

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of	:	
	:	
	:	
Orwell Natural Gas Company,	:	Case No. 15-475-PL-CSS
	:	
Complainant,	:	
	:	
	:	
Vs.	:	
	:	
	:	
Orwell-Trumbull Pipeline Company, LLC,	:	
	:	
Respondent.	:	

DIRECT TESTIMONY OF MS. JESSICA CAROTHERS

ON BEHALF OF ORWELL-TRUMBULL PIPELINE COMPANY, LLC

Filed: March 15, 2016

1 **INTRODUCTION**

2 Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

3 A. My name is Jessica Carothers and my business address is 3511 Lost Nation Road, Suite
4 213, Willoughby, Ohio 44094.

5 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

6 A. I am employed by Orwell-Trumbull Pipeline, Co., LLC (“OTP”) and my job title is
7 Accounting Manager.

8 Q. WHAT ARE YOUR RESPONSIBILITIES AS ACCOUNTING MANAGER?

9 A. First, I am responsible for ensuring that the company’s accounting is correct, including
10 account receivables. I also oversee the day-to-day company operations, and I am responsible for
11 overseeing any legal issues that arise.

12 Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?

13 A. I am a high school graduate who has taken college courses at Columbus State
14 Community College and Ohio State University. In addition to those courses, I am currently
15 enrolled at Lakeland Community College in Kirtland, Ohio, where I am obtaining an Associates
16 of Arts Degree. Prior to working at OTP, I spent five years working in retail banking at Lake
17 National Bank.

18

19 **COMPANY HISTORY**

20 Q. ARE YOU FAMILIAR WITH THE HISTORY OF OTP?

21 A. I am.

22

1 Q. WOULD YOU PLEASE PROVIDE A BRIEF HISTORY OF OTP, THEN?

2 A. OTP is a limited liability company that was founded on September 2, 2004. OTP was
3 founded by its members and then President Thomas J. Smith (“Tom”), to operate an intrastate
4 pipeline company. The Public Utilities Commission of Ohio (“PUCO”) approved OTP to do so
5 on March 21, 2006.

6 Q. DO YOU KNOW WHY OTP WAS FORMED?

7 A. OTP was formed to serve two purposes. At the time it was formed, Mr. Richard M.
8 Osborne (“Rick”) owned multiple natural gas production companies operating in northeast Ohio.
9 These included John D. Oil and Gas Company (“JDOG”), Great Plains Exploration Company
10 (“Great Plains”), and OsAir, Inc. (“OsAir” and collectively known as the “Production
11 Companies”). At the same time, the only pipeline company servicing areas in which the
12 Production Companies were producing natural gas was Dominion East Ohio Gas Company
13 (“DEO”). Rick’s Production Companies depended upon DEO to get natural gas to ONG and to
14 the broader market.

15 Rick also owned a natural gas public utility operating in northeast Ohio, ONG. ONG,
16 was equally dependent upon DEO to bring in natural gas to serve end use customers.

17 Rick was dissatisfied with the rates his companies were being charged by DEO and by
18 certain terms of DEO’s service that restricted ONG’s ability to pursue new business. The
19 formation of OTP promised to create diversity for in supply options for ONG, and diversity for
20 the Production Companies in options for shipment of natural gas. Rick therefore formed OTP
21 and sought the PUCO’s permission to create a new pipeline to compete with DEO. The PUCO
22 approved this request and OTP became a PUCO-approved pipeline in 2006.

23

1 Q. WHO OWNS OTP TODAY?

2 A. OTP has two members. Rick owns the majority of the membership interests in OTP, and
3 he is OTP's managing member.

4 Q. WHO OWNS ONG TODAY?

5 A. Today, ONG is a wholly-owned subsidiary of Gas Natural, Inc. ("GNI"), a publicly held
6 company listed on the New York Stock Exchange. GNI, then known as Energy West,
7 Incorporated, acquired ONG in 2009, together with Brainard Gas Corporation, and Northeast
8 Ohio Natural Gas Corporation – two other natural gas utilities – from interests ultimately
9 controlled by Rick.

10 Q. DESPITE THAT SALE, DO ONG AND OTP CONTINUE TO HAVE A
11 RELATIONSHIP?

12 A. They do.

13 Q. WHAT IS THE RELATIONSHIP BETWEEN OTP AND ONG?

14 A. In short, ONG purchases, and OTP provides, intrastate pipeline transportation services.
15 OTP transports the natural gas ONG purchases on the interstate market, and delivers that natural
16 gas to ONG for re-delivery to ONG's end use customers.

17 Q. WHO OWNS THE PRODUCTION COMPANIES, TODAY?

18 A. Rick is still technically the "owner" of the Production Companies. In reality, however,
19 all three companies were forced to file petitions seeking the protection of the federal bankruptcy
20 courts in January, 2012. All three companies are currently operated by a United States
21 Bankruptcy Trustee for the Western District of Pennsylvania. The trustee's name is Guy C.
22 Fustine, Esq. of the Knox, McLaughlin, Cornall & Sennett, PC law firm in Erie, Pennsylvania.

23

1 Q: ARE YOU AWARE OF THE STATUS OF THOSE BANKRUPTCY CASES?

2 A: Only in very general terms. Even so, I understand that at the request of the trustee, the
3 bankruptcy court entered an Order on January 13, 2016 that converted all three cases from
4 Chapter 11 cases to Chapter 7 cases. This conversion indicates that the assets of the three
5 entities are likely to be liquidated at some point in time in the near future. I am also aware that
6 the trustee has proposed a timeline for liquidation that – assuming it is approved and executed as
7 proposed – will result in the sale of all assets belonging to the Production Companies by
8 September 1, 2016.

9 **BACKGROUND TO COMPLAINT**

10 Q. HAVE YOU EXAMINED THE COMPLAINT FILED BY ONG IN THIS CASE?

11 A. I have.

12 Q. WOULD YOU PLEASE SUMMARIZE THE COMPLAINT, IN YOUR OWN TERMS?

13 A. ONG filed the complaint on March 9, 2015. For its complaint, ONG alleged that ONG
14 had been informed only days earlier that OTP intended to permanently terminate service to ONG
15 customers along Vrooman Road in Lake County, Ohio. ONG even claimed that the shutdown
16 would leave ONG end-use customers with no available source of natural gas during the winter
17 heating season. Finally, ONG claimed that there was no need for, and no evidence to even
18 suggest a need, for this action by OTP.

19 Q. DID THIS ACCURATELY CHARACTERIZE WHAT WAS ABOUT TO OCCUR?

20 A. Absolutely not. In fact, the complaint appears to have been calculated to be deliberately
21 misleading.

22

1 Q. WHY DO YOU SAY THAT?

2 A. First, ONG's intimation that OTP, by cutting the pipeline, was acting unilaterally in order
3 to injure ONG was flatly false, and ONG knew it was false.

4 Q. CAN YOU EXPLAIN WHY THE STATEMENT IS FALSE AND HOW ONG KNEW
5 THE STATEMENT WAS FALSE?

6 a. You must keep in mind that ONG and OTP were affiliated companies until 2009, when
7 the PUCO approved the sale of ONG to GNI. You also need to be aware that following the sale,
8 OTP's president, Rick, was also president, CEO, and the Chairman of the Board of GNI until
9 August, 2014.

10 As a result, at all times during the period between 2009 through 2014, the officers and
11 employees of ONG and OTP were thoroughly intertwined. Management of BOTH entities were
12 well aware that the State of Ohio's Department of Transportation (ODOT) planned to make
13 substantial modifications to Vrooman Road in Lake County, Ohio. In fact, the state had been
14 proposing changes to Vrooman Road for some thirty years, had completed the permitting and
15 environmental work necessary by 2009, publicly announced funds were available for the
16 Vrooman Road project in 2014 and that construction would begin with the I-90 interchange.

17 Since at least 2013, and probably before that, ONG and OTP, management, officers, and
18 employees were also completely aware that OTP facilities would be disrupted by ODOT's work
19 on Vrooman Road, and BOTH entities were aware that ODOT intended to Order OTP to sever
20 and discontinue its use of the pipeline running beneath I-90 while ODOT worked on the ramps to
21 and from I-90. In fact, Mr. Marty Whelan, the current president of ONG, was involved in
22 discussions with ODOT and contractors concerning the project, at least prior to August, 2014.

23

1 Q. WAS THERE ANOTHER REASON THAT YOU FELT ONG'S COMPLAINT WAS
2 MISSLEADING?

3 Yes, the complaint expressly states that the severance of the pipeline would impact
4 service to end use customers of ONG. This, too, was simply not true – unless ONG chose to
5 make it so.

6 First, ONG has acknowledged that it could inject compressed natural gas into the pipeline
7 spur north of I-90 in order to meet its customers' demands. It simply did not wish to incur that
8 cost.

9 Second, and even more pointedly, ONG's Complaint suggests that OTP is transporting
10 natural gas north, beneath I-90, to serve ONG's customers. This is not, nor has it ever been true.
11 The truth is that OTP takes delivery of natural gas from the 5 production wells north of I-90.
12 That gas flows south, travels beneath I-90, and is ultimately sent to market. The 5 production
13 wells are owned by the Production Companies, and are located west of Vrooman Road and North
14 of I-90.

15 Q. ARE YOU SAYING THAT ONG'S 13 CUSTOMERS ARE SERVED BY THE 5
16 PRODUCTION WELLS ON THE NORTH SIDE OF I-90 AND NOT FROM INTRASTATE
17 PURCHASES OF NATURAL GAS MADE BY ONG?

18 A. Yes. That is exactly correct.

19 Q. WHAT ARE THE NAMES OF THESE FIVE PRODUCTION WELLS?

20 A. The names of the wells are: Vrooman 13B ("13B"); Maggie ("Maggie"); Sharondippity
21 ("Sharondippity"); Dickey 13 ("Dickey"); and Josh 13 ("Josh").

1 Q. ARE THOSE WELLS ABLE TO SERVE ONG'S CUSTOMERS COMPLETELY?

2 Yes, the cumulative production capacity of those wells far, far exceeds the demands of
3 the 13 residential customers. In fact, most of the wells could, individually, serve all of the needs
4 of all 13 ONG customers.

5 Q. DO YOU POSSESS ANY EVIDENCE THAT CONFIRMS YOUR STATEMENT
6 THAT THE WELLS ARE ABLE TO SERVE ONG'S CUSTOMERS COMPLETELY?

7 A. Yes. Exhibit No. 1 is a report generated at my request, subject to my supervision, based
8 upon records created in the ordinary course of business by OTP, by persons having knowledge
9 of the information reported therein.

10 Exhibit No. 1 identifies 5 wells owned by Great Plains and OsAir. Those five wells are
11 located in Lake County, west of Vrooman Road, north of I-90, and south of Grand River. The
12 production of each of the five wells is metered at the point that natural gas from those wells is
13 delivered into OTP's system.

14 As you can see, the five wells produced well over 10,000 MCFs, cumulatively during the
15 2014 year.

16 Q. AND DO YOU KNOW HOW MUCH NATURAL GAS IS CONSUMED BY ONG'S
17 CUSTOMERS?

18 A. Yes. Exhibit No. 2 is a second report, generated at my request subject to my supervision,
19 based upon records created in the ordinary course of business by OTP, by persons having
20 knowledge of the information report therein.

21 Exhibit No. 2 shows the total volumes delivered in March, 2015 through December 2015,
22 to ONG's customers. ONG has 13 customers along this portion of Vrooman Road. Collectively,
23 those 13 customer used a total of 440.3 MCFs in 2015 after the pipeline was severed under I-90.

1 We don't yet have figures for January and February of 2016. However, if you assume that in
2 both January and February of 2016 ONG's 13 customers consumed 100 MCFs of natural gas
3 (which would be more gas than the customers consumed in any other month of 2015, including
4 the other winter months), then their total usage for 2015 would be 640.3 MCFs for the entire year
5 of 2015.

6 When you compare that amount of usage against the production of the 5 wells in 2014
7 and 2015, you see that it is likely any one of these wells, by itself, could supply enough natural
8 gas to service the ONG's 13 customers.

9 Q. WAS ONG AWARE OF THE NATURAL GAS AVAILABLE THROUGH THE 5
10 PRODUCTION WELLS?

11 ONG was fully aware.

12 Q. HOW CAN YOU BE SURE THAT ONG WAS AWARE THAT THE NATURAL GAS
13 FROM THE 5 WELLS WAS AVAILABLE?

14 A. Again, at all times during the period between 2009 through 2014, the officers and
15 employees of ONG and OTP were thoroughly intertwined. Any operator, employed by either
16 company, would have had working knowledge of this information.

17 Q. IF ONG WAS AWARE THAT NATURAL GAS WAS AVAILABLE THROUGH THE
18 PRODUCTION COMPANIES THEN WHY DO YOU BELIEVE ONG INITIATED THIS
19 PROCEEDING INSTEAD OF SIMPLY USING THE NATURAL GAS FROM THE
20 PRODUCTION COMPANIES?

21 The simple fact is that at the time ONG filed the Complaint to initiate this matter, ONG
22 refused to transact business with any entity owned by Rick, except (as is the case of OTP) when

1 it can literally find no way to avoid doing so, either because of practical constraints or due to pre-
2 existing contractual obligations.

3 For example, the immediate “crisis” ONG claimed existed in March, 2015 was
4 “resolved” once OTP disclosed the bankruptcy proceedings to ONG, urged ONG to contact the
5 bankruptcy trustee for confirmation, and then itself contacted the bankruptcy trustee to describe
6 the complaint filed by ONG and propose the trustee enter into a post-bankruptcy petition contract
7 directly with ONG. While OTP is not privy to the details, ONG entered into such a contract,
8 indicating it was satisfied with the gas supply north of I-90 once its personnel realized that Rick
9 would not benefit from ONG’s purchase of natural gas from the bankruptcy trustee.

11 **THE FUTURE OF THE PIPELINE BENEATH I-90**

12 Q. WHY WASN’T THE PIPELINE RESTORED IMMEDIATELY AFTER IT WAS
13 SEVERED?

14 A. First, you must understand that it takes time to hire and mobilize a construction company
15 to reconnect the pipeline. Our contractor couldn’t mobilize to bore under I-90 until
16 approximately 30 days after the pipeline was severed. Then, when our contractor was initially
17 scheduled to bore a new line under I-90, it became necessary to divert that contractor to an
18 unanticipated emergency situation involving a gas leak in Millerburg, Ohio. ONG, by the way,
19 was fully aware that this was occurring, and in fact was threatening Cobra Pipeline Company
20 with still another complaint case before this Commission, in the event that the Millersburg
21 pipeline leak wasn’t immediately addressed.

22 Q. WHY HASN’T OTP SET A NEW DATE WITH ITS CONTRACTOR TO
23 RECONNECT THE PIPELINE UNDER I-90?

1 A. OTP lost its opportunity to reconnect the pipeline under I-90 at the conclusion of
2 ODOT's construction when its contractor was diverted to repair the gas leak in Millersburg,
3 Ohio. When OTP lost its opportunity to reconnect at the conclusion of ODOT's construction of
4 I-90, it re-evaluated the cost benefit of a reconnection.

5 Q. DOES THIS MEAN THAT OTP WILL NOT TRANSPORT ONG'S NATURAL GAS
6 TO ONG'S CUSTOMERS?

7 A. Absolutely not. OTP will continue to provide transportation of ONG's natural gas to
8 ONG's end use customers. In fact, OTP is currently transporting ONG's natural gas to the
9 customers along Vrooman Road. ONG is simply receiving that gas from the Production
10 Companies, rather than nominating volumes of interstate gas into OTP's system for that purpose.
11 OTP therefore wishes to keep its options open.

12 Q. DOES OTP EVER INTEND TO RESTORE THE PIPELINE?

13 A. Frankly, we are still exploring our options regarding the restoration of the pipeline.
14 Estimates from our contractors suggest that it will cost somewhere between \$79,000 and
15 \$137,500 to restore the connection under I-90.

16 Currently, OTP's rate for transportation is \$1.01 per MCF and ONG's customers' total
17 consumption levels are currently less than 700 MCF annually. When you also consider the high
18 expense of the reconnection; the low production of the five wells since the date the Production
19 Companies have gone into bankruptcies; and the current low prices of natural gas, OTP is placed
20 in a situation in which it is unsure that it will be able to recoup the cost to reconnect the pipeline
21 under I-90 in a reasonable time period. It is certain, however, that the service to end use
22 customers has not and does not need to be disrupted.

1 Q. WHEN WILL OTP MAKE A DECISION?

2 A. OTP needs to know two things before it can make a final decision. First, OTP needs to
3 know what happens with the Production Companies in the Bankruptcy Court. If the 5 wells are
4 purchased out of bankruptcy by an entity that wants to cap one or more of the wells, then it
5 makes it nearly impossible for OTP to recover the money it would cost to reconnect the pipeline
6 underneath I-90. However, if the 5 wells are purchased out of bankruptcy by an entity that
7 wishes to produce natural gas then it is far more financially feasible to consider such a hefty
8 expense.

9 Second, OTP wants to be assured that that the Vrooman Road reconstruction is complete.
10 Although the I-90 portion of work is now completed, ODOT's plans also call for the widening of
11 Vrooman Road, the relocation of its northern end by roughly 1000 feet, and the replacement of
12 the Vrooman Road bridge over the Grand River. These portions of the project were delayed due
13 to environmental concerns raised by the of the "Snuffbox Mussel" at the site of ODOT's work.
14 Frankly, OTP does not want to spend \$79,000 or more at the south end of Vrooman Road, only
15 to later learn that it must spend a similarly large amount at the north end.

16 Q. DO YOU THINK IT IS LIKELY AN ENTITY WILL PURCHASE THE 5 WELLS
17 OUT OF BANKRUPTCY AND RESUME PRODUCTION OF NATURAL GAS?

18 A. Absolutely. In fact, it is more than likely that an entity purchasing natural gas wells
19 would want to produce natural gas from those wells. The party who purchases those wells, and
20 wants to use the wells, would want something for its natural gas. In fact, I could see OTP, ONG,
21 or any of the landowners on Vrooman Road being interested in acquiring the 5 wells from the
22 Bankruptcy Trustee.

23 Q. WHAT WOULD HAPPEN IF NO ONE IS WILLING TO PURCHASE THE 5 WELLS?

1 A. I am not an attorney and I have not consulted bankruptcy lawyers. Still, I understand that
2 procedures exist in which the current owner can compel the Trustee to abandon the wells back to
3 the current owners, i.e. to companies controlled by Rick.

4 Q. WHAT WOULD HAPPEN IF ONG OR ONE OF THE LANDOWNERS PURCHASED
5 THE PRODUCTION COMPANIES?

6 A. Well nothing is certain, but I can imagine three scenarios if that were to happen.
7 Scenario One would involve a landowner purchasing a well to acquire a “free” lifetime supply
8 for the property. If this were to happen, ONG would likely engage the landowner to transport
9 excess natural gas that he/she isn’t using, through OTP’s pipeline system, located next to
10 Vrooman Road, for distribution to other ONG customers.

11 Scenario Two involves a landowner (or landowners) or ONG, itself, purchasing the 5
12 wells solely to distribute that natural gas to the end use customers already located on Vrooman
13 Road.

14 Scenario Three involves an as yet unknown party purchasing the 5 wells to send the
15 natural gas that is produced to market.

16 In any of these situations, the end use customers located on Vrooman Road would almost
17 certainly continue to be served by the natural gas produced from the 5 production wells currently
18 owned by the Production Companies.

19 Q. WHAT WOULD HAPPEN IF THE PURCHASER OF THE PRODUCTION
20 COMPANIES DECIDED TO CAP AND ABANDON ALL 5 WELLS?

21 A. This seems like a highly unlikely scenario. First, the Ohio Department of Natural
22 Resources would require all wells be plugged and abandoned in an environmentally sound way.
23 I can’t imagine anyone spending the money necessary to purchase the wells just to spend

1 additional money to properly plug and abandon the wells. However, in the event that this did
2 happen, then virtually all of OTP's financial incentives to reconnect its Vrooman Road pipeline
3 under I-90 to the rest of its system would be eliminated. OTP would then likely come to the
4 PUCO seeking the right to abandon the pipeline.

5 Q. ASSUMING THAT THE PUCO WOULD GRANT OTP'S REQUEST TO ABANDON
6 THIS PIPELINE, WOULDN'T THAT TERMINATE NATURAL GAS SERVICE TO ONG'S
7 CUSTOMERS LOCATED ON VROOMAN ROAD?

8 A. Not at all. First, it is important to remember the roles of each of the companies in this
9 case. Both companies are regulated by the PUCO, but they perform different roles. ONG is a
10 utility and OTP is a pipeline company. Therefore, it is ONG's job to provide natural gas to end
11 users and it is OTP's job to transport natural gas.

12 Second, as already stated, ONG has acknowledged that it could inject compressed natural
13 gas into the pipeline spur north of I-90 in order to meet its customers' demands. While it is true,
14 that this would increase the cost to ONG, it is ONG who is in the best situation to recover those
15 costs. Every year, ONG, as a utility, comes before the PUCO in its GCR case to modify the rate
16 it is allowed to charge its customers for the price of natural gas. This process would allow ONG
17 to recover the increased price of the compressed natural gas.

18 Finally, while ONG wants OTP to incur the cost in this situation, it is important to
19 remember that OTP does not have an annual GCR Case. Instead, OTP has a contract that was
20 agreed to by ONG and approved by the PUCO. This contract fixes the price that OTP can
21 charge ONG for the transportation of natural gas along its system. Because of the relatively little
22 amount of natural gas that the 13 ONG customers use, as documented earlier, and the lack of any
23 opportunities to expand services along this spur, it would take OTP decades – and it might take

1 OTP more than a century– to recover the costs of reconnecting the line to allow ONG to serve
2 those customers.

3 Q. IS IT POSSIBLE THAT ONG COULD ACQUIRE MORE CUSTOMERS IN
4 THAT AREA TO INCREASE THE NATURAL GAS THAT WOULD FLOW THROUGH
5 OTP'S PIPELINE UNDER I-90.

6 A. No. The geography of the area seriously limits the likelihood of development in that area
7 (See Exhibit 3 for a map of the location). As we know, I-90, and its overpass, separates this
8 section of Vrooman Road at the southern end. The east side of this portion of Vrooman Road is
9 Indian Point Park. The west side of this portion of Vrooman Road is already completely
10 developed with roughly 24 parcels of land. The north side of this portion of Vrooman Road is
11 Mason's Landing Park. And the areas behind the north, east, and west sides of this portion of
12 Vrooman Road are completely surrounded by the Grand River. Natural gas services north of the
13 Grand River, in Painesville, Ohio, is currently provided by DEO.

14 When you look at the surrounding area, it is clear that additional expansion opportunities
15 simply do not exist. Even if OTP wanted to expand, however, it would be quite expensive to run
16 a pipeline under the Grand River, which is probably why DEO has not connected its pipelines in
17 Painesville, Ohio to this area.

18 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

19 A. Yes.

				DECEMBER 2013
API Number	Wells	Type of Well	Company	Total Mcf
34085212030000	Josh (1st read 1/12)	Rabbit	GPE	327
34085211970000	Maggie (1st read 1/11)	Rabbit	GPE	381
34085211890000	Sharyndipity #13	Pump Jack	GPE	114
34085212770000	Vrooman #13B (online 2/11/09)	Pump Jack	GPE	55
34085212780000	Dickey #13 (online 6/7/11)	Rabbit	GPE	0

JULY 2014	AUGUST 2014	SEPTEMBER 2014	OCTOBER 2014	NOVEMBER 2014	DECEMBER 2014
Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf
229	324	256	296	308	323
396	416	334	456	453	446
11	14	69	76	87	73
140	135	104	79	77	42
41	72	23	0	9	3

JANUARY 2014	FEBRUARY 2014	MARCH 2014	APRIL 2014	MAY 2014	JUNE 2014
Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf
207	238	314	253	297	264
271	400	414	422	415	430
87	92	100	152	130	122
125	72	76	84	91	67
6	0	2	16	18	65

JANUARY 2015	FEBRUARY 2015	MARCH 2015	APRIL 2015	MAY 2015	JUNE 2015
Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf
296	261	158	0	0	0
369	300	141	0	0	0
86	53	140	652	111	0
90	64	318	7	0	0
5	14	16	3	0	1

JULY 2015	AUGUST 2015	SEPTEMBER 2015	OCTOBER 2015	NOVEMBER 2015	DECEMBER 2015
Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf	Total Mcf
0	0	0	0	0	0
0	0	0	0	0	0
0	15	77	344	310	466
0	0	0	0	0	0
0	1	0	0	0	0

Totals (Dec 2013 - Dec 2015)	Wells
4,351	Josh (1st read 1/12)
6,044	Maggie (1st read 1/11)
3,381	Sharyndipity #13
1,626	Vrooman #13B (online 2/11/09)
295	Dickey #13 (online 6/7/11)

North of Vrooman (Gas System 627)

Mar	76.8
Apr	86.6
May	22.4
Jun	6.3
Jul	5
Aug	3.4
Sep	6.7
Oct	51.6
Nov	92
Dec	89.5
	440.3

Google Maps Vrooman Rd

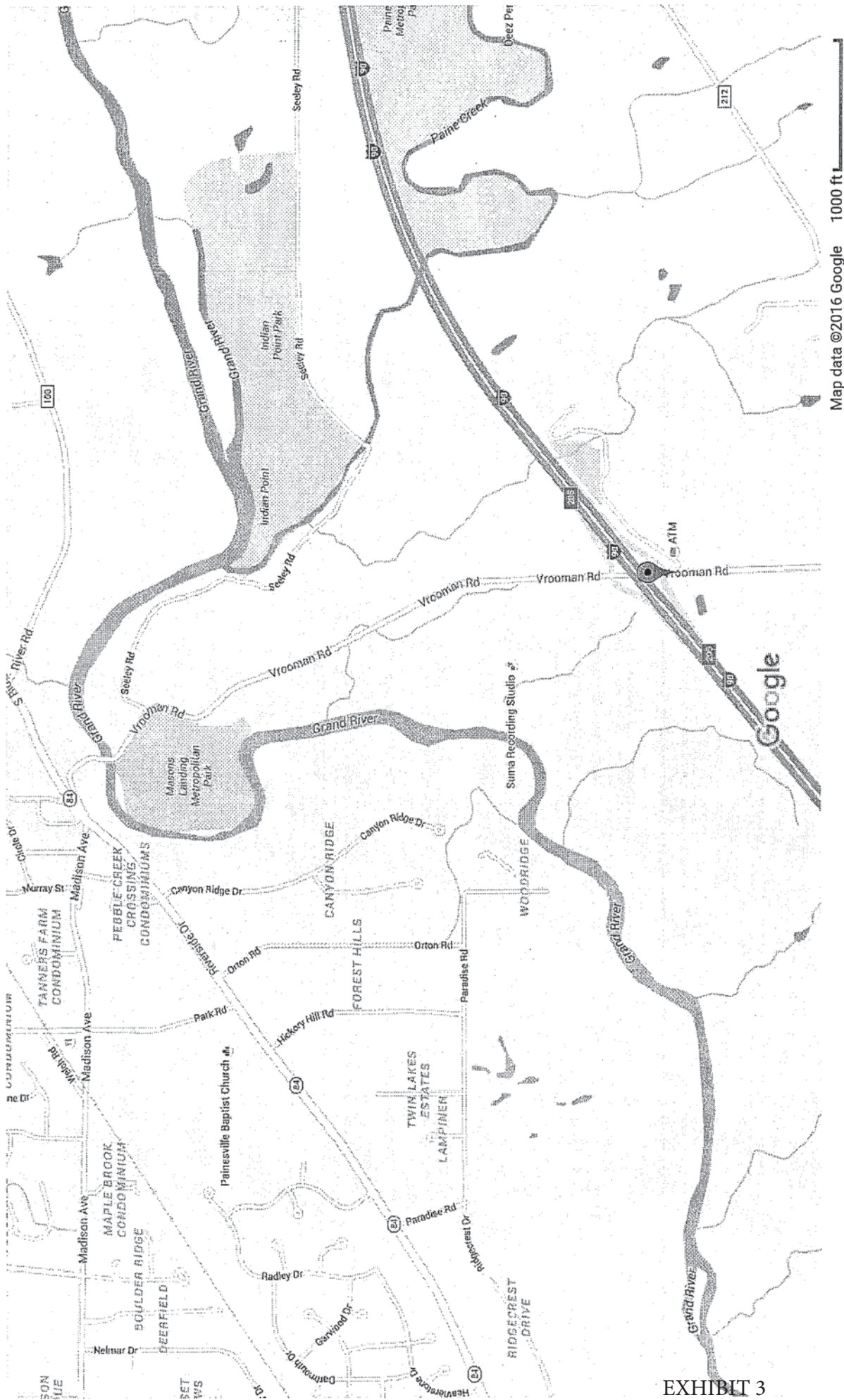


EXHIBIT 3



Ohio Oil & Gas Wells
ODNR - Division of Oil & Gas

▶	Legend & Layers
▶	County Bookmarks
▶	Other Tools
▶	Print
▼	Search

By Attribute	By Shape
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Select A Layer:

Oil & Gas Wells ▼

Well API Number:

Example: 34089259000000

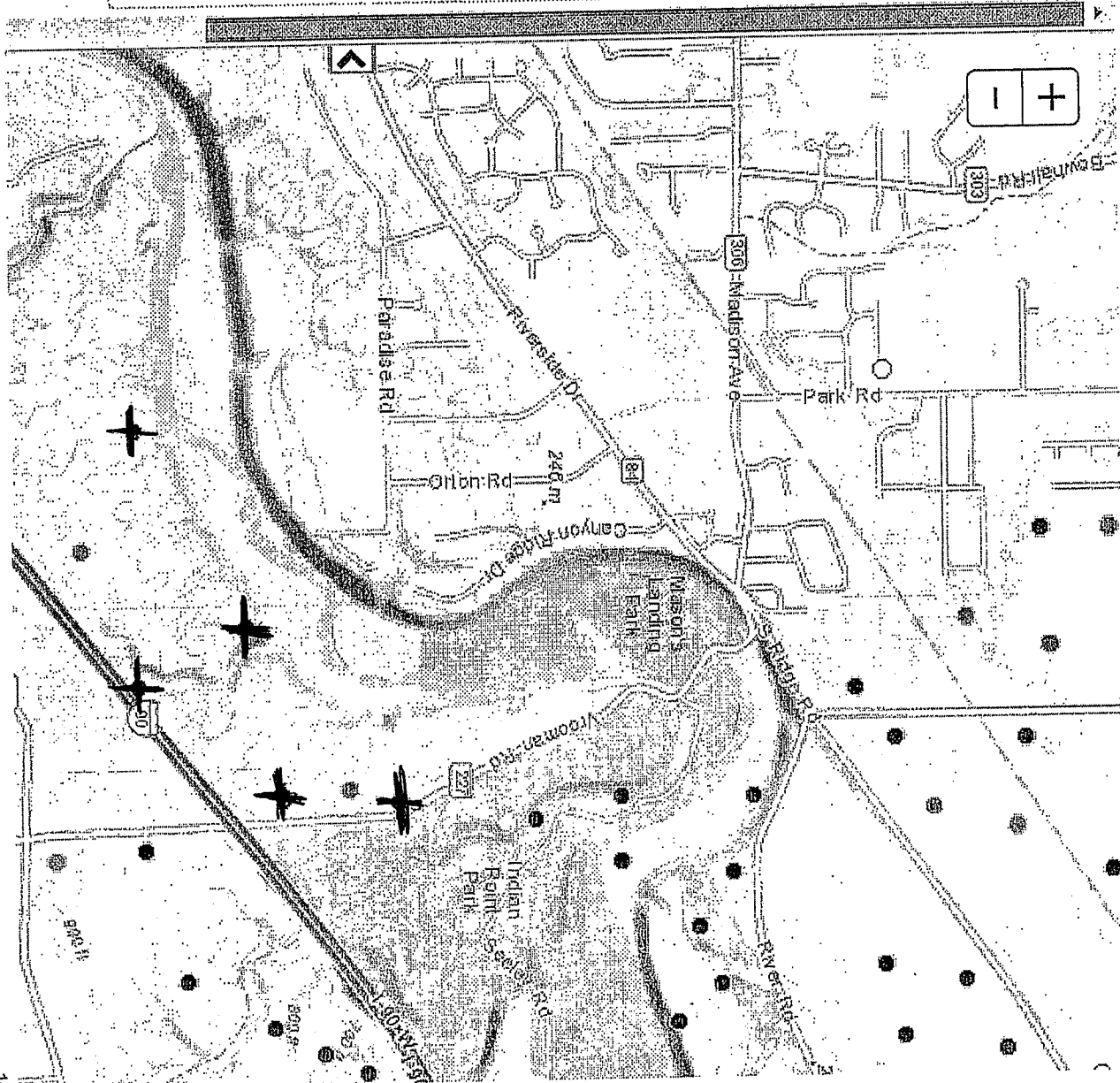
Well Company Name:

Example: HOPEWELL OIL

Well Name:

Example: GRUBAUGH

Q Search



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in

Case No(s). 15-0475-GA-CSS

Summary: Testimony OTP files the Testimony of Jessica Carothers in Case No. 15-0475.
electronically filed by Mr. Justin M Dortch on behalf of Orwell-Trumbull Pipeline Company, LLC