

Kellie Martinec

From: Billy K. Lemons @ RAM GROUP, LLC <billy.k.lemons@resourceanalytical.com>
Sent: Monday, August 25, 2014 11:32 AM
To: rulescoordinator
Cc: Resource Analytical & Management Group LLC
Subject: Comments to Proposed Amendment to 16 TAC §3.70, relating to Pipeline Permits Required; Gas Utilities Docket No. 10366.
Attachments: 2014082501-001-L Railroad Commission of Texas.pdf

Please find attached our letter providing our comments to Proposed Amendment to 16 TAC §3.70, relating to Pipeline Permits Required; Gas Utilities Docket No. 10366.

Thank you.

Billy K. Lemons

*Pres. / Principal Consultant
Resource Analytical & Management Group, LLC
Natural Resource Consultants
Mailing: P.O. Box 632400
Nacogdoches, Texas 75963-2400
Shipping: 207 Blount St.
Nacogdoches, Texas 75965-3541
Email: Billy.K.Lemons@ResourceAnalytical.com
936.569.7228 Office Telephone
936.569.7220 Facsimile
936.554.5209 Wireless*

www.ResourceAnalytical.com

CONFIDENTIALITY & OTHER NOTICES: Incorporated herein this electronic communication (including any attachments hereto) as though written herein verbatim are these important confidentiality and other notices regarding Texas Government Code Section 83.001(b)(3), Texas Occupations Code Chapter 954, Petroleum And Mineral Land Services, Section 954.001, Exception To Practice Of Law, and Texas Occupations Code Section 1101.501, The Real Estate License Act.

RESOURCE ANALYTICAL & MANAGEMENT GROUP, LLC

NATURAL RESOURCE CONSULTANTS

www.ResourceAnalytical.com
Land, Energy & Minerals Resources
Environmental Resources Forest & Wildlife Resources
Geospatial & Photogrammetric Information Resources

Billy K. Lemons
President & Principal Consultant

billy.k.lemons@resourceanalytical.com
936.569.7228 Telephone
936.569.7220 Fax

Mailing Address:
P.O. Box 632400
Nacogdoches, Texas 75963-2400

Office & Shipping Address:
207 Blount Street
Nacogdoches, Texas 75965-3451

August 25, 2014

Rules Coordinator
Office of General Counsel
Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78711-2967

Via email to rulescoordinator@rrc.state.tx.us

Re: Comments to Proposed Amendment to 16 TAC §3.70, relating to Pipeline Permits Required;
Gas Utilities Docket No. 10366.

Dear Railroad Commission of Texas:

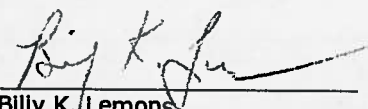
Our firm has been representing private landowners in the State of Texas in negotiations for easements and rights-of-way and other dealings with pipeline companies for more than thirty years. Both we and our private landowner clients cherish our private property rights in the State of Texas and have often been faced with both the use and abuse of eminent domain in the State of Texas to take away those rights.

While we could comment on our own at great length regarding the above-referenced rule proposed by the Commission, for the sake of clarity and efficiency we respectfully wish instead to simply align ourselves with and support in their entirety the comments that have already been submitted to you by letter on this date jointly by the Texas Cattle Feeders Association, the Texas Forestry Association, the Texas Land & Mineral Owners Association, the Texas and Southwestern Cattle Raisers Association and the Texas Wildlife Association. We could not have stated our position any better than is already stated by those parties on their own behalf in that joint letter.

Thank you for your consideration.

Sincerely,

RESOURCE ANALYTICAL
& MANAGEMENT GROUP, LLC

By: 
Billy K. Lemons
Pres. / Principal Consultant

BKL/s

Notice: Pursuant to Texas Government Code Section 83.001(b)(3) and Texas Occupations Code Chapter 954, Petroleum And Mineral Land Services, Sec. 954.001, Exception To Practice Of Law, this writing relates or may relate to the lease, purchase, sale, or transfer of a mineral or mining interest in real property or an easement or other interest associated with a mineral or mining interest in real property, and the writer is neither a licensed attorney nor does he hold himself out as an attorney licensed to practice law in this state or in another jurisdiction. None of the contents of this writing or any enclosures or attachments should be construed as legal advice. The writer and Resource Analytical & Management Group, LLC, are both registered as Easement or Right-Of-Way Agents under Texas Occupations Code Section 1101.501, The Real Estate License Act, and are thereby authorized to sell, buy, lease, or transfer an easement or right-of-way for another in the State of Texas.