

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2025-00042

IN THE MATTER OF:

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

RYAN ALLEN'S RESPONSES TO FIRST REQUEST FOR INFORMATION

Comes now Ryan Allen for his Responses to First Request for Information states as follows:

1. Refer to the Joint Response to Motion to Submit,2 page 4, regarding the consideration received for the natural gas pipeline right-of-way and easement over Ryan Allen's property located at 12565 SE Licking River Road, Salyersville, Kentucky 41465 (Allen/Howard Property). Explain how the documents provided require Kentucky Frontier to provide free gas services to Ryan Allen at the Allen/Howard Property.

ANSWER: Free gas was the consideration for the original gas pipeline easement in the Right of Way Agreement to BTU Gas Company. Kentucky Frontier Gas, LLC acquired this gas pipeline and Right of Way at the bankruptcy sale of BTU Gas Company.

2. Refer to the Joint Response to Motion to Submit,3 page 4, regarding the consideration for the natural gas pipeline easement and right-of-way over the Allen/Howard Property. State when Kentucky Frontier refused to pay the consideration for the natural gas pipeline easement and right-of-way over the Allen/Howard Property and the amount of consideration requested.

ANSWER: Free gas for 1 residence has been received free of charge. A second tap has not been utilized.

3. Refer to the Joint Response to Motion to Submit, 4 page 4, regarding Ryan Allen's request for the fair market value of his property before and after the construction of the natural gas pipeline over the Allen/Howard Property by BTU Gas Company, Inc. State the fair market value of the Allen/Howard Property before and after the construction of the natural gas pipeline and provide any evidence used to calculate or estimate the stated property value.

ANSWER: If free gas is no longer available then the measure of damages would be the difference in the fair market value of our property before and after the gas pipe line was constructed the property. No appraiser has valued the difference in the fair market value at this time.

4. Provide the dates for any communication with BTU Gas Company or Kentucky Frontier regarding free gas and explain the reason for the communication.

ANSWER: I have spoken to representatives of Kentucky Frontier Gas, LLC about the consideration promised of free gas for the pipeline right of way 3-4 times since I received the original Complaint. The purpose of my calls was to inform them that I was entitled to free gas under the gas pipeline easement and right of way agreement signed by Kathy Howard, my mother who was my predecessor in title.

5. Provide any additional documents filed in Case No. 2026-CI-00030.6 This data request is continuing and should be updated in a supplemental filing as additional information becomes available.

ANSWER: Please see attached Deeds and previous documents filed which are attached again.

/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 25th day of March, 2026:

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

Ryan Allen
Kathy Howard

LODGED FOR RECORD
MAGOFFIN COUNTY CLERK
OCT 22 2019
TIME 11:51 AM

DEED OF CONVEYANCE

THIS DEED OF CONVEYANCE, made and entered into by and between **Pauline Howard**, widow, of 15274 S. E. Licking River Road, Salyersville, KY 41465, by and through her Power of Attorney, Kathy Howard, as evidenced by Power of Attorney recorded in Miscellaneous Book 49, page 124 of the Magoffin County Court Clerk's Office, hereinafter referred to as party of the first part and **Ryan Allen**, married, of 15274 S.E. Licking River Road, Salyersville, KY 41465, hereinafter referred to party of the second part;

The in care of address to which the property tax bill for 2013 may be sent is as follows:

Ryan Allen, 15274 S.E. Licking River Road, Salyersville, KY 41465

WITNESSETH, that said party of the first part for and in consideration of the love and affection, she has for her grandson, the party of the second part, the receipt of which is hereby acknowledged, does hereby sell, grant and convey all of her undivided interest, with joint rights of survivorship, in and to the below described property to the party of the second part;

The following described real estate in Magoffin County, Kentucky on the right side of Lick Branch:

Beginning at a point in the center of Lick Branch & Salt Lick Road; thence N 11 degrees 18' 49" E a distance of 376.86' to the center of Lick Branch; thence N 08 degrees 38' 16" E a distance of 351.89' to the center of Lick Branch; thence N 48 degrees 46' 44" E a distance of 387.69' to the center of Lick Branch; thence N 33 degrees 17' 14" E a distance of 246.67' to the center of Lick Branch;

thence N 29 degrees 55'36" E a distance of 225.81' to the center of Lick Branch & unnamed trib.; thence N 31 degrees 36'56" W a distance of 465.16' to a cl of unnamed trib.; thence N 24 degrees 54'10" W a distance of 311.20' to a cl of unnamed trib.; thence N 32 degrees 08'16" E a distance of 369.81' to a cl of unnamed trib.; thence N 34 degrees 46'11" E a distance of 413.29' to a cl of ridge; thence N 57 degrees 25'19" E a distance of 218.34' to a cl of ridge; thence N 46 degrees 12'54" E a distance of 340.84' to a cl of ridge; thence N 60 degrees 58'21" E a distance of 903.93' to a cl of ridge; thence N 70 degrees 54'42" E a distance of 500.44' to a cl of ridge; thence S 84 degrees 01'07" E a distance of 457.96' to a cl of ridge; thence S 71 degrees 59'21" E a distance of 332.29' to a cl of ridge; thence S 26 degrees 30'36" E a distance of 336.53' to a cl of ridge; thence S 06 degrees 59'18" E a distance of 239.32' to a cl of ridge; thence S 34 degrees 59'52" W a distance of 324.74' to a cl of ridge; thence S 27 degrees 41'47" W a distance of 571.48' to a cl of point; thence S 12 degrees 03'01" W a distance of 506.78' to a cl of point; thence S 02 degrees 53'54" E a distance of 380.78' to a cl of point; thence S 11 degrees 43'08" E a distance of 309.96' to a cl of point; thence S 02 degrees 20'12" W a distance of 492.16' to a cl of point; thence S 26 degrees 59'29" E a distance of 427.79' to a cl of point; thence S 16 degrees 36'42" E a distance of 293.09' to a cl of county road; thence S 57 degrees 03'54" W a distance of 94.08' to a cl of county road; thence S 87 degrees 31'38" W a distance of 220.65' to a cl of county road; thence S 80 degrees 35'09" W a distance of 239.28' to a cl of county road; thence S 65 degrees 15'53" W a distance of 280.69' to a cl of county road; thence N 71 degrees 44'50" W a distance of 218.74' to a cl of county road; thence N 87 degrees 57'09" W a distance of 274.00' to a cl of county road; thence S 79 degrees 08'01" W a distance of 259.60' to a cl of county road; thence N 75 degrees 28'15" W a distance of 195.08' to a cl of county road; thence N 85 degrees 54'44" W a distance of 274.53' to a cl of county road; thence N 86 degrees 30'36" W a distance of 160.82' to a cl of county road; thence S 67 degrees 28'45" W a distance of 255.55' to a cl of county road; thence N 73 degrees 42'07" W a distance of 383.67' to a cl of county road; thence N 47 degrees 05'55" W a distance of 373.82' to a cl of county road; thence S 79 degrees 53'06" W a distance of 124.24' to a cl of Lick branch & county road; which is the point of beginning, having an area containing 215.85 acres

This being a portion of the same property conveyed by Edward Lee Watkins and Bonnie Jean Watkins to Kindle Wireman and Polly Wireman, as evidenced by Deed recorded in Deed Book 103, page 421; also, please see the Last Will and Testament of Kindle Wireman, recorded in Will Book 6, page 54; the Last Will and Testament of Polly Wireman, recorded in Will Book 6, page 488; and the Affidavit of Descent of Ethel Mullins, recorded in Deed Book 213, page 722; and the Affidavit of Descent of Bill K. Wireman, recorded in Deed Book 213, page 721; and the same property conveyed by Hazel Wireman, Et Al to Pauline Howard and Ryan Allen, as evidenced by Deed

recorded in Deed Book 214, page 290; all of record in the Office of the Magoffin County Court Clerk's Office.

Also please Pauline Howard's Power of Attorney, recorded in Miscellaneous Book 49, page 124 of the Magoffin County Court Clerk's Office.

TO HAVE AND TO HOLD, the same together with all the appurtenances thereunto belonging unto party of the second part, his heirs and assigns forever, with Covenant of General Warranty.

We the Grantor and the Grantee, do hereby certify, pursuant to K.R.S. Chapter 382, that the above stated consideration is the true, correct and full consideration paid for the property herein conveyed. We further understand that falsification of the stated consideration or sale price of the property is a Class D Felony, subject to one to five years' imprisonment and fines up to ten thousand dollars. The approximate value of the property herein conveyed is \$ 5,000.00.

This Deed as prepared by Gordon B. Long, Attorney at Law, is based solely on information supplied by one or more of the parties to this conveyance, which information includes the parties' relationship and marital status, the description of the property sold or conveyed, and the price paid for the property or the value of the property. Gordon B. Long has no liability for any errors, inaccuracies or omissions in this Deed resulting from the information provided, and makes no representations with respect to the accuracy of the property description or whether any mortgages, liens, encumbrances, taxes, or right of others may exist against the property unless Gordon B. Long by separate instrument(s) addressed to the Grantee(s) issued a title examination letter. Gordon B. Long has not personally examined the property. All parties hereto consent to this disclaimer by the signing of this deed.

IN TESTIMONY WHEREOF, witness our signatures, this the 10 day of Oct., 2019.

Pauline Howard

by Kathy Howard
Kathy Howard as Power of Attorney for

Ryan Allen
Ryan Allen (party of the second part)

Pauline Howard (party of the first part)

COMMONWEALTH OF KENTUCKY
COUNTY OF MAGOFFIN

I, Kimberly Howard, a Notary Public in and for the County and State aforesaid, do certify that the foregoing deed from Kathy Howard as Power of Attorney for Pauline Howard, widow, party of the first part to Ryan Allen, married, party of the second part, was on the 10 day of Oct., 2019, produced to me in said county and was subscribed, sworn to, acknowledged and delivered by Kathy Howard as Power of Attorney for Pauline Howard, party of the first part thereto to be her free act and deed.

Given under my hand, this the 10 day of Oct., 2019.

MY COMMISSION EXPIRES:

1/23/22



COMMONWEALTH OF KENTUCKY
COUNTY OF MAGOFFIN

I, Kimberly Howard, a Notary Public in and for the County and State aforesaid, do certify that the foregoing deed from Kathy Howard as Power of Attorney for Pauline Howard, widow, party of the first part to Ryan Allen, married, party of the second part, was on the 10 day of Oct., 2019, produced to me in said county and was subscribed, sworn to, acknowledged and delivered by Ryan Allen, party of the second part thereto to be his free act and deed.

Given under my hand, this the 10 day of Oct., 2019.

MY COMMISSION EXPIRES:

1/23/22





COMMONWEALTH OF KENTUCKY
COUNTY OF MAGOFFIN

I, Renee Shepherd, Clerk of the County Court for the County and State aforesaid, certify that the foregoing Deed was on the 22 day of Oct., 2019.

lodged for record, whereupon the same with the foregoing and this certificate have been duly recorded in my office.

Given under my hand, this the 22 day of October, 2019.

<p>Description provided by parties and scanned title opinion not rendered An abstract was not requested & Description and value were provided By the parties</p> <p>THIS INSTRUMENT PREPARED BY: GORDON B. LONG LAW OFFICE, P.S.C.</p> <p>BY: </p> <p>HON. GORDON B. LONG ATTORNEY AT LAW P.O. BOX 531 SALYERSVILLE, KY 41465 TELEPHONE - (606) 349-1558 FAX - (606) 349-2441 E-MAIL ADDRESS - atlong@foothills.net</p>	<p>RENEE SHEPHERD MAGOFFIN COUNTY COURT CLERK</p> <p>BY:  D.C.</p> <p>DEED BOOK <u>221</u>, PAGE <u>684</u></p>
--	--

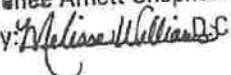
Book: 221 Pages: 684-688 (5)
Name: DEED

RENEE ARNETT-SHEPHERD
MAGOFFIN COUNTY
10/22/2019 0:00 AM



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 22, 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 22, 2019
RENEE ARNETT-SHEPHERD, CLERK

11:51 AM BY:  D.C.

No Deed Tax Collected
Renee Arnett-Shepherd
By:  D.C.

DEED Book 221 Page 688