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September 30, 2025

DOCKET# 37080
DOCUMENT# 224167

Ms. Michelle Thebert

Director, Office of Pipeline Safety/Facilities Protection

Georgia Public Service Commission

244 Washington St. SW

Atlanta, Georgia 30334

Re: Re: Inspection(s) AT17-046 City of Shellman

Docket Number 37080

Dear Ms. Thebert,

This letter is in response to the City of Shellman inspection report AT17-046, Dated November 21, 2017.

The City of Shellman and its consultant, Harp and Associates have reviewed the PAP inspection report received from Pipeline Safety Office and Inspector Alan Towe and would like to make the following response to the existing Probable violations:

The City of Shellman failed to write a response letter to the Inspection report AT17-046 back in 2018. Our consultants at the time of this inspection failed to inform us of replying to the inspection in a timely manner. As per our informal meeting we are writing a general response letter to the Inspection report and recognize the issues and importance of this inspection report.

CONTINUING VIOLATIONS:

192.195- PROTECTION AGAINST ACCIDENTAL OVERPRESSURING

THIS ISSUE WAS CLEARED IN INSPECTION AT17-045 BUT FROM NO RESPONSE IT IS STILL LISTED.

192.465(D)- EACH OPERATOR SHALL TAKE REMEDIAL ACTION TO CORRECT ANY DEFICIENCIES INDICATED BY THE INSPECTIONS AND TESTSING.

THIS ISSUE WAS CLEARED IN INSPECTION DL20-035

NEW VIOLATIONS:

192.13©- EACH OPERATOR SHALL MAINTAIN, MODIFY AS APPROPRIATE, AND FOLLOW PLANS, PROCEDURES, AND PROGRAMS THAT IS REQUIRED

WE HAVE UPDATED OUR OQ PLAN AND TRAINING

192.616©- THE OPERATOR MUST FOLLOW THE GENERAL PROGRAM RECOMMENDATIONS, INCLUDING BASELINE AND SUPPLEMENTAL REQUIREMENTS OF API RP1162

HAVE MADE NUMEROUS CHANGES TO OUR PAP PROGRAM AND OUR MAILINGS

Should you need further information please let us know.

Respectfully,

Mayor
City of Shellman

CC: Peter Schultz – Harp and Associates
Eddie Harp – Harp and Associates