



Matt Paulson

Partner

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About Matt

Matt Paulson represents companies in the oil and gas, refining, power and chemical manufacturing industries on environmental matters, including strategic permitting, regulatory compliance, investigations, enforcement, crisis response, civil and appellate litigation and transactions. His work includes advising clients on issues arising under all the major federal environmental laws and their state counterparts.

Matt regularly advises clients at the early project planning stages, assisting with scoping a broad array of regulatory and permitting requirements across all media and disciplines, from air, water and waste permitting to endangered species and cultural resource reviews, as well as other federal, state, and local requirements that can affect project timing and viability. He regularly represents clients in state and federal enforcement actions and internal investigations involving alleged environmental violations at major industrial facilities.

Matt also advises energy companies on sustainability/ESG reporting, related policy issues, and strategic risk and risk mitigation related to climate change/greenhouse gas initiatives, including scoping CCUS projects, conducting GHG lifecycle and scenario analyses, and evaluating alignment with third-party disclosure formats, among other strategic climate/ESG initiatives.

Matt's deep, facility-level understanding of the industries he represents, coupled with a highly strategic approach help him evaluate key legal risks and drive toward practical, successful outcomes for his clients.

Recent Notable Matters

Enforcement

Chemical manufacturing company — defense in a multi-media state and federal enforcement action involving alleged air, water and waste violations

Chemical manufacturing company — defense in a contested state enforcement action, ultimately resolved through mediation, involving alleged air quality violations

LNG export company — defense in a state enforcement action involving alleged excess emissions associated with flaring

Midstream oil and gas company — defense in a federal enforcement action involving alleged air quality violations at multiple facilities

Permitting and Regulatory Compliance

LNG export company — strategic counseling on state and federal environmental authorizations associated with construction and operation of export facilities and associated infrastructure, including pipelines and compressor stations in Texas

Major oil company — multimedia permitting for major refinery expansion

LNG export company — strategic counseling on state and federal environmental authorizations associated with construction and operation of export facilities and associated infrastructure, including pipelines and compressor stations in Louisiana

Upstream oil and gas company — evaluation of source aggregation under the Clean Air Act

Energy storage company — greenhouse gas permitting matters before the U.S. EPA

Sustainability/ESG

LNG Export Company — advice and counseling on legal aspects of corporate ESG strategies, including innovative ESG reporting and first-mover ESG initiatives

Midstream oil and gas company — advice and counsel in connection with development of inaugural voluntary ESG report

Midstream oil and gas company — guidance on legal risk issues associated with ESG reporting

Investigations and Incident Response

Midstream oil and gas company — internal investigation regarding allegations of circumvention of emissions reporting requirements

Upstream oil and gas company — incident response associated with fatality and major fire at exploration and production site

Chemical manufacturing company — development of comprehensive response to EPA Clean Water Act information request

Midstream oil and gas company — internal investigation associated with allegedly unauthorized disposal of hazardous waste

Environmental consulting company — internal investigation associated with alleged circumvention of leak detection and repair requirements

Transactions

Bison Oil & Gas Partners II, LLC — \$300 million total cash divestiture DJ Basin operator to Civitas Resources, Inc., which was restructured from stock and cash consideration prior to closing

Pioneer Natural Resources Company — sale of approximately 20,000 net acres in western Glasscock County to Laredo Petroleum, Inc. for a combination of cash and LPI common stock

Pioneer Natural Resources Company — agreement with undisclosed buyer to sell all of its assets in the West Panhandle field in Texas for \$201 million (2018)

TC Energy Corporation — approximately \$1.275 billion sale of US midstream assets held by its subsidiary, Columbia Midstream Group, to a subsidiary of UGI Corporation

Litigation

National Association of Manufacturers, et al. — challenge to EPA's GHG Tailoring Rule. The National Association of Manufacturers, et al. v. EPA, Case No. 10-1218 (DC Circuit)

Chemical manufacturing company — Superfund cleanup of former hazardous waste disposal facility

Midstream oil and gas company — Superfund cleanup of former hazardous waste treatment, storage and disposal facility

U.S. Chamber of Commerce and National Automobile Dealers Association — challenge to EPA grant of preemption waiver to California under Section 209 of the Clean Air Act to regulate greenhouse gas emissions from motor vehicles. US Chamber of Commerce, et al. v. EPA, Case No. 09-1237 (DC Circuit).

Major oil company — contested case hearing challenging the air permit for a major refinery expansion

Publications and Speeches

“The Weaponization of Misinformation in Environmental Compliance,” Texas Chemical Council, Air Conservation Committee Quarterly Virtual Meeting, September 12, 2023.

“Managing Legal and Regulatory Risk in ESG Reporting,” 4C Health/Safety/Environmental Conference, Austin, April 5, 2023.

“Managing Legal and Regulatory Risk in CCUS Project Development,” 4C Health/Safety/Environmental Conference, Austin, April 5, 2023.

Co-presenter, “Oil and Gas Update: Big Month for Methane,” Bracewell Environmental Essentials Webinar Series, December 13, 2022.

“ESG for EHS Professionals – Intermediate Training,” 4C Health / Safety / Environmental Conference, Austin, April 6, 2022.

“ESG Issues in Different Disciplines – Environmental,” Bracewell 2021 ESG Virtual Seminar, June, 17, 2021.

“Crisis Response Strategies for In-House Counsel,” 18th Annual Gas and Power Institute, Houston, September 26, 2019.

“Regulatory Updates: Hot Topics for Energy Infrastructure Projects,” Southern Gas Association Technical Conference on Environmental Permitting and Construction, Frisco, February 13, 2019.

“TSCA Reform, Take 2: Reconciling Trump’s Deregulatory Agenda and a Congressionally-Mandated Program,” 4C Health / Safety / Environmental Conference, San Antonio, April 3, 2018.

“Strategic Permitting: From Project Planning to First Fire,” Bracewell Fall 2016 Environmental Law Seminar, Houston, November 15, 2016.

“Environmental Challenges Facing Midstream,” Bracewell Oil and Gas Regulatory Symposium, Houston, October 6, 2016.

“RMP Amendments, Methane Rules, and ERC Developments,” 28th Annual Texas Environmental Superconference, Austin, August 4, 2016.

“TSCA Reform: A Work in Progress,” The Auditing Roundtable, South Central Regional Meeting, Austin, August 3, 2016.

“Preparing for and Defending Environmental Enforcement Actions,” Association of Corporate Counsel South/Central Texas Chapter, San Antonio, July 6, 2016.

“EPA’s Clean Power Plan: The Sky is the Limit,” Air & Waste Management Association Annual Conference, New Orleans, June 23, 2016.

"Proposed Amendments to EPA's Risk Management Program Regulations: Scoping Potential Legal Challenges," Air & Waste Management Association Annual Conference, New Orleans, June 22, 2016.

"Appellate Challenges to Environmental Rules," Bracewell Spring 2016 Environmental Law Seminar, Houston, May 17, 2016.

"The Integration of the RMP and PSM," Bracewell Spring 2016 Environmental Law Seminar, Houston, May 17, 2016.

"Major Accident Response and Planning," Association of Corporate Counsel South Central Texas Chapter's Oil & Gas Law Lunch and Learn, San Antonio, April 28, 2016.

"EPA's Effort to Expand Risk Management Program Requirements - Necessary Improvements in Chemical Safety or a Failure to Implement and Enforce Existing Regulations," 2016 American Institute of Chemical Engineers Spring Meeting & 12th Global Congress on Process Safety, Houston, April 12, 2016.

"Proposed Amendments to EPA's Risk Management Program Regulations," The Auditing Roundtable, South Central Regional Meeting, Houston, February 29, 2016.

"Misinterpreting Machiavelli? Where the Ends and the Means Collide with Sound Law, Science And Policy: The Impacts of EPA's Ozone NAAQS Revision on the Midstream Oil and Gas Industry," The Institute for Energy Law's Midstream Oil & Gas Law Conference, Houston, December 3, 2015.

"Strategic Permitting," Bracewell Fall 2015 Environmental Law Seminar, Houston, November 18, 2015.

"EPA's RMP Initiative," Bracewell Fall 2015 Environmental Law Seminar, Houston, November 18, 2015.

"How Did ERCOT Perform in 2014?," ERCOT Market Summit 2015, Austin, February 26, 2015.

"Hot Air Issues – 2014," Texas Chemical Council, Air Conservation Committee Quarterly Meeting, Houston, November 13, 2014.

"The Drive to Inherently Safer Systems and Technology," Chemical Safety and Security Seminar, Houston, September 16, 2014.

"Greenhouse Gas Permitting in the Wake of UARG v. EPA," Association of Air Pollution Control Agencies Annual Meeting, Austin, September 12, 2014.

"Hot Air Topics," Texas Chemical Council, Air Conservation Committee Quarterly Meeting, Houston, April 1, 2013.

"Clean Air Act Update," Houston Bar Association Environmental Section Luncheon, Houston, February 1, 2013.

"Greenhouse Gas Permitting," Texas Chemical Council/Association of Chemical Industry of Texas 2012 Environmental, Health and Safety Seminar, Galveston, June 1, 2012.

Education

University of Denver Sturm College of Law, J.D.
1998 – *with honors*

University of California, Santa Cruz, B.A.
1995

Noteworthy

Chambers USA, Texas Environment, 2012 - 2023; Nationwide Climate Change, 2010 - 2017

The Legal 500 United States, Environment: Transactional, 2017; Environment: Litigation, 2016; Environment: Regulatory, 2016, 2023

BL Rankings, *Best Lawyers*, Environmental Law, 2014 - 2024; Litigation - Environmental, 2021 - 2024

Lawdragon Inc., *Lawdragon 500 Leading US Energy Lawyers*, Energy Regulation, 2023 - 2024

Lawdragon Inc., *Lawdragon Green 500: Leaders in Environmental Law*, Environmental Law, Including Permitting, Enforcement, Litigation, 2024

Thomson Reuters, *Texas Super Lawyers*, Environmental, 2014 - 2016, 2018 - 2020

Thomson Reuters, *Texas Super Lawyers*, Rising Stars Environmental, 2007 - 2011

Law Business Research Ltd., *Who's Who Legal*, Environment, 2016, 2023

Affiliations

Austin Bar Association, Environmental Section, 2007 - 2016

Texas Bar Foundation, Fellow, 2014 - 2016

Bar Admissions

Colorado
Texas