

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

**REPLY TO RESPONSE TO REQUEST FOR INTERVENTION OF CRYSTAL SHAWN
RISNER AND RICKI CARTY**

Comes now Crystal Shawn Risner and Ricki Carty, by Counsel, and for their Reply to the Response filed by Hon. L. Allyson Honaker, Counsel for Frontier, states that:

The BTU Gas Company, Inc. Right of Way Easement Agreement covering their property described as the Edward Gilpin property, now owned by Crystal Shawn Risner Blanton and Ricki Lynn Carty was executed by Irvin Allen and Ethel Allen as the legal guardians. This BTU Gas Company, Inc. Right of Way Easement Agreement is attached as Exhibit A.

Thus, Crystal Shawn Risner and Ricki Carty, now adults, 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

BTU GAS COMPANY

RIGHT OF WAY EASEMENT AGREEMENT

For and in consideration of One Hundred Dollars(\$100.00) ad other good and valuable consideration the receipt of which is hereby acknowledged, the undersigned, one free tap, Edward Gilipin, his successors, heirs, and assigns do hereby grant to BTU Gas Company, INC. its licensees, successor, 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 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 117 Page number 365 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.

This property now known as the Edward Gilipin property is now owned by Crystal Shawn Risner Blanton and Ricky Lynn Carty Sheers. Irvin and Ethel

Exhibit A

Allen are the legal guardians over said property until the above mentioned is of legal age.

The right away agreement is in default of Fronteer Gas Co., P.O. Box 408 Prestonsburg, KY 41653. Fronteer Gas known as the owner of BTU Gas Right Of Way Easement Agreement has been broken by removing the gas from the gas line known as the BTU pipeline which is against the above agreement.

If gas is not restored back into this line to provide Irvin and Ethel Allen, which is known as the Edward Gilipin Property, with gas within thirty (30) days of this letter the agreement will become null and void.

This has been prepared by Irvin and Ethel Allen, owner of said property 2825 Long Creek Road Salyersville, KY. 41465 on July 09, 2015. Phone number: 606-884-5411



Irvin Allen Jr.



Ethel Allen

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

MOTION

Comes now Ricki Carty and Crystal Shawn Risner, by Counsel, and requests an Order amending their Request for Intervention in the Kentucky Frontier Gas, LLC Application for Declaratory Order on Free Gas to allow them to attach the BTU Gas Company, Inc. Right of Way Easement Agreement dated July 9, 2015, attached as Exhibit A, executed by Irvin Allen and Ethel Allen as guardian for Crystal Shawn Risner and Ricki Lynn Carty for that portion of the Edward Gilpin property owned by Crystal Shawn Risner and Ricki Carty who were both infants at that time. This is the BTU Gas Company, Inc. Right of Way Easement Agreement that traverses the property of Ricki Carty and Crystal Shawn Risner.

/s/ John C. Collins
HON. JOHN C. COLLINS
ATTORNEY AT LAW
132 WEST MAPLE STREET
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Irvin Allen Jr.



Ethel Allen