



October 20, 2016

Mr. James Urisko, Director
Southern Region, OPS
233 Peachtree Street NE, Suite 600
Atlanta, GA 30303
(404) 832-1147

Re: CPF No. 2-2016-0001
CPF No. 2-2016-0002

Dear Mr. Urisko,

This letter is provided as LEDIC Realty Company, LLC's response to a letter dated September 30, 2016 from Alan Mayberry, Acting Associate Administrator for Pipeline Safety. LEDIC has addressed specific items outlined in Mr. Mayberry's letter as described below;

1. **Violation of 192.355 – Service regulator vents and regulators.** (item 1) LEDIC has contracted with Bill Fenwick Plumbing Inc, operator qualified (see attached certificate) to replace the applicable regulators and vents/and/or reposition the vents. We are proposing to complete this work no later than December 31, 2016. See attached proposal and a deposit that we have made for the company to begin the work.
2. **Violation 192.463** (item 3) – Respondent must bring its cathodic protection systems into compliance. – **Please see attached proposal from Southern Cathodic** dated 10/6/16 – again we propose to have this work completed at both sites no later than December 31, 2016.
3. **Violation 192.605** – (item 6) **Respondent must prepare and follow a manual of written procedures for conducting O & M activities and emergency response.** Please see attached invoice from Southeastern Gas Engineering where the manuals were produced in February 2016 for both sites. **COMPLETE**
4. **Violation 192.614 – Regarding Sunshine 811** – (item 7) Respondent must bring its systems into compliance by registering and activating its pipeline systems with Sunshine 811 – I have contacted Sunshine 811 and am waiting for membership package to be sent to me.–this should be completed by November 15, 2016 assuming Sunshine 811 will send me the necessary materials to register.
5. **Violation 192.616** – (item 8) **Develop a written procedure for delivering public awareness messages 2 times annually** – See letters attached – they were delivered to all residents on June 1st although dated May 27, 2016.
6. **Violation 192.707** – (item 9) Must place line markers at all locations that do not have one. **Southern Cathodic will be placing a line marker at Hollycrest where the pipeline crosses. This should be done no later than December 31, 2016.**

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7. **Violation 192.805** (Item 11) Respondent must prepare and follow a written qualification program for ensuring that its staff and contractors who perform covered tasks are qualified. Please see invoice from Southeastern Gas Engineering for OQ training for staff conducted June 14-15th 2016. **COMPLETED**

8. **Violation 192.101** – (item 13) Must provide a written IM Plan – Please see invoice from Southeastern Gas Engineering for the IM Plan – **COMPLETED**

It is my understanding Mr. Mayberry's letter that we are to complete items 1-8 (stated above) and are to prepare records to document such with results within 90 days after receipt of the final order. The final order is dated September 30, 2016. We propose the above incomplete items to be completed no later than December 31, 2016 barring no inclement weather. Please note that Jacksonville just experienced a hurricane and this has delayed progress. Should we need to extend beyond that point, it is my understanding that the Director may grant an extension should good cause be demonstrated.

Sincerely,

Willie Anne Conn
Regional Property Manager

Cc: **Associate Administrator**
Office of Pipeline Safety, PHMSA
1200 New Jersey Avenue
SE BLDG 2nd Floor
Washington DC 20590

Cc: **Office of Chief Counsel**
Office of Pipeline Safety, PHMSA
1200 New Jersey Avenue
SE BLDG 2nd Floor
Washington DC 20590



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Washington Heights Apartments
4229 Moncrief Road West
Jacksonville, FL 32209
904-764-0561

May 27, 2016

Dear Residents of Washington Heights Apartments

This is a reminder that the Washington Heights Apartments is served by reliable natural gas. Washington Heights Apartments is diligent in its efforts to maintain a safe pipeline system. However, because natural gas is potentially hazardous, it is important to be able to recognize and react to potential gas emergencies. If you smell natural gas (rotten egg smell) or hear a hissing sound coming from piping while on premises, please leave the area immediately and call the Washington Heights Apartments office at 904-764-0561 or call 911 from a safe location. If you are inside a building, while exiting, do not turn on or off light switches, do not use the telephone or do anything that may create a spark. Also, there should be no digging on premises without notifying management first as damage to the natural gas pipeline may occur.