



Pipeline Safety Division Investigation Report

Investigation regarding: Nipsco

UPPAC Database Record ID: 3301

Investigator: John McLaughlin

Report Date: 8/27/2012

Damage Date: 7/2/2012 11:42:40 AM

Damage Address: 8101 Polo Club Dr

City: Merrillville

County: Lake

The Parties

Excavator: **Nipsco**

Contact: Steve Tayler

Address: 1460 East 15th Avenue, Gary, In 46402

Telephone:

Facility Owner: NIPSCO

Contact: Kit Earle

Address: 101 West Ohio Street, Indianapolis, IN 46204

Pipeline Facility

Facility Type: Natural Gas

Facility Function: Distribution

Investigation regarding: Nipsco

UPPAC Database Record ID: 3301

Damage Impact

Product release: Yes

Ignition: No

Service Interruption: False

Number of Customers Affected: 0

Injuries: 0

Fatalities: 0

Repair Cost (if known): \$0

Excavator Activities/Cause of damage information:

Excavator request locates: Yes Indiana 811 ticket Number: 1206250982

Type of Equipment: Boring

Type of work performed: Electric

Synopsis: Gas operator reported a natural gas line was damaged while performing boring for electric work.

Findings: Reported by Indiana 811; excavator did not respond to initial notice mailed July 13, 2012. The excavator had a valid locate request and the operator provided accurate locate markings. The excavator reported it “failed to verify location by test-hole pot-holing”.

Conclusion: Excavator failed to maintain the required clearance with mechanized equipment.

Violation: IC 8-1-26-20(b): Failure to plan excavation to avoid damage or interference with underground facilities; Failure to maintain two (2) feet clearance with mechanized equipment.



101 West Ohio Street, Suite 1707
Indianapolis, IN 46204

August 13, 2012

Via Electronic Transmission – PipelineDamageCase@urc.in.gov

Pipeline Safety Division – Case No. 3301
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500 East
Indianapolis, Indiana 46204

RE: Investigation Request for Information and Notice of Preliminary Determination of Violation; Pipeline Division Case No. 3301

To Whom It May Concern:

Attached please find Northern Indiana Public Service Company's ("NIPSCO") written information, and supporting documentation, relating to the following event:

Date of Event: 7/2/2012

Event Location: 8101 Polo Club Dr, Merrillville

Facility Owner: Northern Indiana Public Service Company

Excavator: Northern Indiana Public Service Company

Other Party: N/A

Pipeline Division Case No. 3301

NIPSCO has reviewed its recovery and damage prevention files for this matter and has provided answers, when known, to the list of questions set forth in the Information Request. To the extent available, NIPSCO is also providing a copy of the Damage Information Report – Pipeline Safety Division previously submitted by NIPSCO to IURC Pipeline Safety as well as additional documentation relating to this Event Location.

Upon completion of the investigation, NIPSCO requests that it be provided with a copy of the Pipeline Division's Investigation Report with findings that will be forwarded to the Underground Plant Protection Advisory Committee. If there are any additional questions, please contact the undersigned.

Very truly yours,

Christopher C. (Kit) Earle
NiSource Corporate Services - Legal
Phone: 317-684-4904
Fax: 317-684-4918
Email: cearle@nisource.com

IURC INFORMATION REQUEST	
Pipeline Safety Division Case No. 3301	
Date of Event	7/2/2012
Event Location	8101 Polo Club Dr, Merrillville
Facility Owner	Northern Indiana Public Service Company
Excavator	Northern Indiana Public Service Company
Date of IURC Information Request	7/13/2012
THE PARTIES	
EXCAVATOR:	
BUSINESS NAME	Nipsco
RESPONSIBLE PARTY PERSONAL NAME	
TITLE (IF ANY)	
ADDRESS	1460 East 15 th Ave
CITY/ STATE/ZIP	Gary, IN 46402
PREFERRED TELEPHONE	219 886 5592
CELL PHONE TELEPHONE	219 384 1279
EMAIL ADDRESS	nsmith@nisource.com
FACILITY INFORMATION - OWNER/OPERATOR OF UTILITY LINE:	
BUSINESS NAME	NORTHERN INDIANA PUBLIC SERVICE COMPANY
RESPONSIBLE PARTY PERSONAL NAME	LUKE SELKING
TITLE	
ADDRESS	1501 HALE AVENUE
CITY/STATE/ZIP	FORT WAYNE, IN 46802
PREFERRED TELEPHONE	260/439-1290
SECONDARY TELEPHONE	
EMAIL ADDRESS	LSELKING@NISOURCE.COM
LOCATOR SERVICE INFORMATION	
BUSINESS NAME	USIC
RESPONSIBLE PARTY PERSONAL NAME	Morgan Thompson
TITLE (IF ANY)	Claims Coordinator
ADDRESS	9045 N. River Rd. Suite 300
CITY/ STATE/ZIP	Indianapolis, IN 46240
PREFERRED TELEPHONE	1-317-538-7301
CELL PHONE TELEPHONE	Same
EMAIL ADDRESS	morganthompson@usicinc.com
OTHER (WITNESS, POLICE, FIRE, OTHER) INFORMATION	
PERSONAL CONTACT	
BUSINESS/ORGANIZATION NAME	
TITLE (IF ANY)	

ADDRESS	
CITY/ STATE/ZIP	
PREFERRED TELEPHONE	
CELL PHONE TELEPHONE	
EMAIL ADDRESS	
UTILITY LINE IMPACT	
LOCATION OF DAMAGE	
ADDRESS	8101 Polo Club Dr
CITY/STATE/ZIP	Merrillville, IN
NEAREST INTERSECTION	W 84 th Ave
PRODUCT TYPE (Select One)	
NATURAL GAS	X
LIQUID PIPELINE	
UNKNOWN/OTHER	
FACILITY TYPE (Select One)	
DISTRIBUTION	X
GATHERING	
SERVICE/DROP	
TRANSMISSION	
UNKNOWN/OTHER	
SIZE (DIAMETER/ETC.)	4"
PRESSURE (PSIG/INCHES)	
INTERRUPTION IN SERVICE (YES/NO)	N
NUMBER OF CUSTOMERS AFFECTED	0
EVACUATION (YES/NO)	N
IF YES, HOW MANY EVACUATED	0
REPAIR COST (IF KNOWN) (\$)	
CAUSE OF DAMAGE INFORMATION:	
TYPE OF EQUIPMENT (Select One)	
Auger	
Backhoe/Trackhoe	
Boring/Drilling	X
Directional Drilling	
Explosives	
Farm Equipment	
Grader/Scraper	
Hand Tools	
Milling Equipment	
Probing Device	

Trancher	
Vacuum Equipment	
Unknown/Other	
TYPE OF WORK PERFORMED (Select One)	
Agriculture	
Cable TV	
Curb/Sidewalk	
Bldg. Construction	
Bldg. Demolition	
Drainage	
Driveway	
Electric	X
Engineering/Surveying	
Fencing	
Grading	
Irrigation	
Landscaping	
Liquid Pipeline	
Milling	
Natural Gas	
Pole	
Public Transit Authority	
Railroad Maintenance	
Road Work	
Sewer (Sanitary/Storm)	
Site Development	
Steam	
Storm Drain/Culvert	
Street Light	
Telecommunications	
Traffic Signal	
Traffic Sign	
Water	
Waterway Improvement	
Unknown/Other	
RELEASE OF PRODUCT (YES/NO)	Y
IGNITION AND/OR FIRE (YES/NO)	N
EXCAVATOR NOTIFY 811 (YES/NO)	Y 1207021842
LOCATE INFORMATION:	
EXCAVATOR REQUEST LOCATE (YES/NO)	Y

INDIANA 811 LOCATE TICKET NUMBER	1206250982
LOCATE MARKS VISIBLE (YES/NO)	Y
LOCATE MARKS CORRECT (YES/NO)	Y
EXCAVATOR "WHITE LINED" (YES/NO)	N
MAPS USED TO MARK FACILITIES (YES/NO)	Y
OPERATOR EMPLOYEES ON-SITE DURING EXCAVATION (YES/NO)	Y
INCIDENT IMPACT INFORMATION	
NUMBER OF OUTPATIENT TREATED	0
NUMBER OF INPATIENT TREATED	0
NUMBER OF FACILITIES	
FIRE DEPARTMENT RESPONSE (YES/NO)	Y
FPOLICE DEPARTMENT RESPONSE (YES/NO)	Y
AMBULANCE RESPONSE (YES/NO)	N
ADDITIONAL INFORMATION/COMMENTS	
<p>Excavator failed to verify location by test-hole pot-holing Nipsco emergency repair ticket #: 1207020688</p>	

STATE OF INDIANA



INDIANA UTILITY REGULATORY COMMISSION
101 W. WASHINGTON STREET, SUITE 1500E
INDIANAPOLIS, INDIANA 46204-3407

<http://www.in.gov/iurc>
Office: (317) 232-2701
Facsimile: (317) 232-6758

July 13, 2012

Steve Tayler
Northern Indiana Public Service Company
1460 East 15th Avenue
Gary, In 46402

Subject: Notice of Preliminary Determination of Violation, Pipeline Safety Division Case No. 3301
Date of Event: 7/2/2012
Event Location: 8101 Polo Club Dr, Merrillville, Lake County
Excavator: Northern Indiana Public Service Company
Facility Owner: Northern Indiana Public Service Company

To Whom It May Concern:

On behalf of the Indiana Utility Regulatory Commission ("IURC"), I am writing to inform you that information has been filed with our Pipeline Safety Division regarding an alleged violation of Indiana Code chapter 8-1-26, the Indiana Damage to Underground Facilities Act ("the Act"). You are receiving this letter because you have been identified as the Respondent Excavator.

The purpose of this Act is to promote excavation and pipeline safety and to reduce imminent danger to life, health, property, or loss of service associated with unsafe digging practices. Based upon the information received, the Pipeline Safety Division is commencing an investigation into the event concerning you or your business. Please note that the investigation does not entail determining criminal liability or a civil determination of fault or damages; however, it does determine whether any statutory violations were committed regarding public safety.

Although the law was enacted in 1991, enforcement measures did not go into effect until July 2009. The IURC was tasked with completing a formal rulemaking on how to determine whether a violation occurred, as well as how the subsequent penalties should be determined. Due to the amount of time required for the rule to take effect and for the Underground Plant Protection Advisory Committee ("Advisory Committee") to be appointed and convened, you are now receiving this notification. Your case will be handled according to the recently approved administrative rule, 170 IAC 5-5, which can be found here: http://www.in.gov/legislative/iac/iac_title?iact=170.

The Pipeline Safety Division has preliminarily identified that one or more of the following statutory violation(s) may have occurred:

- IC 8-1-26-16(g): Failure to provide notice of excavation.
- IC 8-1-26-16(h): Failure to perform required white lining.
- IC 8-1-26-20(b): Failure to maintain two (2) feet clearance with mechanized equipment.

You have an opportunity to file documentation explaining what occurred. *In order for this information to be considered, you must provide a written response to each allegation and written evidence (e.g., maps, photographs, narrative statements, or other evidence) within thirty (30) days of the date of this letter.* The

Investigation will be completed after this time period, even if you do not respond or fail to provide additional evidence for the Pipeline Safety Division to consider. Findings will then be forwarded to the Advisory Committee for a recommendation to the IURC on the appropriate penalty.

If you are a business entity, please provide your full personal name and business title, as well as your legal authority to represent the business in this matter. If you lack such authority or are mistakenly named as the Respondent, you must notify the Pipeline Safety Division as soon as possible, providing the name of the proper representative, if known.

Pursuant to the Act, civil penalties may include:

1. A warning letter for homeowners and tenants who are first time offenders regarding a violation in which no one was personally injured;
2. A civil penalty up to a maximum of ten thousand dollars (\$10,000.00);
3. Required participation of employees in a mandatory education and training program sponsored by the IURC; and/or
4. Required development of a plan to avoid future violations, which must be approved by the IURC.

Depending upon the individual circumstances of each case, any combination of the civil penalties may be reduced to a Consent Agreement between the IURC and the Respondent.

If you believe there are other parties or witnesses with relevant information for the Pipeline Safety Division to consider in its investigation, we request that you *immediately* provide their name, address, telephone number and email address *in writing* to the Pipeline Safety Division. Because the investigation should be completed within sixty (60) days, any delay in providing additional persons to be contacted may result in the investigation being concluded without this additional source of information.

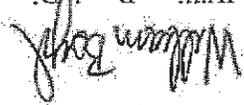
You are encouraged to fill out the required information form electronically by going to <http://www.in.gov/iurc/235.htm> and clicking on Information Request. However, you may call Bobi Culver at (317) 233-6140 to request a hard copy to return by mail. In addition to the information form, you can forward additional information such as maps and drawings by mailing them to the address below or by scanning and emailing them. Please include your assigned Pipeline Safety Division Case Number on all communications and add your Case Number and denote "INITIAL DOCUMENTS - EXCAVATOR" at the top of your materials or in the subject heading of your email.

Mail: Pipeline Safety Division - Case No. 3301
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500 E
Indianapolis, IN 46204

Email: PipelineDamageCase@iurc.in.gov

Included with this letter is a *Summary of Procedures and Respondent's Rights* to assist in answering your questions. Should you have procedural or legal questions regarding the Advisory Committee or the IURC, please contact DeAnna L. Poon, Advisor to the Advisory Committee and Assistant General Counsel at the IURC, at (317) 232-6735. For questions regarding the pipeline damage identified above, or our investigation, please contact me at (317) 232-2718. Thank you for your assistance.

Sincerely,



William Boyd, Director Pipeline Safety Division

Enclosures: Summary of Procedures and Respondent's Rights

Fact Based Investigation Report

01820120702004
Northern IN
7/2/2012 11:33:00 AM
7/2/2012 11:45:09 AM
STEVE TAYLER
8101 POLO CLUB DR
MERRILLVILLE
ST: IN ZIP:

NOTIFICATION ID:
DISTRICT:
DAMAGE DATE:
NOTIFICATION DATE:
NOTIFIED BY:
DAMAGE ADDRESS:
CITY:

NIPSCO

DAMAGED CUSTOMER:

07/02/2012
09:30:00
09:40:00

INVESTIGATION DATE:
FROM:
TO:

NIPSCO
install electric

EXCAVATOR INVOLVED:
TYPE OF EXCAVATION:

1206250982
6/27/2012 10:15:00 AM
Routine

ORIG. LOCATE REQ.:
START DATE/TIME:
TYPE OF TICKET:
LOCATE REQ. INFO N/A:

1207020688
7/2/2012 9:20:00 AM

DIG UP/DAMAGE REQ.:
START DATE/TIME:

jonathan linn
7/2/2012 9:35:00 AM
Digital

PICTURES TAKEN BY:
DATE/TIME:
PHOTOGRAPHY TYPE:
FRAME #:

125982
jonathan linn

INVESTIGATOR EMP#:
INVESTIGATOR NAME:

BASED ON YOUR INVESTIGATION, IS FURTHER INVESTIGATION NEEDED?

No

Fact Based Investigation Customer Information

01820120702004

NIPSCO

(optional)

NOTIFICATION ID:

SELECT A CUSTOMER:

CUSTOMER #:

LOWPROF

main - 4"

Linn Jonathon - 125982

FACILITY DESCRIPTION:

FACILITY ID:

LOCATOR NAME & EMP #:

LOCATOR NOT KNOWN:

CHECK ALL THAT APPLY TO INVESTIGATION:

Facility Marked Accurately

Other:

CHECK ALL THAT APPLY TO METHOD OF INVESTIGATION (at least one must be checked):

Visual, Facility Exposed At Time Of Investigation,
Investigation Results Verified By Utility Representative

INVESTIGATOR STATEMENT/CAUSAL FACTORS:

4" plastic main hit. marks accurate USIC not at fault. post locate, as well as damage photos attached to C2

NAMES OF UTILITY REPRESENTATIVES CONTACTED OR ON SITE AND STATEMENT:

na

NAMES OF EXCAVATOR'S REPRESENTATIVES CONTACTED OR ON SITE AND STATEMENT:

na

LIST ANY OTHER INDIVIDUALS ON SITE:

na

WERE ANY MARKINGS VISIBLE ON THE DAMAGE SITE UPON ARRIVAL?

Yes

WERE ANY OTHER INDICATORS OF FACILITY PRESENT IN THE AREA?

Yes

WAS THE EXCAVATION WITHIN THE TOLERANCE ZONE OF MARKS?

Yes

EXTENT OF FACILITY DAMAGE

unknown

REPLACEMENT FOOTAGE

unknown

WAS CONTRACTOR ASSISTANCE REQUIRED? IF YES, WHO?

No

WHAT CONTRACTOR EQUIPMENT WAS USED?

boring rig

IS THE FACILITY SHOWN ON THE UTILITY RECORDS?

Yes

IF YES, PLEASE LIST RECORD #(S)

fieldbrowser

NIPSCO 00551 IUPPSa 07/02/2012 11:42:49 1207021842-00A EMER DAMG STRT

#3301

DAMAGE SEE REMARKS

Ticket : 1207021842 Date: 07/02/2012 Time: 11:33 Oper: JSMITH Chan:088

State: IN Cnty: LAKE Twp: ROSS
Cityname: MERRILLVILLE Inside: Y Near: N
Subdivision:

Address : 8101
Street : POLO CLUB DR
Cross 1 : W 84TH AVE Within 1/4 mile: Y
Location: LOCATE ENTIRE PROPERTY AND GAS SERVICE FROM RISER TO MAIN
***Boring Where = UNDER POLO CLUB DR
:
Grids : 4127A8721C 4128D8721C 4128C8721C 4127A8721B 4128D8721B
Grids : 4128C8721B
Boundary: n 41.471230 s 41.466015 w -87.359238 e -87.356979

Work type : INSTALL ELEC SERVICE
Done for : NIPSCO
Start date: 07/02/2012 Time: 11:33 Hours notice: 0/0 Priority: EMER
Ug/Oh/Both: U Blasting: N Boring: Y Railroad: N Emergency: Y
Duration : 1 DAY Depth: 6FT

Company : NORTHERN INDIANA PUBLIC SERVICE COMPANY Type: MEMB
Co addr : 1460 EAST 15TH AVENUE
City : GARY State: IN Zip: 46402
Caller : STEVE TAYLER Phone: (219)886-5592
Contact : BRIAN GOWAN CELL Phone:
BestTime:
Mobile : (219)384-1279
Fax : (219)886-5567
Email : NSMITH@NISOURCE.COM

Remarks : All tickets are taken and processed on Eastern Daylight Time
NIPSCO GAS MAIN LINE WAS CUT IN THE REAR EASEMENT OF THE PUMP HOUSE ON THE EAST
SIDE OF THE FIRST POND AT SUMMER WOOD APARTMENTS AT THE NORTHEAST CORNER OF
APARTMENT BUILDING D--GAS LINE IS NOT BLOWING--CALLER HAS ALREADY NOTIFIED
NIPSCO AND 911 OF THE DAMAGED LINE--CREW IS ON SITE--CALLER DESCRIBES THE LINE AS
A YELLOW 4 INCH PLASTIC LINE--PREVIOUS TICKET NUMBER IS 1206250982--THANK YOU!!
Will you be white-lining the dig site area? NO

Submitted date: 07/02/2012 Time: 11:33
Members: COMCN IB ID2227 ID3996 ID6784 NIPSCO SM

NIPSCO 00300 IUPPSa 06/25/2012 10:06:20 1206250982-00A NORM NEW STRT

#3301

NORMAL NOTICE

Ticket : 1206250982 Date: 06/25/2012 Time: 09:52 Oper: NEKETTA.SMITH Chan:000

State: IN Cnty: LAKE Twp: ROSS
Cityname: MERRILLVILLE Inside: Y Near: N
Subdivision:

Address : 8101
Street : POLO CLUB DR
Cross 1 : W 84TH AVE Within 1/4 mile: Y
Location: LOCATE ENTIRE PROPERTY AND GAS SERVICE FROM RISER TO MAIN
***Boring Where = UNDER POLO CLUB DR

:
Grids : 4127A8721C 4128D8721C 4128C8721C 4127A8721B 4128D8721B
Grids : 4128C8721B
Boundary: n 41.471230 s 41.466015 w -87.359238 e -87.356979

Work type : INSTALL ELEC SERVICE
Done for : NIPSCO
Start date: 06/27/2012 Time: 10:15 Hours notice: 48/48 Priority: NORM
Ug/Oh/Both: U Blasting: N Boring: Y Railroad: N Emergency: N
Duration : 1 DAY Depth: 6FT

Company : NORTHERN INDIANA PUBLIC SERVICE COMPANY Type: MEMB
Co addr : 1460 EAST 15TH AVENUE
City : GARY State: IN Zip: 46402
Caller : NEKETTA SMITH Phone: (219)886-5592
Contact : BRIAN GOWAN CELL Phone:
BestTime:
Mobile : (219)384-1279
Fax : (219)886-5567
Email : NSMITH@NISOURCE.COM

Remarks : All tickets are taken and processed on Eastern Daylight Time
Will you be white-lining the dig site area? NO
:

Submitted date: 06/25/2012 Time: 09:52
Members: COMCN IB ID2227 ID3996 ID6784 NIPSCO SM

**NORTHERN INDIANA PUBLIC SERVICE COMPANY
FACILITY DAMAGE REPORT
** COMPLETE FORM FOR ALL DAMAGES TO NIPSCO FACILITIES ****

REPORTING OPERATING AREA _____ MAXIMO WO # _____
 OPERATING AREA CONTACT _____ JOB ORDER # _____
 TRACKING NUMBER _____ LOCATE REF # _____
 Locate Performed By: _____

DATE AND TIME OF ACCIDENT 7-2 2012 8:00 AM DATE OF REPORT 7-2-2012
 PLACE OF DAMAGE (INCLUDE CITY) 8101 Golf Club Dr, Merrillville, IN

DAMAGE WAS TO:

ELECTRIC - POLE / TRANSFORMER: # _____ SIZE _____ YEAR INSTALLED _____ BROKEN YES () NO ()

OTHER (DESCRIBE) _____

GAS: SERVICE () MAIN () SIZE 4" MATERIAL: PLASTIC () STEEL () METER () REG STATION () STUB ()

DEPTH OF FACILITY (inches) 32"

PRESSURE (PSI) 32 Lbs.

RELEASE OF GAS: YES () NO () IGNITION OF GAS: YES () NO () EVACUATION REQUIRED: YES () NO ()

INTERRUPTION OF SERVICE: YES () NO () NUMBER OF CUSTOMERS LOST: _____

DURATION OF INTERRUPTION: TIME REPORTED 8:00 AM TIME RESTORED 11:30 AM

DIAMETER/MEASUREMENT OF HOLE IN GAS FACILITY: 1 1/4"

LOCATE MARKS ON SITE: YES () DISTANCE BETWEEN FACILITY AND LOCATE MARKS _____ NO ()

HOW LOCATED: PAINT () FLAGS () BOTH () WHITE LINED ()

PARTY THAT CAUSED DAMAGES (NAME) Bole Crew

ADDRESS OF PARTY (INCLUDE CITY) NIPSCO

WHO WAS IN CHARGE OF THE WORK SITE AT TIME OF DAMAGE Keith Pickett

WITNESS NAME AND ADDRESS Grant Glassman / NIPSCO

WITNESS REMARKS _____

AGENCIES NOTIFIED / ONSITE: POLICE () AGENCY _____

FIRE () AGENCY _____

OTHER () _____

Any Injuries? () YES # _____ () NO

(ATTACH PHOTOS TO REPORT)

PHOTOS TAKEN: YES () NO () TAKEN BY: _____
 MEDIA ON SITE: YES () NO ()

WORK IN PROGRESS WHEN FACILITY DAMAGED - CHECK APPROPRIATE CHOICE BELOW

- () AGRICULTURE/FARMING
- () BLDG CONSTRUCTION
- () AUGER
- () MILLING EQUIPMENT
- () EXPLOSIVES
- () VACUUM EQUIPMENT
- () CABLE TV
- () DEMOLITION
- () ROAD WORK
- () CURB/SIDEWALK
- () DRAINAGE
- () SURVEYING
- () IRRIGATION
- () MILLING
- () SEWER
- () TELECOMMUNICATIONS
- () WATER
- () DRAINS/CULVERTS
- () MOWING
- () OTHER _____

TYPE OF EQUIPMENT USED - CHECK APPROPRIATE CHOICE BELOW

- () HAND TOOLS
- () PROBING DEVICE
- () TRENCHER
- () GRADER
- () AUGER
- () MILLING EQUIPMENT
- () EXCAVATING BEFORE LOCATES DUE
- () CARELESS MACHINE OPERATOR
- () STUB
- () OTHER _____

REASON DAMAGE OCCURRED - CHECK APPROPRIATE CHOICE BELOW

- () NO NOTIFICATION
- () MARKS DISTURBED
- () EXCAVATING BEFORE LOCATES DUE
- () CARELESS MACHINE OPERATOR
- () STUB
- () OTHER _____

SEE REVERSE SIDE FOR COMMENTS AND DIAGRAM