

CASE

NUMBER:

99-207

INDEX FOR CASE: 99-207

B.T.U. PIPELINE

Deviation

FROM WEEKLY ODOR TESTING

AS OF : 10/05/99

IN THE MATTER OF A DEVIATION FOR B.T.U. GAS COMPANY, INC.
FROM WEEKLY ODOR TESTING

SEQ NBR	ENTRY DATE	REMARKS
0001	05/07/99	Application.
0002	05/19/99	Acknowledgement letter.
0003	07/07/99	Order entered; info due 7/22/99.
M0001	07/22/99	PAM WILLIAMS BTU GAS CO-RESPONSE TO ORDER GAS TESTING
0004	08/13/99	Data Request Order, response due 8/30/99.
M0002	08/30/99	BTU GAS PAM WILLIAMS-RESPONSE TO ORDER OF AUGUST 13,99
0005	10/05/99	Final Order granting a deviation.



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY. 40602
(502) 564-3940

CERTIFICATE OF SERVICE

RE: Case No. 99-207
B.T.U. PIPELINE

I, Stephanie Bell, Secretary of the Public Service Commission, hereby certify that the enclosed attested copy of the Commission's Order in the above case was served upon the following by U.S. Mail on October 5, 1999.

Parties of Record:

Pam Williams
B.T.U. Pipeline
P. O. Box 707
Salyersville, KY. 41465

Stephanie Bell

Secretary of the Commission

SB/hv
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF BTU GAS COMPANY, INC.)
FOR A DEVIATION FROM 807 KAR 5:022) CASE NO. 99-207
SECTION 13(17)(G)(4), ODORIZATION REPORT)

O R D E R

On January 5, 1999, BTU Gas Company, Inc. ("BTU") applied to the Commission for authority to deviate from 807 KAR 5:022, Section 13(17)(g)(4).¹ This deviation will allow BTU to conduct a monthly, rather than weekly, sampling of natural gas in its system for odorant level.

On August 26, 1999, BTU filed its records regarding the odorant level in its natural gas. BTU does not inject odor into its natural gas but its gas supply, which is produced from local gas wells, contains a natural odorant. Its records for the last 12 months show that its gas contains an adequate odorant level of 0.31 percent that is below the one-percent limit required by the Commission's regulations.

On September 7, 1999, David B. Kinman, a gas safety investigator with the Commission's Gas Branch, conducted a field visit and tested the natural gas in BTU's system. The investigation report is in the records of this case. Mr. Kinman confirmed that,

¹ 807 KAR 5:022, Section 13(17)(g)(4), states "Separately odorized systems with more than ten (10) customers shall be sampled for proper odorant level at least once each week."

in fact the concentration of the odorant is within the acceptable level established in 807 KAR 5:022, Section 13(17)(a).²

After considering the evidence of record and being sufficiently advised, the Commission finds that:

1. The natural gas in BTU's system contains natural odorant within the acceptable level established in 807 KAR 5:022, Section 13(17)(a).

2. Extending periodic sampling from weekly to monthly should not affect the odorant level in the natural gas of BTU's system.

3. BTU's petition for a deviation from 807 KAR 5:022, Section 13(17)(g)(4), to extend the periodic testing for odorant level from weekly to monthly should be granted.

4. BTU should sample the odorant level in its gas supply at approximately the furthest point from the gas supply enters its system and retain the odorant sampling record of each monthly test.

5. If the odorant level drops at any location in BTU's system below the concentration specified in 807 KAR 5:022, Section 13(17)(a), BTU should immediately report such occurrence to the Commission, install odorization facilities to comply with the Commission regulations and implement weekly sampling.

IT IS THEREFORE ORDERED that:

1. BTU is granted a deviation from 807 KAR 5:022, Section 13(17)(g)(4). BTU shall test its gas for proper odorant level at least once each month.

2. BTU shall comply with the instructions set forth in Findings 4 and 5.

² Combustible gas in a distribution line shall contain a natural odorant or be odorized so that at a concentration of air of one-fifth (1/5) of the lower explosive limit (approximately one (1) percent by volume) gas is readily detectable by a person with a normal sense of smell.

Done at Frankfort, Kentucky, this 5th day of October, 1999.

By the Commission

ATTEST:


Executive Director

11 ma
2-14

RECEIVED
AUG 30 1999
PUBLIC SERVICE
COMMISSION

B.T.U. GAS COMPANY, INC.

CASE NO. 99-207

AUGUST 26, 1999

ORIGINAL

ORIGINAL

B.T.U. GAS COMPANY, INC.
P.O. BOX 707
SALYERSVILLE, KY 41465

RECEIVED
AUG 30 1999
PUBLIC SERVICE
COMMISSION

PHONE: 606-349-1097
606-349-1096

FAX: 606-349-1510

August 26, 1999

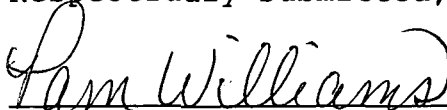
Public Service Commission
730 Schenkel Lane
P.O. Box 615
Frankfort, KY 40602

RE: Case No. 99-207

Dear Director Helton;

Enclosed in the booklet you will find the information requested from B.T.U. Gas Company, Inc. in your order dated August 13, 1999.

Respectfully Submitted;



Pam Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville

Date: 2-2-99 Time: 8:30 am

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville

Date: 2-9-99 Time: 8:30 AM

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville

Date: 2-16-99 Time: 8:30 am

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville

Date: 2-23-99 Time: 8:30 am

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville

Date: 3-2-99 Time: 8:30 am

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: 3-9-99 Lakeville

Date: 3-9-99 Time: 8:30 am

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville
Date: 3-16-99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 3-23-99 Time: 8:30 pm
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 3-30-99 Time: 8:30 am
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville
Date: 4-6-99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 4-13-99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 4-20-99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville

Date: 4.27.99 Time: 8:30 AM

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville

Date: 5.4.99 Time: 8:30 AM

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville

Date: 5-11-99 Time: 8:30 AM

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville
Date: 5-18-99 Time: 8:30 am
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 5-25-99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 6-1-99 Time: 8:30 am
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakerville
Date: 6.8.99 Time: 8:30 AM

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakerville
Date: 6.15.99 Time: 8:30 pm

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakerville
Date: 6.22.99 Time: 8:30 AM

Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville
Date: 6.29.99 Time: 8:30 am
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 7.6.99 Time: 8:30 am
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 7.13.99 Time: 8:30 am
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Hakeville
Date: 7.20.99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Hakeville
Date: 7.27.99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Hakeville
Date: 8.3.99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

"SNIFF TEST" and/or "ODOROMETER TEST"
ODORIZATION CHECK REPORT

Form 11

Location: Lakeville
Date: 8.10.99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 8.17.99 Time: 8:30 am
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

Location: Lakeville
Date: 8.24.99 Time: 8:30 AM
Odor Level: Nil
 Barely Detectable
 Readily Detectable
 Strong

List other odors present: _____

Remarks: (Odorometer Reading) .31

Observed by: Richard Williams

MONTH OF FEBRUARY 1999

Between the hour of 8:00 a.m. and 9:00 a.m. the system of B.T.U. Gas was checked for hydrogen sulfide. This test was performed using a Gastec detector tube No. 4LL or 4HM. This system was checked once a week on Tuesday. The check was done at Lakeville. The testing was done or observed by Richard Williams.

Remarks: _____

MONTH OF MARCH 1999

Between the hour of 8:00 a.m. and 9:00 a.m. the system of B.T.U. Gas was checked for hydrogen sulfide. This test was performed using a Gastec detector tube No. 4LL or 4HM. This system was checked once a week on Tuesday. The check was done at Lakeville. The testing was done or observed by Richard Williams.

Remarks: _____

MONTH OF APRIL 1999

Between the hour of 8:00 a.m. and 9:00 a.m. the system of B.T.U. Gas was checked for hydrogen sulfide. This test was performed using a Gastec detector tube No. 4LL or 4HM. This system was checked once a week on Tuesday. The check was done at Lakeville. The testing was done or observed by Richard Williams.

Remarks: _____

MONTH OF MAY 1999

Between the hour of 8:00 a.m. and 9:00 a.m. the system of B.T.U. Gas was checked for hydrogen sulfide. This test was performed using a Gastec detector tube No. 4LL or 4HM. This system was checked once a week on Tuesday. The check was done at Lakeville. The testing was done or observed by Richard Williams.

Remarks: _____

MONTH OF JUNE 1999

Between the hour of 8:00 a.m. and 9:00 a.m. the system of B.T.U. Gas was checked for hydrogen sulfide. This test was performed using a Gastec detector tube No. 4LL or 4HM. This system was checked once a week on Tuesday. The check was done at Lakeville. The testing was done or observed by Richard Williams.

Remarks: _____

MONTH OF JULY 1999

Between the hour of 8:00 a.m. and 9:00 a.m. the system of B.T.U. Gas was checked for hydrogen sulfide. This test was performed using a Gastec detector tube No. 4LL or 4HM. This system was checked once a week on Tuesday. The check was done at Lakeville. The testing was done or observed by Richard Williams.

Remarks: _____

MONTH OF AUGUST 1999

Between the hour of 8:00 a.m. and 9:00 a.m. the system of B.T.U. Gas was checked for hydrogen sulfide. This test was performed using a Gastec detector tube No. 4LL or 4HM. This system was checked once a week on Tuesday. The check was done at Lakeville. The testing was done or observed by Richard Williams.

Remarks: _____



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY. 40602
(502) 564-3940

August 13, 1999

Pam Williams
B.T.U. Pipeline
P. O. Box 707
Salyersville, KY. 41465

RE: Case No. 99-207

We enclose one attested copy of the Commission's Order in
the above case.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Bell".

Stephanie Bell
Secretary of the Commission

SB/hv
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF BTU GAS COMPANY, INC.)
FOR A DEVIATION FROM 807 KAR 5:022,) CASE NO. 99-207
SECTION 13(17)(G)(4), ODORIZATION REPORT)

O R D E R

IT IS ORDERED that BTU Gas Company, Inc. ("BTU") shall file the original and 6 copies of the following information with the Commission, with a copy to all parties of record within 15 days from the date of this Order. BTU shall furnish with each response the name of the witness who will be available to respond to questions concerning each item of information requested should a public hearing be scheduled. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately labeled, for example, Item 1(a), Sheet 2 of 6.

1. With reference to BTU's response to the first question of the Commission's Order dated July 7, 1999, provide BTU's weekly odorization check report indicating the date, time, and the location of the tests for the last 12 months. Indicate the odorometer reading for each test with the name of the employee who observed the test.

2. Refer to BTU's response to question 3 of the Commission's Order dated July 7, 1999. Provide the results of the weekly test reports for the last 12 months.

Provide the date, time, location, and result of each test and the name of the employee who conducted the test.

Done at Frankfort, Kentucky, this 13th day of August, 1999.

By the Commission

ATTEST:


Executive Director



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY. 40602
(502) 564-3940

July 7, 1999

Pam Williams
B.T.U. Pipeline
P. O. Box 707
Salyersville, KY. 41465

RE: Case No. 99-207

We enclose one attested copy of the Commission's Order in
the above case.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Bell".

Stephanie Bell
Secretary of the Commission

SB/rlm
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF BTU GAS COMPANY, INC.)
FOR A DEVIATION FROM 807 KAR 5:022,) CASE NO. 99-207
SECTION 13(17)(G)(4), ODORIZATION REPORT)

O R D E R

IT IS ORDERED that BTU Gas Company, Inc. ("BTU") shall file the original and 6 copies of the following information with the Commission, with a copy to all parties of record within 15 days from the date of this Order. BTU shall furnish with each response the name of the witness who will be available to respond to questions concerning each item of information requested should a public hearing be scheduled. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets is required for an item, each sheet should be appropriately labeled, for example, Item 1(a), Sheet 2 of 6.

1. Provide the results of the tests conducted by BTU to determine the concentration of odorant in its gas pursuant to 807 KAR 5:022, Section 17(g), for the last 12 months.

2. Past records show BTU's gas contained hydrogen sulfide in 1996. How did BTU test the odor during 1996 and what precautions were taken to protect its employees from hydrogen gas during odor testing? Explain in detail.

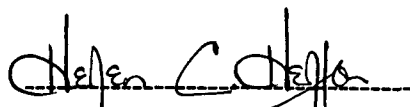
3. Provide the results of hydrogen sulfide tests performed on BTU's system during the last 12 months. Explain how the tests were conducted.

4. Is BTU purchasing natural gas from recently drilled wells? If yes, provide the odor level and the hydrogen sulfide content of the gas produced from the new wells.

Done at Frankfort, Kentucky, this 7th day of July, 1999.

By the Commission

ATTEST:


Executive Director



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY. 40602
(502) 564-3940

May 19, 1999

Pam Williams
B.T.U. Pipeline
P. O. Box 707
Salyersville, KY. 41465

RE: Case No. 99-207
B.T.U. PIPELINE
(Deviation) FROM WEEKLY ODOR TESTING

This letter is to acknowledge receipt of initial application in the above case. The application was date-stamped received May 17, 1999 and has been assigned Case No. 99-207. In all future correspondence or filings in connection with this case, please reference the above case number.

If you need further assistance, please contact my staff at 502/564-3940.

Sincerely,

Stephanie Bell

Stephanie Bell
Secretary of the Commission

SB/jc

B.T.U. GAS COMPANY, INC.
P.O. BOX 707
SALYERSVILLE, KY 41465

RECEIVED
MAY 17 1999
PUBLIC SERVICE
COMMISSION

PHONE: 606-349-1097
606-349-1096

FAX: 606-349-1510

January 5, 1999

Public Service Commission
730 Schenkel Lane
P.O. Box 615
Frankfort, KY 40602

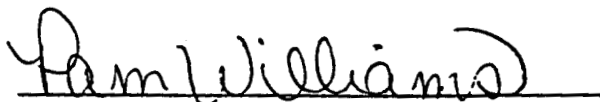
CASE 99-207

RE: Deviation From Weekly Odor Testing

Dear Director Helton;

B.T.U. Gas would like to request a deviation from weekly odor testing to monthly odor testing since all gas is supplied from local wells. 49 CFR part 192.625 [807 KAR 5:022, Section 13 (17)].

Respectfully Submitted;



Pam Williams

B.T.U. GAS COMPANY, INC.
P.O. BOX 707
SALYERSVILLE, KENTUCKY 41465

PHONE: 606-349-1097
606-349-1096

FAX: 606-349-1510

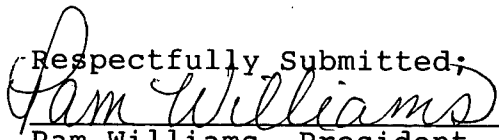
July 21, 1999

Public Service Commission
730 Schenkel Lane
P.O. Box 615
Frankfort, KY 40602

RE: Case No. 99-207

Dear Ms. Bell,

Enclosed you will find the original and six (6) copies of
B.T.U. Gas Company's response in Case No. 99-207.

Respectfully Submitted;

Pam Williams, President

RECEIVED

JUL 22 1999

PUBLIC SERVICE
COMMISSION

CASE NO. 99-207

ORIGINAL

B.T.U. GAS COMPANY, INC.
P.O. BOX 707
SALYERSVILLE, KENTUCKY 41465

PHONE: 606-349-1097
606-349-1096

FAX: 606-349-1510

July 21, 1999

RECEIVED

JUL 22 1999

PUBLIC SERVICE
COMMISSION

Public Service Commission
730 Schenkel Lane
P.O. Box 615
Frankfort, KY 40602

RE: Case No. 99-207

Dear Ms. Bell,

B.T.U. Gas Company, Inc. would like to respond to this Order in the following manner:

1. The natural gas in this system has a natural odor. The gas comes from local wells. This was tested with a HealthTech odorator and had a reading of .31. See attached Affidavit. Tab 1.
2. The hydrogen sulfide tests were done using a Gastec detector tube No. 4LL or No. 4HM manufactured by the Sensidyne Corporation. This information is on file with the Commission. Reference case No. 96-087. See attached Affidavit. Tab 2.
3. The last twelve (12) months the hydrogen sulfide tests were done weekly using a Gastec detector tube No. 4LL or 4 HM manufactured by Sensidyne Corporation. See attached Affidavit. Tab 3.
4. There are no recently drilled wells in this system.

Ms. Bell, it should be noted there has been no hydrogen sulfide present in this system since 1996. The well that carried this hydrogen sulfide has been disconnected from this system completely. That is the reason we ask to deviate from weekly testing to monthly testing.

Respectfully Submitted;


Pam Williams, President

A F F I D A V I T


The Affiant, Richard Williams, after first being duly sworn; states as follows:

I am Operations Manager for B.T.U. Gas Company, Inc.

In that capacity, beginning February 1999 up to date I have personally checked or seen to it that someone checked the B.T.U. gas system on a weekly basis for the odorization level of the gas in this system. The odor level has been .31. This system was checked with a HealthTech odorator.

This has been done weekly but it should be noted B.T.U. requested to deviate to a monthly basis January 5, 1999. The only response from that is, our request was acknowledged May 19, 1999.

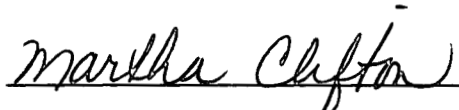
FURTHER THE AFFIANT SAITH NOT.


Richard Williams

Subscribed and sworn to before me by Richard Williams this 14th day of July, 1999.

MY COMMISSION EXPIRES:

Feb. 10, 2001


NOTARY PUBLIC

A F F I D A V I T

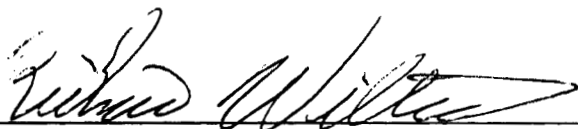
The Affiant, Richard Williams, after first being duly sworn; states as follows:

I am Operations Manager for B.T.U. Gas Company, Inc.

In that capacity, beginning on July 5, 1996 through November 30, 1997, I have personally checked or seen to it that someone checked the B.T.U. gas system on a daily basis between the hours of 8:00 a.m. and 9:00 a.m. for hydrogen sulfide using a Gastec detector tube No. 4LL or No. 4HM manufactured by the Sensidyne Corporation.

This was done at the Lakeville pressure gauge and also at each scrubber along the system. If a trace was detectable on the Draker tube at a scrubber, we immediately shut the well in and changed the Sulfa-Treat product in the scrubber.

FURTHER THE AFFIANT SAITH NOT.




Richard Williams

Subscribed and sworn to before me by Richard Williams this 10th day of December, 1997.

MY COMMISSION EXPIRES:

Feb. 10, 2001


NOTARY PUBLIC

COPY

A F F I D A V I T

The Affiant, Richard Williams, after first being duly sworn; states as follows:

I am Operations Manager for B.T.U. Gas Company, Inc.

In that capacity, beginning in December 1997 to date, July, 1999, I have personally checked or seen to it that someone checked the B.T.U. gas system on a weekly basis between the hours of 8:00 a.m. and 9:00 a.m. for hydrogen sulfide using a Gastec detector tube No. 4LL or No. 4HM manufactured by the Sensidyne Corporation.

This was done at the Lakeville pressure gauge and also at each scrubber along the system. If a trace was detectable on the Draker tube at a scrubber, we immediately shut the well in and changed the Sulfa-Treat product in the scrubber.

FURTHER THE AFFIANT SAITH NOT.




Richard Williams

Subscribed and sworn to before me by Richard Williams this 14th day of July, 1999.

MY COMMISSION EXPIRES:

Feb. 10, 2001



NOTARY PUBLIC