

**ORIGINAL**

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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*ARW*

IN THE MATTER OF THE COMMISSION'S )  
INVESTIGATION INTO THE COMPLIANCE OF )  
SNOW & OGDEN GAS COMPANY, INC. WITH )  
PIPELINE SAFETY STANDARDS AND )  
MATTERS RELATING TO THE SAFETY OF ITS )  
GAS DISTRIBUTION SYSTEM PURSUANT TO )  
INDIANA CODE CHAPTER 8-1-22.5 )

CAUSE NO. 44517

APPROVED: JUL 30 2014

ORDER OF THE COMMISSION

**Presiding Officers:**  
**Carol A. Stephan, Commission Chair**  
**Loraine L. Seyfried, Chief Administrative Law Judge**

Based upon a letter received from the General Counsel of the Indiana Utility Regulatory Commission ("Commission") and pursuant to Ind. Code ch. 8-1-22.5, the Commission hereby notifies Snow & Ogden Gas Company, Inc. ("Snow & Ogden") of its intent to commence an investigation into its compliance with pipeline safety standards and to determine the appropriateness of issuing a hazardous condition order.

**1. Commission Jurisdiction.** Snow & Ogden is an investor-owned natural gas utility providing utility service to approximately 22 residential customers in Henry County, Indiana. Snow & Ogden is a public utility as defined in Ind. Code § 8-1-2-1 and subject to the Commission's jurisdiction. Snow & Ogden is subject to, among other requirements, the gas pipeline safety standards and requirements set forth in Ind. Code ch. 8-1-22.5 and 170 IAC 5.

Ind. Code § 8-1-22.5-4(3) provides that Pipeline Safety, through the Commission, may:

[w]henever a particular pipeline facility is found to be hazardous to human life or property, require, through the issuance of a hazardous condition order, the person who owns, operates, or leases such pipeline facility to take such action necessary to remove such hazards. Except in cases where immediate or extreme emergency is found to exist, such order shall not be issued until such person is afforded an opportunity to present the person's views and any facts bearing on the situation.

In addition, Ind. Code § 8-1-22.5-7 authorizes the imposition of civil penalties for violations of Chapter 22.5 and the Commission's rules after notice and opportunity for a public hearing. Pursuant to Ind. Code § 8-1-22.5-10, notice is required to be given as provided in Ind. Code § 8-1-1-8 and hearings are required to be conducted in accordance with Ind. Code §§ 8-1-2-54 through 8-1-2-72. Accordingly, the Commission has jurisdiction over Snow & Ogden and the subject matter of this proceeding.

2. **Background and Procedural History.** On July 23, 2014, the Commission's General Counsel requested the Commission commence an investigation into the compliance of Snow & Ogden with pipeline safety standards and to issue an appropriate order addressing violations and safety issues. See attached July 23, 2014 letter from Beth Krogel Roads. The request indicates that the Commission's Office of General Counsel ("OGC") and Pipeline Safety Division have been working with Snow & Ogden frequently since the Commission issued its March 14, 2013 Order authorizing Joe Ramsey to own and operate Snow & Ogden. OGC and the Pipeline Safety Division now believe that Joe Ramsey is either insufficiently motivated or incapable of safely and reliably operating the gas utility.

3. **Investigation.** In accordance with Ind. Code ch. 8-1-22.5 and based upon the information and request of OGC and the Pipeline Safety Division, the Commission hereby initiates this investigation into Snow & Ogden's compliance with pipeline safety standards and any matter relating to the condition, operation, maintenance and safety of Snow & Ogden's gas distribution system. In accordance with Ind. Code § 8-1-1-5, the following Commission staff shall be considered testimonial and represented by Assistant General Counsel DeAnna Poon: Bob Veneck, Bill Boyd, Dan Novak, Grant Gray, and Jay Scherer.

**IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION that:**

1. Based upon information from OGC and the Pipeline Safety Division, an investigation pursuant to Ind. Code ch. 8-1-22.5 is hereby commenced.

2. A Prehearing Conference and Preliminary Hearing is hereby scheduled in this Cause for August 13, 2014 at 10:30 a.m. in Room 224, PNC Center, 101 West Washington Street, Indianapolis, Indiana.

3. In accordance with Ind. Code §§ 8-1-22.5-10 and 8-1-2-59, this Order constitutes notice of the matters under investigation.

4. This Order shall be effective on and after the date of its approval.

**STEPHAN, MAYS, WEBER, AND ZIEGNER CONCUR:**

APPROVED: JUL 30 2014

I hereby certify that the above is a true and correct copy of the Order as approved.



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**Shala M. Coe**  
Acting Secretary to the Commission

# STATE OF INDIANA



INDIANA UTILITY REGULATORY COMMISSION  
101 WEST WASHINGTON STREET, SUITE 1500 EAST  
INDIANAPOLIS, INDIANA 46204-3419

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

July 23, 2014

Lorraine Seyfried, Chief Administrative Law Judge  
Indiana Utility Regulatory Commission  
101 W. Washington Street, Suite 1500 E  
Indianapolis, Indiana 46204-3407

Re: Request for Investigation Regarding Gas Pipeline Safety of Snow & Ogden Gas Company, Inc.

Dear Judge Seyfried:

As General Counsel of the Indiana Utility Regulatory Commission ("Commission"), I respectfully request that the Commission open an investigation into Snow & Ogden Gas Company, Inc. ("Snow Ogden") regarding its level of compliance with state and federal pipeline safety standards. As explained in more detail below, the Office of General Counsel ("OGC") and the Pipeline Safety Division ("Division") have had repeated communications with Snow & Ogden's owner, Mr. Joe Ramsey, explaining safety expectations and setting deadlines for compliance. Mr. Ramsey has failed to meet nearly every compliance deadline. To date, Mr. Ramsey is not operator qualified, cannot or has not located historical records for the system, and has not met other benchmarks required by the Division. In addition, Snow Ogden has insufficient rates to make system updates necessary to meet federal safety requirements and has not initiated a small utility proceeding to modify its rates even after prompting by the Division during a May 14, 2014, meeting at the Commission office. Furthermore, Mr. Ramsey has not complied with the statements he made to the Commission during his acquisition of Snow Ogden in Cause No. 44220 approved March 14, 2013. After more than a year and a half, Mr. Ramsey has still not complied with his own testimony in a Commission hearing.

Failing to meet the compliance actions required by the Division could potentially lead to an unsafe operating condition. The Division and OGC believe that the utility's operator, Joe Ramsey, is either insufficiently motivated or incapable of safely and reliably operating the utility. It is crucial to Snow Ogden's customers that these issues are remedied prior to the beginning of the winter heating season. Thus, the OGC and Division request this investigation be administered in an expedited manner as allowed by law.

Judge Seyfried  
July 23, 2014  
Page 2

On March 14, 2013, in Cause No. 44220, the Commission issued a Final Order (**Attachment A**) acknowledging Joe Ramsey's acquisition of 100% of the stock of Snow Ogden and authorizing him to "own, control, operate, and manage" Snow and Ogden. This authorization was contingent upon Mr. Ramsey "taking steps to obtain further education in pipeline safety and maintenance."

Since that time, the Division continued to communicate and meet with Mr. Ramsey to monitor his education status and ensure the system is operating safely.

On January 8, 2014, the Division sent a Notice of Probable Violation (**Attachment B**) to Mr. Ramsey after several attempts to resolve certain issues informally failed. The letter required Mr. Ramsey to complete multiple actions by certain deadlines, including but not limited to identifying an emergency responder, repairing several system leaks, and completing the Operator Qualification training that was originally required in the March 14, 2013, Order.

On April 15, 2014, Assistant General Counsel DeAnna Poon sent a follow-up letter to Mr. Ramsey (**Attachment C**). She noted that, while Snow and Ogden successfully completed some requested actions, additional items remained to be completed, including but not limited to completing training to become Operator Qualified, drafting an acceptable operating manual, and locating historical records for the utility.

On May 14, 2014, staff from the Division and the OGC met with Mr. Ramsey to more fully discuss the content of the previous letters and set final firm deadlines for compliance. A meeting recap was emailed to Mr. Ramsey restating all of the expected action items and due dates (**Attachment D**). Mr. Ramsey was warned verbally that failure to timely complete any action items may result in the initiation of an investigation.

On June 20, 2014, Division staff sent an internal email explaining the status (**Attachment E**). He noted two leaks to the system. One leak occurred on a service line stub where the line went to a residence that has not had service since the time Mr. Ramsey owned Snow Ogden, meaning that the line should have been, but was not, properly retired at the main. Another leak exhibited pit holes, illustrating the lack of proper cathodic protection on the system, which is a federal and state pipeline safety requirement.

To date, Mr. Ramsey failed to complete the majority of the aforementioned action items. Others were not completed timely. The Division and OGC doubt the integrity of this system, Mr. Ramsey's ability to operate it, and his willingness to comply with the Commission's directives and with state and federal pipeline safety statutes and rules. The Commission has the authority to investigate Snow Ogden's utility practices, and it is my recommendation that the Commission open an investigation pursuant to Ind. Code 8-1-2 and 8-1-22.5.

In summary, the following issues remain unresolved regarding Snow Ogden's operator and physical gas system:

1. Snow Ogden has not provided the Division its operations and maintenance plan, emergency plan, operator qualification plan, public awareness plan, or distribution integrity management plan. The most recent deadline to submit these documents was June 13, 2014.
2. Mr. Ramsey had not completed the required covered tasks to become a qualified operator as outlined in 49 CFR 192.801, subpart N. The most recent completion deadline was June 30, 2014.
3. Mr. Ramsey has not produced Snow Ogden's previous operations and maintenance records. The production deadline was June 13, 2014.
4. Mr. Ramsey has not discussed a "small utility" rate case with the OUCC to increase rates nor initiated any other mechanism to provide financing for necessary system improvements. The necessity of these improvements was raised repeatedly by Division staff from the time Mr. Ramsey purchased the system through the May 14, 2014, meeting.

Please note the following Commission staff shall be considered testimonial effective immediately upon the filing of this letter and shall be represented by Assistant General Counsel DeAnna Poon:

Bob Veneck  
Bill Boyd

Dan Novak  
Grant Gray  
Jay Scherer

Please contact me if you have any questions or if you need any additional information.

Sincerely,



Beth Krogel Roads  
General Counsel  
Indiana Utility Regulatory Commission

ORIGINAL

Attachment A

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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| IN RE: THE MATTER OF SNOW AND )<br>OGDEN GAS CO., INC.'S REPORT OF )<br>UTILITY STOCK ACQUISITION AND )<br>REQUEST FOR ACKNOWLEDGEMENT )<br>OF STOCK ACQUISITION ) | CAUSE NO. 44220<br><br>APPROVED: MAR 14 2013 |
|--|--|

ORDER OF THE COMMISSION

**Presiding Officers:**

**Kari A.E. Bennett, Commissioner**  
**Jeffery A. Earl, Administrative Law Judge**

On July 12, 2012, Snow and Ogden Gas Co., Inc. ("Snow and Ogden" or "Petitioner") filed its Report of Utility Stock Acquisition and Request for Acknowledgement of Stock Acquisition ("Petition") with the Indiana Utility Regulatory Commission ("Commission"). Pursuant to notice, given and published as required by law, proof of which was incorporated into the record, the Commission held a Prehearing Conference and Preliminary Hearing at 1:30 p.m. on August 13, 2012, in Hearing Room 222, 101 West Washington Street, Indianapolis, Indiana. Snow and Ogden and the Indiana Office of Utility Consumer Counselor ("OUCC") appeared and participated at the hearing. On August 22, 2012, the Commission issued a Prehearing Conference Order, which established the procedural schedule in this cause.

On September 24, 2012, Snow and Ogden submitted the Direct Testimony of its witness Joe Ramsey as its case-in-chief. On November 19, 2012, the OUCC submitted the testimony of its witness Bradley E. Lorton. On December 11, 2012, the Commission entered a Docket Entry requesting that Petitioner respond to certain requests for information or be prepared to present responsive testimony regarding such requests during the Evidentiary Hearing in this Cause.

Pursuant to notice, given and published as required by law, proof of which was incorporated into the record, the Commission held an Evidentiary Hearing at 1:30 p.m. on December 17, 2012, in Hearing Room 222, 101 West Washington Street, Indianapolis, Indiana. Snow and Ogden and the OUCC appeared and participated at the Evidentiary Hearing. During the Evidentiary Hearing, Snow and Ogden requested that the Commission take Administrative Notice of certain pages from Petitioner's Class C-D Private Gas Utility Annual Report and Petitioner's 2011 IURC Pipeline Safety Annual Report. The Presiding Administrative Law Judge granted the request. No members of the public appeared or sought to testify at the hearing.

Based upon the evidence presented and applicable law, the Commission finds as follows:

1. **Commission Jurisdiction and Notice.** Proper notice of the hearings in this Cause was given and published as required by law. Snow and Ogden is a "public utility" as that term is defined in Ind. Code § 8-1-2-1, and is subject to the jurisdiction of the Commission. The

Commission has authority under Ind. Code §§ 8-1-2-48 and 8-1-2-58 to investigate matters involving the management of public utilities, including a change in a utility's management. Therefore, the Commission has jurisdiction over Snow and Ogden and the subject matter of this proceeding.

2. **Petitioner's Characteristics.** Snow and Ogden is an investor-owned natural gas utility with its principle office located at 3823 South A, Richmond, Indiana. Snow and Ogden provides natural gas utility service to approximately 22 residential gas customers in Henry County, Indiana. Snow and Ogden obtains its natural gas through a perpetual gas lease to two wells, which are part of the Trenton gas fields located in Henry County, Indiana.

3. **Relief Requested.** Snow and Ogden requests that the Commission acknowledge Joe Ramsey's acquisition of 100% of Snow and Ogden's outstanding stock from Kent and Sandra House.

4. **Petitioner's Case-In-Chief.** Joe Ramsey, President and sole stock owner of Snow and Ogden, testified that on November 1, 2011, he acquired all of Snow and Ogden's outstanding stock from Kent and Sandra House through a Stock Purchase Agreement. Mr. Ramsey manages and operates Snow and Ogden. He is responsible for Petitioner's financial, billing, and regulatory affairs and oversees the operation and maintenance of the system.

Mr. Ramsey said he completed a four-year plumbing and pipefitter apprenticeship program at Local Union 661 in Muncie, Indiana, which he started in 1984. The course covered the state plumbing code, the state gas plumbing code, welding, underground pipe work, overhead pipe work, and industrial pipe work. Mr. Ramsey testified that he has twenty-five years of experience in pipefitter construction, pipelines, and steam operation, including five years as a plumbing contractor. Over the past three years, he has worked as a licensed real estate agent. Mr. Ramsey said that through managing his own plumbing contractor business and working as a real estate agent, he gained management, business operation, and customer service experience that has prepared him to manage and operate Snow and Ogden. Mr. Ramsey testified that his twenty-five years of industrial pipefitting experience provided him with an understanding of the schedule required to maintain gas facilities, including underground piping, controls and regulations, and pressure reducers, and the practical experience and knowledge necessary to properly maintain Snow and Ogden's facilities.

Mr. Ramsey testified that he plans to enroll and complete Utility Safety and Design, Inc. ("USDI") operating courses in order to become licensed to perform installations and maintenance. At the Evidentiary Hearing, Mr. Ramsey clarified that he hired USDI to create a written operator qualification plan, which has been completed. In February 2013, Mr. Ramsey plans to begin the Midwest Energy Association ("MEA") courses, which should require two to three months to complete. After the MEA courses are completed, USDI will perform a field evaluation. Until he completes the USDI courses, Mr. Ramsey said that licensed contractors will be used to perform installations and maintenance, including preventative gas well maintenance.

Mr. Ramsey testified that Kent E. Honse has provided consulting services to Snow and Ogden related to the operation of its business and maintaining compliance with Indiana statutes

and rules. Mr. Ramsey said that funds for improvements and operation will be financed through equity contributions and Snow and Ogden's revenues. Due to the small size of the company and the inability to obtain outside financing at a reasonable rate, Mr. Ramsey said it is the preference of Snow and Ogden to obtain equity rather than debt financing. Mr. Ramsey testified that currently Snow and Ogden does not maintain any debt or financing. Snow and Ogden has annual revenues between \$18,000 and \$24,000. Snow and Ogden's expenses include annual costs for routine maintenance of approximately \$1,500, administrative overhead costs, and costs associated with walking the line and performing minor maintenance at the well head.

At the Evidentiary Hearing, Mr. Ramsey provided evidence regarding his personal financial health and the financial health of Snow and Ogden. Mr. Ramsey said that Snow and Ogden will continue to timely file the company's 2012 Class C – D Private Gas Utility Annual Report and that he will hire an accountant with requisite utility accounting experience to assist him in preparing Snow and Ogden's 2012 financial information.

Mr. Ramsey also testified that Snow and Ogden submitted a 2011 Pipeline Safety Report and that no safety issues were reported. He further testified that he is not aware of any outstanding safety or compliance issues at Snow and Ogden. When questioned about a September 14, 2011 letter from the Commission's Pipeline Safety Division to Snow and Ogden's former owners, Mr. Ramsey said that he could not locate a copy of the letter in Petitioner's books and records. However, Mr. Ramsey testified that Snow and Ogden is in compliance with all state and federal pipeline safety codes and that safety and compliance are of utmost importance to Snow and Ogden.

5. **OUCC's Case-in-Chief.** Bradley E. Lorton, a Utility Analyst in the OUCC's Natural Gas Division, testified in support of the relief sought by Snow and Ogden. Mr. Lorton noted that Mr. Ramsey has 25 years experience as an industrial pipefitter in construction, pipelines, and steam operation. Mr. Lorton testified that the OUCC believes that Mr. Ramsey has sufficient business and technical experience to manage a small company. Mr. Lorton stated that because Mr. Ramsey has no previous experience running a gas utility, the OUCC is encouraged that Mr. Ramsey retained the previous owners on a contract basis to provide consulting and other managing services and intends to complete operating courses with USDI to become licensed and to perform installation maintenance. Mr. Lorton stated the OUCC recommends that the Commission acknowledge Mr. Ramsey's acquisition of Snow and Ogden. However, Mr. Lorton expressed the OUCC's concern with the lateness of Petitioner's filing and believes the matter should have been brought to the Commission's attention prior to the stock acquisition.

6. **Discussion and Findings.** The Commission has statutory authority to review and consider the effects of a change in control or management of a public utility as the result of a stock transaction. The Commission has broad authority under Ind. Code § 8-1-2-58 to investigate the activities of public utilities. Further, the Commission has specific statutory authority to review and investigate the activities of public utility management under Ind. Code § 8-1-2-48. The Commission can require public utilities to report when a majority of their stock is transferred. Upon receiving a report of a transfer of a majority interest in ownership of public utility stock, the Commission may make such inquiry as it deems appropriate. If the results of

that inquiry raise concerns regarding the new management of the public utility, the Commission may initiate an investigation.

Mr. Ramsey submitted evidence demonstrating his managerial, financial, and technical ability to run Snow and Ogden. Mr. Ramsey has extensive pipefitting experience and is taking steps to obtain further education in pipeline safety and maintenance. In the meantime, Mr. Ramsey is making appropriate use of experienced contractors to assist him in managing and maintaining the utility. Therefore, based on the evidence, we find that Mr. Ramsey has the managerial, financial, and technical ability to own and operate Snow and Ogden.

We conclude that Mr. Ramsey's acquisition of all of Snow and Ogden's stock should be acknowledged and the records of the Commission should reflect his ownership of Snow and Ogden. Mr. Ramsey shall be responsible for ensuring the utility submits any requisite reports to the Commission, including the utility's Annual report, which is due by April 30th of each year. Beginning 30 days after the effective date of this Order, Mr. Ramsey may contact the Commission's Natural Gas Division staff for assistance with reporting requirements and to learn more about the Commission's small utility procedures.

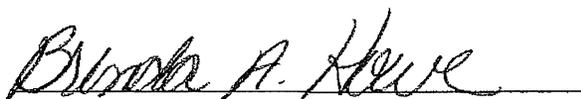
**IT IS, THEREFORE, ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION THAT:**

1. Joe Ramsey's acquisition of 100% of the stock of Snow and Ogden Gas Co., Inc. is acknowledged by the Commission, and the records of the Commission shall reflect his ownership of the Snow and Ogden stock.
2. Joe Ramsey is authorized to own, control, operate, and manage Snow and Ogden consistent with the finding in Paragraph 6 above.
3. This order shall be effective on and after the date of its approval.

**ATTERHOLT, BENNETT, LANDIS, MAYS AND ZIEGNER CONCUR:**

**APPROVED:**      MAR 14 2013

**I hereby certify that the above is a true and correct copy of the order as approved.**

  
Brenda A. Howe  
Secretary to the Commission

## STATE OF INDIANA



INDIANA UTILITY REGULATORY COMMISSION  
101 W. WASHINGTON STREET, SUITE 1500E  
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Facsimile: (317) 232-6758

January 8, 2014

Mr. Joe Ramsey  
Snow & Ogden Gas Company Inc.  
7320 Manning Road  
Economy, Indiana 47339

**Re: Notice of Probable Violation, NOPV-13-004**

Dear Mr. Ramsey,

While your response to my December 18, 2013, letter regarding Notice of Probable Violation, NOPV-13-004, provided most of the information required, there are several items that still need to be addressed. As stated in my December 18<sup>th</sup> letter, you were required to perform the following actions and provide certain written verifications.

You were to submit your signed contract with JB Whitecavage Associates ("Whitecavage") that provides details of their roles and responsibilities including but not limited to:

- Emergency response; who will respond and the response time for emergency calls.
- The results of the leak survey and a repair schedule for the repair of the five (5) below ground and two (2) above ground leaks discovered on December 11, 2013.
- Results from the odor testing of your system.
- Rates and charges for Whitecavage services rendered.
- Schedule for routine leak survey and odor testing of entire system (this should be outlined in the O&M).
- Creating specific plans for Snow & Ogden Gas Company utilizing the generic Utility Safety and Design, Inc. (USDI) plans as the basis.

**Please note the following actions that need to be taken by the deadlines indicated:**

1. On or about December 31, 2013, you provided a signed agreement with Whitecavage indicating that Whitecavage agrees to be Operator of Record for Snow & Ogden Gas Company, Ogden, Indiana, until they conduct Midwest Energy Association Operator Qualification-Certification Training for maintenance personnel. **The Agreement does not identify the individual who will be the emergency responder. Please submit the name of the individual who will be the emergency responder by January 10, 2014.**
2. You were also required to have the five below ground leaks and the two above ground leaks that were discovered on December 11, 2013, repaired as soon as possible. Your signed agreement with Whitecavage indicated that they will repair all underground gas leaks reported on December 11, 2013, before January 27, 2014. **Please let me know when the repairs are scheduled to be performed, as I intend to be present during the repairs. These repairs must be concluded no later than January 27, 2014.**

3. You were to provide written proof of your enrollment in the Midwest Energy Association courses to become Operator Qualified. Your signed agreement with Whitecavage indicates that Whitecavage will conduct Midwest Energy Association Operator Qualification-Certification Training for maintenance personnel. It further states that written tests will be completed and passed by all individuals with 80% or greater grades. **This training must be completed no later than February 7, 2014. The IURC pipeline safety division will then conduct an Operator Qualification field inspection of Snow & Ogden Gas Company as verification.**

4. You were to provide specific plans for Snow & Ogden Gas Company utilizing the generic Utility Safety and Design, Inc. (USDI) plans as the basis. Please provide a copy of the specific plans for Snow & Ogden Gas Company. This plan must utilize the **Generic Utility Safety and Design, Inc. (USDI) plans as the basis. Any plan not following these guidelines will be rejected.** The plan should include at a minimum the following:

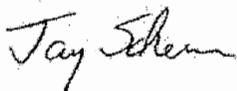
1. Operations & Maintenance Plan
2. Operator Qualifications Plan
3. Distribution Integrity Management Plan ("DIMP")
4. Emergency Plan
5. Public Awareness Plan

**This plan must be submitted to me by close of business February 7, 2014.**

Should you fail to provide **any** of the items in this letter by the dates given, the Division will petition the Commission to issue a hazardous conditions order. Should such an order be issued, Snow & Ogden must cease operations immediately until you take such action as necessary to remove such hazard to human life or property, per Indiana Code section 8-1-22.5-4(3).

Please contact me by telephone at (317) 460-8405 with regular updates as to progress made on these items.

Sincerely,



Jay Scherer  
Indiana Utility Regulatory Commission  
Pipeline Safety Engineer  
317-460-8405  
[jscherer@urc.IN.gov](mailto:jscherer@urc.IN.gov)

cc: Robert Veneck Jr  
Carol Stephan  
William Boyd  
Dan Novak  
Joe Whitecavage

Enclosures: Scherer letter dated December 18, 2013

## STATE OF INDIANA



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April 15, 2014

Snow and Ogden Gas Company, Inc.  
7320 Manning Road  
Economy, Indiana 47339

**Re: Notice of Probable Violation, NOPV-13-004**

Dear Mr. Ramsey,

Bill Boyd, Dan Novak, and Jay Scherer of the Indiana Utility Regulatory Commission's ("IURC") Pipeline Safety Division ("Division") have been meeting with you regarding Notice of Probable Violation No. NOPV-13-004 to resolve probable violations of both state and federal pipeline safety laws by Snow and Ogden Gas Company, Inc. ("Snow & Ogden"). The attached letters from Jay Scherer on December 5, 2013, December 18, 2013, and January 8, 2014, listed certain actions that Snow & Ogden must complete to comply with state and federal laws.

In addition to other items Snow & Ogden successfully completed, the January 8, 2014, letter required you to do the following:

- Repair the five (5) belowground leaks and the two (2) aboveground leaks discovered on December 11, 2013, and provide the repair schedule to Jay Scherer so he can be present during the repairs.
- Complete training in the Midwest Energy Association courses to become Operator Qualified by February 7, 2014.
- Provide specific plans for Snow & Ogden utilizing the generic Utility Safety and Design, Inc. ("USDI") plans as the basis. The letter noted that any plan not following the USDI plan would be rejected.

**Please note that Snow & Ogden must take the following actions by the deadlines indicated:**

1. You were to provide written proof of your enrollment in the Midwest Energy Association courses to become Operator Qualified and complete training no later than February 7, 2014. You were observed by Division members receiving Energy University training from Joe Whitecavage on Abnormal Operating Conditions; Characteristics of Natural Gas; Inside Leak Investigation; Outside Leak Investigation; and Patrolling. No later than **May 2, 2014**, you must provide written proof that you successfully completed this training and received a passing grade of 80% or greater.
2. You were to provide specific plans for Snow & Ogden utilizing the generic USDI plans as the basis. The Division noted that any plan not following these guidelines would be rejected. The plan you submitted did not utilize the generic USDI plans as the basis and is therefore **REJECTED**.

Snow & Ogden  
 April 15, 2014  
 Page 2

- No later than **May 1, 2014**, you must contact USDI and engage them to create a specific plan for Snow & Ogden utilizing the generic USDI plans. The Division must be copied on the letter to USDI.
  - No later than **May 9, 2014**, USDI must provide written confirmation to the Division that it understands and can provide the Division a compliant plan to Snow & Ogden by **June 1, 2014**.
  - No later than **June 13, 2014**, you must submit the plan to the Division along with a written statement that you have read and understand the plan and confirm it is accurate to the best of your knowledge.
3. You completed a required leak survey on December 11, 2013. Due to the history of leaks on the Snow & Ogden system, you are required to complete a leak survey every six (6) months. The next survey should be conducted on **June 11, 2014**, in the presence of Mr. Boyd or Mr. Novak. Snow & Ogden must continue to conduct leak surveys in the presence of Division staff every six (6) months for the foreseeable future. In addition to conducting leak surveys, you must repair any gas leaks classified by code requirement.
  4. To date, Snow & Ogden has not been able to produce records for the utility dating prior to your purchase of the gas system. Not later than **June 13, 2014**, you must provide the Division with the historical records provided to you from the former Snow & Ogden owner, Kent House.

No additional extensions of time shall be granted to complete the above-listed items. Should you fail to successfully complete these items by the deadlines listed, **the Division will petition the IURC to initiate a Hazardous Conditions investigation**. A Hazardous Conditions Order will likely require you to **cease operations** and notify all customers of the hazardous conditions and advise them to seek alternative sources of fuel until Snow & Ogden takes such action as necessary to remove hazards to human life or property, pursuant to Indiana Code section 8-1-22.5-4(3).

Please contact me by telephone at (317) 232-6735 with any legal questions. Technical questions should be directed to Dan Novak or Bill Boyd.

Sincerely,



DeAnna Poon  
 Indiana Utility Regulatory Commission  
 Assistant General Counsel

cc: Robert Veneck, Jr., Executive Director  
 Beth Krogel Roads, General Counsel  
 William Boyd, Program Manager  
 Dan Novak, Chief Pipeline Engineer  
 Jay Scherer, Senior Pipeline Engineer  
 Joe Whitecavage

Enclosures: Scherer letters dated December 5, 2013, December 18, 2013 and January 8, 2014

## STATE OF INDIANA



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

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December 5, 2013

Mr. Joe Ramsey  
Snow and Ogden Gas Company Inc.  
7320 Manning Road  
Economy, Indiana 47339

**Re: Notice of Probable Violation, NOPV-13-004**

Dear Mr. Ramsey,

Pursuant to Indiana Code section 8-1-22.5-4, the Indiana Utility Regulatory Commission's ("Commission") Pipeline Safety Division ("Division") shall administer and require compliance with federal and state pipeline safety standards. These standards include the federal Natural Gas Pipeline Safety Act of 1968 (Public Law 90-481: USC, 1671 et seq.) and the Indiana Pipeline Safety Act of 1971 (Indiana Code chapter 8-22.5). The Division accomplishes this, among other means, by conducting periodic inspections of Indiana's intrastate gas operators.

On November 27, 2013, Division inspectors William Boyd, Dan Novak and I met with you in the Commission office to review all of the related operating procedures for Snow and Ogden Gas Company ("Snow and Ogden"). You presented files which contained the 2012 Annual Federal Report and customer and billing information. You failed to provide other records that the Division requested:

1. Operations & Maintenance Plan
2. Operator Qualifications Plan
3. Distribution Integrity Management Plan ("DIMP")
4. Emergency Plan
5. Public Awareness Plan
6. Operating records for the current year, i.e. leak surveys, patrols, etc.

In addition to your failure to provide the requested records, the Division discovered you are still not operator qualified to perform routine and emergency operations and maintenance functions. According to the Commission's March 14, 2013 Order in Cause No. 44220, you previously testified to the following:

- You planned to enroll and complete Utility Safety and Design, Inc. ("USDI") operating courses in order to become licensed to perform installations and maintenance.
- You clarified that you hired USDI to create a written operator qualification plan, which you testified has been completed.
- In February 2013, you planned to begin the Midwest Energy Association ("MEA") courses, which should have required two to three months to complete. After completion of the MEA courses, USDI would perform a field evaluation prior to you performing installations and maintenance.
- Snow and Ogden submitted a 2011 Pipeline Safety Report and no safety issues were reported. You further testified you were not aware of any outstanding safety or compliance issues and Snow and Ogden is in compliance with all state and federal pipeline safety codes, noting that safety and compliance are of utmost importance to Snow and Ogden.

Based on your testimony in this Cause, the Commission's Order found you demonstrated the "managerial, financial, and technical ability" to own, operate Snow and Ogden. You were now authorized to "own, control, operate, and manage" Snow and Ogden. "Operating" Snow and Ogden includes following federal and state statutory requirements.

In contrast to your testimony, during our November 27, 2013 meeting, you stated that you did not have an Operator Qualification plan from USDI as required by the Order, nor did you secure training to become operator qualified through MBA/USDI as you testified you would.

You also testified that you were not aware of any outstanding safety or compliance issues. However, on September 14, 2011, Dan Novak, one of the Division's Senior Pipeline Safety Engineers, sent a letter to your consultant, Kent House, stating that the Division's August 23, 2011 inspection revealed that Snow and Ogden had outstanding probable violations. Mr. Novak's letter clearly stated that (1) Snow and Ogden did not provide documentation to support leak repairs, (2) it did not provide records for examination of buried pipelines that were exposed, and (3) it failed to complete a DIMP Plan.

Based upon your failure to follow through on your representations made to the Commission in Cause No. 44220 and Snow and Ogden's failure to provide the records and plans as required by Mr. Novak's letter, I now issue this Notice of Probable Violation ("NOPV") to you as the owner/operator of Snow and Ogden. This NOPV is issued pursuant to Indiana Code chapter 8-1-22.5, the Natural Gas Pipeline Safety Act of 1968 and the Hazardous Liquid Pipeline Safety Act of 1979 (49 U.S.C. 60101, *et seq.*).

During our November 27, 2013 meeting, the Division required three (3) actions be completed immediately:

1. Secure a qualified person to be able to respond to emergency calls.
2. Perform a leak survey of all mains and service lines.
3. Conduct odor testing of the system.

These items must to be completed on or before December 13, 2013. If you fail to comply with this letter, the Division shall petition the Commission to investigate whether a hazardous conditions order should be issued. Should such an order be issued, Snow & Ogden must cease operations immediately until you take such action as necessary to remove such hazard to human life or property, per Indiana Code section 8-1-22.5-4(3).

Please provide a written response to this letter no later than December 13, 2013 indicating what steps are being taken to correct these possible non-compliance issues or areas of concern. Also, please contact me by telephone at (317) 460-8405 with regular updates.

Sincerely,



Jay Scherer  
 Indiana Utility Regulatory Commission  
 Pipeline Safety Engineer  
 317-460-8405  
[jscherer@urc.IN.gov](mailto:jscherer@urc.IN.gov)

cc: Robert Veneck Jr  
 DeAnna Poon  
 William Boyd  
 Dan Novak

Enclosures: Novak letter dated September 14, 2011  
 Cause No. 44220 Final Order

## 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

December 18, 2013

Mr. Joe Ramsey  
Snow and Ogden Gas Company Inc.  
7320 Manning Road  
Economy, Indiana 47339

**Re: Notice of Probable Violation, NOPV-13-004**

Dear Mr. Ramsey,

I am writing to inform you that your response to my December 5, 2013 letter regarding Notice of Probable Violation, NOPV-13-004, is not sufficient. As stated in my December 5<sup>th</sup> letter, you were required to perform the following three (3) actions on or before December 13, 2014:

1. Secure a qualified person to be able to respond to emergency calls.
2. Perform a leak survey of all mains and service lines.
3. Conduct odor testing of the system.
4. Provide a written response indicating what steps are being taken to correct these possible non-compliance issues or areas of concern.

You called me on December 13, 2013 and stated that JB Whitecavage and Associates will respond to any emergency calls. You also indicated that the leak survey and odor testing of the system were completed.

You subsequently called me on December 16, 2013 and told me that you had turned over the operation of Snow Ogden Gas Company to JB Whitecavage and Associates until such time that you have proper plans and are qualified to operate Snow Ogden Gas Company. You stated that Mr. Joe Whitecavage was writing a contract agreement with the terms and conditions. You also indicated that you had secured the required Operations and Maintenance Plans from Utility Safety and Design, Inc. (USDI). As referenced in the December 5<sup>th</sup> letter you were required to secure all of the below stated Operations and Maintenance Plans. To date we have not been seen the plans listed below:

1. Operations & Maintenance Plan
2. Operator Qualifications Plan
3. Distribution Integrity Management Plan ("DIMP")
4. Emergency Plan
5. Public Awareness Plan

Joe Whitecavage called me the evening of December 16, 2013, and stated that he had agreed to be the operator for Snow Ogden Gas Company until such time that you have the proper qualifications and plans in place to operate the Company.

While these telephone updates have been helpful, I must receive a written response as requested in my December 5, 2013 letter. The following written verifications must be received by my office by the dates indicated:

1. Please submit your signed contract with JB Whitecavage that provides details of their roles and responsibilities including but not limited to:

- Emergency response; who will respond and the response time for emergency calls;
- The results of the leak survey and a repair schedule for the repair of the five (5) below ground and two (2) above ground leaks discovered on December 11, 2013;
- Results from the odor testing of your system;
- Rates and charges for Whitecavage services rendered;
- Schedule for routine leak survey and odor testing of entire system; (this should be outlined in his O&M);
- Create specific plans for Snow Ogden Gas Company utilizing the generic Utility Safety and Design, Inc. (USDI) plans as the basis.

The signed written contract as detailed above with JB Whitecavage and Associates must be delivered to me by December 27, 2013.

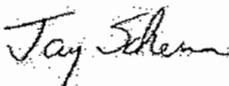
2. Please also provide written proof of your enrollment in the Midwest Energy Association courses to become Operator Qualified. This must be delivered to me by January 3, 2014.

3. You must also have the five below ground leaks and the two above ground leaks that were discovered on December 11, 2013 repaired as soon as possible. Written verification of these repairs must be received by my office no later than January 17, 2014.

Should you fail to provide **any** of the items in this letter, the Division will petition the Commission to issue a hazardous conditions order. Should such an order be issued, Snow & Ogden must cease operations immediately until you take such action as necessary to remove such hazard to human life or property, per Indiana Code section 8-1-22.5-4(3).

Please contact me by telephone at (317) 460-8405 with regular updates as to progress made on these items.

Sincerely,



Jay Scherer  
Indiana Utility Regulatory Commission  
Pipeline Safety Engineer  
317-460-8405  
[jscherer@urc.IN.gov](mailto:jscherer@urc.IN.gov)

cc: Robert Veneck Jr  
Carol Stephan  
William Boyd  
Dan Novak  
Joe Whitecavage

Enclosures: Scherer letter dated December 5, 2013

## 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

January 8, 2014

Mr. Joe Ramsey  
Snow & Ogden Gas Company Inc.  
7320 Manning Road  
Economy, Indiana 47339

**Re: Notice of Probable Violation, NOPV-13-004**

Dear Mr. Ramsey,

While your response to my December 18, 2013, letter regarding Notice of Probable Violation, NOPV-13-004, provided most of the information required, there are several items that still need to be addressed. As stated in my December 18<sup>th</sup> letter, you were required to perform the following actions and provide certain written verifications.

You were to submit your signed contract with JB Whitecavage Associates ("Whitecavage") that provides details of their roles and responsibilities including but not limited to:

- Emergency response; who will respond and the response time for emergency calls.
- The results of the leak survey and a repair schedule for the repair of the five (5) below ground and two (2) above ground leaks discovered on December 11, 2013.
- Results from the odor testing of your system.
- Rates and charges for Whitecavage services rendered.
- Schedule for routine leak survey and odor testing of entire system (this should be outlined in the O&M).
- Creating specific plans for Snow & Ogden Gas Company utilizing the generic Utility Safety and Design, Inc. (USDI) plans as the basis.

**Please note the following actions that need to be taken by the deadlines indicated:**

1. On or about December 31, 2013, you provided a signed agreement with Whitecavage indicating that Whitecavage agrees to be Operator of Record for Snow & Ogden Gas Company, Ogden, Indiana, until they conduct Midwest Energy Association Operator Qualification-Certification Training for maintenance personnel. **The Agreement does not identify the individual who will be the emergency responder. Please submit the name of the individual who will be the emergency responder by January 10, 2014.**
2. You were also required to have the five below ground leaks and the two above ground leaks that were discovered on December 11, 2013, repaired as soon as possible. Your signed agreement with Whitecavage indicated that they will repair all underground gas leaks reported on December 11, 2013, before January 27, 2014. **Please let me know when the repairs are scheduled to be performed, as I intend to be present during the repairs. These repairs must be concluded no later than January 27, 2014.**

Mr. Joe Ramsey  
Page 2  
January 7, 2014

3. You were to provide written proof of your enrollment in the Midwest Energy Association courses to become Operator Qualified. Your signed agreement with Whitecavage indicates that Whitecavage will conduct Midwest Energy Association Operator Qualification-Certification Training for maintenance personnel. It further states that written tests will be completed and passed by all individuals with 80% or greater grades. **This training must be completed no later than February 7, 2014. The IURC pipeline safety division will then conduct an Operator Qualification field inspection of Snow & Ogden Gas Company as verification.**

4. You were to provide specific plans for Snow & Ogden Gas Company utilizing the generic Utility Safety and Design, Inc. (USDI) plans as the basis. Please provide a copy of the specific plans for Snow & Ogden Gas Company. This plan must utilize the **Generic Utility Safety and Design, Inc. (USDI) plans as the basis. Any plan not following these guidelines will be rejected.** The plan should include at a minimum the following:

1. Operations & Maintenance Plan
2. Operator Qualifications Plan
3. Distribution Integrity Management Plan ("DIMP")
4. Emergency Plan
5. Public Awareness Plan

**This plan must be submitted to me by close of business February 7, 2014.**

Should you fail to provide **any** of the items in this letter by the dates given, the Division will petition the Commission to issue a hazardous conditions order. Should such an order be issued, Snow & Ogden must cease operations immediately until you take such action as necessary to remove such hazard to human life or property, per Indiana Code section 8-1-22.5-4(3).

Please contact me by telephone at (317) 460-8405 with regular updates as to progress made on these items.

Sincerely,



Jay Scherer  
Indiana Utility Regulatory Commission  
Pipeline Safety Engineer  
317-460-8405  
[jscherer@urc.IN.gov](mailto:jscherer@urc.IN.gov)

cc: Robert Veneck Jr  
Carol Stephan  
William Boyd  
Dan Novak  
Joe Whitecavage

Enclosures: Scherer letter dated December 18, 2013

## Snow Ogden Status Update Meeting Recap

### Attendees

Joe Mr. Ramsey, Snow and Ogden Gas Company  
 Bob Veneck, Executive Director  
 Beth Roads, General Counsel  
 DeAnna Poon, Assistant General Counsel  
 Dan Novak, Chief Pipeline Engineer

Meeting actions are noted in **bold** and due dates are in **red**.

### 1. Immediate Concerns

#### a. Current Status of Gas System.

A. Mr. Ramsey testified that licensed contractors will perform installations and maintenance, including preventative gas well maintenance, until he is Operator Qualified. Who is doing this?

- **C&C Trenching has been used for underground work and trenching.**
- **J.B. Whitecavage has installed anodes.**

What has been done for preventative gas well maintenance to date?

- **Steve Fromer and Walt McMichaels have been used for bailing.**
  - **The front well has been bailed once per year, the last time was July 2013.**
  - **The back well has not been bailed since Mr. Ramsey purchased the utility in November 2011 and is usable when the front well is being bailed; it operates at 15 psig.**
  - **Both wells will be bailed **summer 2014**.**

B. Until Mr. Ramsey is Operator Qualified, what contractor(s) will be used and for what purposes?

- **Mr. Ramsey will continue to use J.B. Whitecavage for day to day operations and emergencies until Mr. Ramsey is Operator Qualified.**

#### b. Plans.

A. Has Mr. Ramsey completed plans to the satisfaction of the PSD in the areas below (due June 13, 2014):

- Operations and Maintenance.
- Emergencies. **Mr. Ramsey understands that the emergency plan must include his plan for timely emergency response when he is unavailable. Mr. Ramsey intends to have his son and possibly another person Operator Qualified for this purpose.**
- Operator Qualification.
- Public Awareness.
- DIMP (distribution integrity management plan).
- **Mr. Ramsey acknowledges that he must review the plans, understand them, and correct any inaccuracies prior to sending them to the PSD. Mr. Ramsey**

also understands that he must provide a written statement that he has read and understands the plans and confirms they are accurate to the best of his knowledge.

- B. If the plans are insufficient, when will Mr. Ramsey produce satisfactory plans?
- No new plans were submitted. They will be submitted by **June 13, 2014**.
- c. Operator Qualification.
- A. Mr. Ramsey testified he would enroll/complete USDI operating courses. Complete? No.
- B. Mr. Ramsey testified he would begin MEA courses February 2013 and complete them in two to three months. Complete? No.
- C. Is Mr. Ramsey now Operator Qualified? No.
- D. Schedule PSD Element 9 review of Mr. Ramsey's Operator Qualifications.
- Mr. Ramsey and Kyle Ramsey (his son) have successfully completed the written portion of the classroom Operator Qualification training with a score of 80% or higher on the following MEA modules:
    - Module 192, Abnormal Operating Conditions
    - Module 192.0101, Characteristics & Hazards of Natural Gas
    - Module 192.0901, System Patrolling
    - Module 192.1202, Outside Leak Investigations
    - Module 192.120, Inside Leak Investigations
  - Mr. Ramsey has signed up for 5 licenses to have access to MEA's 72 modules. Mr. Ramsey will work with Mr. Novak to determine which of the 72 modules Mr. Ramsey needs to take. Mr. Ramsey will present a list of these modules to the PSD by **Friday, May 16, 2014**.
  - Mr. Ramsey will complete the MEA modules on the list by **June 1, 2014** unless Mr. Novak determines additional time is necessary.
  - USDI will proctor Mr. Ramsey's Operator Qualification field test and Mr. Ramsey will pass the test by **June 30, 2014**.
  - After the successful field test, Mr. Novak will conduct the PSD Element 9 review; Mr. Ramsey will pass this review by **July 31, 2014**.
- d. Snow Ogden must produce operating records from the previous owner (due **June 13, 2014**).
- Mr. Ramsey understands that these operating records must be found and remain easily accessible until such time as the gas system is replaced.

2. Long Term Plan

- a. The entire gas system needs to be replaced. When will this occur? **Mr. Ramsey notes that while most of the system needs replacing, there is some useable pipe. Mr. Novak stated that existing plastic pipe may only remain in service if pressure testing was already done (with results in writing) or if it is pressure tested now.**
- b. Will Mr. Ramsey operate the system (other than leak surveys) once he is Operator Qualified or will he contract out certain duties? **Mr. Ramsey will operate the system; as noted above, he may use his son or another contractor to respond to emergencies.**
- c. Water needs to be pumped out of the gas wells periodically. How often does this occur? When is it scheduled to occur again? **See above; this occurs yearly and will occur again this summer.**
- d. Mr. Ramsey must confirm that leak surveys will be completed every six months. Gas leaks classified by code requirements must be repaired according to federal timetables and standards, under supervision of the PSD. **Mr. Ramsey understands this. He also understands that once the system is replaced, he likely will not need to do leak surveys as frequently; they may be as far as 5 years apart.**

3. Financing

- a. Does Snow Ogden have annual revenues of \$18,000 - \$24,000? Is this sufficient to operate the utility?
- b. If the annual revenues are insufficient, what is the plan to finance necessary improvements and continued operations, including petitioning IURC regarding rates?
  - **Mr. Ramsey understands that he may file a “small utility” case to increase rates sufficient to finance necessary system improvements to ensure safe and reliable service.**
  - **Mr. Veneck provided Mr. Ramsey an information packet to file a small u case and contact information for the OUCC’s Leja Courter, who can provide assistance and guidance on filing the case.**
  - **Mr. Ramsey was told that he does not need (but may use if he wishes) an attorney or accountant/consultant in order to file the small u case.**
  - **Mr. Ramsey was told the case should outline future plans for improvements, including the cost of new plastic piping and replacing the wellhead and meters. Mr. Ramsey was told that a work packet must be provided in the case and he should reach out to USDI or another engineering firm to provide this information.**
  - **Mr. Ramsey estimates it will cost approximately \$40,000 to replace the system.**

4. Any Additional Information

- **Mr. Ramsey intends to redo the main wellhead and lay new plastic pipe to National Road this summer if financing allow.**
- **Mr. Ramsey intends to add a dryer or heater (timing unknown). Mr. Ramsey understands that the dryer must be added prior to replacing any pipe.**
- **Mr. Ramsey was notified that if he is not operator qualified or the PSD feels the system is not operating safely by September 2014, drastic action will be taken to remedy the situation. This could include closing the utility indefinitely until the problems are addressed and notifying customers that they will have to find another heat source.**



**Poon, DeAnna**

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**From:** Novak, Dan  
**Sent:** Friday, June 20, 2014 1:32 PM  
**To:** Veneck Jr., Robert; Poon, DeAnna; Boyd, William  
**Cc:** Allen, Steve  
**Subject:** Snow Ogden  
**Attachments:** IMG\_0023.jpg; IMG\_0027.jpg

Good afternoon,

Mike Twyman from JB Whitecavage & Associates was in Ogden to conduct a leak survey of the below ground piping recently, as required by the Commission. During the inspection two below ground leaks were discovered. On Thursday, yesterday, I met with Joe Ramsey and Mr. Twyman as repairs were made to the system.

One leak was discovered on a 1" service line at the curb (shut off) valve. The valve and section of piping was removed and they installed approximately 14" of black steel pipe.

The second leak was on an old 1" service line stub at the end of the system. The residence that once was served by this line has not been in operation since Mr. Ramsey has owned Snow Ogden. Unsure how long the stub has been inactive. It was retired at the 3" main.

Both below ground leaks have been repaired.

Pictures attached for viewing. Image 23 shows the pit holes and corrosion pits. (zoom in for better viewing) Image 27 is the dresser fitting used to sleeve in the new section of service pipe.

Dan



