, 2016. The last amendment to the Field Rule was Oil and Gas Docket No. 08-0310856, dated October 16, 2018.

The current docket, Docket No. 08-0319130, is an application for the Phantom (Wolfcamp) Field, Culberson, Loving, Pecos, Reeves, Sterling, Ward, and Winkler Counties, Texas. Shell is seeking to adopt an exception to Statewide Rule 13(b)(4)(A) regarding tubing requirements through the establishment of an alternate program.

Shell's request for relief did not include any other changes to the Field Rules other than the exception through alternate program for tubing identified as Rule 8 below:

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<sup>2</sup> 16 Tex. Admin. Code § 3.13(b)(4)(A).

*Shell's Requested Provision for the Phantom (Wolfcamp) Field – Rule 8:*

Operators of flowing oil wells may comply with the following casing program as an alternative to Statewide Rule 13(b)(4) (*tubing requirements for land wells and bay wells*) so long as each participating well meets the requirements of the program as described by this Rule and otherwise satisfies the intent of Statewide Rule 13(a)(1). Any operator complying with the alternative casing program outlined in this Rule is not required to submit the fee describe in Statewide Rule 13(d)(1).

- a. For horizontal oil wells cased with tapered long-string production casing from the toe of the well to surface designed for all normal producing well loads, the operator shall comply with the following conditions:
  - (1) the bottom of tubing shall be installed no more than 100 feet (vertical) above the point of transition from the larger diameter production casing to the smaller diameter production casing in the tapered long-string casing;
  - (2) the point of transition described in subsection (1) shall be located no more than 1,200 feet (vertical) above the top of the correlative interval of the field; and
  - (3) the production casing cement shall extend 200 feet above the intermediate casing shoe.
- b. In the event the base of the intermediate casing is above the top of the correlative interval of the field, the operator shall pressure test the annulus of the intermediate casing and production casing to at least 1,200 psi and run a cement evaluation survey to assess radial cement integrity and placement behind the production casing from the top of the correlative interval of the field to at least 200 feet above the base of the intermediate casing.
  - (1) The operator shall submit all pressure test results and cement evaluation surveys electronically to the district director as soon as practicably possible, but no later than 48 hours after receipt of the pressure test results and cement evaluation survey.
  - (2) If the pressure test results or cement evaluation survey indicates insufficient isolation, (sufficient isolation as described in Statewide Rule 13(a)(1)), completion operations may not re-commence until the district director approves a remediation plan, the operator implements the approved plan, and pressure test results and cement evaluation surveys indicate sufficient isolation.
  - (3) Upon the request of the operator, the district director may approve completion operations in the portion of the wellbore where sufficient isolation exists while remediation operations described in subsection (b)(2) are ongoing with the following restrictions:

- (A) the operator shall monitor all annuli during completion operations;
  - (B) if the pressure deviates above or below the level anticipated by pressure or thermal transfer, the operator shall immediately cease completion operations and notify the district director;
  - (C) if the operator is required to cease operations pursuant to subsection (b)(3)(B) of this Rule, the operator shall then comply with subsections (b)(1) and (b)(2) described herein.
- c. Unless district director approval is required under subsection (b) of this Rule, Commission approval is not required for an operator participating in and complying with the requirements of the alternative casing program set forth in this Rule.
  - d. All exceptions to Statewide Rules as discussed in Rules 6 and 8 of this order shall be applicable to all wells in the field (including any wells for which completion forms were filed prior to the issuance of this order), regardless of when completion forms are filed.

**ii. Sandbar (Bone Spring) Field (80544500)**

The Sandbar (Bone Spring) Field was discovered on November 30, 2010 and developed with horizontal wells similar to other Bone Spring fields, with Field Rules established in October 2011. The Field has a correlative interval from 8,007 feet to 11,067 feet. The Field was designated an UFT Field on May 10, 2016. The last amendment to the field rule was Oil and Gas Docket No. 08-0295961, dated March 20, 2018.

The current docket, Docket No. 08-0319479, is an application for the Sandbar (Bone Spring) Field, Culberson, Loving, Pecos, Reeves, Ward, and Winkler Counties, Texas. Shell is seeking to adopt an exception to Statewide Rule 13(b)(4)(A) regarding tubing requirements through the establishment of an alternate program.

Shell's request for relief did not include any other changes to the Field Rules other than the exception through alternate program for tubing identified as Rule 8 below:

**Shell's Requested Provision for the Sandbar (Bone Spring) Field – Rule 8:**

Operators of flowing oil wells may comply with the following casing program as an alternative to Statewide Rule 13(b)(4) (*tubing requirements for land wells and bay wells*) so long as each participating well meets the requirements of the program as described by this Rule and otherwise satisfies the intent of Statewide Rule 13(a)(1). Any operator complying with the alternative casing program outlined in this Rule is not required to submit the fee describe in Statewide Rule 13(d)(1).

- a. For horizontal oil wells cased with tapered long-string production casing from the toe of the well to surface designed for all normal producing well loads, the operator shall comply with the following conditions:

- (1) the bottom of tubing shall be installed no more than 100 feet (vertical) above the point of transition from the larger diameter production casing to the smaller diameter production casing in the tapered long-string casing;
  - (2) the point of transition described in subsection (1) shall be located no more than 1,200 feet (vertical) above the top of the correlative interval of the field; and
  - (3) the production casing cement shall extend 200 feet above the intermediate casing shoe.
- b. In the event the base of the intermediate casing is above the top of the correlative interval of the field, the operator shall pressure test the annulus of the intermediate casing and production casing to at least 1,200 psi and run a cement evaluation survey to assess radial cement integrity and placement behind the production casing from the top of the correlative interval of the field to at least 200 feet above the base of the intermediate casing.
- (1) The operator shall submit all pressure test results and cement evaluation surveys electronically to the district director as soon as practicably possible, but no later than 48 hours after receipt of the pressure test results and cement evaluation survey.
  - (2) If the pressure test results or cement evaluation survey indicates insufficient isolation, (sufficient isolation as described in Statewide Rule 13(a)(1)), completion operations may not re-commence until the district director approves a remediation plan, the operator implements the approved plan, and pressure test results and cement evaluation surveys indicate sufficient isolation.
  - (3) Upon the request of the operator, the district director may approve completion operations in the portion of the wellbore where sufficient isolation exists while remediation operations described in subsection (b)(2) are ongoing with the following restrictions:
    - (A) the operator shall monitor all annuli during completion operations;
    - (B) if the pressure deviates above or below the level anticipated by pressure or thermal transfer, the operator shall immediately cease completion operations and notify the district director;
    - (C) if the operator is required to cease operations pursuant to subsection (b)(3)(B) of this Rule, the operator shall then comply with subsections (b)(1) and (b)(2) described herein.

- c. Unless district director approval is required under subsection (b) of this Rule, Commission approval is not required for an operator participating in and complying with the requirements of the alternative casing program set forth in this Rule.
- d. All exceptions to Statewide Rules as discussed in Rules 5, 6 and 8 of this order shall be applicable to all wells in the field (including any wells for which completion forms were filed prior to the issuance of this order), regardless of when completion forms are filed.

### iii. **Two Georges (Bone Spring) Field (92100050)**

The Two Georges (Bone Spring) Field is composed of siltstone and shale with an average permeability of 10 nanodarcies, resulting in a low transmissivity of fluids through the siltstone and shale. The Field requires hydraulic fracture stimulation to develop porosity in the reservoir rock. The Field Rules were initially adopted in 2011. The Two Georges (Bone Spring) Field has a correlative interval from 8,979 feet to 11,600 feet. Unlike the other two fields in this ERR, the Two Georges (Bone Spring) Field is not a designated UFT Field. The last amendment to the Field Rule was Oil and Gas Docket No.08-0306090 dated January 23, 2018.

The current docket, Docket No. 08-0319480, is an application for the Two Georges (Bone Spring) Field, Culberson, Loving, Reeves, Ward, and Winkler County, Texas.

Shell requested no other changes in their Two Georges (Bone Spring) Field application other than the Rule 13(b)(4) exception through the establishment of an alternative program identified as Rule 7 below:

#### *Shell's Requested Provision for the Two Georges (Bone Spring) Field – Rule 7:*

Operators of flowing oil wells may comply with the following casing program as an alternative to Statewide Rule 13(b)(4) (*tubing requirements for land wells and bay wells*) so long as each participating well meets the requirements of the program as described by this Rule and otherwise satisfies the intent of Statewide Rule 13(a)(1). Any operator complying with the alternative casing program outlined in this Rule is not required to submit the fee describe in Statewide Rule 13(d)(1).

- a. For horizontal oil wells cased with tapered long-string production casing from the toe of the well to surface designed for all normal producing well loads, the operator shall comply with the following conditions:
  - (1) the bottom of tubing shall be installed no more than 100 feet (vertical) above the point of transition from the larger diameter production casing to the smaller diameter production casing in the tapered long-string casing;
  - (2) the point of transition described in subsection (1) shall be located no more than 1,200 feet (vertical) above the top of the correlative interval of the field; and

- (3) the production casing cement shall extend 200 feet above the intermediate casing shoe.
- b. In the event the base of the intermediate casing is above the top of the correlative interval of the field, the operator shall pressure test the annulus of the intermediate casing and production casing to at least 1,200 psi and run a cement evaluation survey to assess radial cement integrity and placement behind the production casing from the top of the correlative interval of the field to at least 200 feet above the base of the intermediate casing.
  - (1) The operator shall submit all pressure test results and cement evaluation surveys electronically to the district director as soon as practicably possible, but no later than 48 hours after receipt of the pressure test results and cement evaluation survey.
  - (2) If the pressure test results or cement evaluation survey indicates insufficient isolation, (sufficient isolation as described in Statewide Rule 13(a)(1)), completion operations may not re-commence until the district director approves a remediation plan, the operator implements the approved plan, and pressure test results and cement evaluation surveys indicate sufficient isolation.
  - (3) Upon the request of the operator, the district director may approve completion operations in the portion of the wellbore where sufficient isolation exists while remediation operations described in subsection (b)(2) are ongoing with the following restrictions:
    - (A) the operator shall monitor all annuli during completion operations;
    - (B) if the pressure deviates above or below the level anticipated by pressure or thermal transfer, the operator shall immediately cease completion operations and notify the district director;
    - (C) if the operator is required to cease operations pursuant to subsection (b)(3)(B) of this Rule, the operator shall then comply with subsections (b)(1) and (b)(2) described herein.
- c. Unless district director approval is required under subsection (b) of this Rule, Commission approval is not required for an operator participating in and complying with the requirements of the alternative casing program set forth in this Rule.
- d. All exceptions to Statewide Rules as discussed in Rules 5, 6, and 7 of this order shall be applicable to all wells in the field (including any wells for which completion forms were filed prior to the issuance of this order), regardless of when completion forms are filed.



### **Subject Fields and Proposed Language**

As an alternative to the alternate program which would provide a blanket exception to Statewide Rule 13(b)(4) for the Subject Fields, Shell requested a Statewide Rule 13(b)(4) exception for the following 14 specific wells:

Dakar 53-2 LOV Unit 1102H – (API #42-301-33510)  
Dakar 53-2 LOV Unit 1103H – (API #42-301-33508)  
Dakar 53-2 LOV Unit 1104H – (API #42-301-33514)  
Dakar 53-2 LOV Unit 1105H – (API #42-301-33515)  
Dakar 53-2 LOV Unit 1106H – (API #42-301-33516)  
Dakar 53-2 LOV Unit 1107H – (API #42-301-33513)  
Dakar 53-2 LOV Unit 1108H – (API #42-301-33512)  
Dakar 53-2 LOV Unit 1109H – (API #42-301-33511)  
ZPZ 34-196 WRD Unit 2H – (API #42-475-37329)  
Bramblett 34-197 WRD 5H – (API #42-475-37343)  
Stingray 53-2-25 LOV 3H – (API #42-301-33565)  
Wahoo 53-2-23 LOV Unit 6H – (API #42-301-33998)  
University 20 PW 2501H – (API #42-495-34181)  
University 20 TG 2705H – (API #42-495-34171)

### **Technical Staff's Review**

Based on testimony, Shell worked with technical staff to develop the proposed Field Rule amendment language. At the hearing, Mr. Baldemar Navejar, Chief Engineer for the Oil and Gas Division, testified that the technical staff of the Commission find the amendment language, as proposed, acceptable and that it meets the intent of Rule 13.

### **Late-Filed Evidence**

After the hearing, late-filed evidence was submitted in response to the Examiners' requests regarding:

- assurance the district directors concur with the proposed language;
- eliminating fees required by Statewide Rule 13; and
- inclusion that the language in the Final Orders for the Subject Fields meets the intent of Statewide Rule 13.

The proposed field-wide program must meet a set of pre-established criteria outlined in the program that takes key factors into consideration, including well design, well operating conditions, evaluation of the well's casing cement, and the Field's correlative interval/geology.

Late-filed submittals from Shell dated October 9, 2019 and March 13, 2020 and the Oil and Gas Division dated March 13, 2020, resolved most outstanding data gaps revealed by the Examiners questions in the hearing held on July 23, 2019. The Examiners find Shell's request to not require a fee be submitted for any operator complying with the

alternative casing program is in opposition to the intent of Statewide Rule 13. Thus, the Examiners recommended the Statewide Rule required fee remain. Shell stated the requested change to the field rule language is not adverse.

At the hearing, Shell agreed on the record that the Final Orders in this matter are to be final and effective when the Master Order relating to the Final Orders is signed.

### **Examiners' Recommendation**

The amended Field rule changes will promote oil recovery and prevent waste and lessen the regulatory overburden. The Examiners recommend granting the amended Field rule language as presented in the proposed Final Orders.

### **FINDINGS OF FACT**

1. Shell Western E&P (774719) ("Shell" or "Applicant") seeks to amend the current oil and gas field rules in effect for the Phantom (Wolfcamp) Field, Sandbar (Bone Spring) Field, and the Two Georges (Bone Spring) Field ("Subject Fields") in various counties, Texas.
2. Shell requested in the hearing to adopt an exception to Statewide Rule 13(b)(4) regarding tubing requirements for oil wells in the Subject Fields. Shell is requesting relief from the tubing requirement if a flowing oil well meets a set of pre-established criteria outlined in a proposed program that takes several factors into consideration, such as well design, well operating conditions, evaluation of the well's casing cement, and the Field's correlative interval/geology.
3. Shell requested a hearing on March 15, 2019, to consider amending the Field Rules for the Subject Fields. A Notice of Hearing ("Notice") was issued by the Commission on June 26, 2019, for the hearing set for July 23, 2019. The Notice contains (1) a statement of the time, place, and nature of the hearing; (2) a statement of the legal authority and jurisdiction under which the hearing is to be held; (3) a reference to the particular sections of the statutes and rules involved; and (4) a short and plain statement of the matters asserted. Shell indicated in the hearing that notice was not provided to one entity because of an administrative error. On August 12, 2019, correspondence was provided to an updated Service List for an opportunity to protest, object, request a hearing, or file an opposition to Shell's application. All operators in the Subject Fields were notified and given at least ten days to protest. No protest was received for any of the Subject Fields.
4. A hearing was held on July 23, 2019. Late submitted information was filed on October 9, 2019, which closed the hearing record.
5. The Subject Fields include:
  - a. **Phantom (Wolfcamp) Field (Field No. 71052900)** - The Phantom (Wolfcamp) Field was discovered in 1983 by initially drilling vertical wells in the Bone Spring formation. The majority of the wells in the Field are horizontal wells, with the average depth being about 11,000 feet. The correlative interval for the Phantom

(Wolfcamp) Field is from 9,515 feet to 12,447 feet. Initial flowing pressure in the Field is as high as 4,000 pounds per square inch (“psi”). The Field was designated an unconventional fracture treatment (“UFT”) Field on May 10, 2016. The last amendment to the Field Rule was Oil and Gas Docket No. 08-0310856, dated October 16, 2018.

- b. **Sandbar (Bone Spring) Field (80544500)** - The Sandbar (Bone Spring) Field was discovered on November 30, 2010 and developed with horizontal wells with Field Rules established for the Field in October 2011. The Field has a correlative interval from 8,007 to 11,067 feet. The Field was designated an unconventional fracture treatment (“UFT”) Field on May 10, 2016. The last amendment to the Field Rules was Oil and Gas Docket No.08-0295961, dated March 20, 2018.
  - c. **Two Georges (Bone Spring) Field (92100050)** - The Two Georges (Bone Spring) Field is composed of siltstone and shale with an average permeability of 10 nanodarcies resulting in a low transmissivity of fluids. The Field requires hydraulic fracture stimulation to develop porosity in the reservoir rock. The Field Rules were initially adopted in 2011. The Two Georges (Bone Spring) Field has a correlative interval from 8,979 feet to 11,600 feet. The last amendment to the Field Rules was Oil and Gas Docket No.08-0306090 dated January 23, 2018.
6. The proposed rule language for an administrative exception to Statewide Rule 13(b)(4), regarding tubing depth requirements, will comply with the intent of Statewide Rule 13(a)(1) by implementing a proposed program that will consider the well design, well operating conditions, an evaluation of the well’s casing cement, and the Field’s correlative interval/geology.
  7. The amended Field rule changes will prevent waste and protect correlative rights.
  8. The Examiners recommend granting the amended Field rule language as presented in the proposed Final Orders.
  9. At the hearing, Shell agreed on the record that the Final Orders in this case are to be final and effective when the Master Order relating to the Final Order is signed.

### **CONCLUSIONS OF LAW**

1. Resolution of the subject applications are a matter committed to the jurisdiction of the Railroad Commission of Texas. Tex. Nat. Res. Code § 81.051.
2. All notice requirements have been satisfied. 16 Tex. Admin. Code § 1.42.
3. The requested amendment to the Subject Field Rules will prevent waste and protect correlative rights.
4. Pursuant to § 2001.144 (a)(4)(A) of the Texas Government Code and the agreement of the applicant on the record, the Final Orders can be final and effective when a Master Order relating to the Final Order is presented at Commission conference and signed by the Commissioners.

**EXAMINER'S RECOMMENDATION**

Based on the above findings of facts and conclusions of law, the Examiners recommend approval of the requested field rule amendments as stated in the proposed Final Orders.

Respectfully submitted,

DocuSigned by:  
*Robert Musick*  
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Robert Musick, P.G.  
Technical Hearings Examiner

DocuSigned by:  
*Kristi M. Reeve*  
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Kristi M. Reeve  
Administrative Law Judge