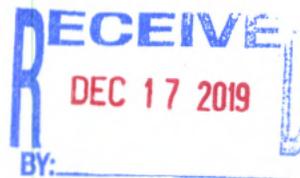


December 16, 2019



Mr. Allan C. Beshore

Director, Central Region, OPS

Pipeline and Hazardous Materials Safety Administration

901 Locust Street, Suite 462

Kansas City, Missouri 64106-2641

RE: CPF 3-2019-6008

Dear Mr. Beshore,

The purpose of this letter is to inform you that Paradigm will not contest the alleged violations and agrees to pay the proposed civil penalty in the amount of \$59,000.

It is our understanding that upon issuing a final order, Paradigm will receive an invoice for the amount listed above. We agree to pay the invoice in a timely manner. It is our understanding that upon receipt of payment, PHMSA will close this case.

Please let me know if you have questions and/or require additional information.

Respectfully,

A handwritten signature in blue ink, appearing to be "Don Luedtke".

Don Luedtke, CSP

HSSE & Regulatory Compliance Director

545 E. John Carpenter Freeway Suite 800 Irving, TX 75062

P.214.389.8194 C.903.904.9633