

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

*Electronic* INVESTIGATION OF JURIS- )  
DICTIONAL STATUS OF EAST KEN- )  
TUCKY MIDSTREAM, LLC, AND OF )  
ITS COMPLIANCE WITH KRS CHAP- )  
TER 278, 807 KAR CHAPTER 005, AND )  
49 CFR PARTS 191 AND 192 )

Case No.  
2022-00238

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**East Kentucky Midstream Request for Information**

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Pursuant to KRS 278.110(2)(b), East Kentucky Midstream, LLC (“EKM”) herewith submits its Request for Information to Sander Resources, L.L.C. (“Sander”), a contracted person. It is requested that Sander provide EKM with its responses on or before September 3, 2024.

INSTRUCTIONS and DEFINITIONS

Responses in paper medium shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the person responsible for responding to questions related to the information provided. Each response shall be answered under oath or be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of Sander that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry. For any request to which Sander refuses or fails to furnish all or part of the requested information, please provide a written explanation of the specific grounds for the failure to completely and precisely respond. If there is personal information in any response the Joint Intervenors files in this case, it should comply with 807 KAR 5:001, Section 4(10), and encrypt or redact the response so that personal information cannot be read.

1. Please provide a detailed listing of the education, training, and work experience of all Sander personnel who participated in the preparation and review of the document entitled “Regulatory Status of East Kentucky Midstream, LLC (EKM) Pipeline System” (hereinafter “the Report”) submitted to the Kentucky Public Service Commission on June 30, 2024.
2. Please provide a copy of the “preliminary report issued on June 13, 2024” referenced on page one of the Report.
3. Please explain what is meant by “more information is now available to assist with filling in critical operational details of the systems in question” (Report p. 1).
4. Please list what additional “information” was provided to Sander after the June 13 preliminary report, and with respect to each listed “information” who provided it or how it was obtained.
5. Please provide copies of any and all communications (including but not limited to letters, emails, texts, notes of conversations) in 2024 between Sander Resources and the following:
  - a. Staff of the Kentucky Public Service Commission,
  - b. Current and former employees of Kentucky Frontier Gas (“KFG”),
  - c. Counsel for KFG.
6. Please describe in detail the steps taken to conduct the investigation and develop the Report, including the names of all persons interviewed, questioned, or who provided information about the EKM system.
7. Is Sander aware there is an ongoing dispute over gas supply between KFG and EKM? If so, when was Sander made aware and by whom?
8. Is Sander aware that PSC staff person Mike Harris recently worked for KFG? If so, when was Sander made aware and by whom?
9. Has Sander or any of its personnel ever performed work for or been employed by KFG or its owner Steve Shute or any companies in which Steve Schute has more than 50% ownership? If so, please describe the nature of that work and the amount of compensation.

Respectfully Submitted,

*/s/ Jason R. Bentley*

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