

**Troublesome Creek Gas Corporation  
Case No. 2019-00467  
Commission Staff's Initial Request for Information**

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**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF: :

ELECTRONIC APPLICATION OF TROUBLESOME : CASE NO.  
CREEK GAS CORPORATION FOR INITIAL RULES, : 2019-00467  
REGULATIONS, AND RATES FOR FURNISHING :  
GAS SERVICE PURSUANT TO KRS 278.485 :

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**TROUBLESOME CREEK GAS CORPORATION'S  
RESPONSE TO COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION**

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**REQUEST 1**

Refer to spreadsheet "Rate Calculation", Tab "1 Employee."

- a. Explain why the annual total used in the rate calculation for Gross Wages is \$2,000 higher than the result of the formula specified.

**RESPONSE:**

The employee's hourly rate is \$16.00. Sixteen dollars multiplied by 2,080 hours multiplied by sixty percent= \$19,968.00 regular annual wages. He works overtime at a rate of \$24.00 per hour. Two thousand dollars was added to estimate the overtime amount required to maintain service to farm tap customers. See the amended proposed rate worksheet (attached to the end of request 1).

**PERSON RESPONSIBLE:** Kim Lockhart

- b. Explain why a sixty percent allocation factor is appropriate and why it is not an explicit component of the calculation of Workers Compensation or Payroll Taxes.

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**RESPONSE:**

The employee estimates that he spends sixty percent of his time on the customers covered by this tariff request. He spends approximately forty percent of his time performing other functions. The workers compensation was erroneously calculated on \$11,968.00 instead of \$21,968.

**PERSON RESPONSIBLE:** Kim Lockhart

- c. Explain how the formula for Workers Compensation was determined.

**RESPONSE:**

The actual Workers Compensation rate paid for this employee is .03600375. Nineteen thousand nine hundred and sixty-eight multiplied by .03600375 equals \$719.00. Two thousand dollars overtime divided by one and a half then multiplied by .03600375 equals \$48. Seven hundred nineteen plus \$48 equals \$767.00.

**PERSON RESPONSIBLE:** Kim Lockhart

- d. Provide the formula used to determine Payroll Taxes. Confirm that "KUCC" is Kentucky state unemployment tax assessment or explain this acronym.

**RESPONSE:**

Payroll taxes:

FICA & Medicare: \$21,968.00 multiplied by .0765= \$1,681.00

KY Unemployment: \$10,500.00 multiplied by 60% multiplied by 6.675%= \$421.00

Fed Unemployment: \$7,000.00 multiplied by 60% multiplied by .6%= \$25.00

Total: 2,127.00

This is the actual calculation. I originally estimated \$2,200.00. See the amended proposed rate worksheet (attached to the end of request 1) reflecting this correction. KUCC stands for Kentucky state unemployment tax assessment.

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**PERSON RESPONSIBLE:** Kim Lockhart

- e. Explain why foregone revenue of \$2 per thousand cubic feet (Mcf) is reasonable. Include in the explanation a discussion of why the gas cost component of rates should not be based on the New York Mercantile Exchange (NYMEX) 12-month strip and Troublesome Creek's British thermal unit (BTU) factor for the gas's heat content.

**RESPONSE:**

The NYMEX 12-month strip in comparison to the \$2.00 foregone revenue was \$2.13 per dth for the period in question (February 2020-January 2021). The \$2.13 per dth converts to \$1.986 per Mcf using the BTU 1.0725 (the BTU factor per the gas analysis for Troublesome Creek (see response to request 4 for analysis)). Troublesome Creek believes \$2.00 is an appropriate number to use in the calculation. However, in the event the NYMEX 12-month strip is deemed more appropriate, Troublesome Creek would be willing to base its gas cost on the 12-month strip and adjust accordingly through a quarterly gas cost adjustment.

**PERSON RESPONSIBLE:** Kim Lockhart

- f. Explain whether the expenses shown for Vehicle Maintenance, Billing, Administration, Postage & Office Expense , Well and Road Repairs , and Depreciation are based on actual expenses from November 1, 2018, through October 31, 2019, or estimates. If the expenses are actuals, identify and describe any allocations from affiliated entities or unregulated business segments. If the expenses are estimates, describe the process used to estimate expenses.

**RESPONSE:**

Vehicle Maintenance: Vehicle gas is an actual expense. The average gas cost for this employee is \$120.00 per week times fifty weeks (assuming a two week vacation). I originally reported one

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hundred percent; this should be corrected to sixty percent, which results in an expense of \$3,600.00.

**Billing:** The office accountant that performs the billing, etc. for these customers is paid \$20.00 per hour. She estimates that she works twelve hours per month on farm tap customers. The original rate request rounded from \$2,880.00 (twelve hours a month multiplied by twelve months in a year) to \$2,900.00. See the amended proposed rate worksheet (attached to the end of request 1) reflecting this correction.

**Administration:** The office administrator is paid \$36.00 per hour. This estimate is based on five to six hours per month multiplied by twelve months, which equals \$2,228.00.

**Postage and Office Expenses:** This number is based on actual expenses during the November 1, 2018 through October 31, 2019 period.

**Well and Road Repairs:** This number is based on actual expenses during the November 1, 2018 through October 31, 2019 period. However, one expenditure was determined to be non-recurring in nature; therefore, the amount is corrected to \$2,400.00 on the amended proposed rate. See the amended proposed rate worksheet (attached to the end of request 1).

**Depreciation:** The amount of depreciation is based on the cost, class life and function of the equipment currently being depreciated.

**PERSON RESPONSIBLE:** Kim Lockhart

- g. Explain why expenses for Well and Road Repairs should be recovered from farm tap customers. Include in the explanation a discussion of how these expenses are allocated to/from affiliated entities or unregulated business segments.

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**RESPONSE:**

The description "Well and Road Repairs" is used to cover all other expenses relating to the customers. The truck used by the employee has to have periodic maintenance, charts for the wells providing the gas to the customers, another person had to be paid to assist with work, etc. An estimate of \$200.00 per month is being used in this revision. See the amended proposed rate worksheet (attached to the end of request 1). No affiliated entity expenses are included or expenses for unregulated business segments.

**PERSON RESPONSIBLE:** Kim Lockhart

- h. Confirm that expenses related to services recovered through non-recurring charges (i.e., seasonal or temporary turn on, reconnection, meter relocation, returned check, initial tap on, etc.) are not included in base rates. If this cannot be confirmed, provide the amounts and location of those expenses.

**RESPONSE:**

Expenses related to services recovered through non-recurring charges are not included in base rates, and the company would incur additional expenses through delivering those services.

**PERSON RESPONSIBLE:** Kim Lockhart

- i. Provide the basis for yearly sales of 4,377 Mcf and explain whether any farm tap customers are non-residential. If not, explain why the calculated monthly usage of approximately 7.3 Mcf is reasonable.

**RESPONSE:**

Four thousand three hundred and seventy-seven Mcf were used during the November 1, 2018-October 31, 2019 period. Bethany Christian Mission School used an average of fifty-two Mcf per month included in the total of 4,377 Mcf.

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**PERSON RESPONSIBLE:** Kim Lockhart

- j. State whether Troublesome Creek will be subject to federal and state income taxes. If so, explain why no provision for income taxes is included in the rate calculation.

**RESPONSE:**

Troublesome Creek is a flow-through entity that generally subjects its owner or owners to tax at an individual income tax rate(s). Based on current marginal rates and projections, the owner will be subject to a twenty-nine percent rate for federal and state income taxes. The estimated amount of tax incurred or benefit derived used on an annual basis is \$2,538.66 (\$8,754.00 multiplied by twenty-nine percent). An income tax provision has been added to the amended proposed rate. See the amended proposed rate worksheet (attached to the end of request 1).

**PERSON RESPONSIBLE:** Kim Lockhart

- k. Explain why Troublesome Creek did not include a provision for margins in its rate calculation.

**RESPONSE:**

The explanation in 1(e) above covers the provision for margins in the rate calculation; however, it was titled foregone revenue (revenue that would be available if the gas was sold at market). The tax on that revenue is now listed as explained in 1(j) above.

**PERSON RESPONSIBLE:** Kim Lockhart

- l. State whether Troublesome Creek is currently or will be required to odorize its system to comply with 807 KAR 5:026, Section 6(12). If so, identify any expenses for compliance and briefly explain how the gas will be odorized.

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**RESPONSE:**

Troublesome Creek does not odorize or anticipate being required to odorize its system. The gas traveling through Troublesome Creek pipelines is naturally odorized and has not been stripped or treated in any manner.

**PERSON RESPONSIBLE:** Charles R. Bradley



CHARLES R BRADLEY

TROUBLESOME CREEK GAS CORPORATION

RESIDENTIAL CUSTOMER EXPENSES

11/01/2018-10/31/2019 EXPENSES

**AMENDED**

ANNUAL

GROSS WAGES (\$16/HR X 2080=33280.00 x 60%)+\$2,000 OT

21,968.00

EMPLOYEE BENEFITS/EXPENSES:

HEALTH INSURANCE (900.78x12x60%)

6,486.00

WORKERS COMPENSATION (SEE NOTE #1 c)

767.00

PAYROLL TAXES (FICA,KUCC & FUTA- SEE NOTE #1 d)

2,127.00

9,380.00

FOREGONE REVENUE (4377 X \$2)

8,754.00

VEHICLE GAS (500 x 12 x 60%)

3,600.00

BILLING

2,880.00

ADMINISTRATION

2,228.00

POSTAGE & OFFICE EXPENSE

1,300.00

WELL AND ROAD REPAIRS

2,400.00

INCOME TAX PROVISION

2,538.00

DEPRECIATION

(TRUCK 1200/YR+EQUIP 2000/YR)

3,200.00

58,248.00

SUBTRACT (\$15 MONTHLY FEE X 50 CUSTOMERS X 12 MTHS)

(9,000.00)

49,248.00

DIVIDE BY EQUALS

4377

11.25

PROPOSED

RATE

**AMENDED**

**Troublesome Creek Gas Corporation**  
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**REQUEST 2**

Refer to the Executed Tariff.

- a. Explain the basis for Troublesome Creek's proposed monthly customer charge of \$15.

**RESPONSE:**

A monthly customer service charge will allow Troublesome Creek to continue services to its customers during those months when customer usage is low, so that consistent and reliable services can be maintained without placing burdens on its customer base.

**PERSON RESPONSIBLE:** Kim Lockhart

- b. Provide the cost support for each of the following:

- (1) Seasonal or Temporary Turn On Fee of \$50;

**RESPONSE:**

The time involved for the employee to turn on the gas will be approximately two hours multiplied by \$16.00 plus additional expenses estimated for record keeping and vehicle gas of \$18.00 per service trip. This is not included in his wages listed for the rate.

**PERSON RESPONSIBLE:** Kim Lockhart

- (2) Relocate Meter of \$150;

**RESPONSE:**

The time involved for the employee will be approximately four hours multiplied by \$16.00 plus the usage of materials and vehicle gas estimated at \$86.00 per service trip.

**PERSON RESPONSIBLE:** Kim Lockhart

- (3) Transfer Service Fee of \$30;

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**RESPONSE:**

The cost for the administrator to revise the service records and billing records is estimated at \$30.00.

**PERSON RESPONSIBLE:** Kim Lockhart

(4) Returned Check Charge of \$30;

**RESPONSE:**

The bank charges a returned check fee, the accountant has to do the bookkeeping and mail the customer a notice and postage.

**PERSON RESPONSIBLE:** Kim Lockhart

(5) Service Trip Charge of \$50;

**RESPONSE:**

The time involved for the employee to perform the service is estimated to be two hours multiplied by \$16.00 plus the usage of materials and vehicle gas estimated at \$18.00.

**PERSON RESPONSIBLE:** Kim Lockhart

(6) Special Meter Reading Charge of \$50; and

**RESPONSE:**

The time involved for the employee to meet with the customer and perform the special meter reading is estimated to be two hours multiplied by \$16.00 plus vehicle gas estimated at \$18.00.

**PERSON RESPONSIBLE:** Kim Lockhart

(7) Meter Test Fee of \$225.

**RESPONSE:**

The meter test fee of \$225.00 includes disconnecting the meter, having it tested and reconnecting the meter.

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**PERSON RESPONSIBLE:** Kim Lockhart

- c. Confirm that the Special Meter Reading Charge will not be assessed if the original meter reading was incorrect. If this cannot be confirmed, please explain.

**RESPONSE:**

If the original meter reading is incorrect, there will not be a special meter reading charge.

**PERSON RESPONSIBLE:** Kim Lockhart

- d. Confirm that Troublesome Creek will not provide gas service to any person other than the owner of the property on or over which any of Troublesome Creek's producing well or gas gathering pipeline is located or the owner of real estate whose property and point of desired service is located within one-half air mile of Troublesome Creek's producing gas well or gas gathering pipeline. If this cannot be confirmed, explain.

**RESPONSE:**

Troublesome Creek confirms.

**PERSON RESPONSIBLE:** Charles R. Bradley

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**REQUEST 3**

Refer to the application for Gas Service. Explain why terms of service sections after Refusal of Service are not included in Troublesome Creek's proposed tariff.

**RESPONSE:**

Troublesome Creek deemed the terms and conditions sections after Refusal of Service to be applicable only to the Application for Gas Service. All the terms and conditions in the Application abide by KRS 278.485. As stated in the proposed tariff, all gas service rendered by Troublesome Creek will be in accordance with KRS 278.485 and all applicable rules and regulations established by the Public Service Commission of Kentucky. Troublesome Creek included only the rates, rules and regulations for furnishing natural gas in the proposed tariff.

**PERSON RESPONSIBLE:** Charles R. Bradley

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**REQUEST 4**

Provide the heating content of Troublesome Creek's gas in BTUs and any supporting workpapers.

**RESPONSE:**

The BTU for Troublesome Creek gas is 1,072.505 (analysis attached).

**PERSON RESPONSIBLE:** Charles R. Bradley

## Basin Energy

### Holly Creek Production

Data File Name C:\LabSolutions\Data\Natural gases\2020-01-29 ng\20001802.gcd  
 Output Date 1/29/2020  
 Output Time 11:01:16 AM

Type 0  
 Generated 1/29/2020 10:18  
 Generated by Ross Boyd  
 Modified 1/29/2020 11:01  
 Modified by Ross Boyd

#### GAS ANALYSIS BY GC/TCD/FID

COMPONENT	Normalized	Gross Heating	Gross Heating	Gasoline	Specific	Wobbe
	Mole Percent	Value (BTU/ft <sup>3</sup> )	Value (BTU/lb)	Content (gal/1000ft <sup>3</sup> )	Gravity	Index
CO2	0.11992%	0.000	0.00	0.000	0.001822	0
ETHANE	8.29039%	146.715	2633.07	2.211	0.086071	500.09
N2	12.80290%	0.000	0.00	0.000	0.123833	0
METHANE	71.89218%	726.111	13031.93	0.000	0.398225	1150.6
PROPANE	4.51034%	113.485	2036.78	1.239	0.068674	433.05
I-BUTANE	0.39972%	12.998	233.29	0.130	0.008022	145.13
N-BUTANE	1.34392%	43.843	786.88	0.423	0.026970	266.97
NEOPENTANE	0.00000%	0.000	0.00	0.000	0.000000	0
I-PENTANE	0.23767%	9.509	170.66	0.087	0.005921	123.58
N-PENTANE	0.09831%	12.213	219.19	0.110	0.007589	140.19
HEXANE+	0.09831%	4.675	83.91	0.040	0.002925	86.447
<b>TOTAL</b>	<b>99.794%</b>	<b>1069.550</b>	<b>19196</b>	<b>4.239</b>	<b>0.7301</b>	<b>1251.8</b>

COMPRESSIBILITY = 0.9972

Average Wobbe Index Value = 258.74

DRY BTU (IDEAL) = 1069.550

DRY BTU (REAL) = 1072.505

#### FRACTION

C6 1

C7 0

C8 0

SATURATED BTU (IDEAL) = 1050.892

SATURATED BTU (REAL) = 1054.168

UNNORMALIZED TOTAL PERCENT = 100.000%

AVERAGE MOLAR MASS = 21.144

NOTES: IDEAL VALUES NOT CORRECTED FOR COMPRESSIBILITY

REAL VALUES CORRECTED FOR COMPRESSIBILITY

STD CONDITIONS: 14.696 PSIA & SP. GR. @ AIR = 0.9995

GAS CONSTANTS FOR C6+ (C6,C7,C8) ARE FOR N-HEXANE, N-HEPTANE, N-OCTANE

ACCURACY IS TO 1 PART IN 1000 (EXTRA DIGITS FOR ROUNDING)

CALCULATIONS ARE BASED UPON DRY ANALYSIS

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**REQUEST 5**

State whether Troublesome Creek currently provides gas service for compensation. If so, provide a schedule of any rates, rules, regulations, or conditions of service currently in effect.

**RESPONSE:**

Troublesome Creek purchased wells and gathering lines from Holly Creek Production Corporation ("Holly Creek"). Since then, Troublesome Creek has utilized Holly Creek's Rates, Rules and Regulations for Furnishing Gas (Holly Creek tariff attached).

**PERSON RESPONSIBLE:** Charles R. Bradley



# Holly Creek Production Corporation

P. S. C. Ky. No. 1

Cancels P. S. C. Ky. No. \_\_\_\_\_

*Nonjurisdictional*

OF  
HOLLY CREEK PRODUCTION CORPORATION, Campton, Kentucky

**Rates, Rules and Regulations for Furnishing**

*GAS*

AT

Filed with PUBLIC SERVICE COMMISSION OF  
KENTUCKY

ISSUED March 15 1976

EFFECTIVE March 15 1976

**CHECKED**  
PUBLIC SERVICE COMMISSION

NOV 9 1976  
by *[Signature]*  
ENGINEERING DIVISION

ISSUED BY HOLLY CREEK PRODUCTION CORPORATION  
(Name of Utility)

BY *Carleton D. Beh, Jr.*

CARLETON D. BEH, JR.

Holly Creek Production Corporation

For: Entire Service Area

P.S.C. KY No. 1  
First Revised Sheet No. 1

Canceling P.S.C. KY. No. 1  
First Sheet No. 1

**RATES AND CHARGES**

First 2 MCF per month at \$10.69 per MCF

\$21.38 minimum bill (I)

All volumes over 2 MCF per month

\$10.69 per MCF (I)

Date of Issue: June 4, 2007

Effective Date: May 31, 2007

Issued By:

Carleton D. Beh, Jr.  
Carleton D. Beh, Jr.

Title: President

By the Authority of Order of the Public Service Commission  
In Case No. 2007-007 dated May 31, 2007

PUBLIC SERVICE COMMISSION  
OF KENTUCKY  
EFFECTIVE  
5/31/2007  
PURSUANT TO 807 KAR 5:011  
SECTION 9 (1)

By [Signature]

Executive Director

**Troublesome Creek Gas Corporation**  
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**REQUEST 6**

State whether Troublesome Creek provides any customer with free gas service, including customers who receive free gas service as a result of lease or right-of-way agreements. If so, provide the number and average annual usage for these customers.

**RESPONSE:**

Troublesome Creek has fifty-five free customers with an annual usage of 3,606 Mcf. In addition to that amount, there are twenty customers who are not currently metered.

**PERSON RESPONSIBLE:** Kim Lockhart

**Troublesome Creek Gas Corporation**  
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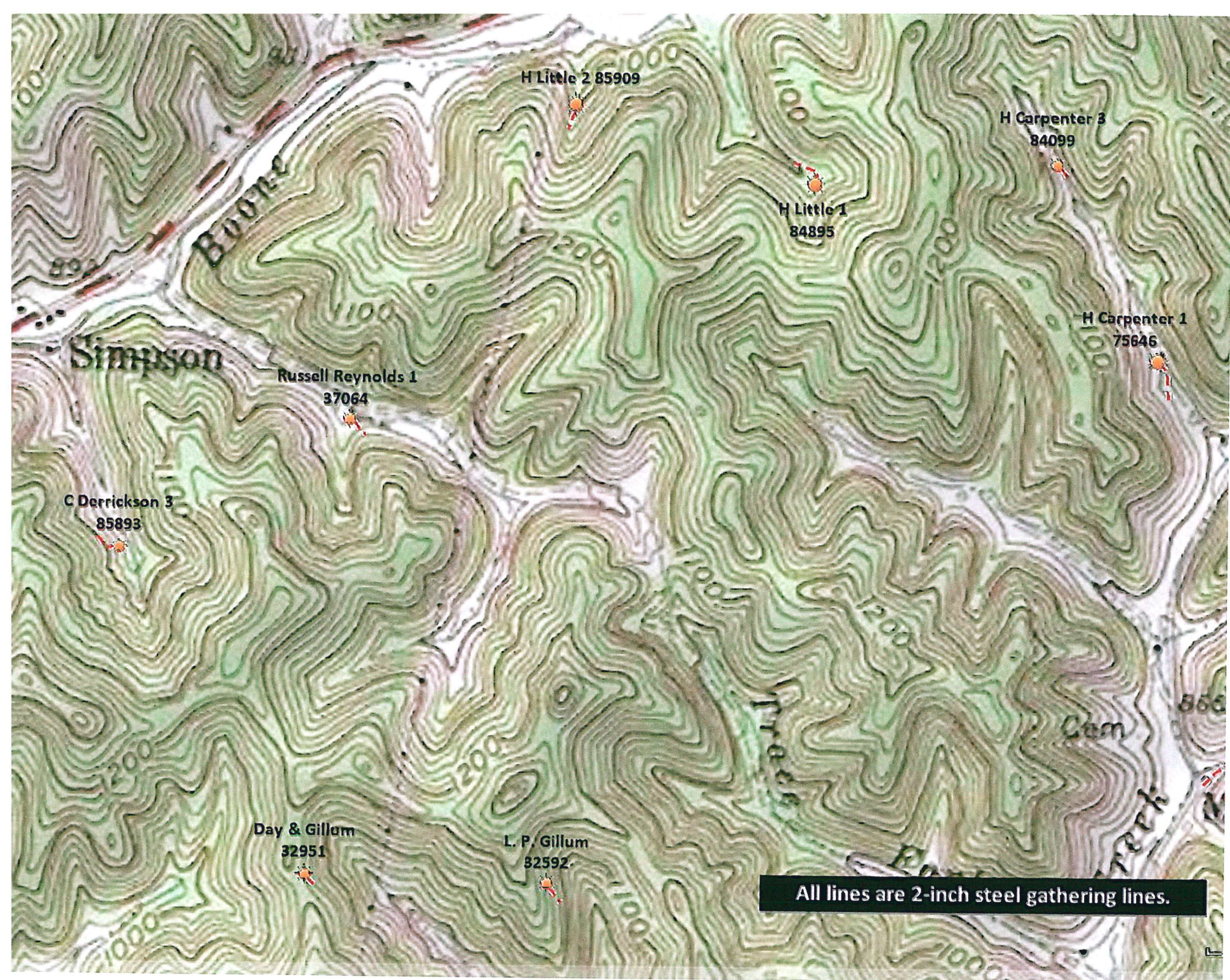
**REQUEST 7**

Provide a system map or maps that show Troublesome Creek's natural gas system, including the location, size, category, and material of lines and the location of producing wells.

**RESPONSE:**

See maps attached.

**PERSON RESPONSIBLE:** Charles R. Bradley



H Little 2 85909

H Carpenter 3  
84099

H Little 1  
84895

H Carpenter 1  
75646

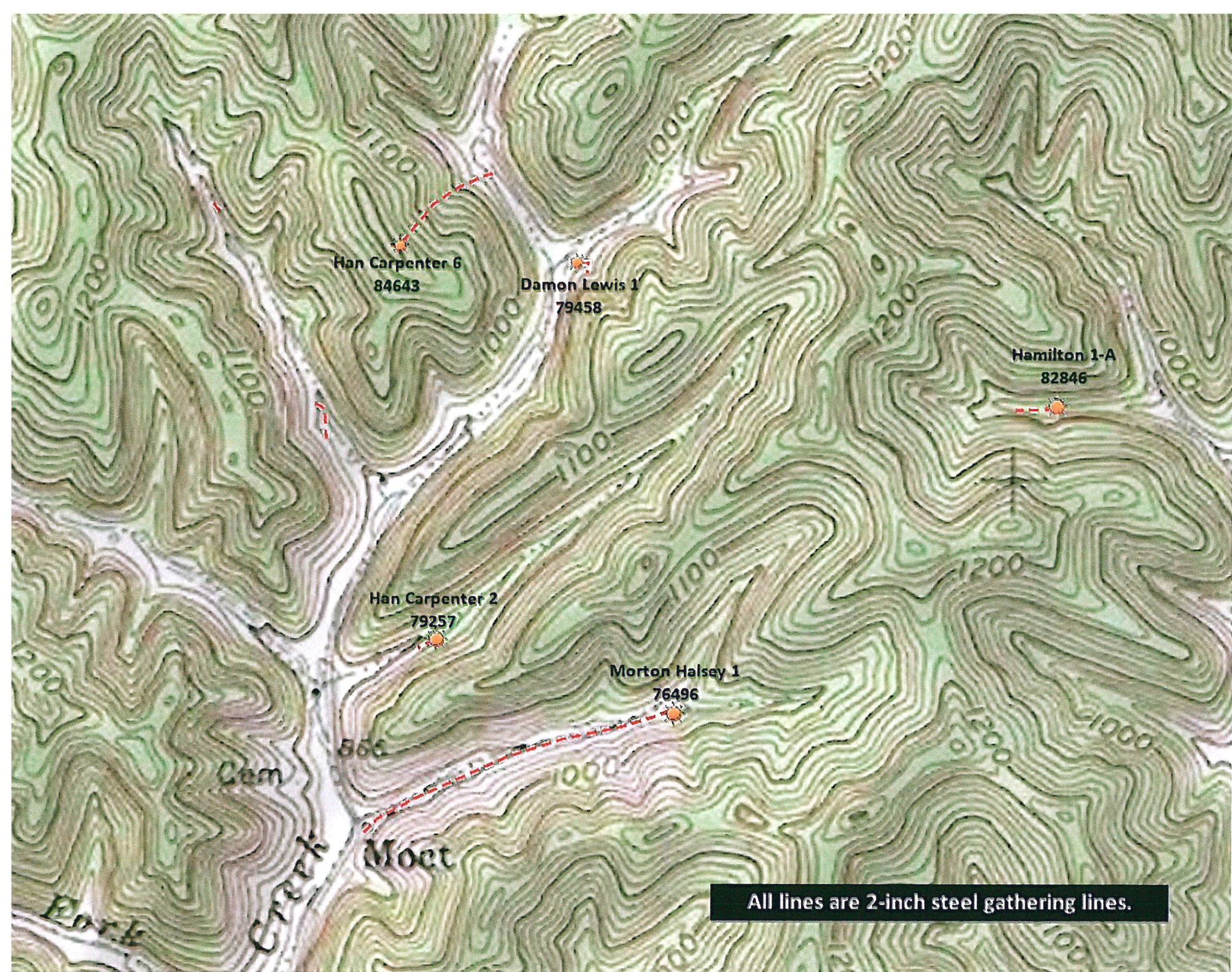
Russell Reynolds 1  
37064

C Derrickson 3  
85893

Day & Gillam  
32951

L. P. Gillum  
82592

All lines are 2-inch steel gathering lines.



Han Carpenter 6  
84643

Damon Lewis 1  
79458

Hamilton 1-A  
82846

Han Carpenter 2  
79257

Morton Halsey 1  
76496

Creek  
Moet  
Park

All lines are 2-inch steel gathering lines.

A topographic map showing contour lines and two points marked with orange pins. A red line connects the two points, with a Y-shaped branch extending upwards from the left point. The map is colored in shades of green and brown, with contour lines labeled with numbers like 800, 1000, and 1100. The text 'Morton Gilbert 74164' is located near the left pin, and 'Andy Hinson 92187' is near the right pin. A black box with white text is at the bottom right.

Morton Gilbert  
74164

Andy Hinson  
92187

All lines are 2-inch plastic gathering lines.



Gas  
Reed Williams 1  
14238

Clay Campbell 1  
18637

Reed Williams 2  
21306

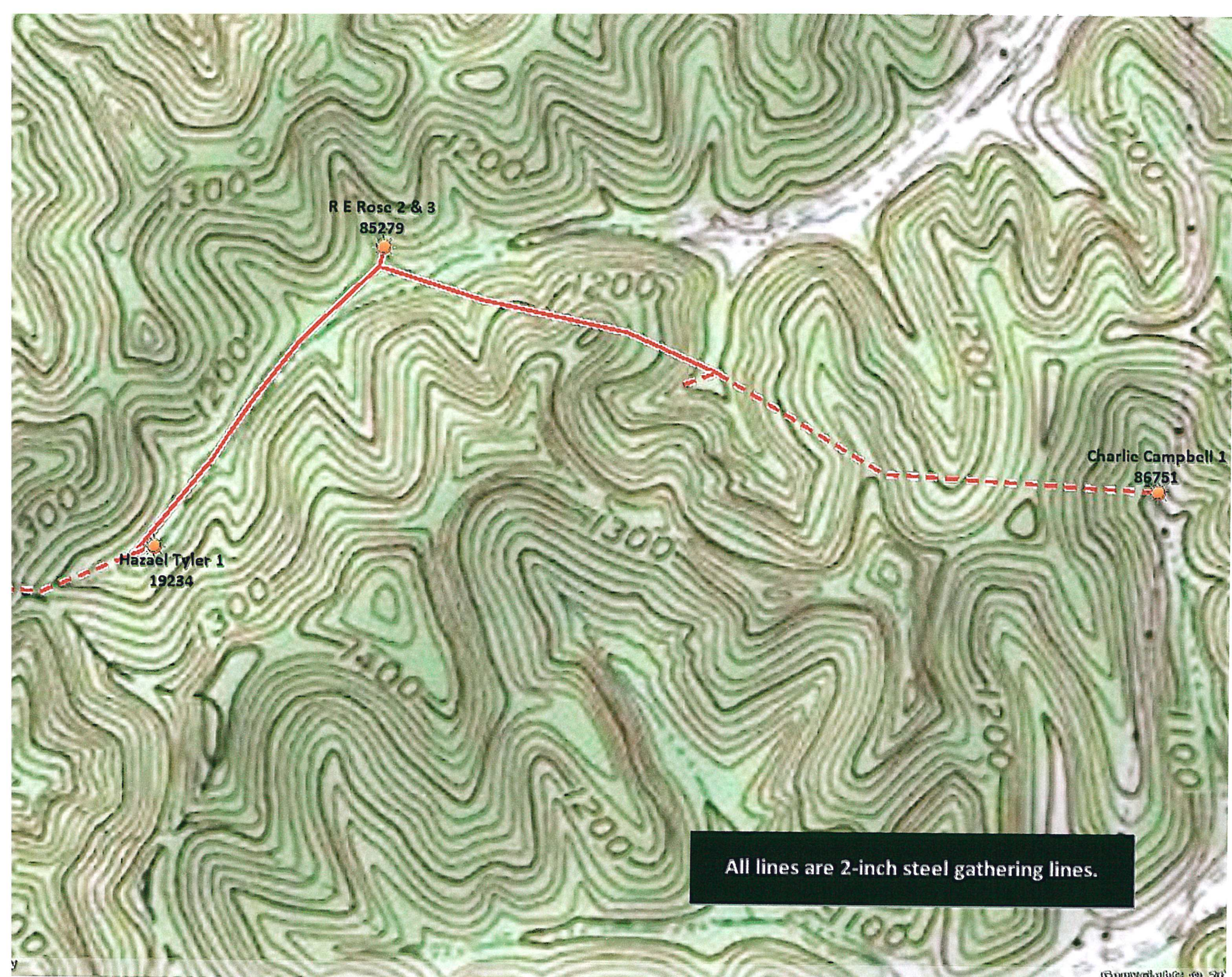
Wyatt #1 85920

Wyatt #2 86196

Charles Campbell #1 85353

All lines are 2-inch gathering lines.  
Blue= Plastic  
Red= Steel

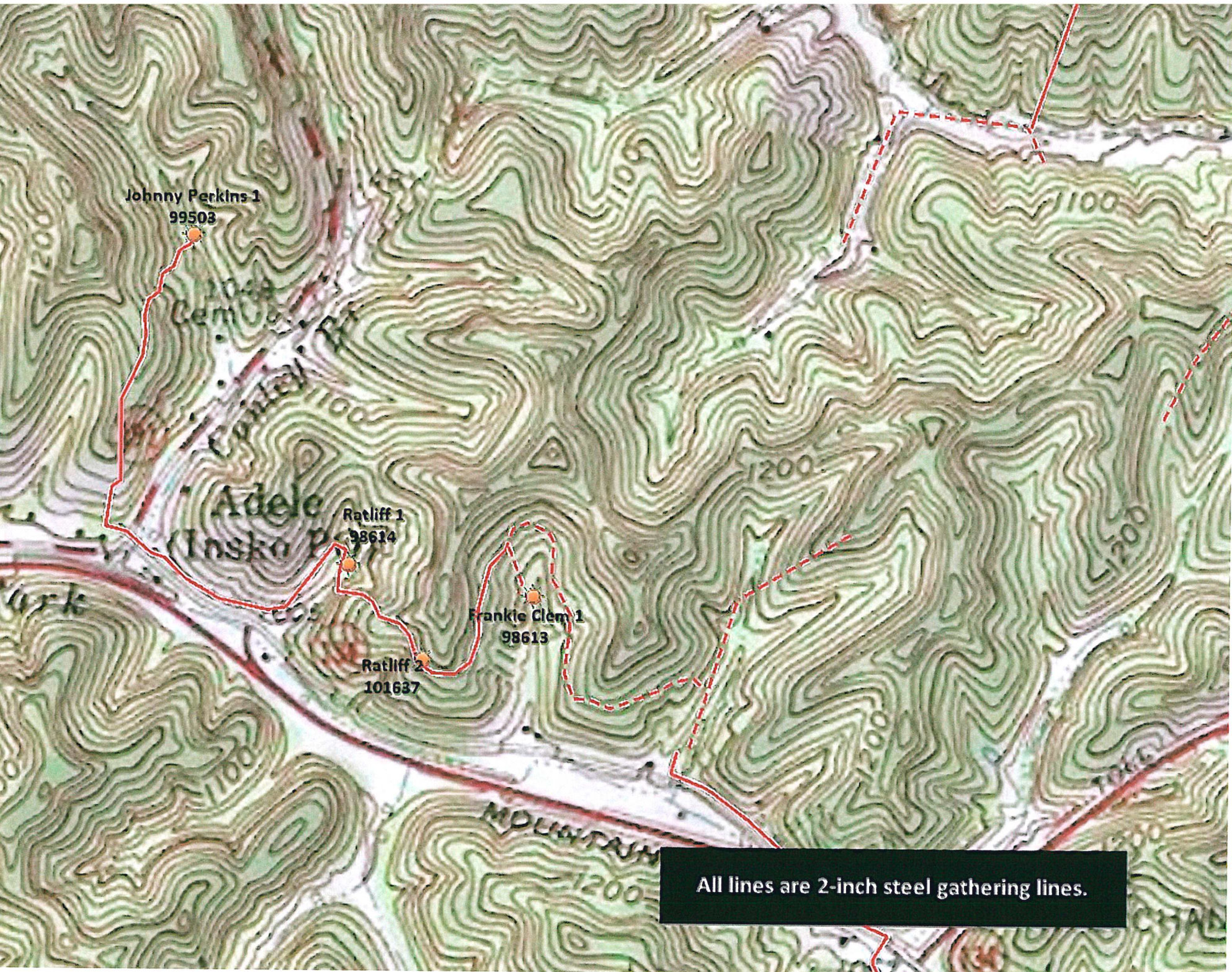




All lines are 2-inch steel gathering lines.



All lines are 2-inch steel gathering lines.



Johnny Perkins 1  
99503

1049  
Cem

Adele  
(Insko P)

Ratliff 1  
98614

Frankie Clem 1  
98613

Ratliff 2  
101637

All lines are 2-inch steel gathering lines.

A topographic map with contour lines and color-coded elevation zones. Three gas wells are marked with orange sun icons and labels: BG Lovins 1 (87693) on the left, B Combs 2 (87661) in the lower center, and B Combs 1 (87170) on the right. A red line, representing a gathering line, starts near B Combs 2, goes east, then north, then east again, ending near B Combs 1. Another red line runs north-south through the center, passing through a 'Gas Well' label. The map includes labels for 'Gross', 'Flk', and 'Turkey'.

BG Lovins 1  
87693

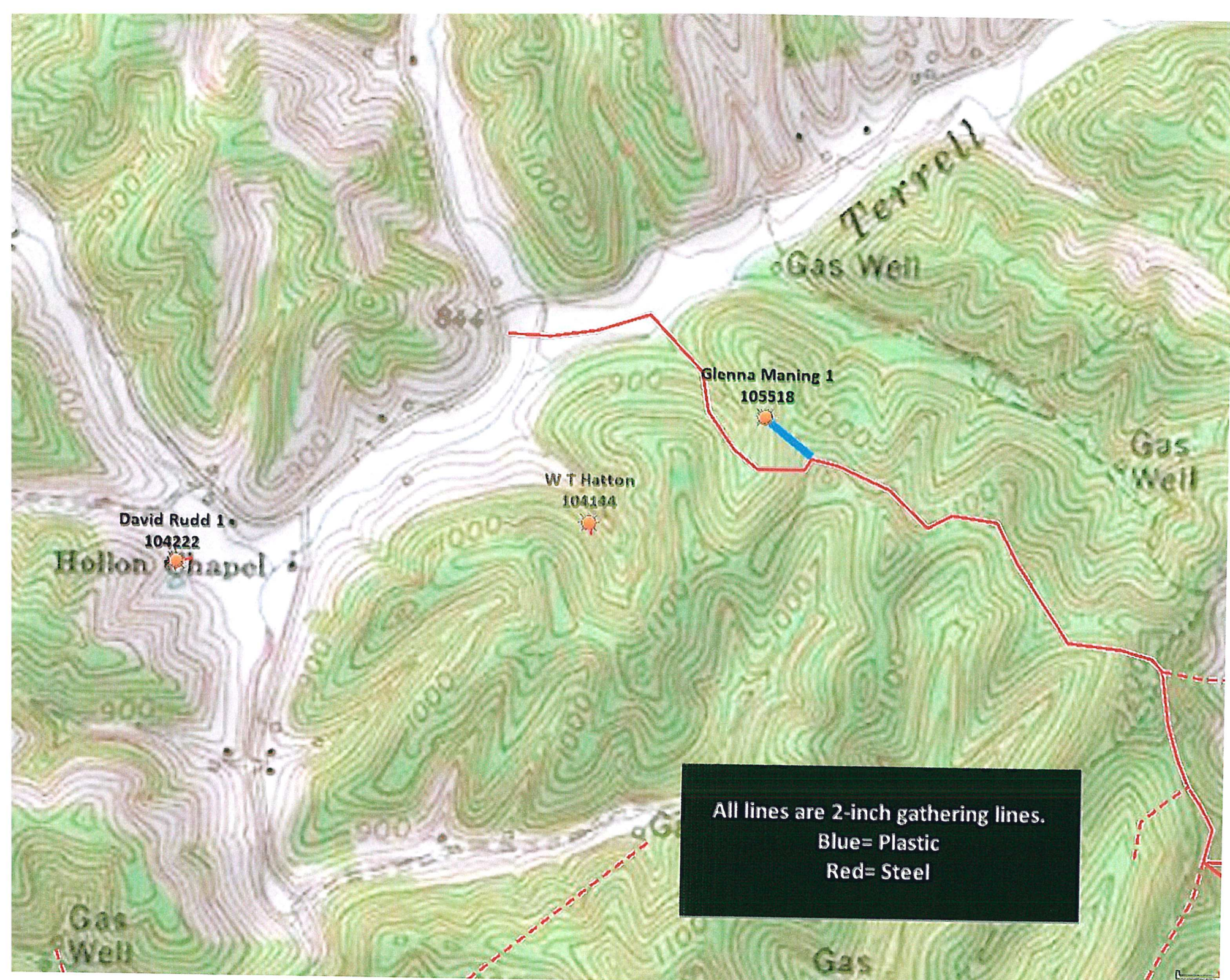
B Combs 1  
87170

B Combs 2  
87661

All lines are 2-inch steel gathering lines.



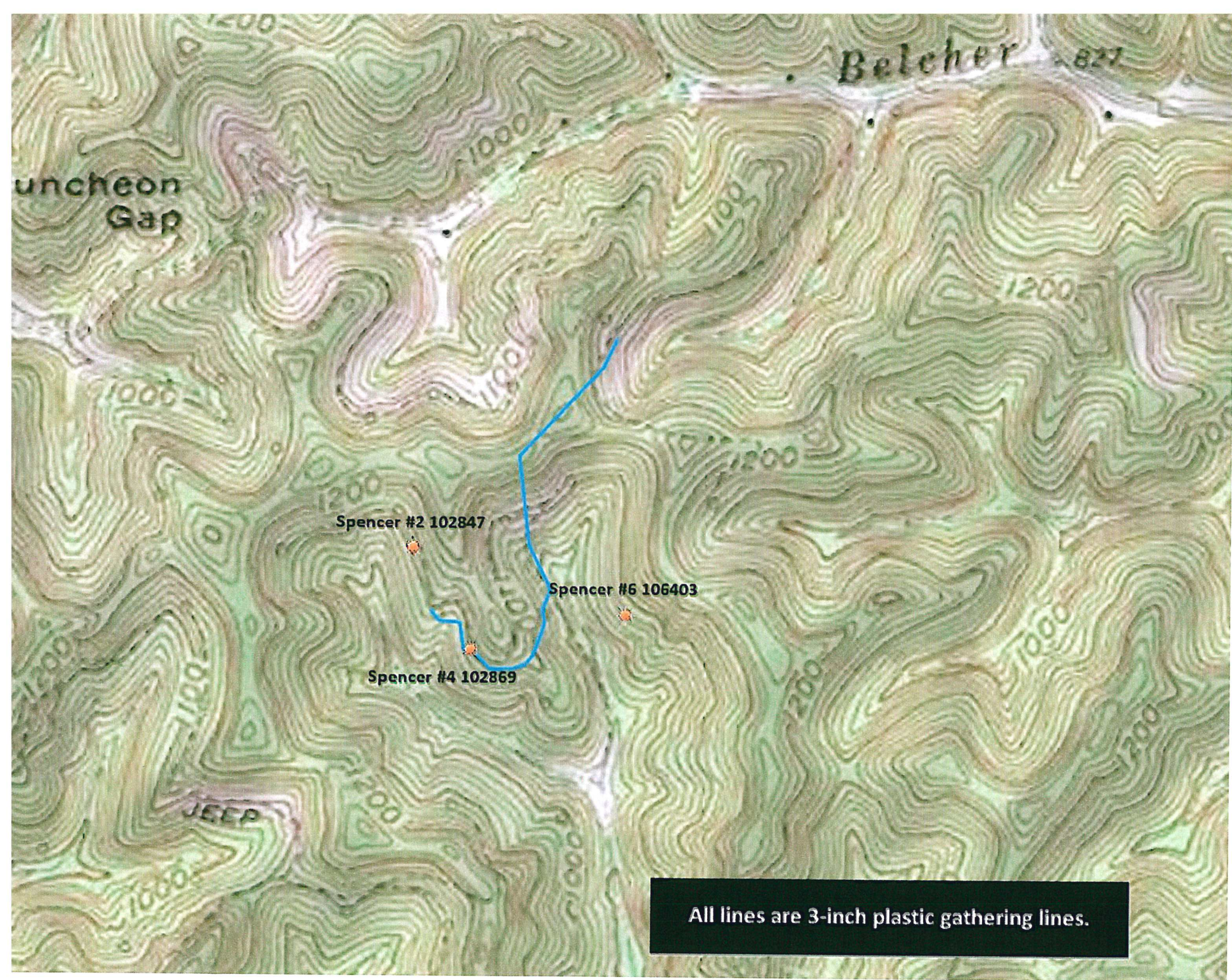
All lines are 2-inch steel gathering lines.



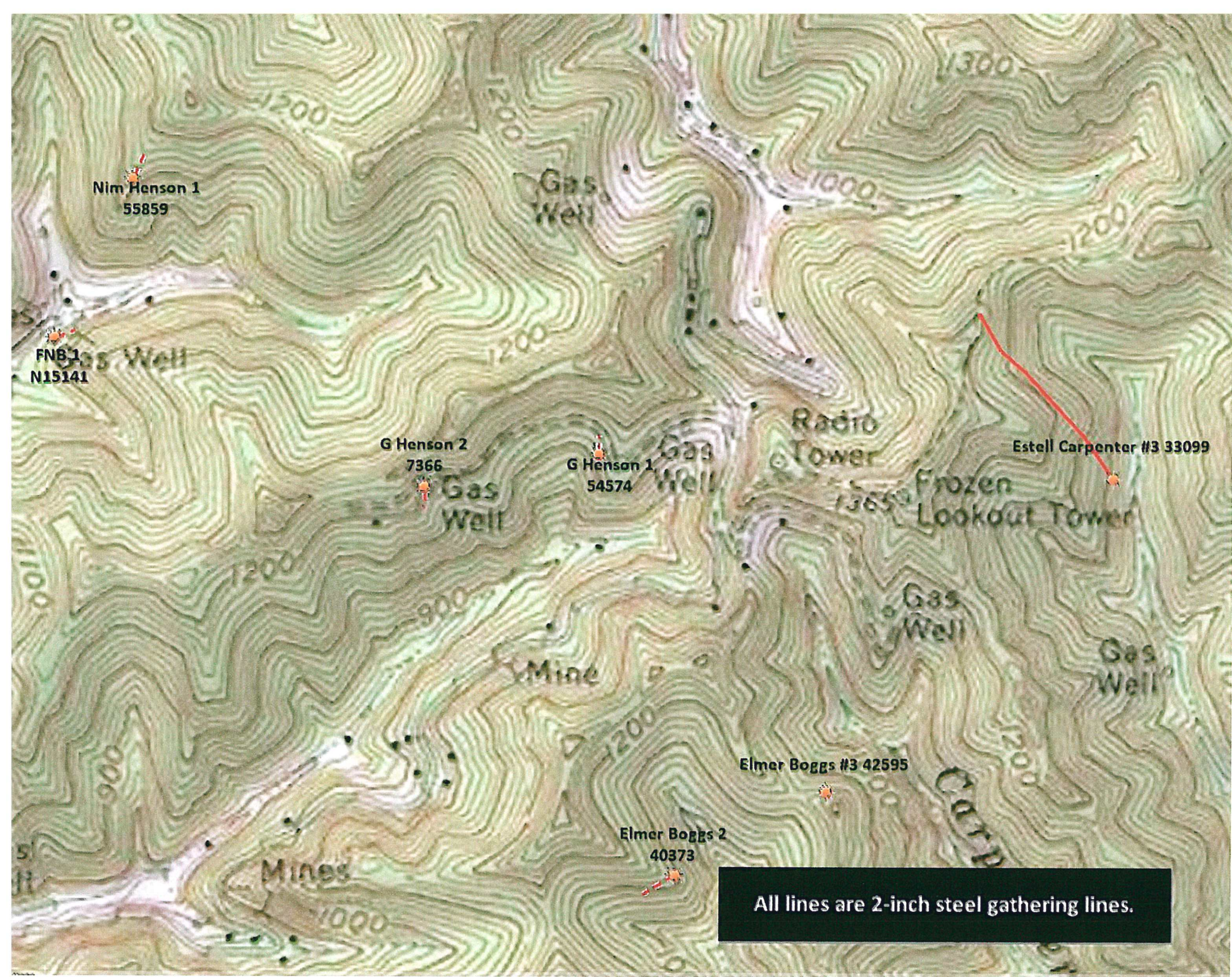
All lines are 2-inch gathering lines.  
Blue= Plastic  
Red= Steel







All lines are 3-inch plastic gathering lines.



Nim Henson 1  
55859

FNB 1  
N15141

G Henson 2  
7366

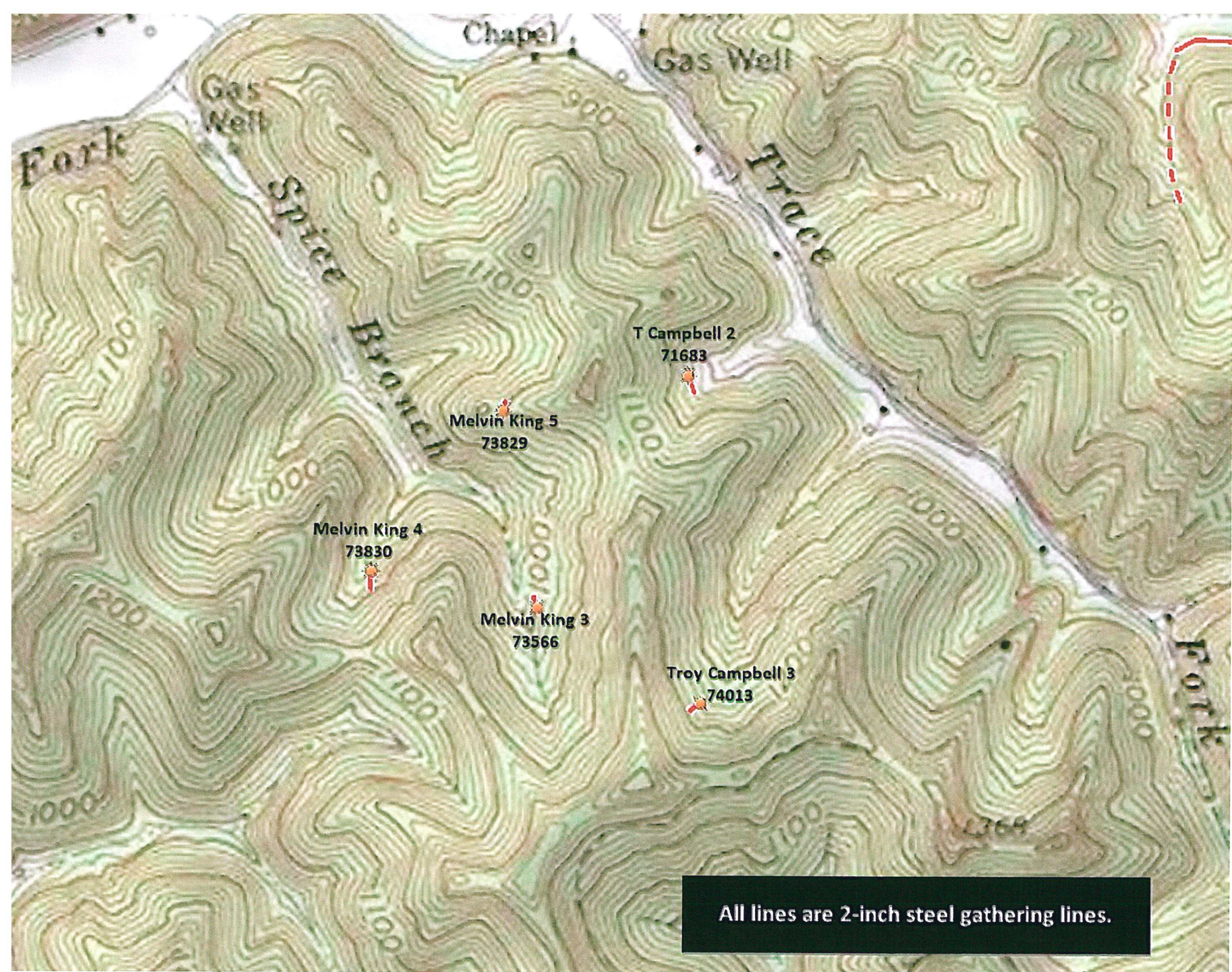
G Henson 1  
54574

Estell Carpenter #3 33099

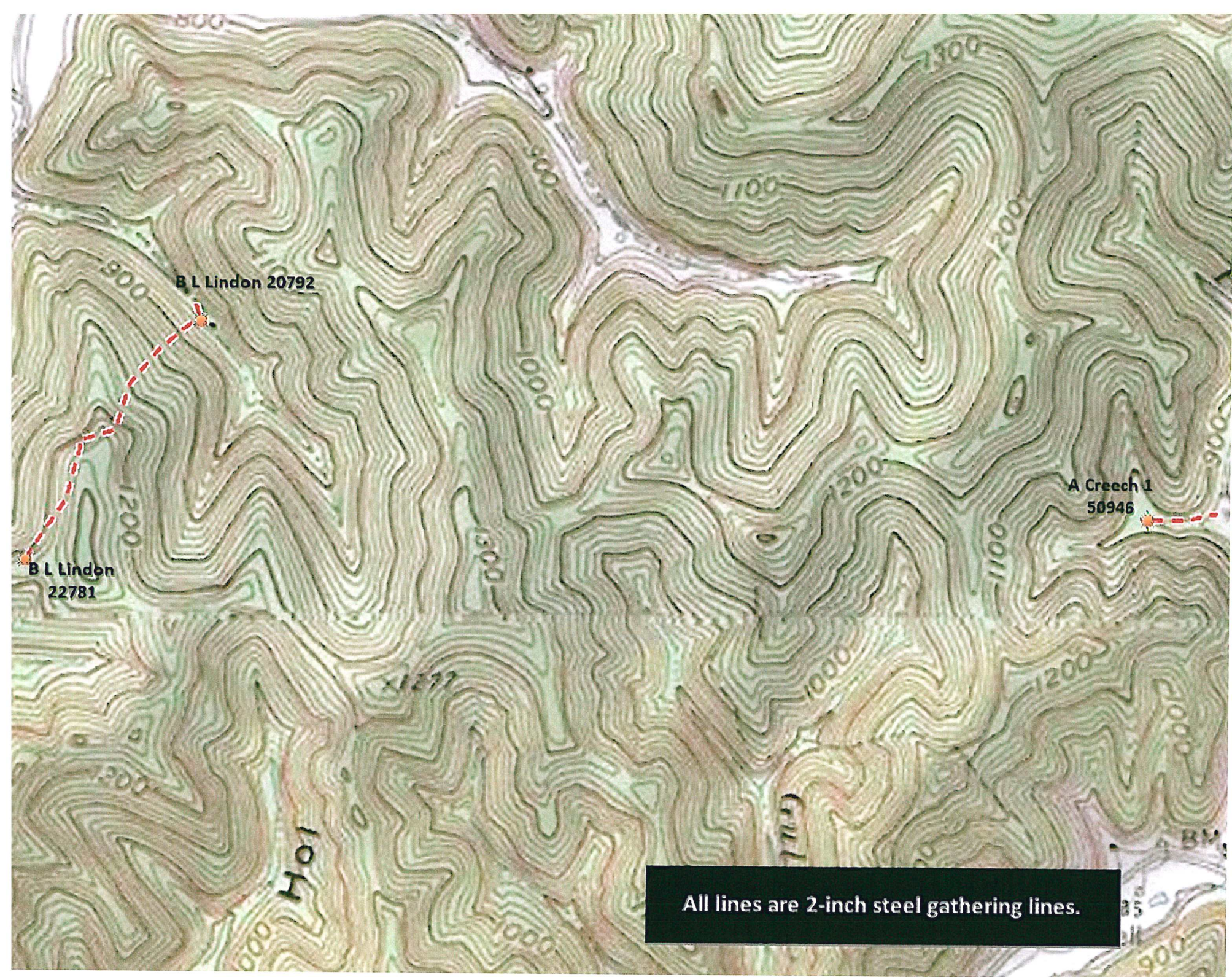
Elmer Boggs #3 42595

Elmer Boggs 2  
40373

All lines are 2-inch steel gathering lines.



All lines are 2-inch steel gathering lines.

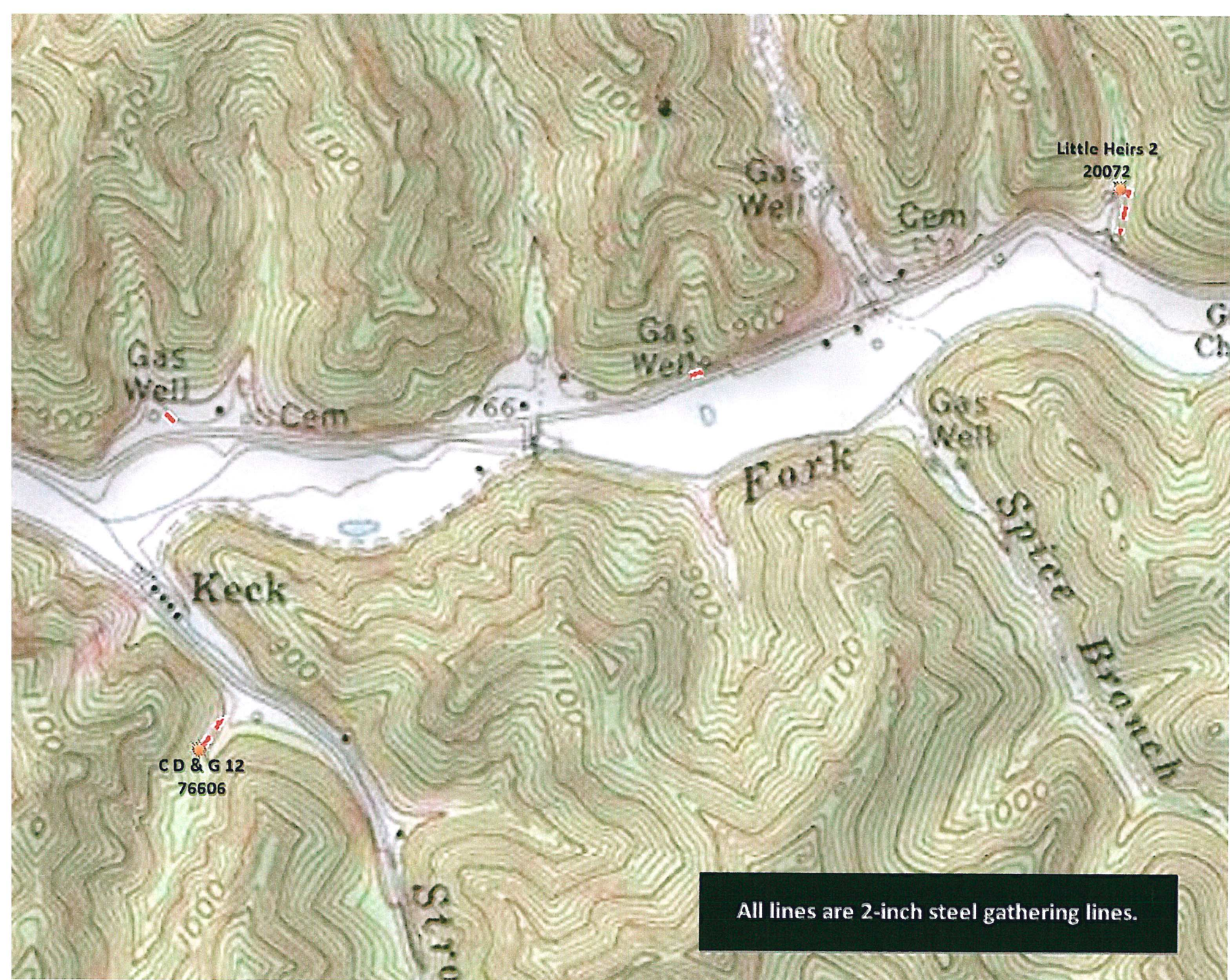


B L Lindon 20792

B L Lindon  
22781

A Creech J  
50946

All lines are 2-inch steel gathering lines.



Little Heirs 2  
20072

Gas Well

Cem

766

Gas Well

Gas Well

Cem

Gas Well

Keck

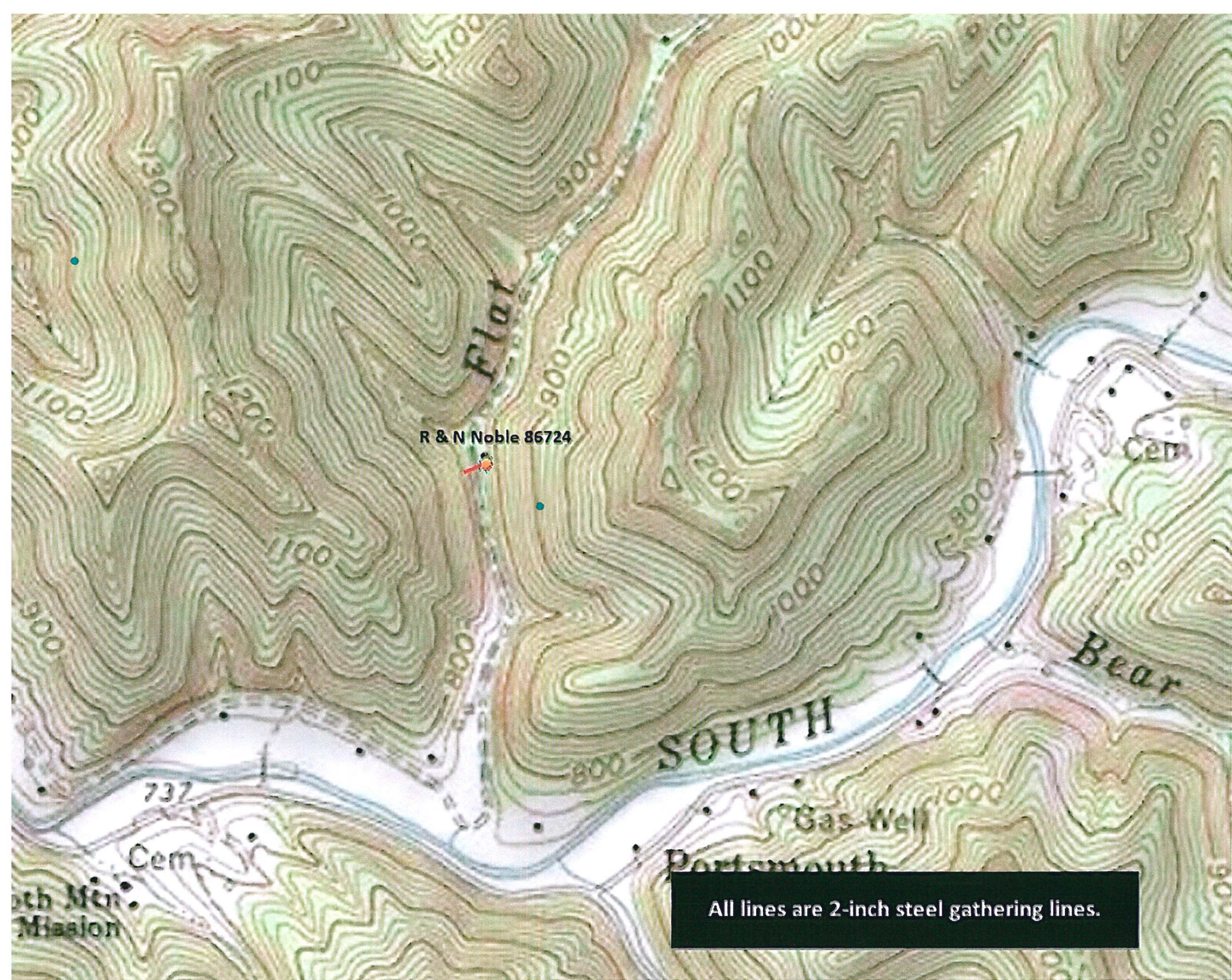
Fork

Spring

Branch

CD & G 12  
76606

All lines are 2-inch steel gathering lines.



R & N Noble 86724

SOUTH

Bear

Gas Well

Portsmouth

All lines are 2-inch steel gathering lines.

South Men Mission

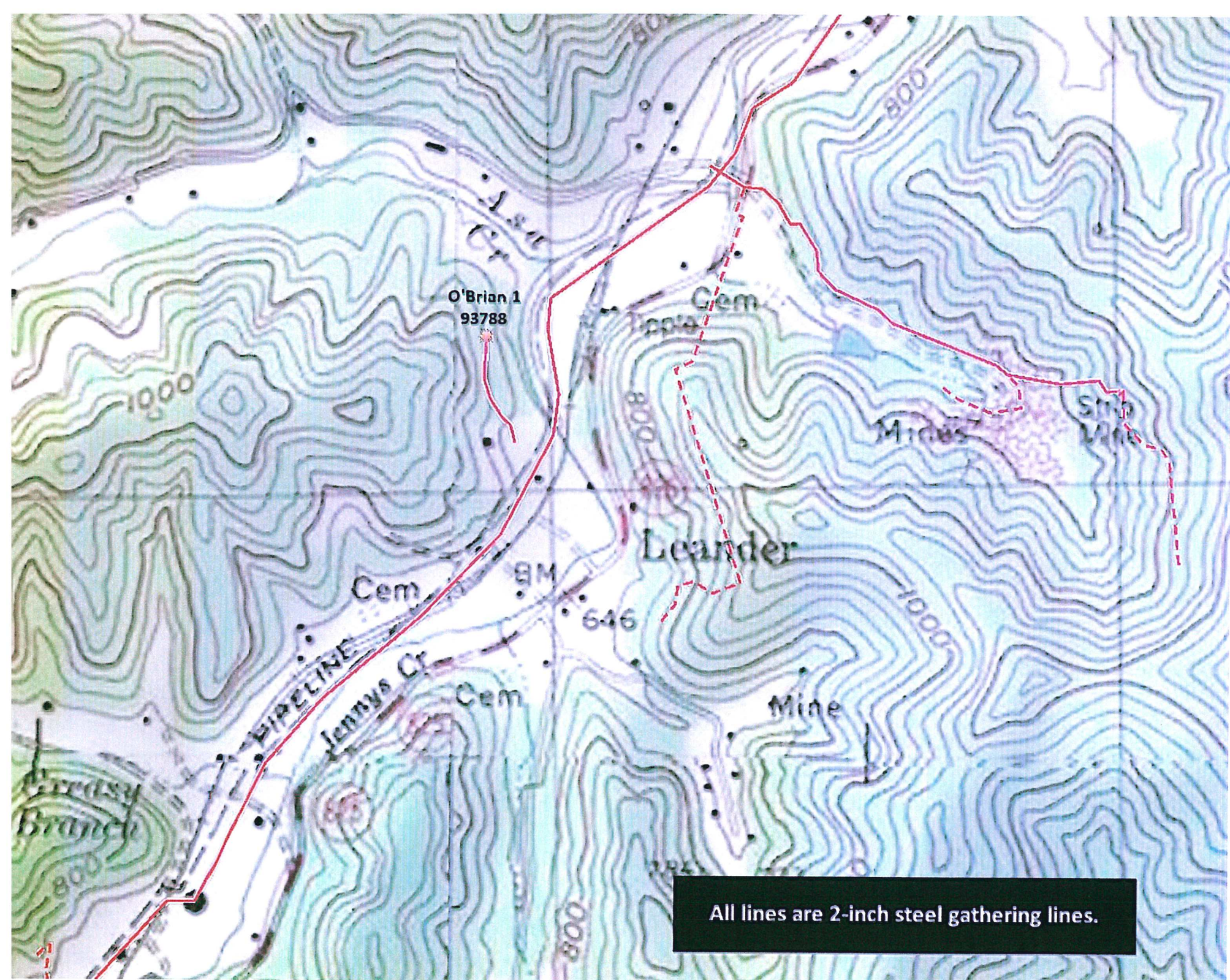
Cem

737

Cem



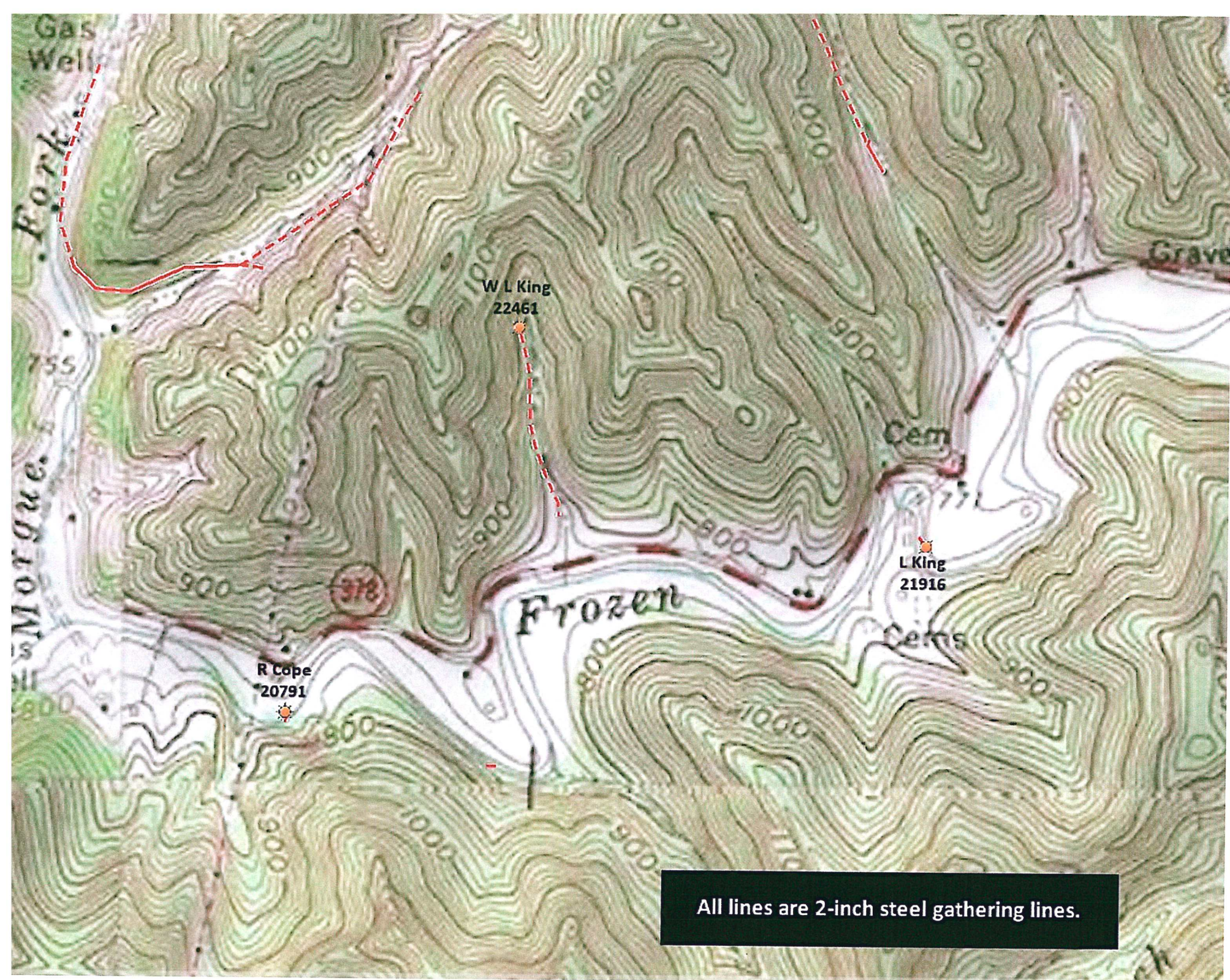
All lines are 2-inch steel gathering lines.



All lines are 2-inch steel gathering lines.







All lines are 2-inch steel gathering lines.



All lines are 2-inch steel gathering lines.

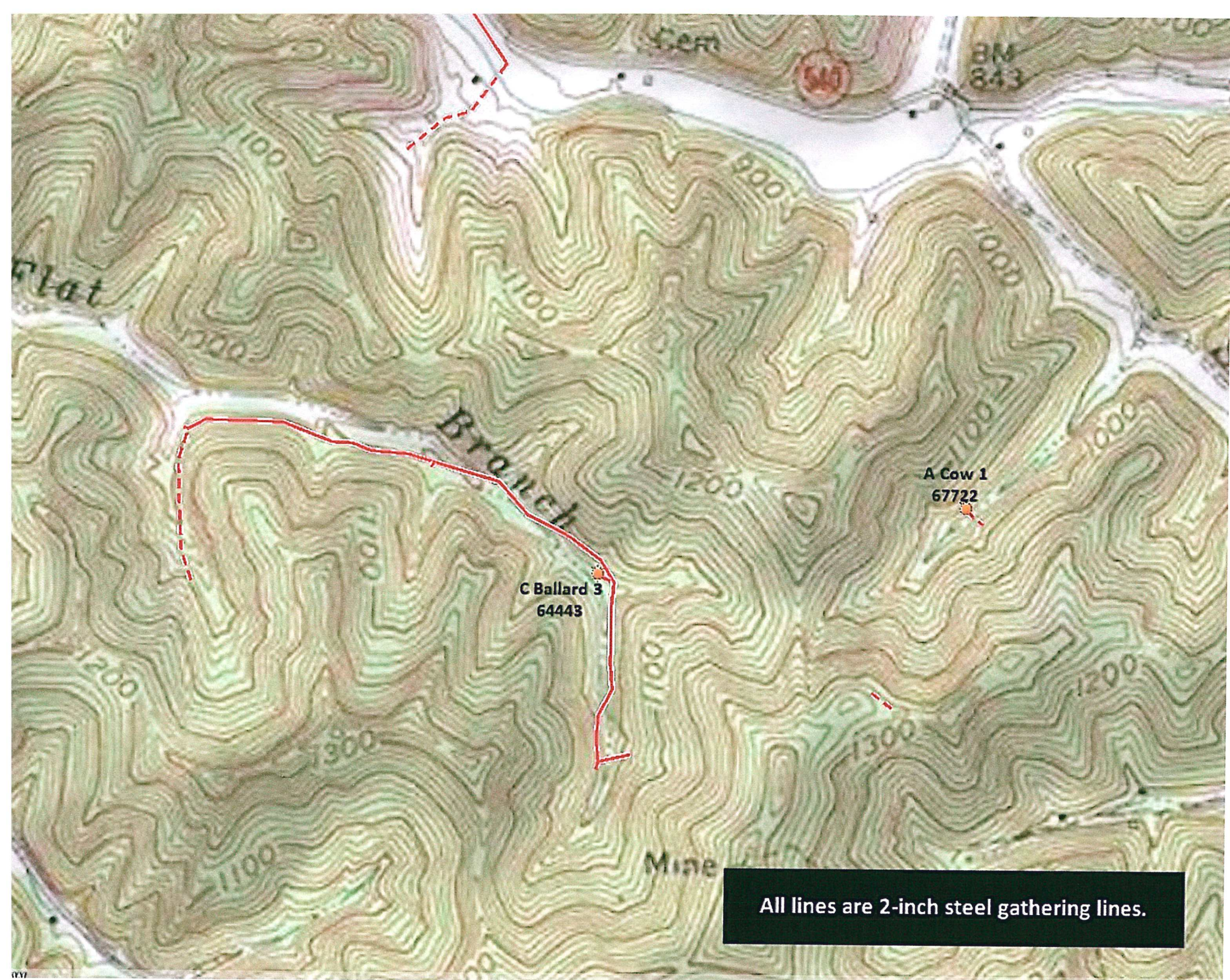
June Hurst 9  
86700

June Hurst 1  
85926

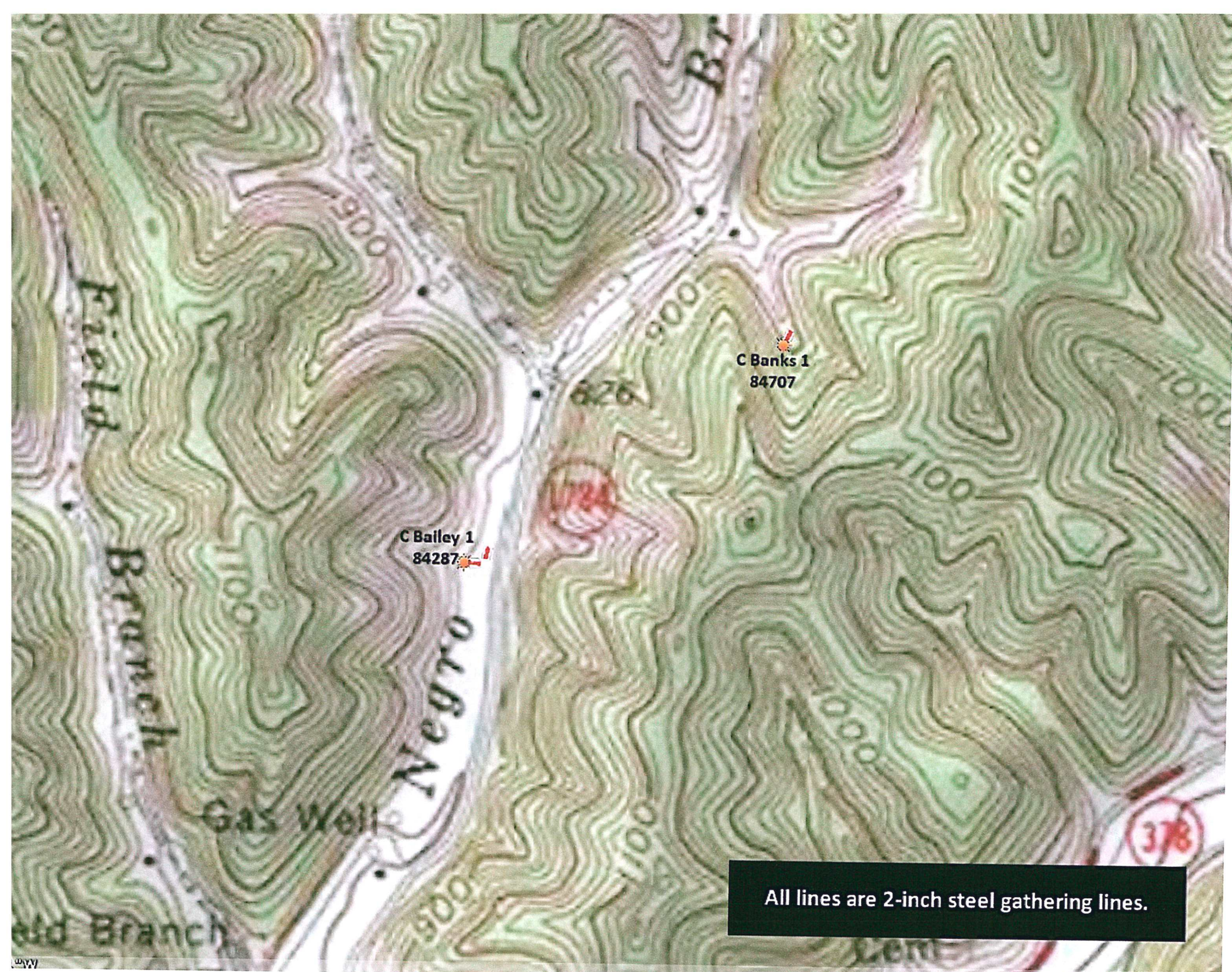
BMX  
769

76 June Hurst 4  
85977

All lines are 2-inch steel gathering lines.



All lines are 2-inch steel gathering lines.



All lines are 2-inch steel gathering lines.



Daniel Bryant 1  
72319

All lines are 2-inch steel gathering lines.

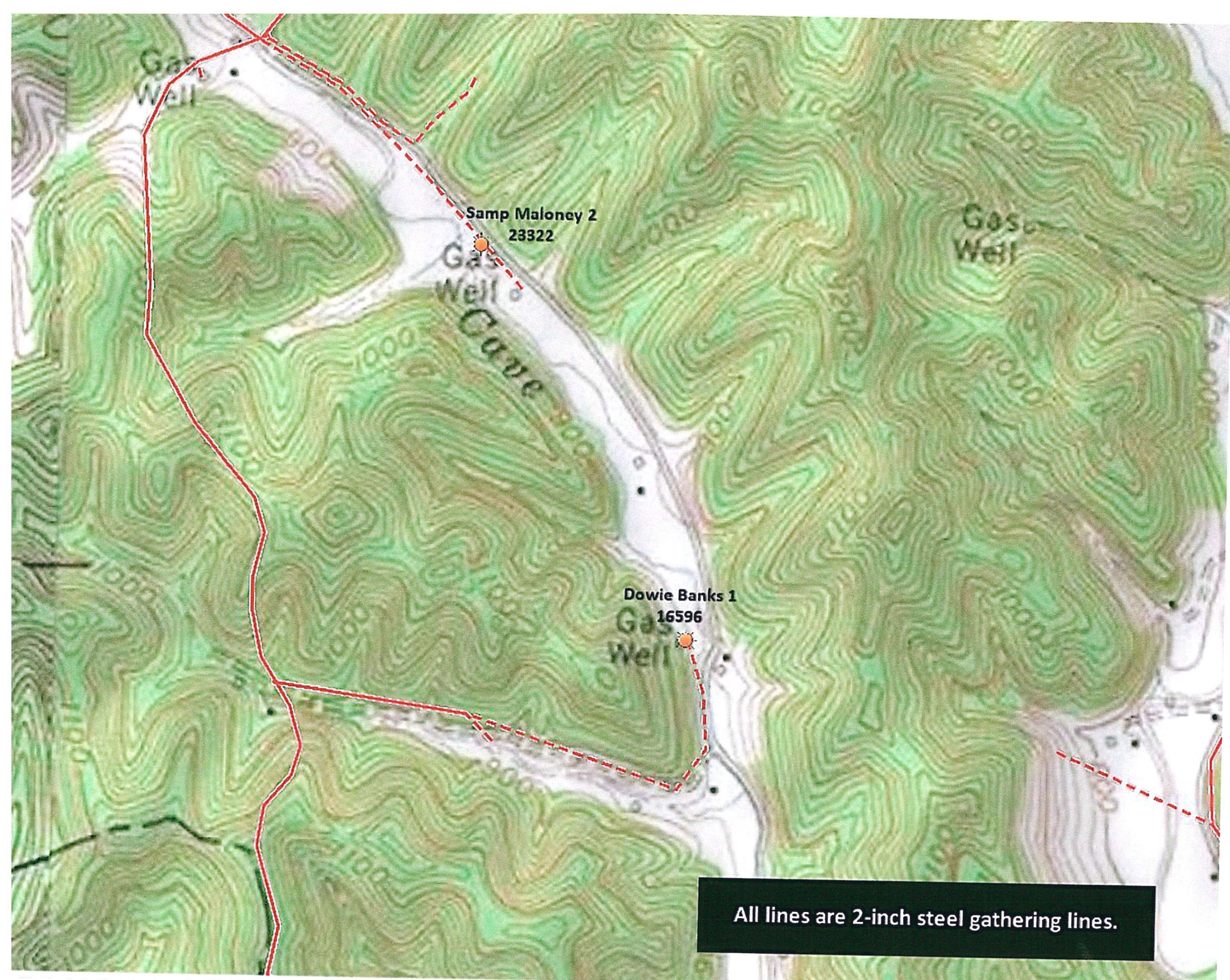


All lines are 2-inch steel gathering lines.





All lines are 1-inch plastic gathering lines.



All lines are 2-inch steel gathering lines.

**Troublesome Creek Gas Corporation**  
**Case No. 2019-00467**  
**Commission Staff's Initial Request for Information**

**REQUEST 8**

Provide a general description of Troublesome Creek's gas system, including the date(s) of construction and ultimate market for gathered gas.

**RESPONSE:**

Troublesome Creek gas system consists of the wells and gathering pipelines it purchased from Holly Creek and eighteen new wells that were drilled since that purchase. Approximately nine of the 18 new wells are active. To the best of my knowledge, the original system was built out in the 1960s. When the field was first developed, Holly Creek owned the production facilities and what is now the Jefferson Gas, LLC ("Jefferson") pipeline. The pipelines Troublesome Creek now owns is the gathering system used to receive gas at the wells and deliver that gas to the Jefferson pipeline. The ultimate market for the gathered gas is Jefferson.

**PERSON RESPONSIBLE:** Charles R. Bradley

**Troublesome Creek Gas Corporation**  
**Case No. 2019-00467**  
**Commission Staff's Initial Request for Information**

**REQUEST 9**

State whether Troublesome Creek has any operator qualifications or operations and maintenance plans or performs leakage or patrolling surveys. If so, provide the details.

**RESPONSE:**


No, as a production company, Troublesome Creek is not required to perform these tasks.

**PERSON RESPONSIBLE:** Charles R. Bradley

**VERIFICATION**

**COMMONWEALTH OF KENTUCKY**            )  
  )  
**COUNTY OF FLOYD**                            )        **SS:**

The undersigned, Charles R. Bradley, owner of Troublesome Creek Gas Corporation, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing Answers to Commission Staff's Initial Request for Information, and that the information contained therein is true and accurate to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Charles R. Bradley, Affiant

Subscribed and sworn to before me by Charles R. Bradley on this 12<sup>th</sup> day of February, 2020.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 9-23-2022

