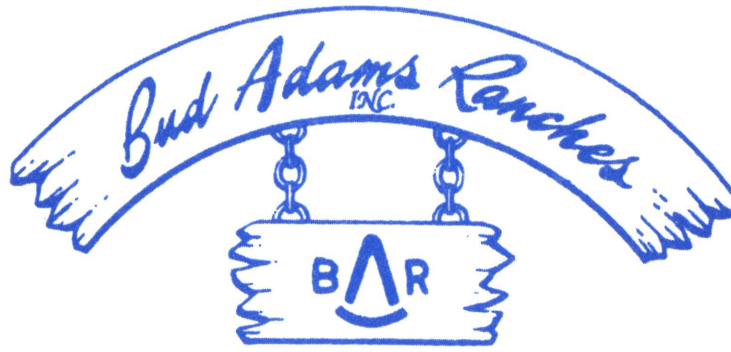


BAR I RANCH
Waller, Texas 77484

BAR II RANCH
Buckholts, Texas 76518



June 23, 2020

P.O. Box 844
Houston, Texas 77001
(713) 881-3400

300795
FD 36025

Ms. Christi Craddick, Commissioner
Railroad Commission of Texas
Post Office Box 12967
Austin, Texas 78711-2967

ENTERED
Office of Proceedings
June 25, 2020
Part of
Public Record

Dear Ms. Craddock-

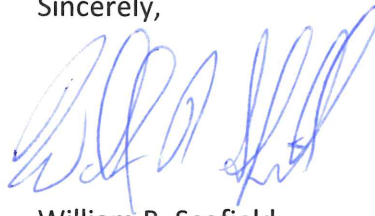
Texas Central Railways (TCR) has proposed building a high-speed rail (HSR) connection between Houston and Dallas. The Federal Railroad Administration (FRA) issued a final Environmental Impact Study (EIS) on TCR's proposed HSR route on May 15, of this year. The EIS was supposed to include information pertaining to every facet of the construction of TCR's project. There are 142 pipelines TCR's project would have to cross on the route chosen by TCR approved by the FRA. TCR employed the engineering firm Freese and Nichols to prepare Schedule F, the Constructability Report, of the EIS. Schedule F does not contain a preliminary engineering analysis detailing how the HSR could be engineered to cross over the extensive network of pipelines. The report only briefly refers to the existence of gas pipelines in Section 6.8; however, there is a table, in a separate part of the report, listing 92 pipelines which will need to be crossed. It appears that the EIS missed more than one third of the potentially impacted pipelines. The report does not contain any information to explain why Freese and Nichols failed to present any information on pipelines, for public scrutiny or FRA review.

The Freese and Nichols report does not contain any information on oil and gas production which would be impacted by the HSR route. For example, the report doesn't mention how TCR would deal with oil and gas gathering systems which would be impacted by construction of the HSR. TCR's President, Carlos Aguilar, revealed in a recent interview that TCR only had access to about 25 percent of its proposed route. This limited access resulted in major deficiencies with both the Freese and Nichols report and the FRA's EIS. How can the FRA issue safety, design, construction and operating procedures with only 25 percent of the information needed to properly prepare and issue an EIS for the proposed route?

Currently TCR is attempting to obtain a ruling from the Surface Transportation Board (STB) that its HSR would be an interstate railroad even though the entire route is within the State of Texas. If TCR obtains interstate status and comes under the STB it might prove difficult or impossible for the railroad commission to regulate any part of the construction process. Texas citizens, businesses, pipeline safety and ability to operate would be controlled by TCR and STB.

Attached to this letter is a copy of my letter of May 18, expressing numerous legitimate concerns about crossing pipelines which the FRA was not willing to consider or address. I hope the Railroad Commission will contact the relevant federal agencies to ensure the rights and safety of Texans are represented, respected and insured.

Sincerely,

A handwritten signature in blue ink, appearing to read 'W. Scofield', with a stylized flourish at the end.

William R. Scofield
President

CC: All Parties of Record