

**OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION**

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

**ORIGINAL**

IN RE: BP PIPELINES (NORTH AMERICA) INC.)

)  
)

Docket No.: 15-0288

**R.L.J, LLC'S PETITION FOR LEAVE TO INTERVENE**

NOW COMES R.L.J., LLC by and through its attorneys, Robert J. Bassett of Williams Venker & Sanders LLC, pursuant to the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Admin. Code, Section 200.200 and prays for Leave to Intervene and be made a party in the above-captioned proceeding. In support of this Petition, R.L.J., LLC states the following:

1. That R.L.J., LLC is the landowner subject to the foregoing Petition filed by BP Pipelines (North America) Inc.
2. That R.L.J., LLC will be affected by an order entered by the Commission in this proceeding and that R.L.J., LLC is accordingly interested in this proceeding.
3. That Robert J. Bassett has been hired to represent R.L.J., LLC with regard to this instant proceeding.

WHEREFORE, for the above stated reasons, the Proposed Intervenor prays that leave to intervene be granted by this Commission and that R.L.J., LLC be made a party to the above-captioned proceeding.

ILLINOIS COMMERCE  
COMMISSION  
2015 MAY 20 A 11:01  
CHIEF CLERK'S OFFICE

Respectfully submitted,

WILLIAMS VENKER & SANDERS LLC

By:   
Robert J. Bassett, #6192950  
Jennifer L. Dickerson #6282750  
100 North Broadway, 21st Floor  
St. Louis, Missouri 63102  
(314) 345-5000  
(314) 345-5055 (FAX)  
[rbassett@wvslaw.com](mailto:rbassett@wvslaw.com)  
[jdickerson@wvslaw.com](mailto:jdickerson@wvslaw.com)

**ATTORNEYS FOR DEFENDANT  
R.L.J., LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above styled case by electronic mail and/or by enclosing same in an envelope addressed to such attorneys at their business address as disclosed by the pleadings of record herein, with postage duly prepaid and by depositing said envelopes in a U.S. Post Office Mail Box in St. Louis, Missouri, on the 18<sup>th</sup> day of May, 2015.

Thomas F. Geselbracht  
Eric M. Roberts  
DLA Piper LLP  
203 North LaSalle Street  
Suite 1900  
Chicago, IL 60601-1293

*Attorneys for Plaintiff  
BP Pipelines (North America) Inc*

Linda Wagner - [lwagner@icc.illinois.gov](mailto:lwagner@icc.illinois.gov)  
Brett Seagle - [bseagle@icc.illinois.gov](mailto:bseagle@icc.illinois.gov)

STATE OF ILLINOIS     )  
  )  
COUNTY OF MADISON    )

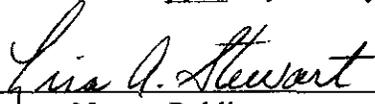
**VERIFICATION**

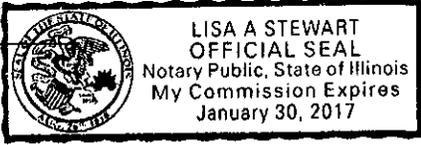
**NOW COMES ROBERT J. BASSETT**, who, affirms, deposes and says:

1.     That he has previously entered his appearance on behalf of the landowner, R.L.J, LLC.
  
2.     That has read the attached PETITION FOR LEAVE TO INTERVENE and that the facts alleged herein are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
ROBERT J. BASSETT

SUBSCRIBED and AFFIRMED to  
before me this 18<sup>th</sup> day of May, 2015

  
\_\_\_\_\_  
Notary Public



**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

IN RE: BP PIPELINES (NORTH AMERICA) INC.)

)  
)

Docket No.: 15-0288

**NOTICE OF FILING**

PLEASE TAKE NOTE that on this 18<sup>th</sup> date of May, 2015, we have filed by U.S. Mail to the Chief Clerk of the Illinois Commerce Commission the enclosed Petition to Intervene and appearances in the above-captioned docket.

Respectfully submitted,

WILLIAMS VENKER & SANDERS LLC

By: 

Robert J. Bassett, #6192950  
Jennifer L. Dickerson #6282750  
100 North Broadway, 21st Floor  
St. Louis, Missouri 63102  
(314) 345-5000  
(314) 345-5055 (FAX)  
[rbassett@wvslaw.com](mailto:rbassett@wvslaw.com)  
[jdickerson@wvslaw.com](mailto:jdickerson@wvslaw.com)

**ATTORNEYS FOR DEFENDANT  
R.L.J., LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the enclosed Petition for Leave to Intervene was served on the attorneys of record of all parties by electronic mail and/or via U.S. first class mail prepaid on the 18<sup>th</sup> day of May, 2015.

