

**RAILROAD COMMISSION OF TEXAS
HEARINGS DIVISION**

**SURFACE MINING DOCKET NO. C18-0005-SC-26-F
APPLICATION BY TEXAS MUNICIPAL POWER AGENCY
FOR RELEASE OF RECLAMATION OBLIGATIONS
PHASE I, II AND III FOR 99.0 ACRES AND PHASE III FOR 31.8 ACRES
PERMIT NO. 26D, GIBBONS CREEK LIGNITE MINE, GRIMES COUNTY, TEXAS**

**ORDER APPROVING APPLICATION FOR RELEASE OF RECLAMATION
OBLIGATIONS**

Statement of the Case

Texas Municipal Power Agency (TMPA), P. O. Box 7000, Bryan, Texas 77805, applied to the Railroad Commission of Texas (Commission), Surface Mining and Reclamation Division (SMRD or Staff), for a release of reclamation obligations on an aggregate of 130.8 acres within Permit No. 26D, Gibbons Creek Mine, Grimes County, Texas. Phases I, II, and III release are requested for 99.0 acres, and Phase III release is requested for 31.8 acres. 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 §§12.312-313 of the "Coal Mining Regulations," Tex. R.R. Comm'n, 16 TEX. ADMIN. CODE CH. 12 (Thomson West 2018) (Regulations).

Permit No. 26D currently authorizes surface coal mining operations at TMPA's Gibbons Creek Mine. Copies of the application for release were filed in the required county and Commission offices. After public notice, no comments or requests for hearing were filed. The only parties to the proceeding are TMPA and the Commission's Surface Mining and Reclamation Division (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 releases with which TMPA concurs. The parties have filed waivers of preparation and circulation of a proposal for decision.

After consideration of the application and the Findings of Fact and Conclusions of Law, the Commission approves the release of reclamation obligations as recommended by Staff. TMPA does not request adjustment to the approved reclamation bond at this time and no new bond has been submitted. The Commission determines an eligible bond reduction amount of \$813,877.24 as calculated by Staff.

FINDINGS OF FACT

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

1. By letter dated October 25, 2016, Texas Municipal Power Agency (TMPA) filed its application (Application) with the Railroad Commission of Texas' (Commission) Surface Mining and Reclamation Division (SMRD and/or Staff) for a release of Phases I, II and III reclamation obligations for 99.0 acres and Phase III reclamation obligations for 31.8 acres in Area B2 within the Gibbons Creek Mine, Permit No. 26D, located in Grimes County, Texas. Processing of the Application was suspended by SMRD pending approval groundcover and soil-testing reports [Findings of Fact Nos. 15(c) and 16(b), *infra*]. The application was declared administratively complete by letter dated April 4, 2018. Staff's technical analysis (TA) was filed in the docket by letter dated May 7, 2018.

2. The application is made pursuant to Texas Surface Coal Mining and Reclamation Act, TEX. NAT. RES. CODE ANN. Ch. 134 (Vernon Supp. 2017) (Act), and the Coal Mining Regulations, Tex. R.R. Comm'n, 16 TEX. ADMIN. CODE Ch. 12 (Thomson West 2017). The application was properly certified in accordance with §12.312(a)(3).
3. The current reclamation performance bond is a collateral bond with letter of credit in the amount of \$11,000,000 that was accepted by Commission Order dated March 20, 2018 [Docket No. C18-0007-SC-26-E].
4. Notice of the application was published once each week for four consecutive weeks in the *Navasota Examiner*, a newspaper of general circulation in the vicinity of the Gibbons Creek Mine in Grimes County, the locality of surface mine. Dates of publication were February 21, 28 and March 7, 14, 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. TMPA submitted affidavits of publication with news clippings by letter dated March 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 Grimes County, 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 March 30, 2018, TMPA submitted copies of letters notifying adjoining landowners and lessees, the Brazos River Authority, Wickson Creek Special Utility District, Texas General Land Office, U.S. Army Corps of Engineers, Fort Worth District, Navasota Soil and Water Conservation District, Texas State Soil and Water Conservation Board, Texas Commission on Environmental Quality, Environmental Protection Agency's District Office in Dallas, Natural Resources Conservation Service, and the Grimes County Judge and Commissioners Court 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 Grimes County Judge of the application as required by §134.133 of the Act by certified letter dated February 9, 2018.

9. Pursuant to §12.312(b) of the Regulations, Staff notified owners of interests in lands and lessees of the application for release and the Office of Surface Mining Reclamation and Enforcement, Tulsa Field Office (OSM) by letters dated October 28, 2016, of the date and time of Staff's field inspection scheduled for November 16, 2016. The notification stated that a 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 November 16, 2016 as scheduled. Following a pre-inspection meeting with representatives from TMPA, SMRD Inspection and Enforcement staff, accompanied by representatives from TMPA, conducted its inspection of the area requested for release. Except for the demonstrations addressed in Findings of Fact Nos. 15(c) and 16(b), *infra*, the field report found that the proposed release area was eligible for the requested releases, pending Staff review.
11. The application contains a notarized statement signed by Dr. Jan Horbaczewski, Regulatory and Compliance Manager, TMPA, October 24, 2016, certifying that all applicable reclamation activities have been accomplished in accordance with the requirements of the Act, the regulatory program and the approved reclamation plan.
12. The permit area is comprised of approximately 10,999 acres located roughly 8 miles northwest of Anderson, Texas. Texas Highway 30 traverses the northernmost portion of the permit area. The 130.8 acres proposed for release is located in eastern portion of the permit area and runs from north to south through Area B2 of the Gibbons Creek Mine. A general location map of the permit area, with the 130.8 acres proposed for release distinguished, is found in Appendix I of Staff's Inspection Report.
13. The approved postmining land use for the 130.8 acres proposed for release is industrial/commercial (I/C).
14. The Commission previously approved Phase I and II release of reclamation liability for the 31.8 acres requested for Phase III release by Order dated December 9, 1999 [Docket No. C9-0017-SC-26-F].
15. The 99.0 acres requested for Phase I release has met requirements for backfilling, regrading, and drainage control pursuant to §12.312(a)(1) of the Regulations.
 - (a) The area requested for Phase I release is stable with no active erosion evident. No cut-and-fill terraces were constructed.
 - (b) The subject acreage was mined and/or disturbed for mining related purposes from 1981 to 2001. Regrading of the area occurred between 1983 and 2012. The area has been regraded to its approximate original contour. All highwalls were eliminated in accordance with §12.384(b)(1) of the Regulations and no cut-and-fill terraces were constructed. The area has been graded in a manner to support I/C land use and minimize erosion and water pollution.
 - (c) By letters dated November 16, 1998; December 15, 1998; and January 11, 2017, SMRD determined that the soil-testing data for all soil-testing grids within the

proposed release area did not indicate the presence of acid- and/or toxic-forming materials in the top four feet of postmine soil [§12.386].

- (d) Surface water runoff from the proposed release area flows in to Pond 6A. Pond 6A was approved as a permanent structure by letter dated August 5, 1999.
 - (e) The following four permanent diversions, including two low-water crossings, one reconstructed drainage and one set of two corrugated metal culverts, are located within the 99.0 acres requested for Phase I release: Pond 1 Haul Road Low-Water Crossing; Rock Lake Creek Low-Water Crossing; Rock Lake Creek; and DD-2B(r). The structures were approved by Staff as permanent diversions by letters dated June 17, 2010; June 17, 2010; April 28, 1995 and December 18, 2003, respectively. Copies of Staff's approval letters and accompanying memoranda for these diversions were provided by TMPA in Section 5 of the Application. All structures were found to be structurally intact and stable during Staff's field inspection of the area.
 - (f) The following six permanent roads are located within the area proposed for Phase I release: Main Haul Road (North-South); Main Haul Road (East-West); Pond 1 Access Road; Pond DP-1 Access Road; South Access Road; and SR-8. One permanent bridge, the "Gibbons Creek Bridge," is located within the subject area. These structures were approved as permanent roads by SMRD letters dated either August 1, 1995 or June 17, 2010. Copies of the letters approving each structure as a permanent postmine feature are included in Section 5 of the Application.
 - (g) No areas are approved for the disposal of non-coal waste within the area proposed for Phase I bond release [§12.375].
 - (h) No small-area depressions are located within the area proposed for release [§12.385(c)].
16. The 99.0 acres requested for Phase II release has met requirements for revegetation and that the area not be contributing suspended solids to streamflow or runoff outside the permit area in excess of effluent limitations pursuant to §12.313(a)(2).
- (a) No rills or gullies were observed or noted in Staff's inspection of the proposed release area [§12.389].
 - (b) Revegetation has been established on the subject acreage pursuant to the requirements for I/C postmine land use [§§12.390 – 12.395]. TMPA submitted a groundcover evaluation for the proposed release area by letter dated May 9, 2016, supplemented by letter dated August 25, 2016. By letter dated January 8, 2018, SMRD confirmed the groundcover in the area is adequate to control erosion pursuant to §12.395(b)(4) of the Regulations.
 - (c) There is no prime farmland located within the 99.0-acre area for which other requirements would be applicable [§§12.620 – 12.625].

- (d) As set out in Findings of Fact Nos. 17(a)-(b), *infra*, the 99.0-acre area requested for release is not contributing excess solids to streamflow or runoff outside the permit area in excess of effluent limitations set out in the water quality permit or in excess of stream segment standards.
17. Surface water monitoring occurred in accordance with the approved permit. For the Phase III release requested for the aggregate 130.8 acres, data provided by TMPA and information provided by Staff demonstrate that Phase III requirements for protection of surface water have been met. The acreage drains to Gibbons Creek and its tributary, Rock Creek, thence to the Navasota River (TCEQ Stream Segment No. 1209), thence to the Brazos River (TCEQ Stream Segment No. 1202). TMPA's consultant's *Surface Water Hydrology Report* was provided. TMPA provided data from eleven ponds (1, 5A, 6A, 7A, B2P-2, B2P-3, B2P-5, B2P-6, B2P-7, DP-1 and HR-2) as well as eight long-term surface water monitoring stations (SWBB1, SWGC1, SWNR1, SWRL3, SWBB2, SWGC2, SWNR2 and SWRL4), Staff bases its recommendation regarding surface water protection on TMPA's data and analysis of the four long-term stations in the vicinity of the areas proposed for release, the Texas Commission on Environmental Quality Permit No. 00246 for the mining and reclamation area, and Staff's technical evaluation. Based upon the information provided by TMPA and Staff review, surface waters have been protected in accordance with § 12.313(a)(3).
- (a) The three ponds that capture runoff from the areas proposed for release are Ponds 1, DP-1 and HR-2. TCEQ's permit does not include these ponds in those for which effluent limitations apply. TMPA's evaluation included a comparison of the water quality of eleven ponds to the stream segment standards for Segments 1202 and 1209. This report provided by TMPA indicates that the requirements for Segments 1209 (Navasota River) and 1202 (Brazos River) for pH and TDS are met for Ponds 1, DP-1 and HR-2. Staff compared the water quality of the three ponds receiving runoff from the areas proposed for release to effluent requirements contained in the TCEQ permit for other ponds. Staff's comparison reflects the following for pH, total dissolved solids (TDS), total suspended solids (TSS), and total iron (Fe): the averages for all parameters comply with the requirements of the TCEQ permit that were applicable to other ponds. For Pond 1 for the period of record, 2009 - 2011, average pH, 7.5 standard units (s.u.), was within the range required for pH, 6.5 – 9.0 s.u.; average TDS concentrations measured 642.7 mg/L, meeting the requirement of less than 750 mg/L for Steam Segment 1202; the range of TSS was 15.0 mg/L, meeting both the allowable daily average and the allowable daily maximum for TSS, 35mg/L and 70 mg/L, respectively; and average Fe, 0.2 mg/L, met both the allowable daily average and the allowable daily maximum, 3.0 and 6.0, respectively. The following results for Ponds DP-1 and HR-2 for the period of record, 2009 – 2011, also met the same requirements of the TCEQ permit listed in this paragraph: average pH, 8.0 s.u. (DP-1) and 8.5 s.u. (HR-2); average TDS, 167.7 mg/L (DP-1) and 373.6 mg/L (HR-2); average TSS, 36.5 mg/L (DP-1) and 8.3 mg/L (HR-2); and average Fe, 0.3 mg/L (DP-1) and 0.2 mg/L (HR-2). Based upon this data, the ponds receiving drainage from the areas proposed for release are not contributing excess solids to runoff or streamflow outside the permit area in accordance with §12.313(a)(2).

- (b) Although TMPA provided data from eight long-term surface water monitoring stations, Staff made its recommendation on the stations that are in the vicinity of the areas proposed for release: undisturbed stations SWBB1 (Big Branch) and SWRL3 (Rock Lake Creek), and disturbed stations SWBB2 (Big Branch) and SWGC2 (Gibbons Creek). The parameters for which monitoring occurred and for which there are stream segment standards are pH, TDS, SO₄ (sulfate), and Cl (chloride). The period of record for the paired stations on Big Branch are: SWBB1 (undisturbed), 2/14/90 – 12/05/17, and SWBB2 (disturbed), 2/17/90 – 12/05/17. The period of record for the paired stations on Rock Lake Creek and Gibbons Creek are: SWRL3 (undisturbed), 1/13/81 – 8/17/17, and SWGC2 (disturbed), 3/04/81 – 12/05/17. For pH, minimum, maximum, and average concentrations were within the required range for the stream segments of 6.5-9.0, with the average pH of 7.1 s.u. for the upstream station SWBB1 and 7.5 for the downstream station SWBB2 (Big Branch), and an average pH of 6.7 s.u. for the upstream station SWRL3 (Rock Lake Creek) and 7.3 s.u. for the downstream station SWGC2 on Gibbons Creek. For TDS, the average for the upstream station on Big Branch, SWBB1, 172.1 mg/L, meets the criterion for the two stream segments, Segments 1209 and 1212. The average for the downstream station on Big Branch, SWBB2, 581.5 mg/L, also meets the stream segment standard for TDS. For TDS on Rock Lake Creek, the average for the upstream station SWRL3, 512.4 mg/L, meets the stream segment standards; the average TDS at downstream station SWGC2 on Gibbons Creeks, 510.6, also meets the stream segment standard. For SO₄, the downstream average at SWBB2 meets the standard for Stream Segment No. 1202 and the downstream average at SWGC2 is lower than the baseline average. For Cl, the averages for disturbed stations SWBB2 and SWGC2 meet the criteria for the stream segments.
- (c) Based upon the surface water monitoring and comparisons from upstream to downstream stations and the comparisons of downstream stations to baseline monitoring results for the same stations for similar periods of record as set out in the application, staff review, and Finding of Fact No. 15(b), *supra*, the results reflect the predicted effects on water quality contained in the probable hydrologic consequences determination in the permit. TMPA indicates that although TDS concentrations at disturbed long-term monitoring station SWGC2 are expected to remain near current levels, they will gradually decrease. For water quantity, TMPA indicates that water quantity is not expected to be significantly impacted and that runoff and consumptive losses from postmine ponds appear to be consistent with TMPA's revised probable hydrologic consequences determination in Revision No. 35, administratively approved January 18, 2017. Staff indicates that because of increased capture in postmine ponds, losses due to evaporation will occur; however, because of attenuation of runoff in ponds, sustained flows will increase. The overall effect is expected to be insignificant when compared to the large levels of storm runoff within the cumulative impact drainage area (Navasota River Basin).
- (d) Staff's Cumulative Hydrologic Impact Assessment (CHIA) required by the Act and Regulations that includes effects from the Gibbons Creek Lignite Mine, as well as the Gibbons Creek Lignite Mine V, the Jewett Mine, and the Kosse Mine is contained in Staff's Addendum No. 2 dated December 16, 2011 to the Technical Analysis document for Docket No. C7-0026-SC-50-C. The CHIA

evaluated the Navasota River Basin, the cumulative impact drainage area. The greatest potential increase in TDS concentration (the indicator parameter) was anticipated at Navasota River Basin Mass Balance Point No. B, USGS Gauging Station No. 08110500, downstream of the confluence of Steele Creek and the Navasota River. This increase in TDS (from 155 to 178 mg/L) is estimated as 14.7%. Even with this increase, the resulting value is well within acceptable drinking water standards (500 mg/L) and is well below the maximum annual average for TDS concentration for Stream Segments No. 1209 and No. 1202, (600 mg/L) and (750 mg/L).

18. TMPA has addressed the requirements of §12.348 to protect the groundwater hydrologic balance (for Phase III areas) through the submission of groundwater information on the spoil, overburden and underburden aquifers near or within the Gibbons Creek Lignite Mine.
 - (a) Permit No. 26D lies within the outcrop of the Manning Formation, one of four formations comprising the Eocene Jackson Group. The Manning Formation is about 800 feet thick in Grimes County and is characterized as having four blanket sands sandwiching layers of mud-rich sediments and lignite.
 - (b) TMPA provided quarterly groundwater monitoring data from five monitoring wells near the B2 Mine block, monitoring wells MAMA4, MOBB2, MOAB4-R4, MB37B and MBUTT. The period of record for Spoil Monitoring well MAMA4 is 1987 to 2016. Data is available from all other wells from 1989 to 2016. These wells are located west/southwest of the proposed release areas. TMPA shows the locations of the monitoring wells on its Exhibit 4, *Structures and Ground and Surface Water Monitoring*. These five monitoring wells will remain as part of the long-term groundwater monitoring (LTGM) plan until the B2 mine block is fully released. TMPA provided summary data for the wells for various constituents, along with a graph showing trends for the water-table elevation, total dissolved solids (TDS) concentration, electrical conductivity (EC) and pH values of the well water for the period of record. These wells are located between 3,380 feet and two miles from the areas requested for release depending upon the specific well. No water supply wells are located within the B2 mine block. Four monitoring wells are screened across an interburden sand [Unit 3055 (Well MOAB4-R4)] located above a lignite seam, and underburden sands [Unit 2355 (Wells MOBB2 and MBUTT) and Unit 1975 (Well MB37B)] located below a lignite seam. The sand units were disturbed by mining in the B2 mine block. Although none of these wells are positioned to capture any spoil water migrating from the 130.8-acre proposed bond release area, Staff has evaluated the five wells in the general vicinity to evaluate protection of groundwater. Staff analysis states that water levels have stabilized in the four wells that monitored water quantity over the period of record. The PHC determination included in Permit No. 26D indicates that most of the sand units (aquifers) would be marginally suitable as a water supply for limited agricultural and industrial purposes. Analysis of the data from baseline conditions supports this assessment. Based on the above-mentioned data, Staff found that no negative impacts to the groundwater hydrologic balance have occurred and that no negative impacts are expected to occur in the future.

19. TMPA is not required to complete an extended responsibility period (ERP) prior to Phase III release for the 130.8 acres of I/C postmine acreage [§12.395]. However, an ERP was initiated on November 3, 1994 on 12.0 acres; December 23, 1994 on 14.6 acres; December 16, 1998 on 1.4 acres; and March 30, 2009 on 0.4 acres within the proposed Phase III release area.
20. The area requested for release of reclamation obligations is capable of sustaining the approved postmine land use. Monthly inspections and Staff's inspection on November 16, 2016 demonstrate that the land has been reclaimed to and managed in accordance with the requirements for industrial/commercial land use.
21. The eligible bond reduction amount is \$813,877.24 as set out below:

Phase Requested	Area Acres	Disturbance Category	Bonded Per Acre	Eligible Reduction Per Acre	Eligible Reduction
Phases I-III	90.4	Disturbed	\$6,513	\$6,513	\$588,755.20
Phases I-III	8.6	Mined	\$13,918	\$13,918	\$119,694.80
Phase III	5.1	Disturbed II	\$988	\$988	\$5,038.80
Phase III	26.7	Mined II	\$988	\$988	\$26,379.60
Subtotal	130.8				\$739,888.40
Admin. Costs (10%)					\$73,988.84
Total	130.8				\$813,877.24

22. The eligible bond reduction amount, based upon the Findings of Fact contained in this Order and Staff calculations, with which TMPA agrees, is \$813,877.24. No reduction of the \$11,000,000 collateral bond and letter of credit Order dated March 20, 2018 is requested in this Application.
23. All acres requested for release were marked in the field to distinguish them from active mining and reclamation areas.
24. TMPA 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.
25. 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. TMPA 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. TMPA has complied with all applicable provisions of the Act and the Regulations for the release of Phases I, II and III for 99.0 acres and Phase III release of 31.8 acres, totaling 130.8 acres of land within the Gibbons Creek Lignite Mine.
5. The Commission may approve a release of Phase I, II and III reclamation obligations for the 99.0 acres and a release of Phase III reclamation obligations for 31.8 acres, as set out in the above Findings of Fact and Conclusions of Law.
6. An eligible bond reduction amount of \$813,877.24 for use in reclamation cost estimates may be determined.

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 I, II and III reclamation obligations for 99.0 acres is hereby approved;

IT IS FURTHER ORDERED that a release of Phase III reclamation obligations for 31.8 acres is hereby approved;

IT IS FURTHER ORDERED that an eligible bond reduction amount of \$813,877.24 is determined;

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 5th day of June, 2018.

RAILROAD COMMISSION OF TEXAS

Christi Craddick

CHAIRMAN CHRISTI CRADDICK

Ryan Sitton

COMMISSIONER RYAN SITTON

Wayne Christian

COMMISSIONER WAYNE CHRISTIAN

ATTEST:

Kathy Way

Secretary
Railroad Commission of Texas

