

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Atmos Energy)
Corporation for Authority to Cease Transacting)
the Business of a Natural Gas Public Utility in a)
Portion of Leavenworth County, Kansas)

Docket No. 22-ATMG-039-CCS

**RESPONSE OF ATMOS ENERGY CORPORATION
TO PROTEST IN OPPOSITION TO ITS
APPLICATION FOR AUTHORITY TO CEASE SERVICE**

Atmos Energy Corporation ("Atmos Energy") submits the following response to the protest filed by Joe F. Jenkins II, Jill A. Jenkins and Tri-County Road and Gun Club, Inc. (collectively referred to as "Petitioners"), on July 29, 2021 in opposition to its application for authority to cease service ("Protest").

1. Petitioners request Atmos Energy provide additional information as it relates to its determination that the main, service and yard lines serving Petitioners need to be replaced now in order to provide safe, efficient and sufficient service and that the replacement cost is economically prohibitive. Atmos Energy submits the following additional information in response to Petitioners' request.

I. RECENT LEAK SURVEYS ON LINES FOUND ACTIVE LEAKS AND LIKELY CORROSION

2. Attached as **Exhibit D** to this Response, and incorporated herein by reference is a copy of the information from the most recent leak surveys conducted by Atmos Energy on the lines in question. **Exhibit D** also contains photos of some of the lines in question. There are currently 14 active leaks on the north/south line located on the Jenkins' property. Eleven of those active leaks should be repaired no later than September 25, 2021, under Kansas Corporation Commission ("KCC") pipeline safety regulations. These leaks were found during the leak surveys completed by Atmos

Energy on April 9, 2019, where 11 of the 14 active leaks were found, and on January 28, 2021, where an additional three leaks were found. Nine of the leaks are on threaded joints. The other five leaks are on the pipe wall itself, which would indicate atmospheric corrosion. Each one of these leaks will need to be re-surveyed every six months. The cost to repair each leak is significant. It will cost approximately \$45,000 to repair the 11 Grade 3 leaks discovered during the April 9, 2019 leak survey. Even if the current leaks are repaired, the majority of the pipe is threaded joints, which means a potential leak every 21 feet (similar to the existing nine leaks that were recently found) is likely given the age and condition of the pipe. In addition, to address the atmospheric corrosion issue with the line will cost an additional \$13,000. The cost to make what would amount to only temporary repairs is itself significant and uneconomical.

II. COST ESTIMATES TO REPLACE LINES ARE SUPPORTED BY BIDS OBTAINED BY ATMOS ENERGY

3. Attached as **Exhibit E** to this Response, and incorporated herein by reference, are the bids Atmos Energy received from NPL Construction Company ("NPL") to replace the lines in question. NPL has over fifty years' experience in pipeline construction and performs a significant amount of pipeline construction in Kansas for the three major natural gas distribution companies, including Atmos Energy. Atmos Energy received three bids from NPL. The first bid was to replace the north-south main and service/yard lines to serve all three Jenkins' properties. The bid amount was for \$210,926.01 plus taxes. That amount did not include Atmos Energy's costs for inspection, overheads, surveys and any recording fees. NPL's bid included rock drilling/breaking, equipment, material and labor.

4. The second bid was to replace the full 2,630 feet of main in the road right-of-way from the intersection of 190th Street and Stillwell Road to the Gun Club. The bid did not include the cost to replace the main and service/yard lines located on the property owned by the Gun Club. The bid

amount was for \$108,855.70 plus tax and did not include Atmos Energy's costs for inspection, overheads, or any right-of-way staking. NPL's bid included rock drilling/breaking, equipment, material and labor.

5. The third bid was for the same work as set forth in the second bid, but revised to only replace 2,130 feet of the full 2,630 feet of main in the road right-of-way. After additional research, Atmos Energy determined that the 2013 vintage MDPE portion of the main could be used and tied into the new main to serve the Gun Club. The bid amount was for \$91,058.00 plus tax and did not include Atmos Energy's costs for inspection, overheads and right-of-way staking. NPL's bid included rock drilling/breaking, equipment, material and labor.

III. THERE IS NOT SUFFICIENT POTENTIAL GROWTH IN THE AREA TO SUPPORT THE COST TO REPLACE THE LINES

6. Attached as **Exhibit F** to this Response, and incorporated herein by reference, is correspondence between Atmos Energy and the Basehor-Linwood School District ("School District") that occurred in July of last year. The correspondence from Mr. David Howard, Superintendent of the School District, to Mr. Kevin Jones, Senior Account Representative for Atmos Energy, dated July 16, 2020, indicated the School District had made a final decision that the proposed school building, referenced by the Petitioners in their Protest, would be all-electric and the School District would not be needing natural gas service from Atmos Energy.

7. Attached as **Exhibit G** to this Response, and incorporated herein by reference, is an affidavit from Tony Benedict, Account Manager for Atmos Energy. Mr. Benedict states he is familiar with the area in question and the records on file with Leavenworth County, Kansas. He is unaware of any platted subdivision in the vicinity of 190th Street and Stillwell Road and Atmos Energy has not been contacted by any developer requesting natural gas service for a proposed subdivision in that area.

Mr. Benedict further states he traveled to the area in question on August 4, 2021, and did not observe any proposed development in the area. Finally, Mr. Benedict states he is familiar with the location of the proposed Hills Pet Nutrition manufacturing facility referred to by Petitioners and indicates it is over six miles from the area in question and is not located within Atmos Energy's service territory.

IV. ANY FUTURE GROWTH IN AREA WOULD NEED TO BE SERVED FROM THE MAIN LOCATED ON 166TH STREET AND NOT FROM THE MAIN ON 190TH STREET

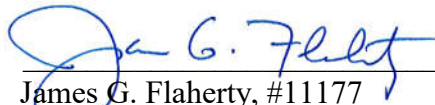
8. Any growth in the subject area would need to be served from the east from Atmos Energy's 4-inch PE main/60 psig system located on 166th Street, and not from the main located in the area of 190th Street and Stillwell Road. The main in the area of 190th Street and Stillwell Road would not be adequate to service new load because of (1) the smaller diameter of the pipe (2-inch pipe); (2) the lower operating pressure (47 psig system); and (3) the regulator station on that line has limited capacity.

V. CONCLUSION; ATMOS ENERGY'S REQUEST TO ABANDON SERVICE TO THE PETITIONERS IS IN THE PUBLIC INTEREST AND SHOULD BE GRANTED BY THE COMMISSION

9. The Commission has found in other cases that it is in the public interest for the utility to abandon service to existing customers in particular areas and to have the utility pay for the cost incurred by those customers to convert to an alternate energy source. The Commission has based its decision in those cases on the fact that it has an obligation to weigh the rights of those existing customers to receive service against the rights of the utility's other customers to not have to subsidize the cost to serve those customers. Under such balancing, the Commission has concluded it is not reasonable to burden the utility's other customers with having to subsidize the cost to replace a main and/or service lines used to serve a few customers in an isolated area who are served off an aging main or pipeline. That is the situation faced in present case. Paying for the Petitioners to convert to

another energy source, as was done in those other cases, provides a fair balancing of the rights of the Petitioners and the rights of Atmos Energy's other customers.

WHEREFORE, Atmos Energy requests the Commission issue its Order allowing it to cease transacting the business of a natural gas public utility in that portion of Leavenworth County, Kansas, serving the four customers identified in Atmos Energy's Application.



James G. Flaherty, #11177

ANDERSON & BYRD, LLP

216 S. Hickory ~ P.O. Box 17

Ottawa, Kansas 66067

(785) 242-1234, telephone

(785) 242-1279, facsimile

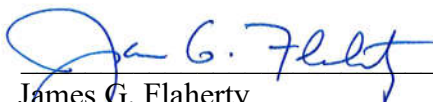
jflaherty@andersonbyrd.com

Attorneys for Atmos Energy Corporation

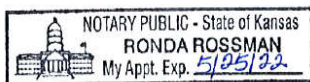
VERIFICATION

STATE OF KANSAS, FRANKLIN COUNTY, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states: That he is an attorney for Atmos Energy Corporation; that he has read the above and foregoing Response of Atmos Energy Corporation to Protest in Opposition to its Application for Authority to Cease Service, knows the contents thereof; and that the statements contained therein are true.


James G. Flaherty

SUBSCRIBED AND SWORN to before me this 9th day of August, 2021.




Ronda Rossman

Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 9th day of August 2021, addressed to:

Cole Bailey
c.bailey@kcc.ks.gov

Glenda Cafer
gcafer@morrislaing.com

C. Michael Lennen
mlennen@morrislaing.com

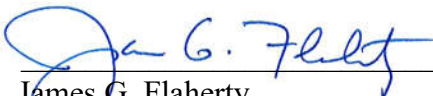

James G. Flaherty

Exhibit D

Asset Group	Type	Asset	Scheduled Due Date	Asset Description
LEAKS	LKRP	LEAK912199	9/28/2021	18462 STILLWELL RD 4147500 LINWOOD 13537848
LEAKS	LKRP	LEAK912200	9/28/2021	18462 STILLWELL RD 4147500 LINWOOD 13537848
LEAKS	LKRP	LEAK912201	9/28/2021	18462 STILLWELL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912202	9/28/2021	18462 STILLWELL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912203	9/28/2021	18462 STILLWELL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912204	9/28/2021	18462 STILLWELL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912205	9/28/2021	18701 HEMPHILL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912206	9/28/2021	18701 HEMPHILL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912207	9/28/2021	18701 HEMPHILL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912208	9/28/2021	18701 HEMPHILL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK912209	9/28/2021	18701 HEMPHILL RD 4147500 LINWOOD 13537848
LEAKS	LKAG	LEAK916371	7/29/2023	18462 STILLWELL RD 4147500 LINWOOD 19597939
LEAKS	LKAG	LEAK916372	7/29/2023	18462 STILLWELL RD 4147500 LINWOOD 19597939
LEAKS	LKAG	LEAK916373	7/29/2023	18701 HEMPHILL RD 4147500 LINWOOD 19597939

Activity	Leak Found	Time	LkFd Grade	Age	Last Order Done	Sched Interval
LEAK REPAIR 3 3143	4/9/2019	9:31:32	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	10:30:07	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	10:45:54	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	11:00:26	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	23:15:10	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	23:30:35	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	12:00:07	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	12:45:25	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	13:15:33	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	13:30:58	3	849	3/8/2021	900
LEAK REPAIR 3 3143	4/9/2019	13:30:19	3	849	3/8/2021	900
LEAK REPAIR 3 3143	1/28/2021	14:30:39	3	189	7/14/2021	900
LEAK REPAIR 3 3143	1/28/2021	14:30:27	3	189	7/14/2021	900
LEAK REPAIR 3 3143	1/28/2021	14:30:55	3	189	7/14/2021	900

LKFD Source	Graded By
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12110	19457 Eakins, Stephenie M
LKSURV12107	19457 Eakins, Stephenie
LKSURV12107	19457 Eakins, Stephenie
LKSURV12107	19457 Eakins, Stephenie

Atmos Energy - As-Built Drawing

Construction Number: C

Page 1 of 4

Minimum Installation Depth of Cover: GR 3 BEL GR

Project Number:

REVAL NO

→ Z

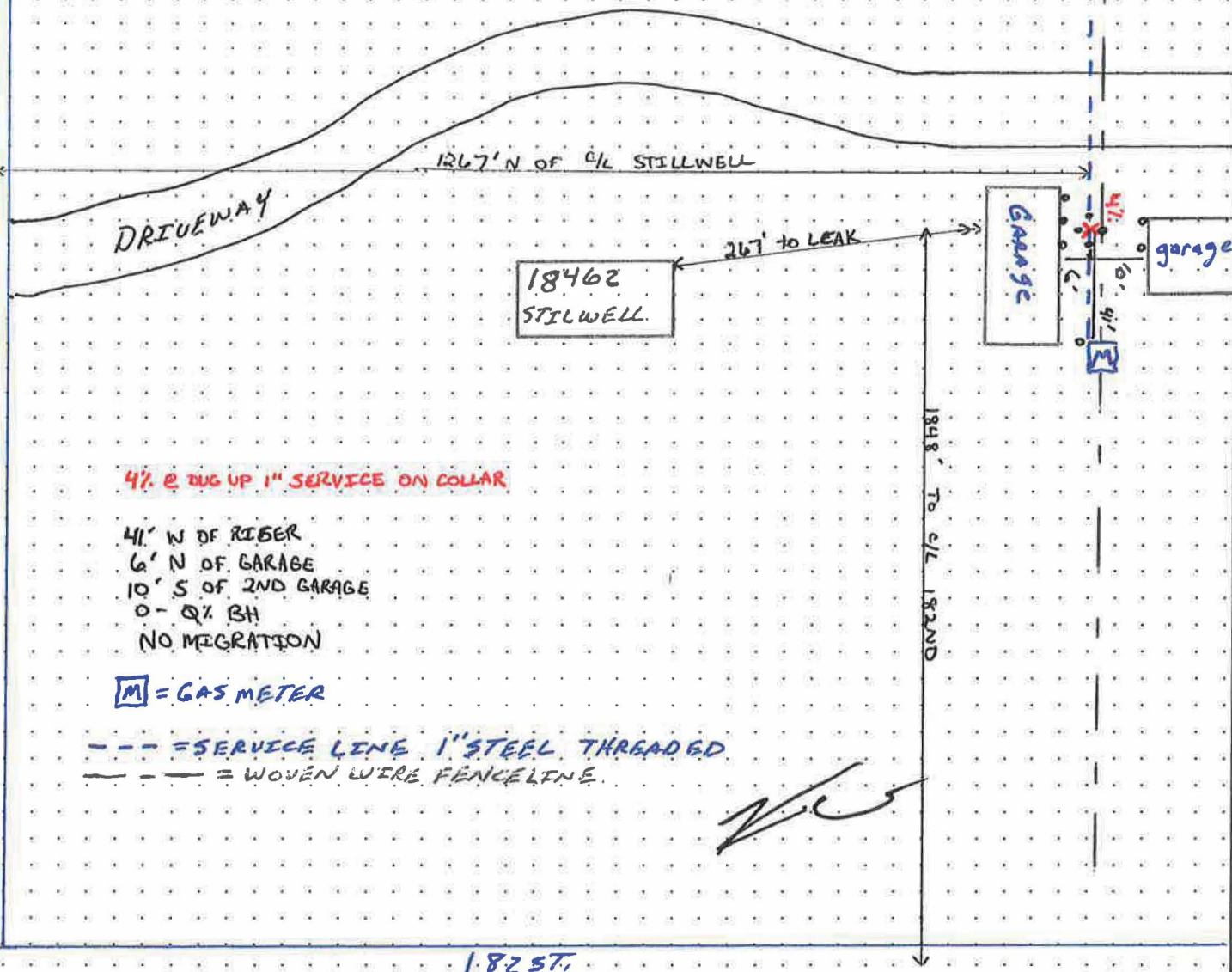
D. HUNT S. EAKINS 4-9-19 GRADE 3 BELOW GROUND

18462 STILLWELL RD. TONGANOXIE KS, CGI#

#1

ASSET: 912199

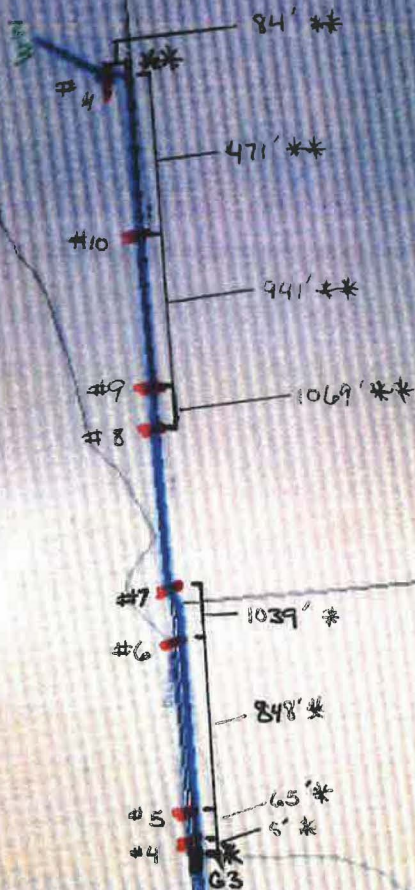
STILLWELL RD.





JENKINS FARM #1
4% - 6' TO BLDG

18701
HEMPHILL
RD



18462
STILLWELL
RD

#1

18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04706909 LONG: -95.00308680

1267' N OF STILLWELL 1/2

1848' W OF 182ND ST 1/2

42' W OF RISER 6' N OF GARAGE 10' S OF SHOP

267' to HOUSE

LEAK REF: JENKINS FARM #1

4% @ COLLAR 1"

ASSET # 9/2/99

STR: 31-11-22

#2

18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04713644 LONG: -95.00919102

1267' N OF STILLWELL RD 1/2

2174' W OF 182ND ST 1/2

434' to HOUSE

LEAK REF: JENKINS FARM #2

35% @ COLLAR 1"

306' W OF DRWY 1/2

ASSET #

STR: 31-11-22

#3

18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04715433 LONG: -95.00926155

2197' W OF 182ND ST 1/2

1267' N OF STILLWELL RD 1/2

488' to HOUSE

329' W OF DRWY 1/2

LEAK REF: JENKINS FARM #3

5% @ COLLAR 1"

ASSET #

STR: 31-11-22

31-11-22

ASSET # 912199

#1

DATE FOUND 9-8-2020

TECHNICIAN NAME Spencer Clark

ADDRESS 18462 Stillwell Rd

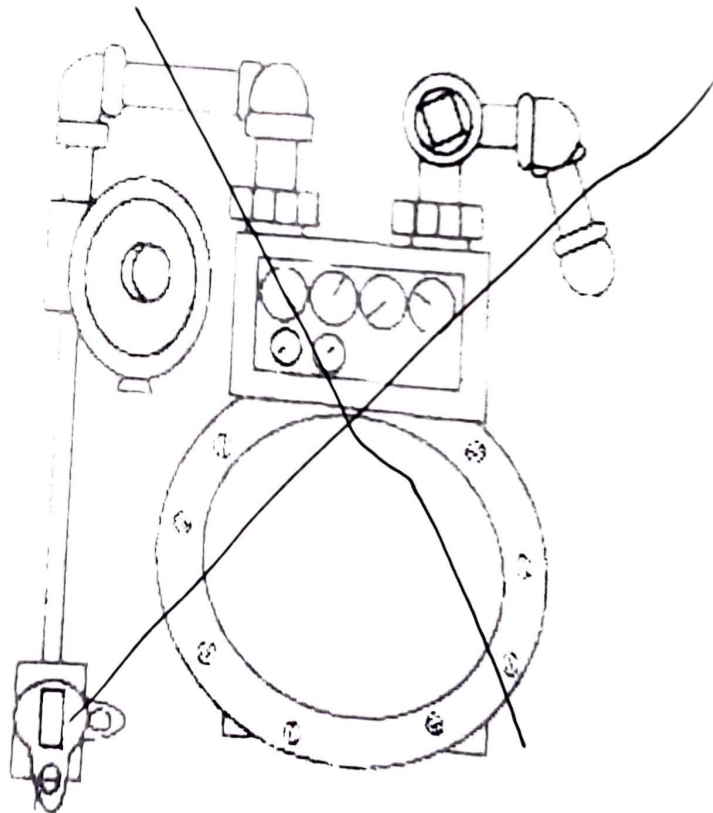
CITY Linwood

CUSTOMER NAME

3% gas on

Collar Marked with

Case



REPAIRED BY

DATE

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#1.

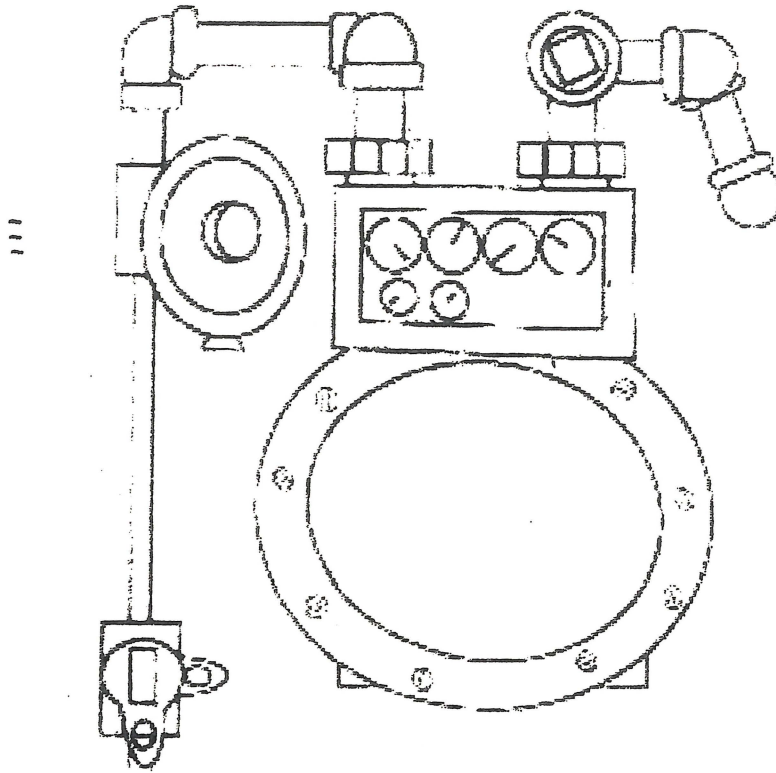
STR _____ ASSET # 912199

DATE FOUND _____ TECHNICIAN NAME _____

ADDRESS 18462 Stillwell Rd CITY _____

CUSTOMER NAME Jenkins Farmer

Drawn map
by Darren Funt
on file



UKRV

REPAIRED BY BOLD DATE 3/13/20

LIST REPAIR DETAILS



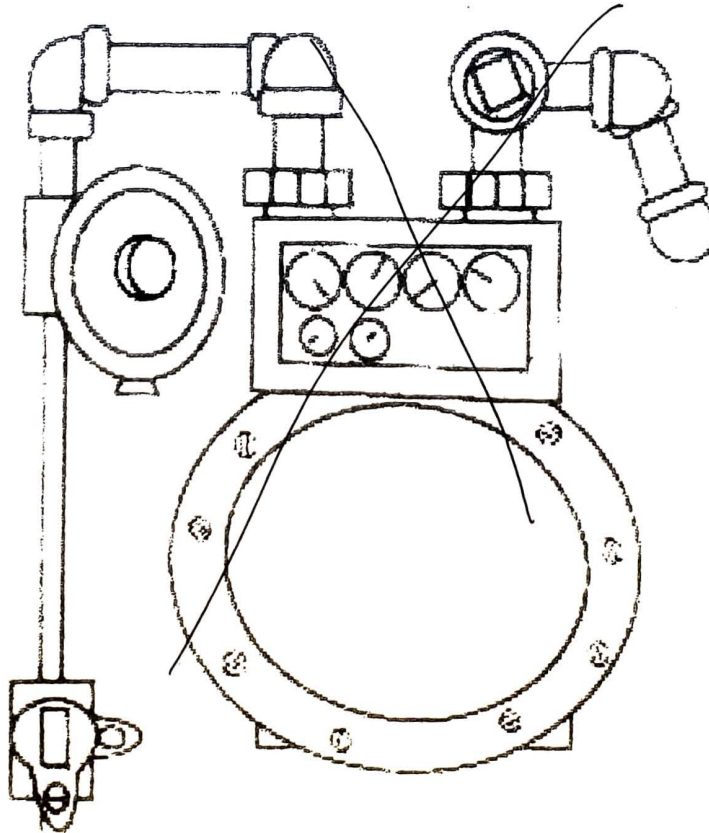
STR 31-11-22 ASSET # 912199

DATE FOUND 3-8-2021 TECHNICIAN NAME Spencer Clark

ADDRESS 18462 St: Howell Rd CITY Linwood

CUSTOMER NAME _____

Known exposed main
venting to air
5/8 gas on
1" service line



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

REVAL NO



D. HUNT S. EAKINS 4-9-19 GRADE 3 BELOW GROUND

18462 STILLWELL RD. TONGANOXIE KS. CGI#

#2

ASSET: 912200

STILLWELL RD.

1267' N. OF 4L STILLWELL

DRIVEWAY

18462
STILLWELL

35% ON COLLAR ON DUGUP 1" SERVICE

BH'S 0%

NO MIGRATION

454' TO HOUSE

[M] = GAS METER

--- = SERVICE LINE 1" STEEL THREADED

- - - = WOVEN WIRE FENCE LINE

1.82 ST.

2174' W. OF 18462 ST. CL.

306' W. OF DRIVEY CL.

15'

Garage

garage



JENKINS FARM #2
35% - 500'~~4~~ TO BLDG

18701
HEMPHILL
RD

#4 84' **
471' **
#10 941' **
#9 1069' **
#8

#7 1039' *
#6 848' *

#5 65' *
#4 6' *
G3

ALL FOOTAGE IS TOTAL FROM REF *
* RED GATE N POST
** E-W MAIN

18462
STILLWELL
RD

FENCE
G2
#2
#1 MIN
G1
41' RASER
306' DRIVEWAY
329' DRIVEWAY
#3

#1 18462 STILLWELL RD Tongie SHERMAN TWP

LAT: 39.04706909 LONG: -95.00808680

1267' N OF STILLWELL 1/2

1848' W OF 182ND ST 1/2

42' W OF RISER 6' N OF GARAGE 10' S OF SHOP

267' to HOUSE

LEAK REF: JENKINS FARM #1

4% @ COLLAR 1"

ASSET #

STR: 31-11-22

#2 18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04715644 LONG: -95.00919102

1267' N OF STILLWELL RD 1/2

2174' W OF 182ND ST 1/2

454' to HOUSE

LEAK REF: JENKINS FARM #2

35% @ COLLAR 1"

306' W OF DRVWY 1/2

ASSET # 912200

STR: 31-11-22

#3 18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04715433 LONG: -95.00926155

2197' W OF 182ND ST 1/2

1267' N OF STILLWELL RD 1/2

488' to HOUSE

329' W OF DRVWY 1/2

LEAK REF: JENKINS FARM #3

5% @ COLLAR 1"

ASSET #

STR: 31-11-22

SIR 31-11-22

ASSET # 912200

DATE FOUND 9-8-2020 TECHNICIAN NAME Spencer Clark

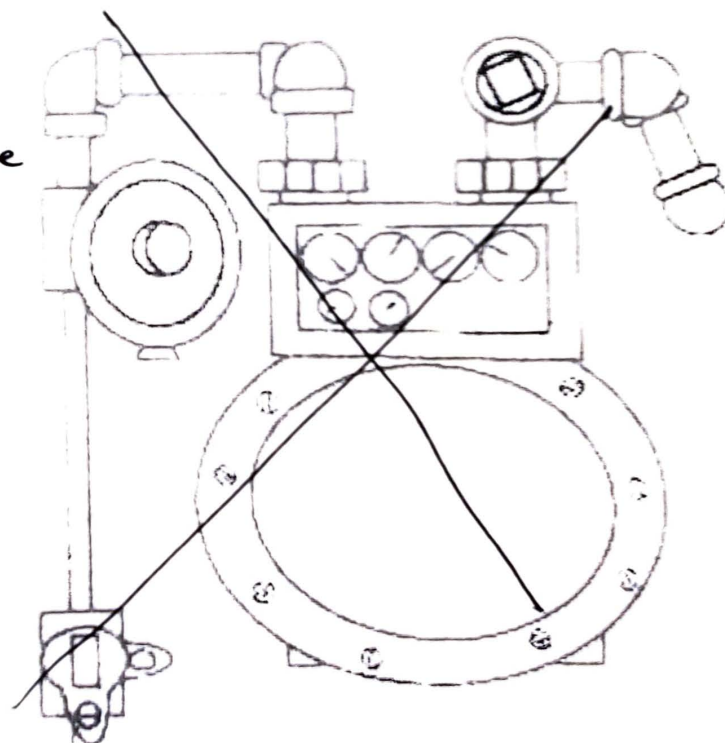
ADDRESS 18462 ST: Howell Rd CITY Linwood

CUSTOMER NAME

Leak #2

35% gas Exposure line

Leak on collar



REPAIRED BY DATE

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#2

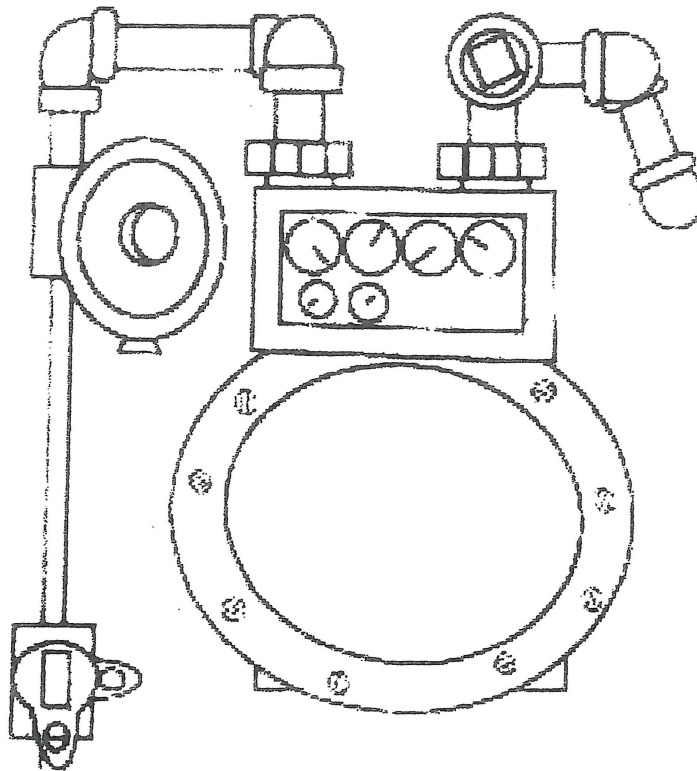
STR _____ ASSET # 912200

DATE FOUND _____ TECHNICIAN NAME _____

ADDRESS 18462 Stillwell Rd CITY _____

Drawn map
by Dan Funt
on file

CUSTOMER NAME Jenkins Farmer



UKRV

REPAIRED BY BOND DATE 3/13/20

LIST REPAIR DETAILS

STR 31-1422

ASSET # 912200

DATE FOUND 3-2-2021

TECHNICIAN NAME Spencer Clark

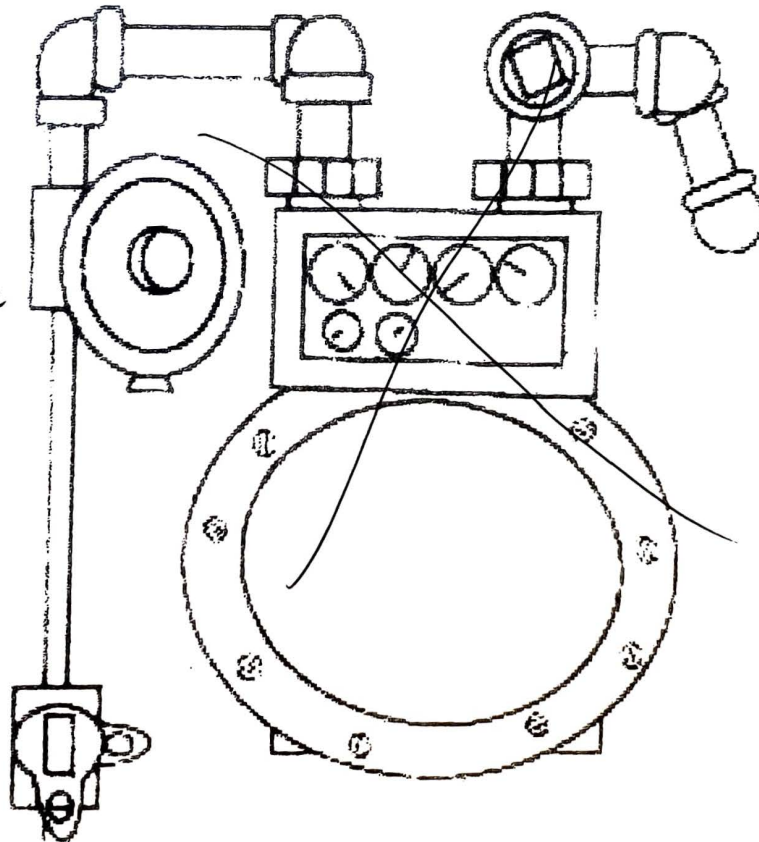
ADDRESS ~~10482~~ Steuell Rd
18962

CITY Linwood

CUSTOMER NAME _____

Know exposed main
venting to air

30% gas on service
1"



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

Atmos Energy - As-Built Drawing

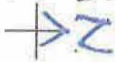
Construction Number: C

Page 1 of 4

Minimum Installation Depth of Cover: GR 3 BEL GR

Project Number:

REVAL NO



D. HUNT S. EAKINS 4-9-19 GRADE 3 BELOW GROUND

18462 STILLWELL RD. TONGANOXIE KS. CGI#

#3

ASSET: 912201

STILLWELL RD

1267' N OF C/L STILLWELL

2197' W OF BRAND C/L

329' W OF DRIVEWAY C/L

DRIVEWAY

18462
STILLWELL

GAS METER

garage

5' @ COLLAR ON DUG UP 1" SERVICE

0 - 84' O/L

NO MIGRATION

488' TO HOUSE

[M] = GAS METER

--- = SERVICE LINE 1" STEEL THREADED

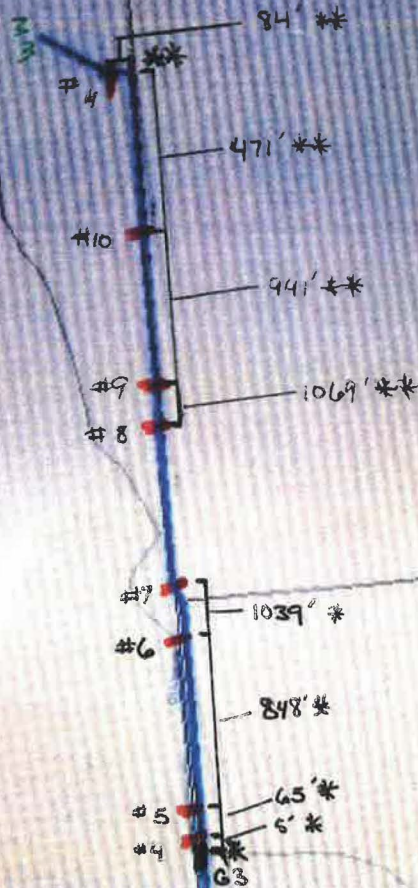
- - - = WOVEN WIRE FENCE LINE

1.8257



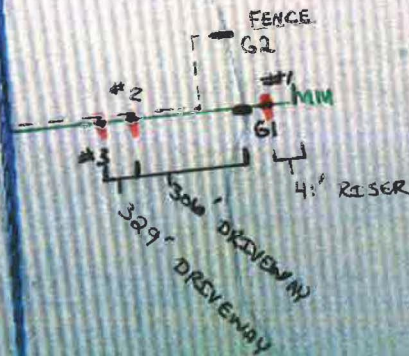
JENKINS FARM #3
5% - 500'+ TO BLDG

18701
HEMPHILL
RD



ALL FOOTAGE IS TOTAL FROM REF*
* RED GATE N POST
** E-W MAIN

18462
STILLWELL
RD



#1 18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04706909 LONG: -95.00808680

1267' N OF STILLWELL $\frac{1}{2}$

1848' W OF 182ND ST $\frac{1}{2}$

42' W OF RISER 6' N OF GARAGE 10' S OF SHOP

267' to HOUSE

LEAK REF: JENKINS FARM #1

4% @ COLLAR 1"

ASSET #

STR: 31-11-22

#2 18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04715644 LONG: -95.00919102

1267' N OF STILLWELL RD $\frac{1}{2}$

2174' W OF 182ND ST $\frac{1}{2}$

454' to HOUSE

LEAK REF: JENKINS FARM #2

35% @ COLLAR 1"

306' W OF DRWY $\frac{1}{2}$

ASSET #

STR: 31-11-22

#3 18462 STILLWELL RD TONGIE SHERMAN TWP

LAT: 39.04715433 LONG: -95.00926155

2197' W OF 182ND ST $\frac{1}{2}$

1267' N OF STILLWELL RD $\frac{1}{2}$

488' to HOUSE

329' W OF DRWY $\frac{1}{2}$

LEAK REF: JENKINS FARM #3

5% @ COLLAR 1"

ASSET # 912201

STR: 31-11-22

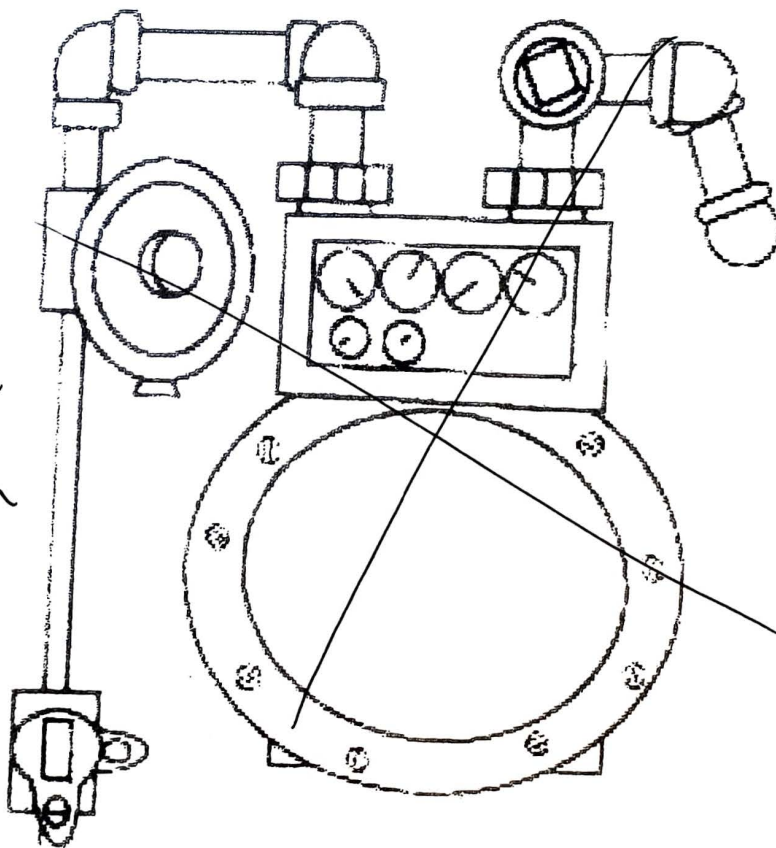
STR ~~311~~ 311-22 ASSET # 912202

DATE FOUND 3-8-2021 TECHNICIAN NAME Spencer Clark

ADDRESS 18462 Stillwell Rd CITY Linwood

CUSTOMER NAME _____

Known exposed
main see pics
5' on full seal
Clamp 2" main



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

ABOVE GROUND LEAK

STR 3/11/22 ASSET # 912202

DATE FOUND 4/9/19 TECHNICIAN NAME Steph E. / Darren H.

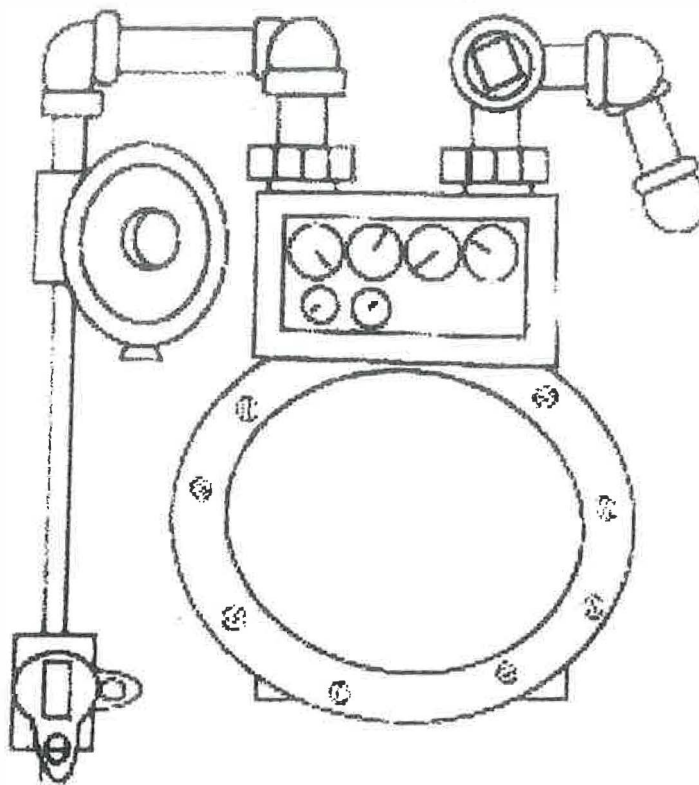
ADDRESS 18462 Stillwell Rd. CITY Liverpool

CUSTOMER NAME Jenkins Farmer

Known Exposure

5 % @ clamps
Single clamps
2" main

6% new road



Reval BY [Signature] DATE 3/20/20

LIST REPAIR DETAILS

STR 21-11-22

ASSET #

912203

DATE FOUND 9.8.2020

TECHNICIAN NAME Spencer Clark

ADDRESS 18462

CITY Linwood

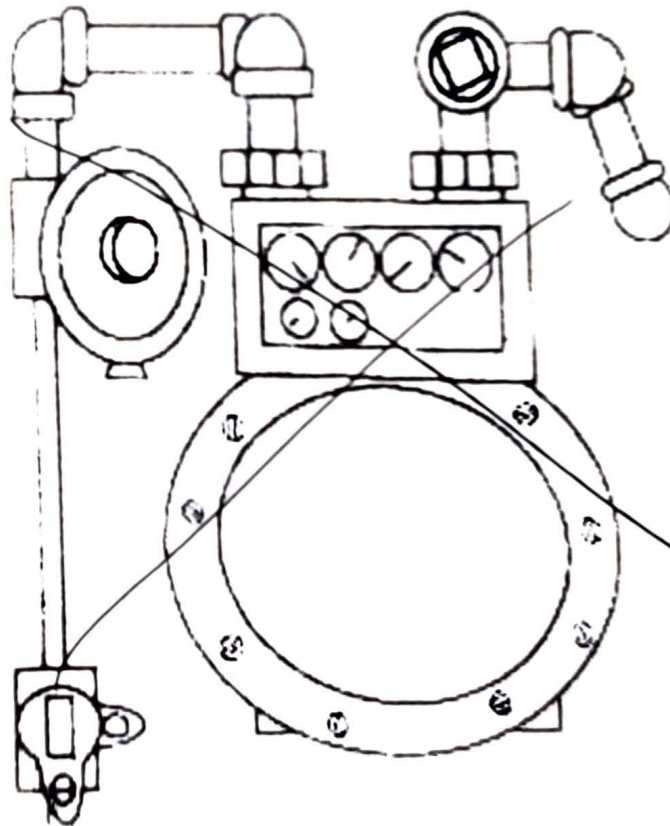
5

CUSTOMER NAME _____

Exposed main

100 % gas

Double Clamp



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#5

STR 31-11-22 ASSET # 912203

DATE FOUND 4/9/19 TECHNICIAN NAME Steph E. / Dennis F.

ADDRESS 18462 Stillwell Rd. CITY Liverpool

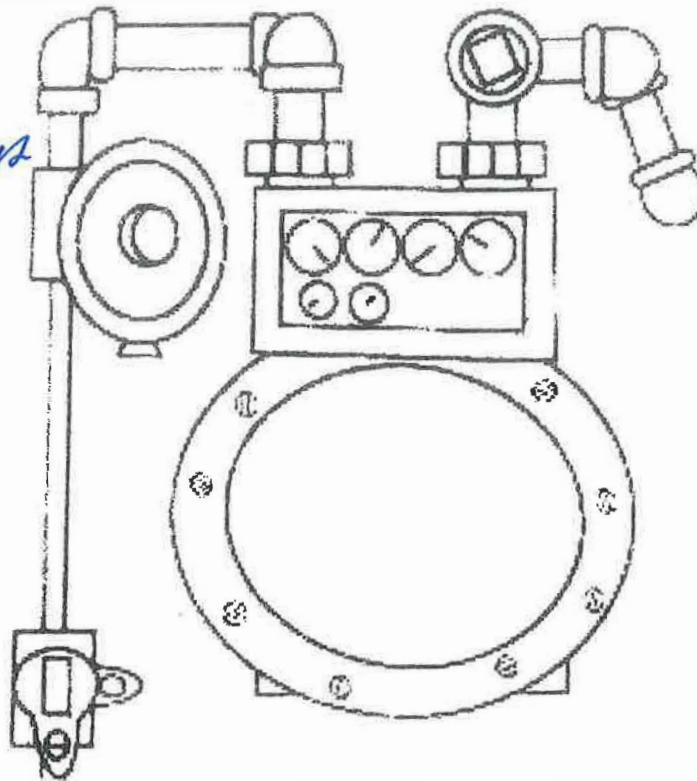
CUSTOMER NAME Jenkins Farm

Known exposure

100% @ clamps

2" main double clamp

No change



BY [Signature] DATE 3/20/20
LIST REPAIR DETAILS

STR 31-11-22

ASSET # 912203

DATE FOUND 8-8-2021

TECHNICIAN NAME Spencer Clark

ADDRESS 18462 Stillwell Rd

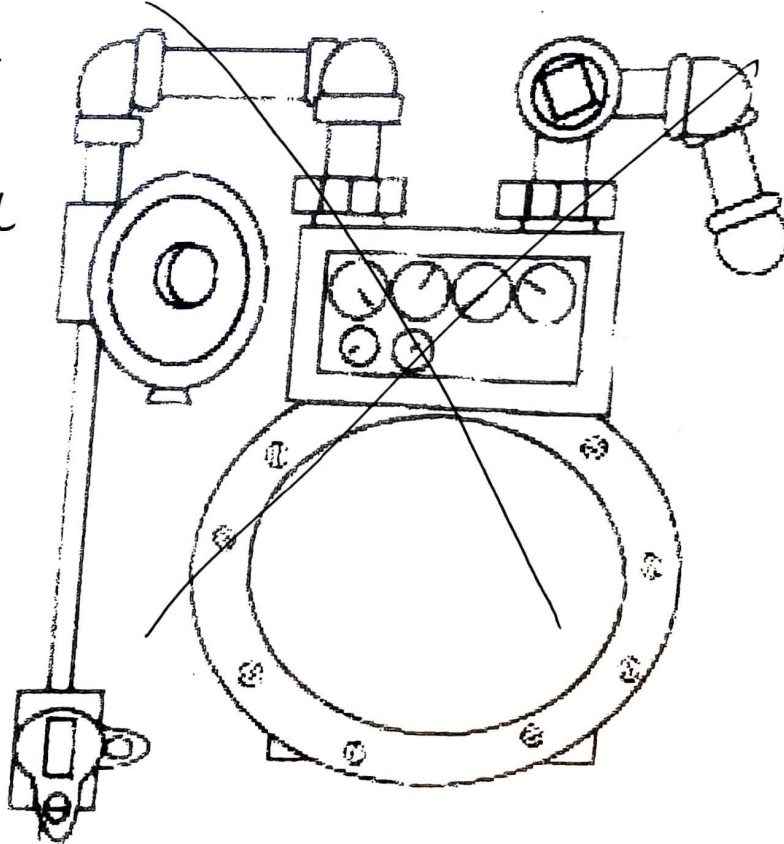
CITY Linwood

CUSTOMER NAME _____

Known exposed meter
See pic

Leakham 2 full seal

Clamp 100% gas



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

STR 31-11-22

ASSET # 912204

DATE FOUND 9-8-2020 TECHNICIAN NAME Spencer Clark

ADDRESS 18462 St. Ivel Rd CITY Linwood

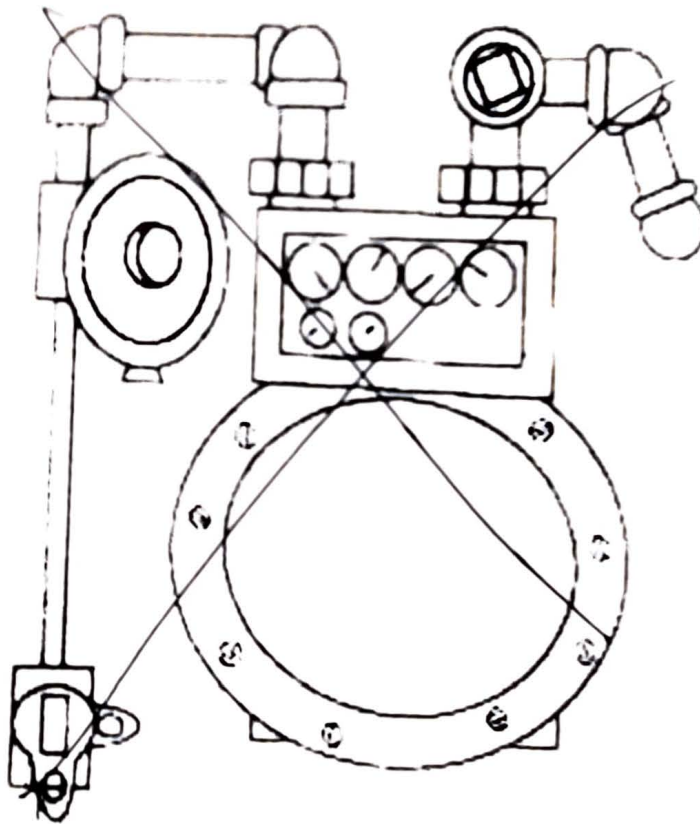
6

CUSTOMER NAME _____

Exposed main

25 % gas

Corroded main



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#6

STR 31-11-22 ASSET # 912204

DATE FOUND 4/9/19 TECHNICIAN NAME Steph L. Amer Jr.

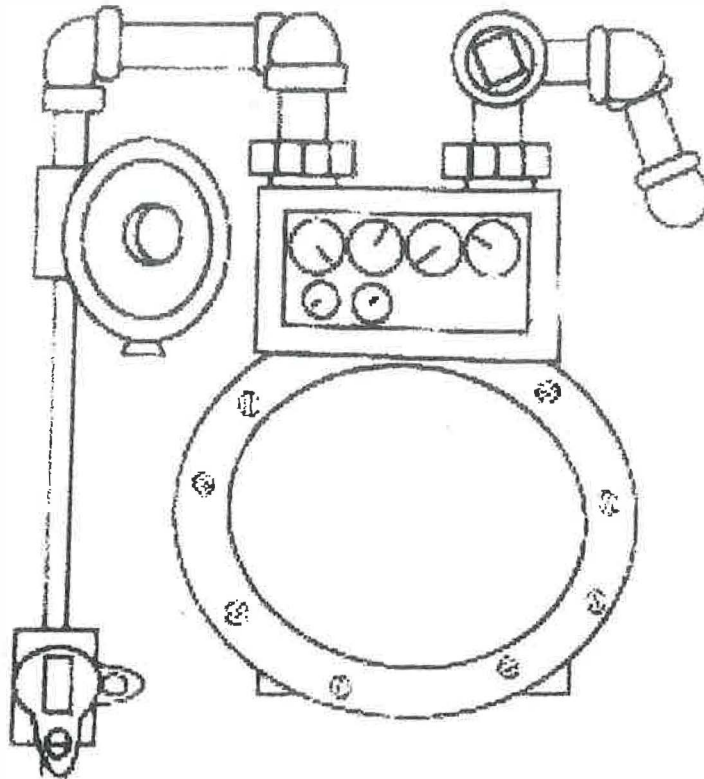
ADDRESS 18462 Stillwell Rd CITY Lincwood

CUSTOMER NAME Jenkins Farm

Known
exposed main

6" previous
read

7" new read



Reval BY [Signature] DATE 3/29/20

LIST REPAIR DETAILS

STR 21-11-22

ASSET # 912204

DATE FOUND 3-8-2021

TECHNICIAN NAME Spencer Clark

ADDRESS 18462 Stillwell Rd

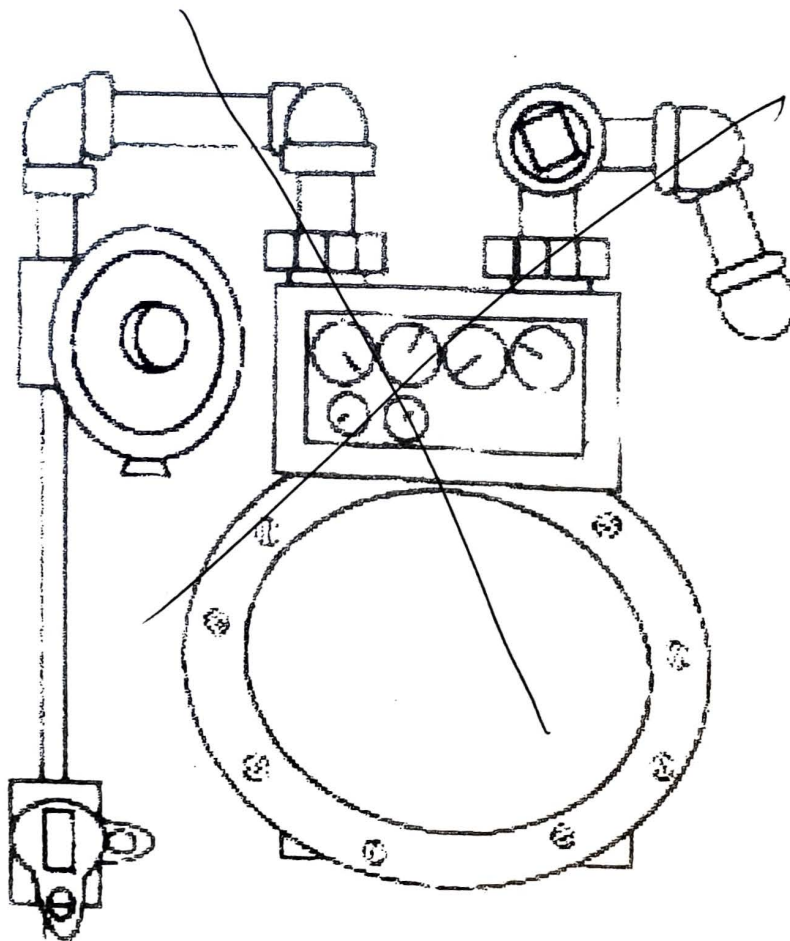
CITY Linwood

CUSTOMER NAME _____

Known exposed
main see
pics

4" gas on

2" main



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

STR 31-11-22 ASSET # 912205

DATE FOUND 9-8-2020 TECHNICIAN NAME Spencer Clark

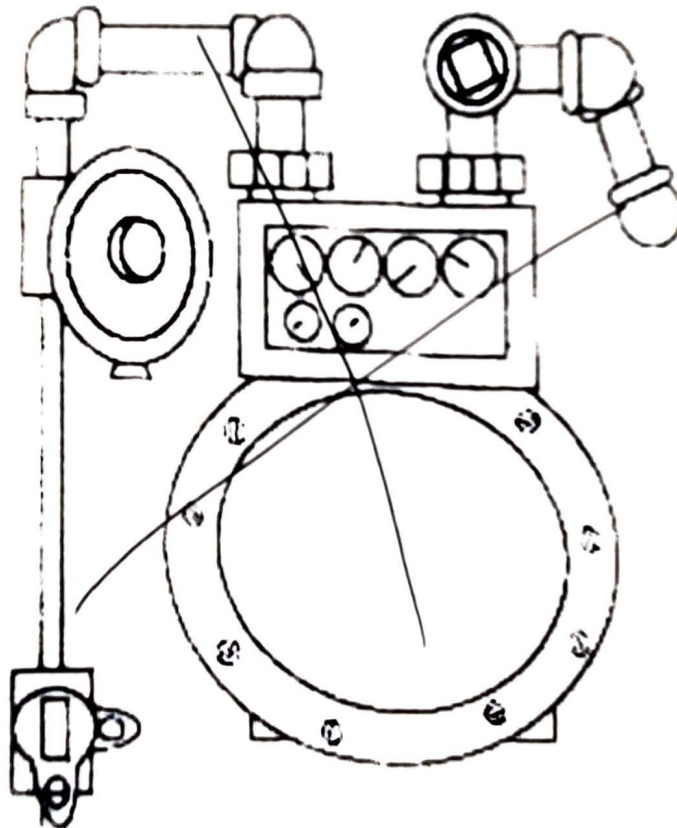
ADDRESS 18701 hemphill Rd CITY Linwood

CUSTOMER NAME _____

#7

Exposed main

40% pin hole on
main



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#7

STR. 31-11-22 ASSET # 912205

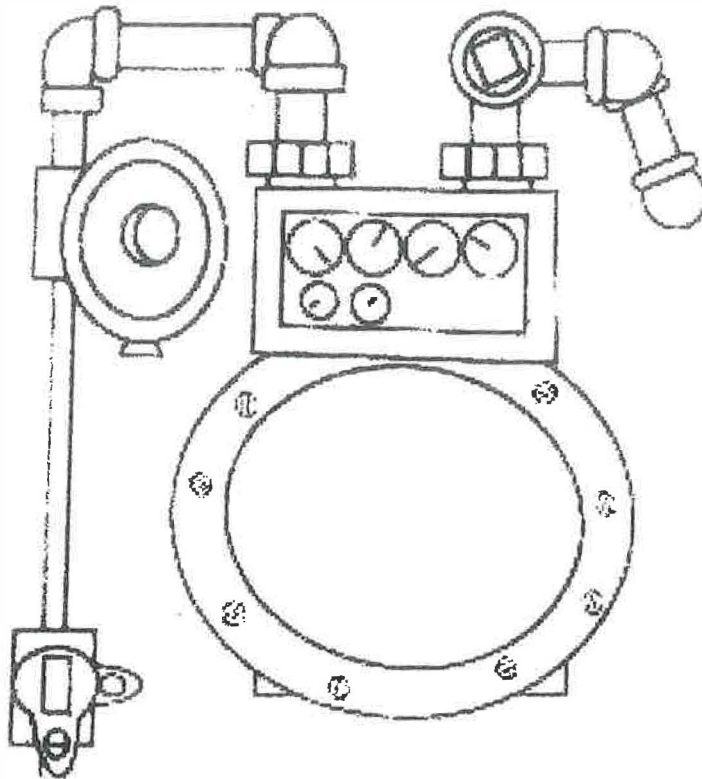
DATE FOUND 4/9/19 TECHNICIAN NAME Steph Lakins, Dennis Hunt

ADDRESS 18701 Fumhill Rd. CITY Linwood

CUSTOMER NAME Jenkins Farm

Known exposed

4/6" pinhole on
2" main



REPAIRED BY [Signature] DATE 3/20/20

LIST REPAIR DETAILS

STR 31-11-22

ASSET # 912205

DATE FOUND 3-8-2021

TECHNICIAN NAME Spencer Clark

ADDRESS 18701 hemphill Rd

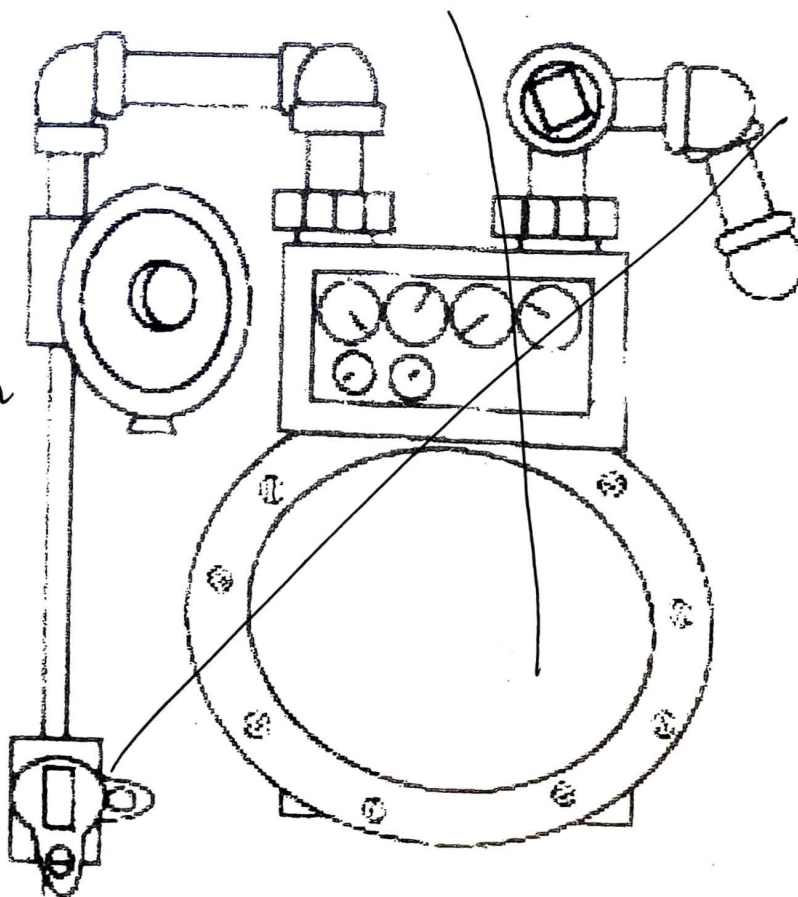
CITY Linwood

CUSTOMER NAME _____

Known exposed
main

36% gas on

Pinhole 2" main



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

STR 31-11-22

ASSET # 912206

#8

DATE FOUND 9-8-2020

TECHNICIAN NAME Spencer Clark

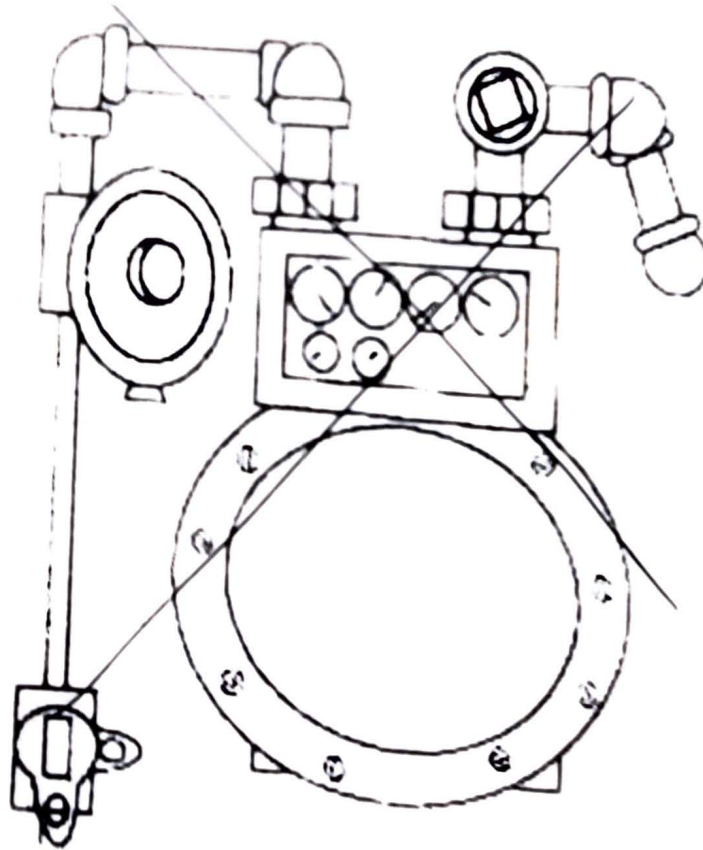
ADDRESS 18701 hemp hill Rd

CITY Linwood

CUSTOMER NAME

Exposed
main

40%
on collar



REPAIRED BY

DATE

LIST REPAIR DETAILS

STR 31-11-22ASSET # 912206DATE FOUND 3-8-2021TECHNICIAN NAME Spencer Cla LADDRESS 18701 hemphill RdCITY Linwood

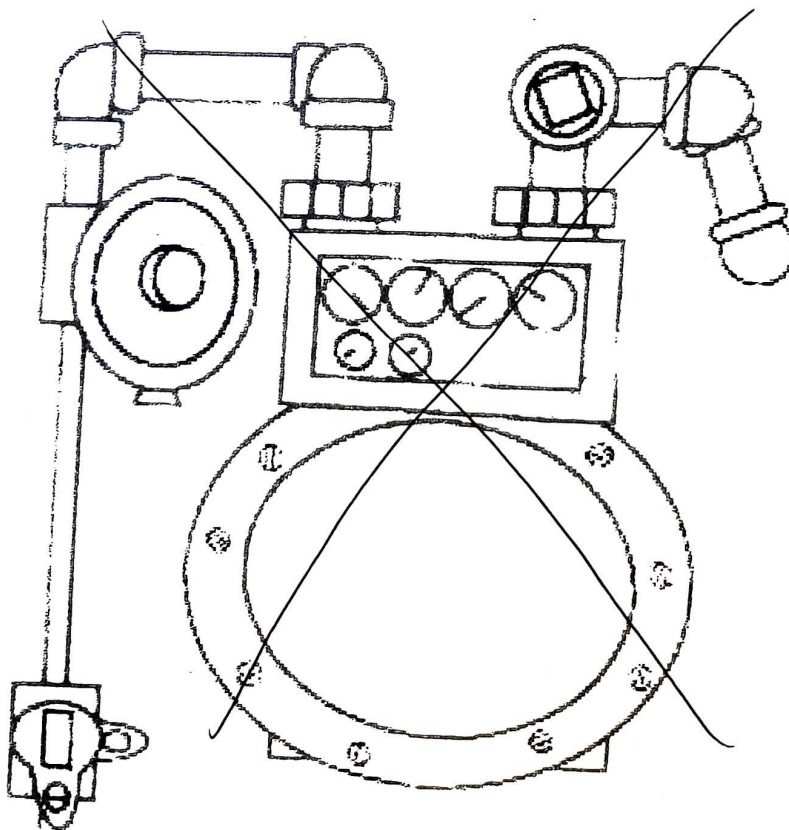
CUSTOMER NAME _____

Known exposed
main

See pics

22" Collar

2" main



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

STR 31-11-22

ASSET # 912207

DATE FOUND 3-8-2021

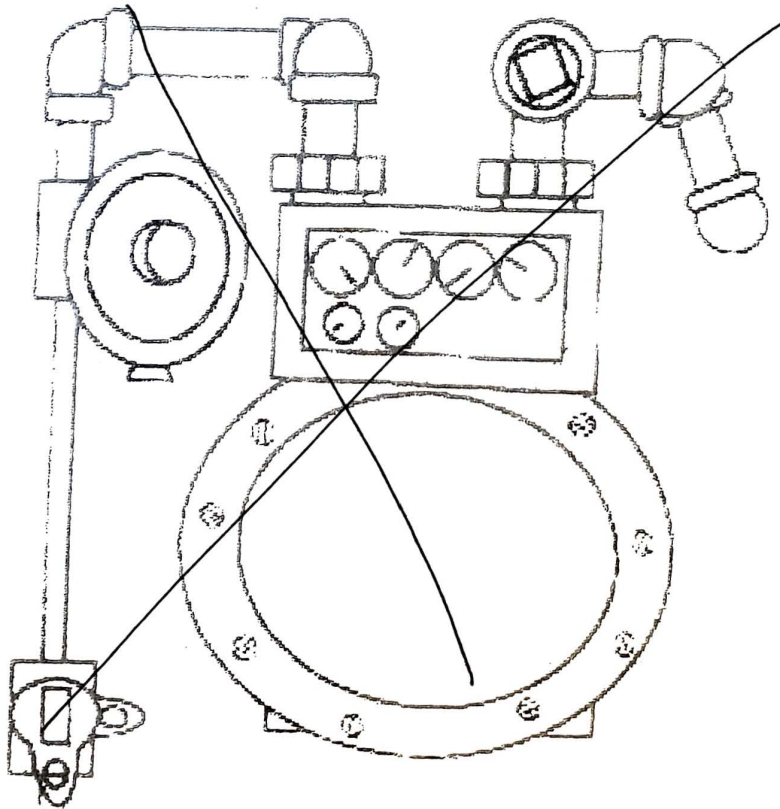
TECHNICIAN NAME Spencer Clark

ADDRESS 18701 henphill Rd

CITY Linwood

CUSTOMER NAME _____

known exposed
main seep pic
50% gas on
1" coupler



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

STR 31-11-22

ASSET # 9/2207

#9

DATE FOUND 9-8-2020

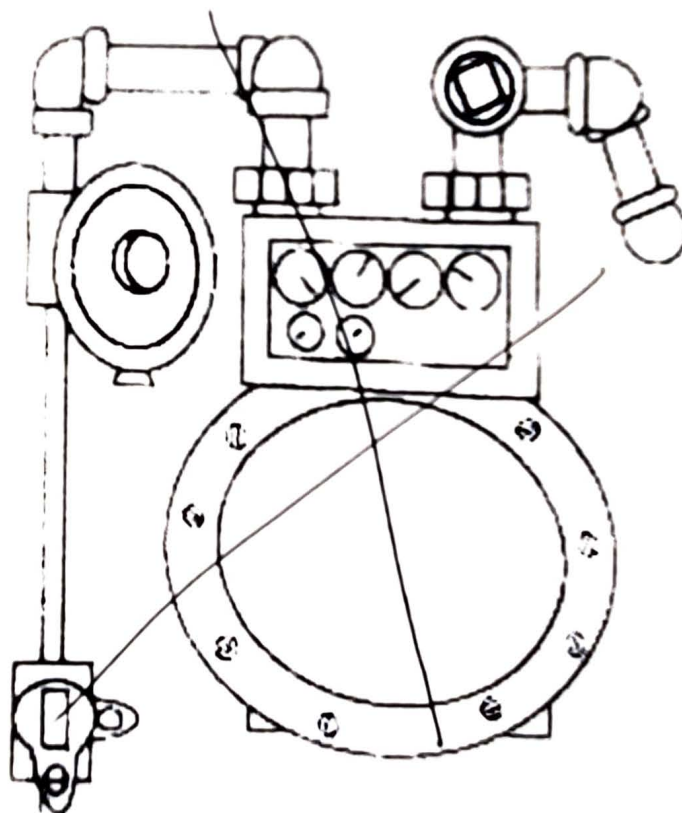
TECHNICIAN NAME Spencer Clark

ADDRESS 18701 Hemphill Rd CITY Lima, OH

Exposed main

CUSTOMER NAME _____

70% on collar



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#9

STR 31-11-22 ASSET # 912207

DATE FOUND 4/19/19 TECHNICIAN NAME Danen/Steph

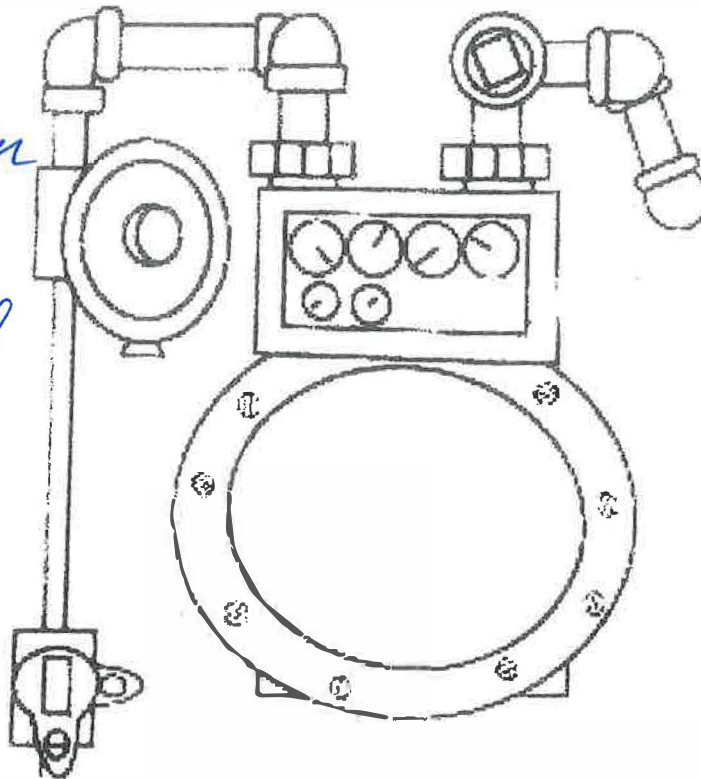
ADDRESS 18701 Lemphill Rd. CITY Airwood

CUSTOMER NAME Jenkins Farm

87.7% reading
on 2" steel main
@ collar

Known exposed
main
previous reading
(77%)

[Signature]



Repl
REPAIRED BY [Signature]

DATE 3/16/20

LIST REPAIR DETAILS

STR 31-11-22 ASSET # 912208

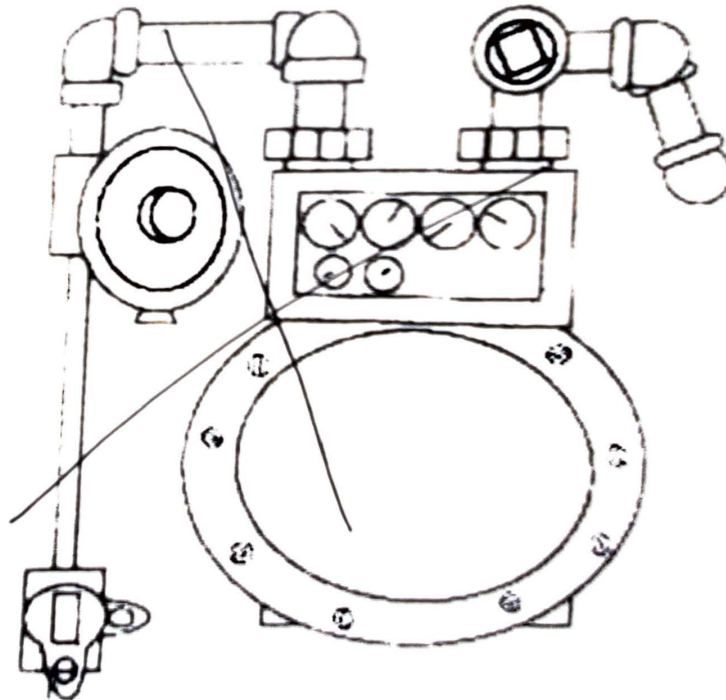
DATE FOUND 9-8-2020 TECHNICIAN NAME Spencer Clark

ADDRESS 18201 hamphill Rd CITY Linwood

CUSTOMER NAME _____

#10
16% collar

Exposed main



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#10

912208

STR 31-11-22

ASSET # ~~912209~~

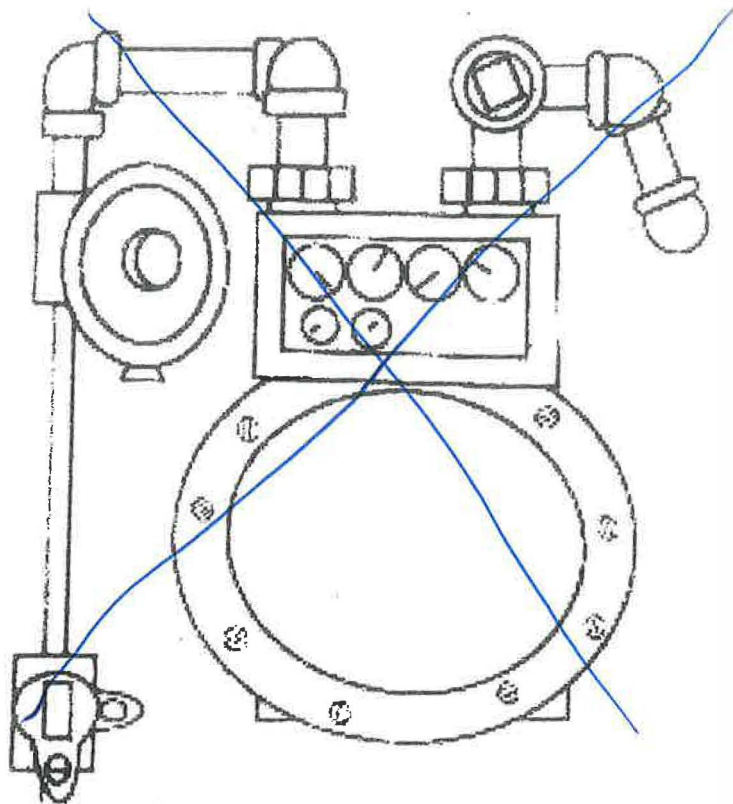
DATE FOUND 4/19/18 TECHNICIAN NAME Steph + Danen

ADDRESS 18701 Hampshire Rd CITY Lima, OH

CUSTOMER NAME Jenkins Farm

Known exposed
main

15.3% @
Collar on 2"
Steel Main
(previous 16%)



Reval
REPAIRED BY Michael Taylor

DATE 3/16/20

LIST REPAIR DETAILS

STR 31-11-22

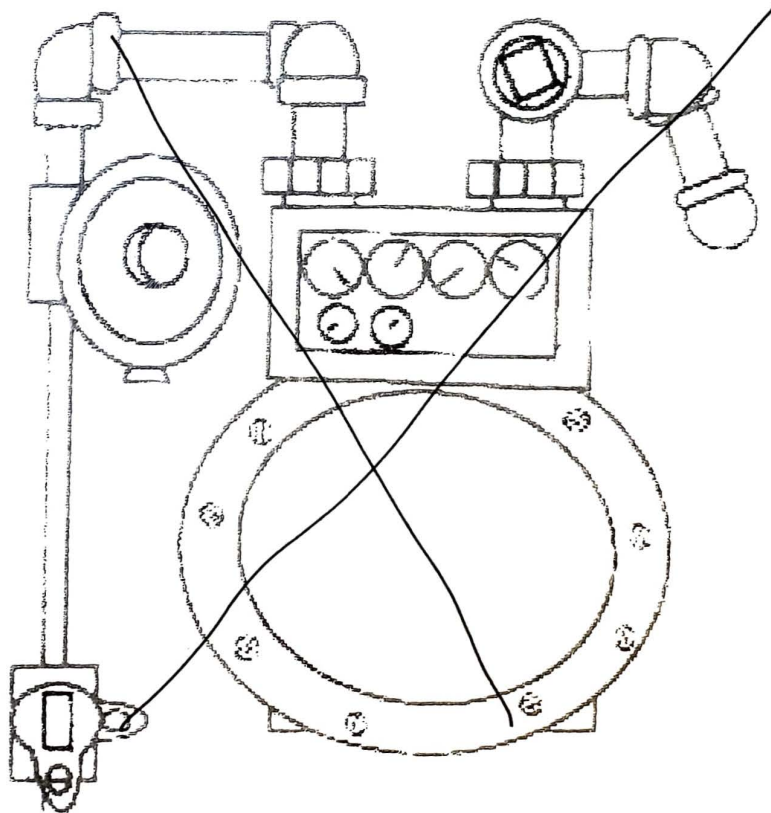
ASSET # 912208

DATE FOUND 3-8-2021 TECHNICIAN NAME Spencer Clark

ADDRESS 18701 Hemphill Rd CITY 28 Linwood

CUSTOMER NAME _____

Known
exposed main
See pic
15% gas on
2" coupler



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

STR 31-11-22 ASSET # 912 209

DATE FOUND 9-8-2020 TECHNICIAN NAME Spencer Clark

#11

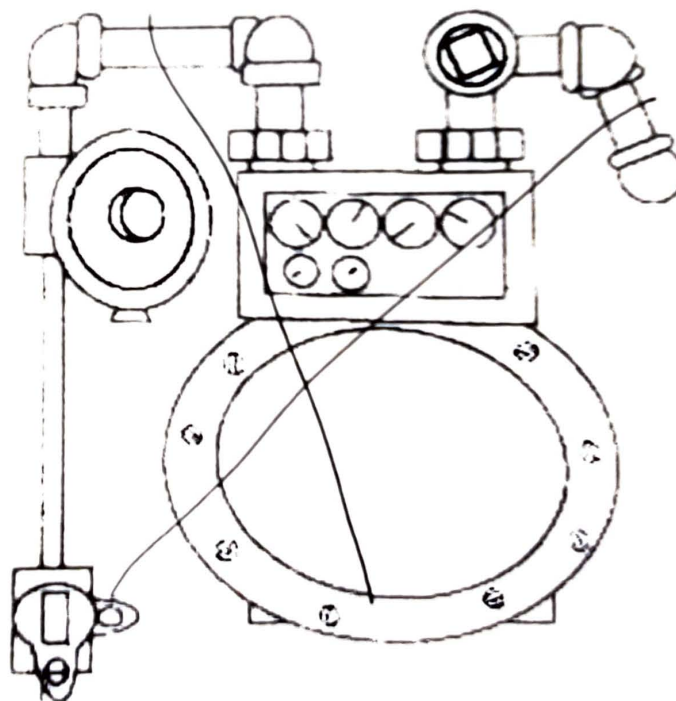
ADDRESS 18701 Hemphill Rd CITY Linwood

Exposed
man

CUSTOMER NAME _____

100% gas

Pin hole



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

ABOVE GROUND LEAK

STR 31-11-22 ASSET # 912209

DATE FOUND 4/19/18 TECHNICIAN NAME Steph / Duren

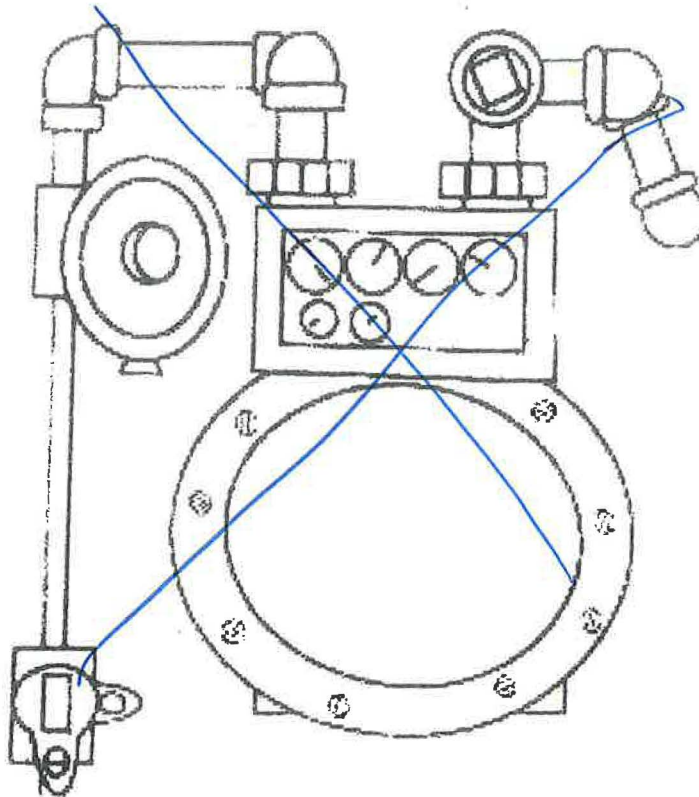
ADDRESS 18701 Lemphill St. CITY Lumbard

CUSTOMER NAME Jenkins Farm

Main exposed
above ground

100% leak
2" steel main
CGI #32600
no change

Post



Revised
REPAIRED BY Mike Byrd DATE 3/16/20

LIST REPAIR DETAILS

ABOVE GROUND LEAK

#8

STR 31-11-22 ASSET # 912209

DATE FOUND 4/19/19 TECHNICIAN NAME Steph / Druen

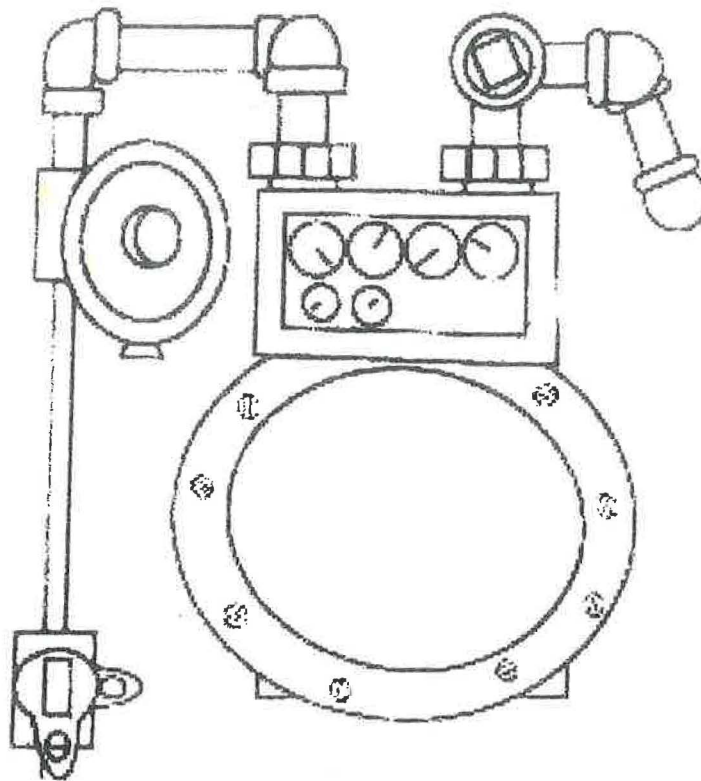
ADDRESS 18701 Lemphill Rd. CITY Linwood

CUSTOMER NAME Jenkins Farm

Known exposed main

previous exposed
main

45' @ Collar
on 8" main
previous read
48' this read



Read BY [Signature] DATE 3/20/20

LIST REPAIR DETAILS

STR 31-11-22 ASSET # 912209

DATE FOUND 3-8-2021 TECHNICIAN NAME Spencer Clark

ADDRESS 18701 hemp hill Rd CITY Linwood

CUSTOMER NAME _____

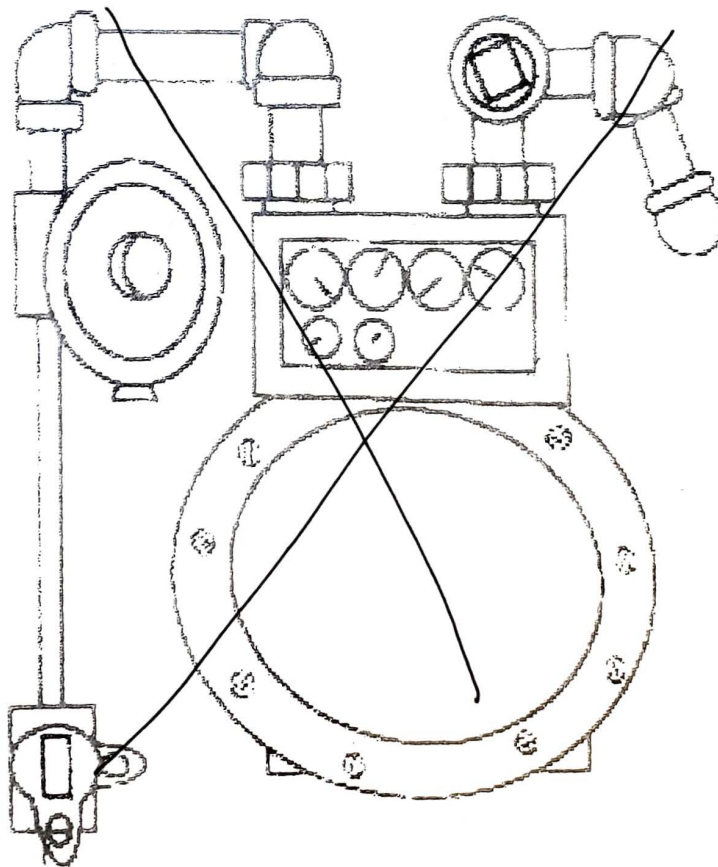
Known exposed

main sec

Pics

100% gas on

2" main



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS



ABOVE GROUND LEAK

STR 31-11-22 ASSET # 916371

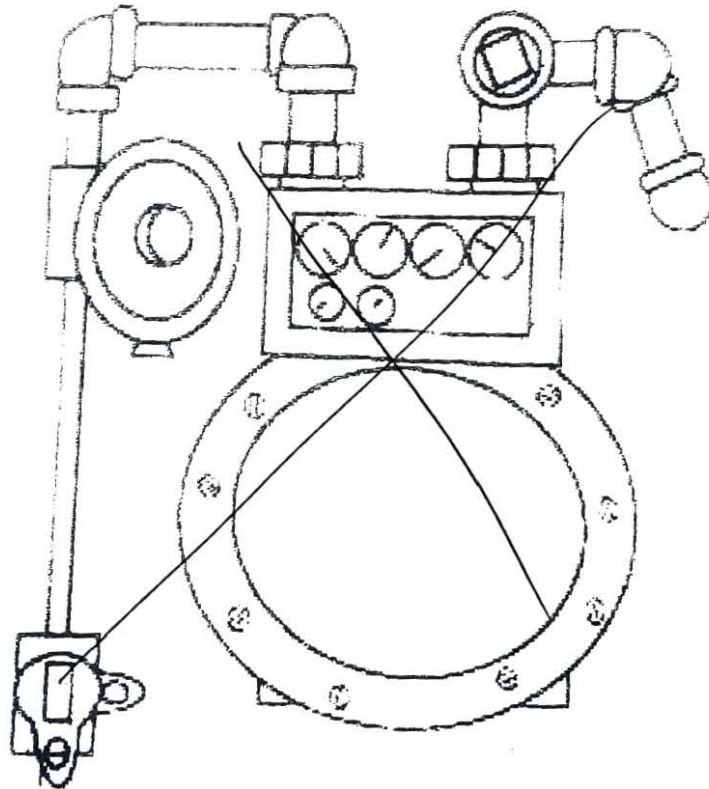
Re-eval
DATE FOUND 7/14/21 TECHNICIAN NAME Clint Stegman

ADDRESS 18462 Stillwell RD CITY Tongue notie

CUSTOMER NAME Jenkins

* Re-eval *

#12 4.5 %
*20' w of gate 1



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

Atmos Energy - As-Built Drawing

Construction Number: C

Page _____ of _____

Minimum Installation Depth of Cover: _____

Project Number: _____

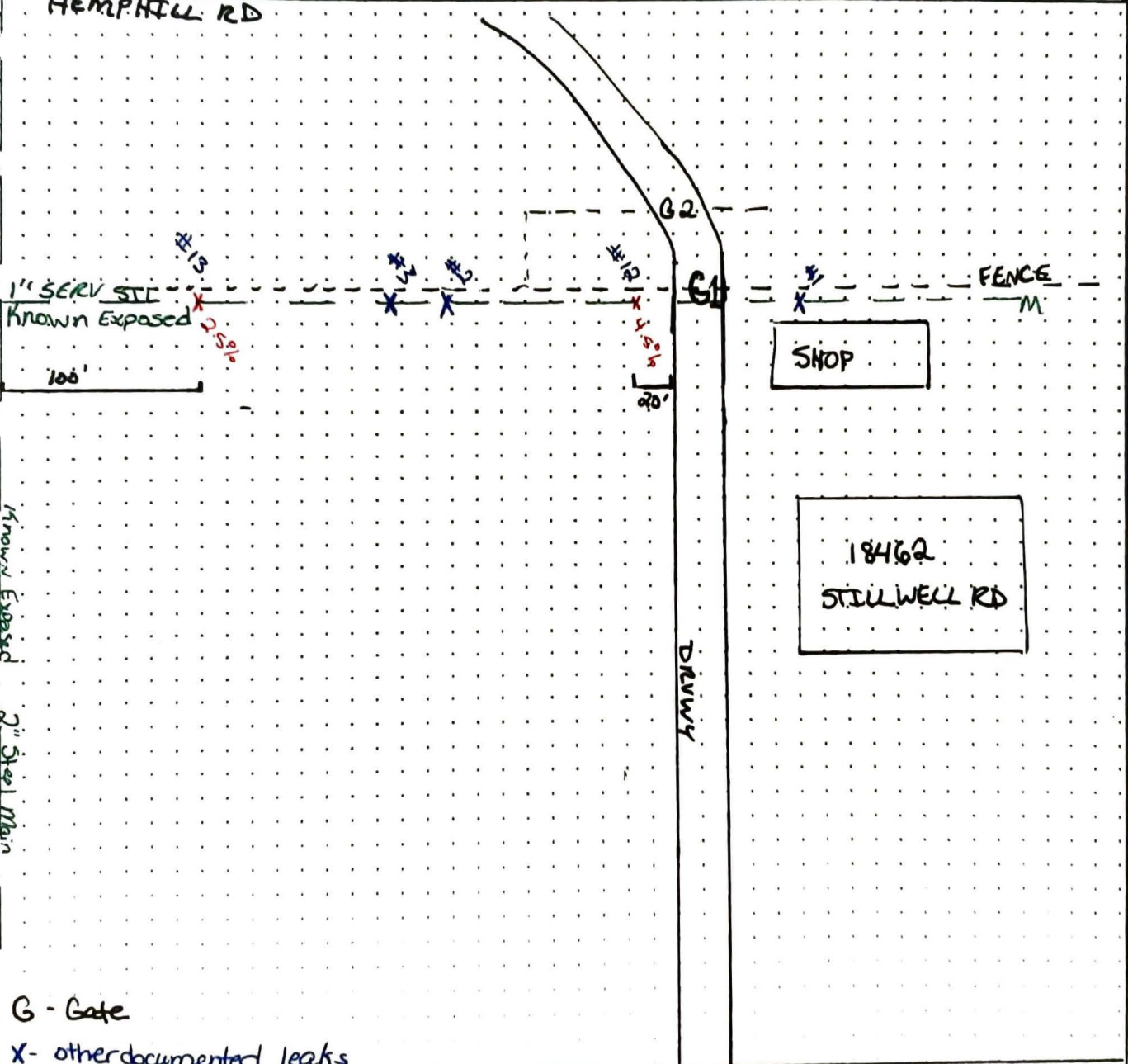
Name S. GAKINS/DHunt Date 1/28/21 REVAL Yes or No Grade 3

Address 18462 STILLWELL RD City TONGANOXIE CGI # _____

Feet To Building 800' ^{40'} Asset # 916371 916372 STR 31-11-22

Migration Pattern Size X

N
18701
HEMPHILL RD



G - Gate
X - other documented leaks
STILLWELL RD

ABOVE GROUND LEAK

STR 31-11-22 ASSET # 916371

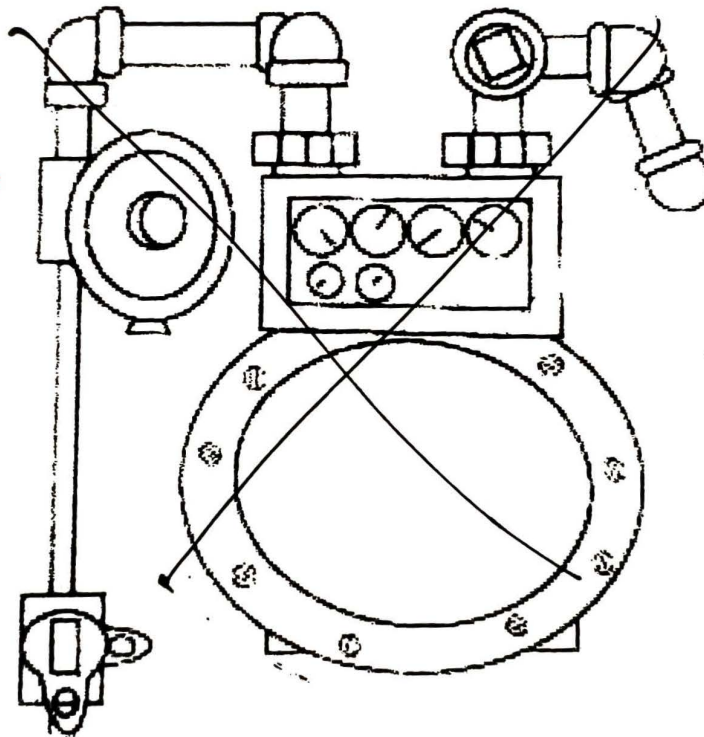
DATE FOUND 1/28/21 TECHNICIAN NAME SEAKINS D. Hunt

ADDRESS 19462 Stillwell Rd CITY Tonguepointe Sherman Twp

CUSTOMER NAME Jenkins
SEE ATTACHED DOCUMENTATION

Known exposed line
#12

4.5%
~20' W of G1
West-most POST



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS



STR 31-11-22

ASSET # 916372

Re-eval

DATE FOUND 7/14/21 TECHNICIAN NAME Clint Stegman

ADDRESS 18462 Stillwell RD CITY Tonganoxie

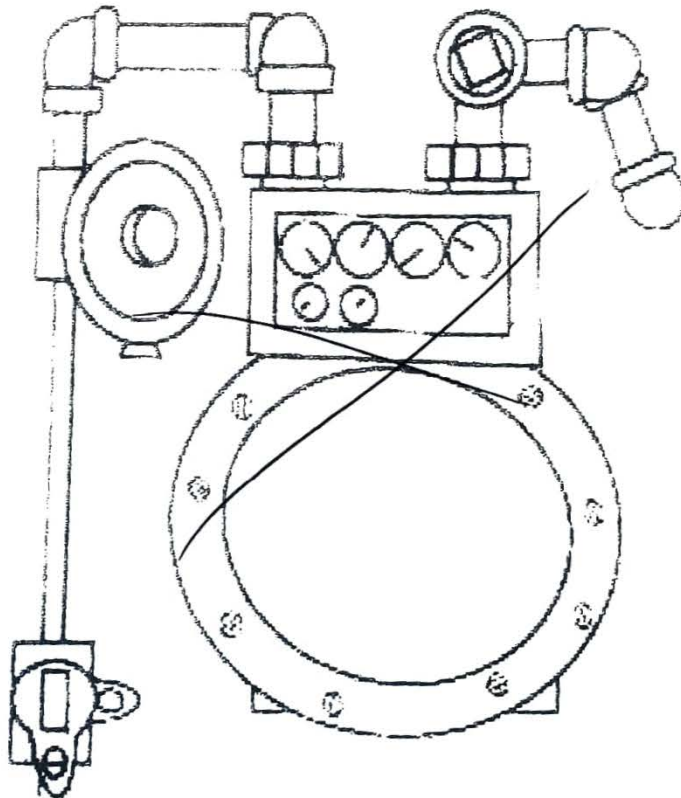
CUSTOMER NAME Jenkins

Re-eval

#13

* 1.2 % @ Collar

* 100' East of tap
off 2" main



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

Atmos Energy - As-Built Drawing

Construction Number: C

--	--	--	--	--	--	--	--

Page _____ of _____

Project Number:

--	--	--	--	--	--	--	--

Minimum Installation Depth of Cover: _____

Name S. GAKINS/DHunt Date 1/28/21 REVAL Yes or No Grade 3

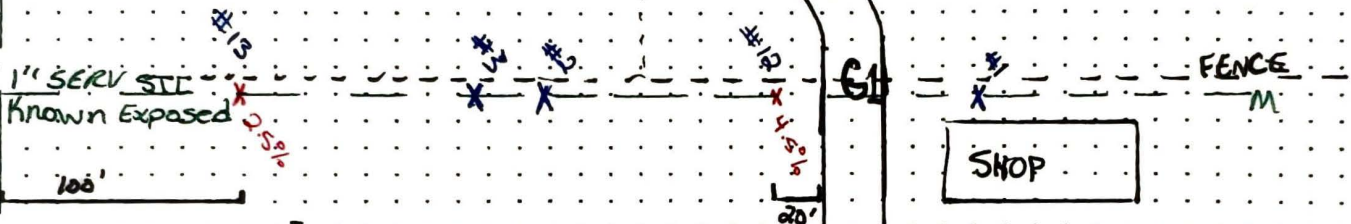
Address 18462 STILLWELL RD City TONGANOXIE CGI # _____

Feet To Building 40' Asset # 916371
800' STR 31-11-22

Migration Pattern Size X

18701

HEMPHILL RD



SHOP

18462
STILLWELL RD

DRIVEWAY

G - Gate

X - other documented leaks

STILLWELL RD

ABOVE GROUND LEAK

STR 31-11-22 ASSET # 916372

DATE FOUND 1/28/21 TECHNICIAN NAME S.EAKINS D.HUNT

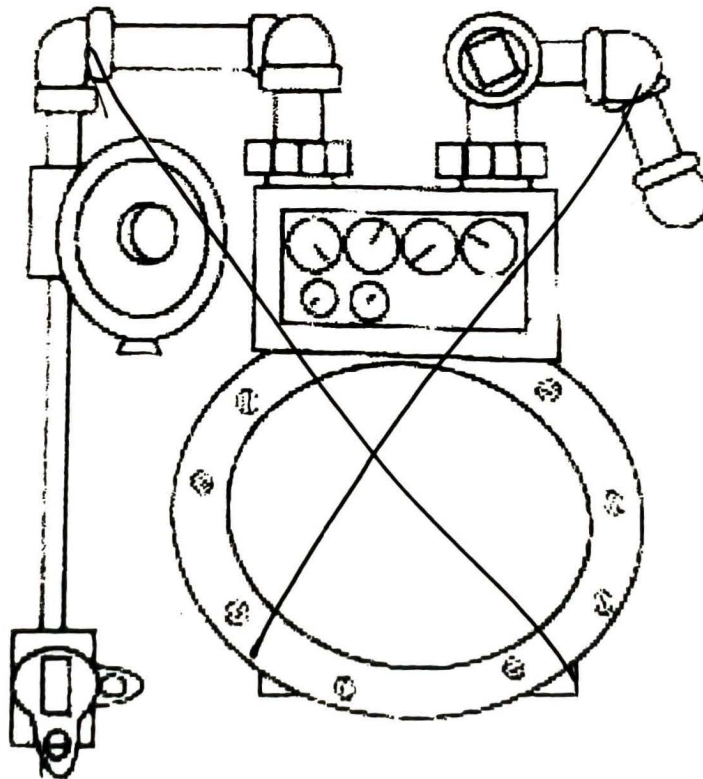
ADDRESS 17462 STILLWELL RD CITY TONGANOXIE

CUSTOMER NAME Jenkins
SEE ATTACHED DOCUMENTATION

Known Exposed line

#13 2.5% @ collar

~ 100' East of tap off
2" main



REPAIRED BY _____ DATE _____

LIST REPAIR DETAILS

Atmos Energy - As-Built Drawing

Construction Number: **C**

Page _____ of _____

Project Number: •

Minimum Installation Depth of Cover: _____



Name D. HUNT Date 1-28-21 REVAL Yes or No Grade 3

Address 18701 HEMPHILL RD. City LINWOOD KS. CGI # 1735

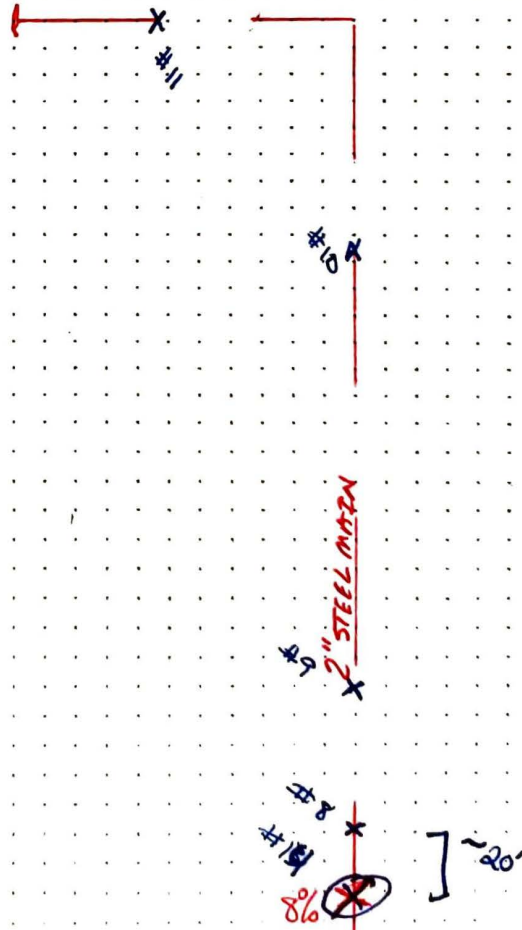
Feet To Building 1525' Asset # 916373 STR 31-11-22

Migration Pattern Size 0' X 0'

18701
HEMPHILL RD.

SEE JENKINS FARM FOLDER.

⊗ = LEAK FOUND LOCATION 8% CGI GAS #1735



⊗ NEW LEAK ~20' S OF J Farm #8 ASSET

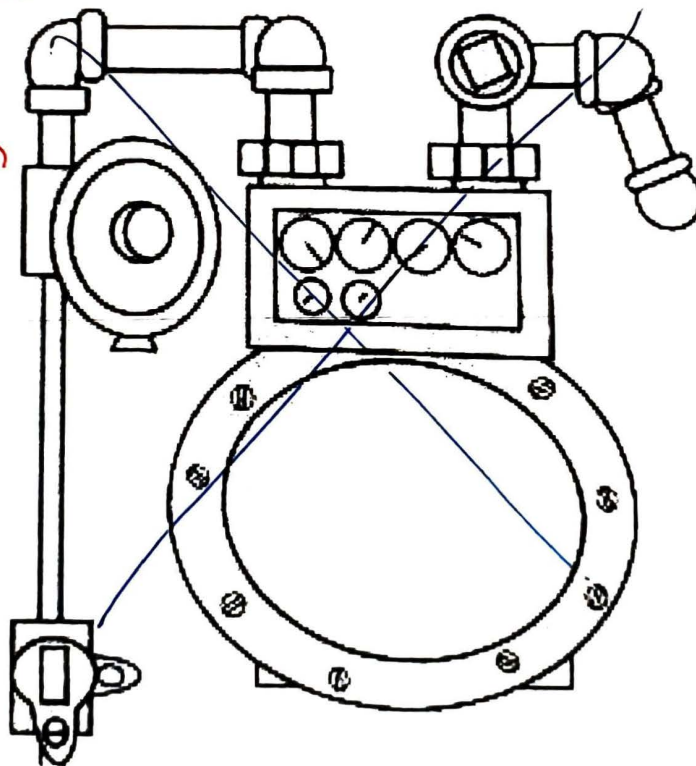
ABOVE GROUND LEAK

STR 31-11-22ASSET # 916373DATE FOUND 1/28/21TECHNICIAN NAME SEAKINS / DHUNTADDRESS 18701 HEMPHILL RDCITY TONGANOXIECUSTOMER NAME JENKINS

SEE ATTACHED DOCUMENTATION

Known Exposed Line

#14 - 8" @ collar
ON 2" main
~20' S of
Jenkins Farm
#8



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS

STR 31-11-22

ASSET # 916 373

Re-eval

DATE FOUND 7/14/21

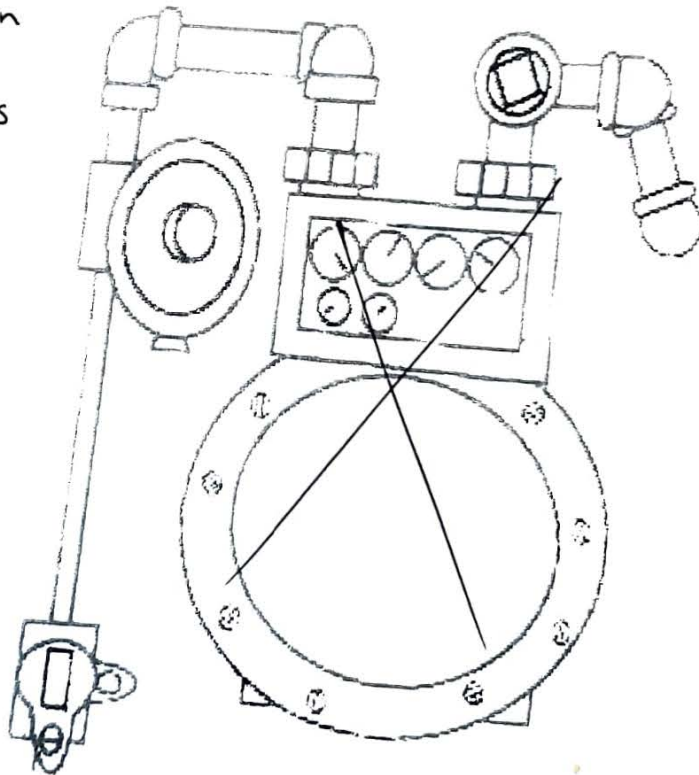
TECHNICIAN NAME Clint Stegman

ADDRESS 18701 Hemphill RD CITY Tonganoxie

CUSTOMER NAME Jenkins

Re-eval

#14 9% on main
#20' S' of Jenkins
Farm #8



REPAIRED BY _____

DATE _____

LIST REPAIR DETAILS







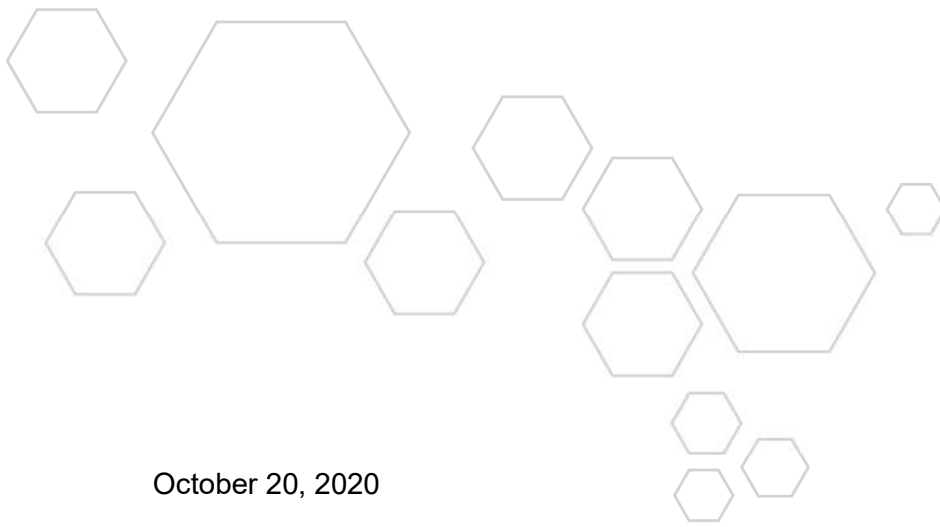








Exhibit E



October 20, 2020

To: Kyle Edlin
Atmos Energy Corporation
25090 West 110th Terrace
Olathe, Kansas 66061

1120 NW US Highway 24
Topeka, KS 66608
Office 785.232.0034
Fax 785.232.4233
www.GoNPL.com

Re: 18462 Stillwell Rd 2" Steel Replacement

Dear Kyle,

In response to your RFP concerning the aforementioned project, NPL Construction Company will supply Equipment, Material and Labor to install the approximate:

- Install 5625' of 2" PE main
- All Necessary Rock Drilling and Breaking
- 5 services totaling 1270'
- All Tie Ins Complete

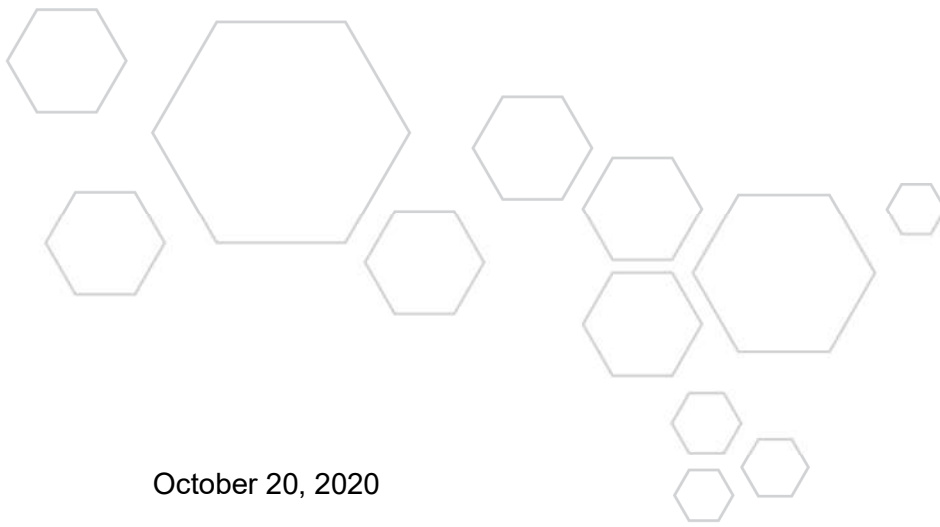
NPL respectfully excludes all Alignment Staking.

Project Complete----- \$210,926.01 + applicable taxes

If you have any questions or to discuss scheduling, please call me at 785-925-1671.

Respectfully,

Tommy Thompson
NPL Construction Company



October 20, 2020

To: Kyle Edlin
Atmos Energy Corporation
25090 West 110th Terrace
Olathe, Kansas 66061

1120 NW US Highway 24
Topeka, KS 66608
Office 785.232.0034
Fax 785.232.4233
www.GoNPL.com

Re: Stillwell Rd 2" Steel Replacement

Dear Kyle,

In response to your RFP concerning the aforementioned project, NPL Construction Company will supply Equipment, Material and Labor to install the approximate:

- Install 2630' of 2" PE main via Directional Drill
- All Necessary Rock Drilling and Breaking
- All Tie Ins Complete

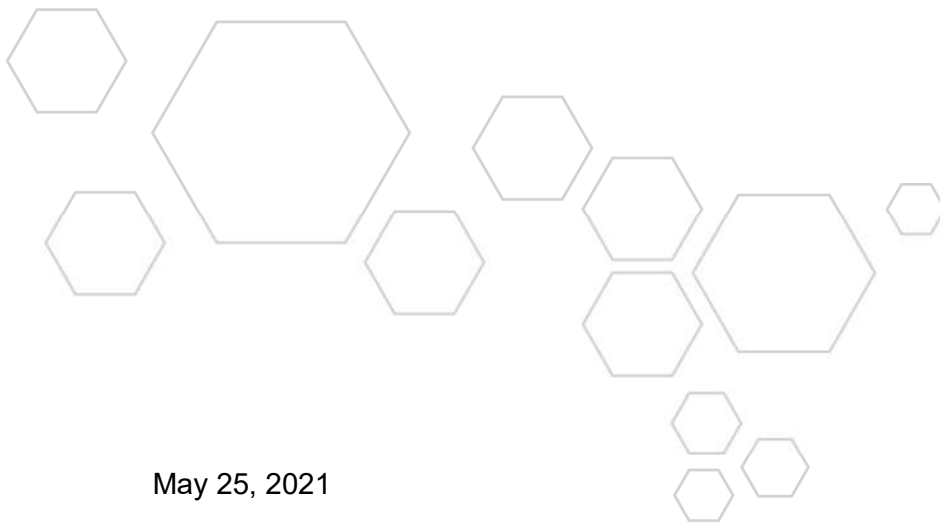
NPL respectfully excludes all Alignment Staking.

Project Complete----- \$108,855.70 + applicable taxes

If you have any questions or to discuss scheduling, please call me at 785-925-1671.

Respectfully,

Tommy Thompson
NPL Construction Company



May 25, 2021

To: Kyle Edlin
Atmos Energy Corporation
25090 West 110th Terrace
Olathe, Kansas 66061

1120 NW US Highway 24
Topeka, KS 66608
Office 785.232.0034
Fax 785.232.4233
www.GoNPL.com

Re: Stillwell Rd 2" Steel Replacement

Dear Kyle,

In response to your RFP concerning the aforementioned project, NPL Construction Company will supply Equipment, Material and Labor to install the approximate:

- Install 2130' of 2" PE main via Directional Drill
- All Necessary Rock Drilling and Breaking
- All Tie Ins Complete

NPL respectfully excludes all Alignment Staking.

Project Complete----- \$91,058.00 + applicable taxes

If you have any questions or to discuss scheduling, please call me at 785-925-1671.

Respectfully,

Tommy Thompson
NPL Construction Company

Exhibit F

From: [Benedict, Tony M](#)
Sent: Tuesday, August 3, 2021 9:55 AM
To: [Holbrook, Becca](#)
Subject: FW: [EXT] Re: Basehor-Linwood South School

Tony M Benedict | Account Manager | Atmos Energy Corporation | Colorado-Kansas Division | 913-254-6344 Office | 913-254-6399 Fax | Tony.Benedict@atmosenergy.com | www.atmosenergy.com

From: Jones, Kevin D <Kevin.Jones@atmosenergy.com>
Sent: Thursday, July 16, 2020 3:33 PM
To: Gant, Eric J <Eric.Gant@atmosenergy.com>
Subject: FW: [EXT] Re: Basehor-Linwood South School

Eric,

I left David Howard with the Basehor-Linwood School District a message yesterday however I didn't hear back from him so I sent an email this afternoon below is his response.

Thanks

Kevin D Jones

Sr Account Representative
Atmos Energy Corporation
Colorado-Kansas Division
913-254-6330 Office
913-254-6399 Fax
Kevin.Jones@atmosenergy.com

From: David Howard <howarddd@usd458.org>
Sent: Thursday, July 16, 2020 3:14 PM
To: Jones, Kevin D <Kevin.Jones@atmosenergy.com>
Subject: [EXT] Re: Basehor-Linwood South School

CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kevin. Sorry, I've been in meetings all day yesterday and today. We actually had our engineers run the cost numbers/savings prior to making our final decision. We have decided to move forward with the building being all electric. Thanks for checking again.

David Howard
Superintendent
USD #458 Basehor-Linwood
913-724-1396
"All Students Developing and Reaching Their Potential"

Exhibit G

AFFIDAVIT OF TONY M. BENEDICT

STATE OF KANSAS
COUNTY OF JOHNSON, ss:

Tony M. Benedict, being duly sworn upon oath, deposes and says:

I am an Account Manager, Kansas-Colorado Division, for Atmos Energy Corporation.

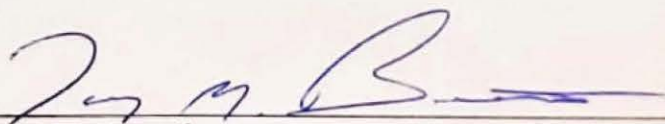
I am familiar with the area subject to Atmos Energy's Application filed in Docket No. 22-ATMG-039-CCS and the records on file with Leavenworth County, Kansas.

I am not aware of any platted subdivision in the vicinity of 190th Street and Stillwell Road. To my knowledge, Atmos Energy has not been contacted by any developer requesting natural gas service for a proposed subdivision in that area.

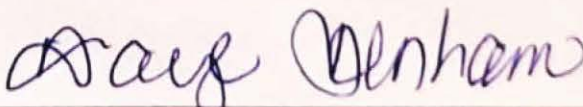
I traveled to the subject area on August 4, 2021 and did not observe any proposed development in the area.

I am also familiar with the location of the proposed Hills Pet Nutrition manufacturing facility referred to by Petitioners. The facility is located over six miles from the area subject to Atmos Energy's Application and said facility is not located within Atmos Energy's service territory.

Further affiant saith naught.


Tony M. Benedict

SUBSCRIBED AND SWORN to before me this 6th day of August, 2021.


Notary Public

Appointment/Commission Expires:

