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**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2025-0042

IN THE MATTER OF:

ELECTRONIC APPLICATION OF KENTUCKY FRONTIER GAS, LLC FOR
DECLARATORY ORDER ON FREE GAS

REQUEST FOR INTERVENTION OF COTY BROWN AND LINDSEY BROWN

Comes now Coty Brown and Lindsey Brown his wife and request Orders of the Kentucky Public Service Commission allowing them to intervene in the above styled case and as grounds for said Motion, states that they are entitled to free gas from Kentucky Frontier, LLC as the pipeline in question, the Fontaine-Williams gas gathering system pipeline traverses their property. Coty Brown's grandparents Ervin Allen, Jr. and Ethel Allen, his wife, in a right of way easement agreement to BTU Gas Company was granted free gas use for residential dwellings on the property which they now inhabit the BTU Gas Company right of way easement agreement is recorded in Deed Book 186, page 97 of the Magoffin County Clerk's Office.

The action sought by Kentucky Frontier Gas, LLC would terminate their right to free gas which was a consideration for the right of way for the Fontaine-Williams gas gathering system pipeline. The Fontaine-Williams gas gathering system pipeline will continue to exist on their property but they will no longer receive the agreed to compensation for such pipeline as was set out in the right of way easement agreement executed by Coty Brown's grandparents, Ervin Allen, Jr. and Ethel Allen. A copy of the Deed to Coty Brown and Lindsey Brown is attached as Exhibit A and a copy of the BTU Gas Company right of way easement agreement is attached as Exhibit B.

WHEREFORE, Coty Brown and Lindsey Brown request Orders of the Kentucky Public Service Commission allowing them to intervene in the above styled action for the reasons set forth above.

/s/ John C. Collins
HON. JOHN C. COLLINS
ATTORNEY AT LAW
132 WEST MAPLE STREET
PO BOX 475
SALYERSVILLE, KY 41465

CERTIFICATE OF SERVICE

This is to certify that the foregoing has been mailed, postage prepaid, or electronically sent to the following on this the 19th day of December, 2025:

Hon. L. Allyson Honaker
Honaker Law Office
1795 Alysheba Way
Suite 1203
Lexington, Ky. 40509

Ms. Linda C. Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Ky. 40602

/s/ John C. Collins
HON. JOHN C. COLLINS

THIS DEED OF CONVEYANCE, made and entered into this
the 23rd day of October, 2019, by and between **BRENDA K.
HOWARD and RICKY HOWARD**, her husband, of 54 Wile Howard Bmelry
Rd. Salyersville, Ky 41465, Parties of the First Part, and

COTY BROWN and LINDSEY BROWN, husband and wife, of
3073 Long Creek Rd. Salyersville, KY 41465,
Parties of the Second Part, WITH RIGHTS OF SURVIVORSHIP.

W-I-T-N-E-S-S-E-T-H:

That for and in consideration of the sum of One
Hundred Thousand (\$100,000.00) Dollars, the receipt of which is
hereby acknowledged, the Parties of the First Part do hereby sell,
grant and convey unto the said Parties of the Second Part, for and
during their joint lives and upon the death of either of them,
then the remainder to the survivor, their heirs and assigns
forever, with Covenants of General Warranty, that certain tract or
parcel of land located in Magoffin County, Kentucky, being more
particularly bounded and described as follows:

SEE ATTACHED EXHIBIT "A"

Being the same property conveyed to Brenda K. Howard by deed
from Irvin Allen, dated December 21, 2018, recorded in Deed
Book 220, Page 352, Magoffin County Clerk's Office.

In accordance with KRS 382.135, the address to which the
current year property taxes may be sent is:

3073 Long Creek Rd. Salyersville, KY 41465.

LODGED FOR RECORD
MAGOFFIN COUNTY CLERK

OCT 29 2019

TIME 9:03 AM

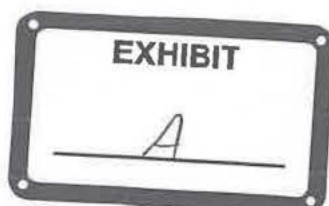


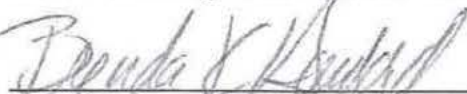
EXHIBIT "A"


One tract of land, lying and being in the County of Magoffin, State of Kentucky and located on Long Creek a tributary of Licking River and bounded as follows:

BEGINNING on a poplar tree near the old splash dam at J. B. Allen's line, thence a south course up a drain to the corner of the field, thence a south course up the hill with the fence a straight line to the top of the hill with J. B. Allen's line to Jimmie Mullins' line thence an east course with Jimmie Mullins' line and the dividing ridge to Sallie Allen's line, and p the ridge to the Bruce Stephens' line at a high knob, thence a north course down the hill to a high rock, and down the hill with a line fence between Bruce Stephens and S. Y. Allen's line to the creek, just above the old splash dam, thence across the creek and up to a cedar tree thence a straight up the hill to the center of the point and Bruce Stephens' line to the dividing ridge between Long Creek and Salt Lick Creek at the S. B. Allen line, thence a south course down the hill with the J. B. Allen line to the creek; thence across the creek to the poplar tree at the beginning, containing 150 acres more or less.

TO HAVE AND TO HOLD all of the above-described real property together with the rights, privileges, appurtenances and improvements thereunto belonging unto the Parties of the Second Part, for and during their joint lives and upon the death of either of them, then the remainder to the survivor, their heirs and assigns forever, with Covenants of General Warranty of title.

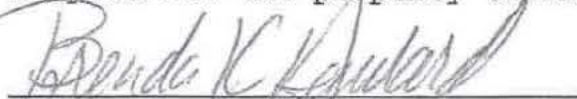
IN WITNESS WHEREOF, the Parties of the First Part have hereby set their hands the day and year first above written.

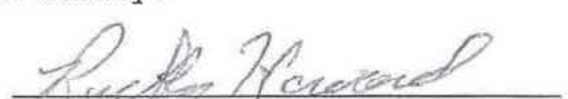

BRENDA K. HOWARD


RICKY HOWARD

CERTIFICATE OF CONSIDERATION

The undersigned hereby swear and affirm, under penalty of perjury, that the consideration recited in the foregoing instrument is the full actual consideration paid or to be paid for the property transferred hereby.


BRENDA K. HOWARD


RICKY HOWARD


COTY BROWN


LINDSEY BROWN

STATE OF Ky
COUNTY OF Pike

The foregoing instrument and certificate of consideration was acknowledged, subscribed and sworn to before me this the 23 day of October, 2019, by BRENDA K. HOWARD and RICKY HOWARD.

My Commission expires 3/17/2022.

Alan M. Green
NOTARY PUBLIC

STATE OF Ky
COUNTY OF Pike

The foregoing certificate of consideration was acknowledged, subscribed and sworn to before me this the 23rd day of Oct, 2019, by COTY BROWN and LINDSEY BROWN.

My Commission expires 3/17/2022.

Alan M. Green
NOTARY PUBLIC

THIS INSTRUMENT PREPARED BY:

Samantha Hatcher Smith

HON. SAMANTHA HATCHER SMITH
ATTORNEY AT LAW
FRANK K. NALL, P.S.C.
P.O. BOX 1018
PIKEVILLE, KENTUCKY 41502

RENEE ARNETT-SHEPHERD
MAGOFFIN COUNTY
10/29/2019 0:00 AM



DEED TAX OF \$ 100.00 COLLECTED
THIS THE 29 DAY OF October 2019
RENEE ARNETT-SHEPHERD CLERK
BY Melissa Williams D.C.

STATE OF KENTUCKY
COUNTY OF MAGOFFIN

I, RENEE ARNETT-SHEPHERD, County Clerk for the County and State aforesaid, certify that the foregoing DEED was on October 29, 2019 0:00 AM lodged for record, whereupon the same with the foregoing and this certificate have been duly recorded in my office.

WITNESS my hand this October 29, 2019
RENEE ARNETT-SHEPHERD, CLERK

9:03 AM
BY: Melissa Williams D.C.

BTU GAS COMPANY
RIGHT OF WAY EASEMENT AGREEMENT

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For and in consideration of one (1) residential free tap and gas (for a total of two (2) residential dwellings with gas; this includes the one residential dwelling from the lease) and other good and valuable consideration the receipt of which is hereby acknowledged, the undersigned, Irvin Allen Jr. and Ethel Allen, their successors, heirs, and assigns do hereby grant to BTU GAS COMPANY, INC. its licensees, successors, and assigns (hereinafter referred to as Grantee), a right of way and easement agreement to construct, operate, maintain, add/or remove such lines or related services as the Grantee may require from time to time consisting of

- A. Buried wires, markers, steel and plastic pipe upon, over and under a strip of land being a twenty (20) foot working right of way, being a ten (10) feet wide permanent easement with the right of ingress and egress across the following lands in Magoffin County, State of Kentucky, described as follows:

Deed Book 170 Page number 342-344 and to the fullest extent the undersigned has the power to grant, if at all, along and under the roads, streets, or highways adjoining or through said property.

The following rights are also granted: ingress and egress to said easement at all times to clear the easement and keep it cleared of all trees, undergrowth or other obstructions; to trim and cut and keep trimmed and cut all dead, weak, leaning or dangerous trees or limbs outside of the easement which might interfere with or fall upon the right of ways. And the right to relocate said facilities on said lands to conform to any future highway relocation, widening or improvements.

To have and to hold the above granted easement unto BTU GAS COMPANY, its successors and assigns forever and in perpetuity.



Grantor(s) warrant(s) that he/she/they/ are the true owner (s) of record of the above described land on which the aforesaid easement is granted.

In witness whereof, the undersigned has/have caused this instrument to be executed on the 12th day of September, 2005.

Witness: Charles Brown Owner: Irvin Allen Jr.
Witness: _____ Owner: Ethel Allen

STATE OF KENTUCKY
COUNTY OF MAGOFFIN

Personally came before me Irvin Allen Jr. and Ethel Allen to be the owner(s) who executed this instrument and acknowledged the same.

This 12 day of September, 2005

Jessica K Long
Notary Public

My commission expires: April 29, 2007

STATE OF KENTUCKY
MAGOFFIN COUNTY

I, Madan B. Arnett, Clerk of the County and State aforesaid certify that the foregoing Row was on the 5th day of May, 2006 lodged for record, whereupon the same with the foregoing and this certificate have been duly recorded in my office.

Given under my hand, this 10th day of May, 2006
at Book 186 Page 97 MADAN B. ARNETT Clerk
Time A.M. 3:45 P.M. By Jessie Bailey D.C.

This instrument prepared by:

Sam Williams