

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

**RECEIVED**

**DEC 23 2025**

**PUBLIC SERVICE  
COMMISSION**

IN THE MATTER OF:

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

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**REPLY TO RESPONSE TO REQUEST FOR INTERVENTION OF COTY BROWN AND  
LINDSEY BROWN**

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Comes now Coty Brown and Lindsey Brown, by Counsel, and for their Reply to the Response filed by Hon. L. Allyson Honaker, Counsel for Frontier, states that:

Coty Brown and Lindsey Brown are in the chain of title, and their property is a portion of the same property described in the Easement Agreement from Irvin Allen and J.R. and Ethel Allen to BTU Gas Company, Inc. This Easement Agreement, which was attached to Coty Brown and Lindsey Brown's Request to Intervene, cited as its source the Deed to Irvin Allen, J.R. and Ethel Allen of record in Deed Book 170 Pages 342 and 344. Irvin Allen later deeded to his daughter Brenda K. Howard a portion of the property described in Deed Book 170 Page 342 in the attached Deed of record in Deed Book 220 Page 352, Magoffin County Court Clerk's records (See Exhibit A). That Deed attached as Exhibit A is the source of the Deed from Brenda K. Howard and Ricky Howard to Coty Brown and Lindsey Brown of record in Deed Book 221 Page 725. The pipeline right of way purchased by BTU Gas Company, Inc. traverses over the property of Coty Brown and Lindsey Brown.

Thus, Coty Brown and Lindsey Brown have a right to intervene.

/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 23 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

Exb. A

**D E E D**

THIS DEED, by and between IRVIN ALLEN, single, of 3073 Long Creek Road, Salyersville, KY 41465; Party of the First Part and BRENDA K. HOWARD, of 54 Wiley Howard Cemetery Road, Salyersville, KY 41465; **(2019 TAX BILL C/O BRENDA K. HOWARD of 54 Wiley Howard Cemetery Road, Salyersville, KY 41465)** Party of the Second Part;

WITNESSETH: That said Party of the First Part for and in consideration of the love and affection the grantor has for the grantee, his daughter, and by gift, does hereby grant and convey to Party of the Second Part, her heirs and assigns, the following described property in Magoffin County, Kentucky, to-wit:

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:

LODGED FOR RECORD  
MAGOFFIN COUNTY CLERK

MAR 18 2019

TIME 1:51 PM

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.

DEED Book 220 Page 352

Exhibit A

Being a portion of the same property conveyed to Irvin Allen, Jr., et al by Deed of record in Deed Book 170, page 342, in the Magoffin County Clerk's Office.

To have and to hold the same, together with all the appurtenances thereunto belonging unto the Party of the Second Part, her heirs and assigns, with covenant of general warranty.

CERTIFICATION

We, IRVIN ALLEN, Grantor(s) and BRENDA K. HOWARD, Grantee(s), do hereby certify, pursuant to KRS Chapter 382, that the above described property was transferred by gift without consideration, and has a fair market value of \$ 8000.<sup>00</sup>.

We further certify that we understand that falsification of the stated full estimated value is a Class D felony, subject to one to five years imprisonment and fines up to \$10,000.00.

IN TESTIMONY WHEREOF, witness our signatures this 21 day of December 2018.

Grantors(s)

SIGNED:

Irvin Allen Jr  
IRVIN ALLEN

Grantee(s)

SIGNED:

Brenda K Howard  
BRENDA K. HOWARD

STATE OF Ky  
COUNTY OF Magoffin

I, Sheila G. Huff

, a Notary Public for the County

and State aforesaid, do certify that the foregoing was on the 27<sup>th</sup> day of December, 2018,  
produced to me in said County and acknowledged, delivered, subscribed and sworn to by  
IRVIN ALLEN, thereto to be his act and deed.

My Commission Expires 12-22-2018

Shirley G. Huff

NOTARY PUBLIC

STATE OF Kentucky :  
COUNTY OF Magoffin :

I, Sandy Spurlock, a Notary Public for the County  
and State aforesaid, do certify that the foregoing was on the 18 day of March, 2018,  
produced to me in said County and acknowledged, delivered, subscribed and sworn to by  
BRENDA K. HOWARD thereto to be her act and deed.

My Commission Expires 9-20-2021

Sandy Spurlock

NOTARY PUBLIC

NO TITLE EXAMINATION PERFORMED,  
DESCRIPTION SUPPLIED BY THE GRANTOR  
AND/OR GRANTEE AND READ AND  
APPROVED BY GRANTOR AND/OR GRANTEE

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

THIS INSTRUMENT WAS PREPARED BY

Gregory D. Allen  
GREGORY D. ALLEN  
ATTORNEY AT LAW  
P. O. BOX 585  
SALYERSVILLE, KENTUCKY 41465



371623  
Lodged on: 3/18/2019 1:51:00 PM  
Entered on: 3/19/2019 3:28:51 PM  
Book: DEED Number: 220  
Pages: 352 - 354  
Renee Arnett-Shepherd, Magoffin County  
DC: MELISSA WILLIAMS

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**MOTION**

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Comes now the Intervening Parties, Coty Brown and Lindsey Brown, by Counsel, and moves this Court to allow them to amend their Motion to Intervene by filing the Deed from Irvin Allen to Brenda K. Howard of record in Deed Book 220 Page 352, Magoffin County Clerk's records, attached as Exhibit A, for part of the property subject to the BTU Gas Company Right of Way Easement Agreement executed by Irvin Allen, of record in Deed Book 186 Page 97. This Deed fills the gap in the chain of title as Brenda K. Howard and her husband Ricky Howard conveyed that same property to Coty Brown and Lindsey Brown, thus establishing their ownership of a portion of the property covered by the Right of Way Easement Agreement executed by Irvin Allen to BTU Gas Company, Inc. and their right to participate in this Action.

/s/ John C. Collins  
HON. JOHN C. COLLINS  
ATTORNEY AT LAW  
132 WEST MAPLE STREET  
PO BOX 475  
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Grantors(s)

SIGNED:

Irvin Allen Jr  
IRVIN ALLEN

Grantee(s)

SIGNED:

Brenda K Howard  
BRENDA K. HOWARD

STATE OF Ky  
COUNTY OF Magoffin

I, Sheila G. Huff

, a Notary Public for the County

and State aforesaid, do certify that the foregoing was on the 21<sup>st</sup> day of December, 2018,  
produced to me in said County and acknowledged, delivered, subscribed and sworn to by  
IRVIN ALLEN, thereto to be his act and deed.

My Commission Expires 12-22-2018

Shirley G. Huff  
NOTARY PUBLIC

STATE OF Kentucky :  
COUNTY OF Magoffin :

I, Sandy Spurlock, a Notary Public for the County  
and State aforesaid, do certify that the foregoing was on the 18 day of March, 2018,  
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My Commission Expires 9-20-2021

Sandy Spurlock  
NOTARY PUBLIC

NO TITLE EXAMINATION PERFORMED,  
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No Deed Tax Collected  
Renee Arnett-Shepherd  
By: Melissa Williams D.C.

THIS INSTRUMENT WAS PREPARED BY

GREGORY D. ALLEN  
GREGORY D. ALLEN  
ATTORNEY AT LAW  
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