

U.S. Department of Labor
Occupational Safety and Health Administration
Suite 203
800 Dolorosa St.
San Antonio, TX 78207
Phone: (210)472-5040 FAX: (210)472-5045



Citation and Notification of Penalty

To:
Ringo Drilling I, L.P.
and its successors
104 Spinks Road
Tye, TX 79563

Inspection Number: 315625079
Inspection Date(s): 06/02/2011-06/03/2011
Issuance Date: 11/17/2011

Inspection Site:
Texas RT 163 & Rt 190 Rig #17
Ozona, TX 79563

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

Please read the following paragraphs which outline your rights and responsibilities.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty you enter into an Informal Settlement Agreement or you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, call our office between 8:00 a.m. and 4:30 p.m. for an appointment, please **complete, remove and post the page 4 Notice to Employees** next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest - You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.

Penalty Payment - Penalties are due within 15 working days of receipt of this notification unless contested. (See the attached Invoice/Debt Collection Notice for details of the Debt Collection Act of 1982.) Make your check or money order payable to "DOL-OSHA". Please indicate the Inspection Number on the remittance.

OSHA does not agree to any restrictions or conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions, conditions, or endorsements do not exist.

Notification of Corrective Action - For each violation which you do not contest, you are required by 29 CFR 1903.19 to submit an Abatement Certification to the Area Director of the OSHA office issuing the citation and identified above. The certification must be sent by you within 10 calendar days of the abatement date indicated on the citation. For **Willful** and **Repeat** violations, documents (examples: photos, copies of receipts, training records, etc.) demonstrating that abatement is complete must accompany the certification. Where the citation is classified as **Serious** and the citations states that abatement documentation is required, documents such as those described above are required to be submitted along with the abatement certificate. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. Attached are two fill-in-the blank form letters for your use to assist you in meeting this requirement.

All abatement verification documents must contain the following information: 1) Your name and address; 2) the inspection number (found on the front page); 3) the citation and citation item number(s) to which the submission relates; 4) a statement that the information is accurate; 5) the signature of the employer or employer's authorized representative; 6) the date the hazard was corrected; 7) a brief statement of how the hazard was corrected; and 8) a statement that affected employees and their representatives have been informed of the abatement.

The law also requires a copy of all abatement verification documents, required by 29 CFR 1903.19 to be sent to OSHA, also be posted at the location where the violation appeared and the corrective action took place.

Employer Discrimination Unlawful - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been

discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Notice to Employees - The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Abatement Methods - The employer is not limited to abatement methods suggested by OSHA; i.e., methods explained are general and may not be effective in all cases. Other methods of abatement may be equally or more appropriate. Ultimate responsibility for determining the most appropriate abatement method rests with the employer, given its superior knowledge of the specific conditions at its worksite.

Inspection Activity Data - You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to your inspection will be available 30 calendar days after the Citation Issuance Date. You are encouraged to review the information concerning your establishment at www.OSHA.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 11/17/2011. The conference will be held at the OSHA office located at , , , , - on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

ABATEMENT CERTIFICATION

REFERENCE: Ringo Drilling I, L.P. 315625079
 104 Spinks Road
 Tye, TX 79563

PLEASE FILL IN ABATEMENT/CORRECTION METHOD INCLUDING DATE COMPLETED FOR EACH ITEM CITED AND RETURN TO THE AREA DIRECTOR. Supporting documentation shall be included; e.g., drawings/photographs, purchase/work orders, air sampling results, or any other related information to show corrections. Abatement verification must be posted and certified as being true and correct. Responses are due **within 10 calendar days** from each abatement date and must be postmarked within the 10 calendar day period.

When the item indicated **QUICK FIX or CORRECTED DURING INSPECTION**, the compliance officer witnessed the abatement/correction during the inspection, and no response is required.

Citation 1, Item 1: Serious

DESCRIBE CORRECTIVE ACTION TAKEN & PROVIDE DATE CORRECTED:

Citation 1, Item 2: Serious

DESCRIBE CORRECTIVE ACTION TAKEN & PROVIDE DATE CORRECTED:

Citation 1, Item 3: Serious

DESCRIBE CORRECTIVE ACTION TAKEN & PROVIDE DATE CORRECTED:

Citation 1, Item 4: Serious

DESCRIBE CORRECTIVE ACTION TAKEN & PROVIDE DATE CORRECTED:

Citation 2, Item 1: Repeat

DESCRIBE CORRECTIVE ACTION TAKEN & PROVIDE DATE CORRECTED:

Citation 2, Item 2: Repeat

DESCRIBE CORRECTIVE ACTION TAKEN & PROVIDE DATE CORRECTED:

Citation 2, Item 3: Repeat

DESCRIBE CORRECTIVE ACTION TAKEN & PROVIDE DATE CORRECTED:

Ringo Drilling I, L.P. 315625079
104 Spinks Road
Tye, TX 79563

I attest that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement activities described in this certification.

Certification of Abatement Response by: _____

Title: _____

Date: _____



Citation and Notification of Penalty

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563

Citation 1 Item 1 Type of Violation: **Serious**

Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer does not furnish employment and a place of employment which are free from recognized hazards that are causing or likely to cause death or serious physical harm to employees in that employees are exposed to falls from using damaged reinforced plastic step ladders to access upper and lower work areas when they are not in the open and locked position:

- a) Wellhead cellar area of drilling rig #17: The employer allows employee(s) to use a step ladder in the closed position on drilling rig #17. On June 2, 2011 and at times prior thereto, employee(s) were exposed to fall hazards from using a 4 foot reinforced plastic step ladder to access the cellar area of the well head (fall distance of approximately 4 feet 6 inches to the ground below). The ladder was in the closed position and leaning against the wall. Employee(s) use this ladder to get into and out of the cellar while performing nipple up and nipple down operations.
- b) Platform area above wellhead of drilling rig #17: The employer allows employee(s) to use a step ladder in the closed position on drilling rig #17. On June 2, 2011 and at times prior thereto, employee(s) were exposed to fall hazards from using a 10 foot reinforced plastic step ladder to access the platform area above the well head (fall distance of approximately 7 feet to the ground below or approximately 11 feet 6 inches to the bottom of the cellar). The ladder was in the closed position and leaning against the platform. Employee(s) use this ladder to access platform to adjust the turnbuckles on the guide that keeps the drill pipe plumb during drilling operations.
- c) Platform area above wellhead of drilling rig #17: The employer allows employee(s) to use a 10 foot step ladder that is damaged. On June 2, 2011 and at times prior thereto, employee(s) were exposed to fall hazards from using a 10 foot reinforced plastic step ladder to access the platform area above the well head (fall distance of approximately 7 feet to the ground below or approximately 11 feet 6 inches to the bottom of the cellar). The step ladder has damage to the upper side rail and is bent. Employee(s) use this ladder to access platform to adjust the turnbuckles on the guide that keeps the drill pipe plumb during drilling operations.

Among other methods, a feasible and acceptable abatement is to use the ladders in accordance with provisions stipulated in ANSI A14.5-2000 for Portable Reinforced Plastic Ladders, para.9.3.1.2 and 9.4.2 as applicable. Essential elements include but are not limited to the following: Step ladders shall not be used in the closed position. Single or straight ladders should be used. Damaged ladders need to be removed from service and destroyed or clearly marked not to use until repaired by a competent mechanic.

See pages 1 through 7 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563

Pursuant to 29 CFR 1903.19, within ten (10) calendar days, the employer must submit an abatement plan describing the actions it is taking to ensure employee(s) are not exposed to the hazards of falling from step ladders being used as single step ladders and allowing damaged ladders to continue to be utilized.

Date By Which Violation Must be Abated: 12/13/2011
Proposed Penalty: \$ 4400.00

Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.22(c): Covers and/or guardrails are not provided to protect personnel from the hazards of open pits, tanks, vats, ditches, etc:

- a) Wellhead cellar, Rig #17: The employer does not provide a guardrail system or equivalent means of fall protection around the cellar of drill rig #17. On June 2, 2011 and at times prior thereto employee(s) were exposed to a fall of more than 4 feet when they perform drilling tasks including "nippling up" and "nippling down" around the well head cellar.

Pursuant to 29 CFR 1903.19, within ten (10) calendar days, the employer must submit an abatement plan describing the actions it is taking to ensure employee(s) are not exposed to the hazards of falls into the well head cellar.

Date By Which Violation Must be Abated: 12/13/2011
Proposed Penalty: \$ 4400.00



Citation and Notification of Penalty

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563

Citation 1 Item 3 Type of Violation: **Serious**

29 CFR 1910.305(b)(2): Each outlet box in completed installations did not have a cover, faceplate, or fixture canopy:

- a) Mud house, Rig #17: The employer allows a junction box to not have a cover on it in the mud house of drilling rig #17. On June 2, 2011 and at times prior thereto, employee(s) are exposed to shock hazards from a 120 volt junction box that does not have a cover. Employee(s) are working in the mud house mixing chemicals for drilling operations.

Pursuant to 29 CFR 1903.19, within ten (10) calendar days, the employer must submit an abatement plan describing the actions it is taking to ensure employee(s) are not exposed to the hazards of shocks and burns from uncovered electrical junction boxes.

Date By Which Violation Must be Abated: 12/07/2011
Proposed Penalty: \$ 4400.00



Citation and Notification of Penalty

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563

Citation 1 Item 4 Type of Violation: **Serious**

29 CFR 1910.333(a): Safety related work practices are not employed to prevent electrical shock or other injuries resulting from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits which are or could be energized:

- a) Drilling rig #17: The employer does not provide safety related work practices to prevent electrical shock or other injuries on drilling rig #17. On June 2, 2011 and at times prior thereto, employee(s) are exposed to electrocution and other injuries while working on electrical components. Employee(s) do not use an electrical lock out system and are allowed to work on energized electrical equipment.

Pursuant to 29 CFR 1903.19, within ten (10) calendar days, the employer must submit an abatement plan describing the actions it is taking to ensure employee(s) are not exposed to the hazards of electrocution from working on energized electrical components.

Date By Which Violation Must be Abated: 12/13/2011
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563

Citation 2 Item 1 Type of Violation: **Repeat**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms four feet or more above adjacent floor or ground level are not guarded with standard railings (or equivalent) and toeboards:

- a) Second floor of mud house, Rig #17: The employer does not provide a guardrail system or equivalent means of fall protection on the second floor of the mud house of drilling rig #17. On June 2, 2011 and at times prior thereto, employee(s) were exposed to a fall of approximately 9 feet through the open doors located on the second floor of the mud house while mixing chemicals for drilling operations. There is only a chain for a top rail and there is not a mid rail or toe boards.
- b) Platform above wellhead, Rig #17: The employer does not provide a guardrail system or equivalent means of fall protection on the platform above the wellhead on rig #17. On June 2, 2011 and at times prior thereto, employee(s) are exposed to a fall of approximately 7 feet from the platform while adjusting the turnbuckles and guides that keep the drill pipe plumb while drilling operations are being performed.

RINGO DRILLING I, L.P. WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1910.23(c)(1) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 314301854, CITATION NUMBER 01, ITEM NUMBER 002, ISSUED ON NOVEMBER 3, 2010. THIS ITEM BECAME FINAL ORDER ON NOVEMBER 23, 2010, WITH RESPECT TO A WORKPLACE LOCATED AT RINGO DRILLING RIG #18 NORTH OF OZONA, TX.

Pursuant to 29 CFR 1903.19, within ten (10) calendar days, the employer must submit an abatement plan describing the actions it is taking to ensure employee(s) are not exposed to the hazards of falls from the mud house and platforms above the well cellar.

Date By Which Violation Must be Abated: 12/13/2011
Proposed Penalty: \$ 27500.00



Citation and Notification of Penalty

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563

Citation 2 Item 2 Type of Violation: Repeat

29 CFR 1910.305(g)(2)(iii): Flexible cords were not connected to devices and fittings so that tension would not be transmitted to joints or terminal screws:

- a) Ground floor of mud house, Rig #17: The employer does not provide strain relief on a flexible cord located next to the centrifugal pumps at the mud house of drilling rig #17. On June 2, 2011 and at times prior thereto, employee(s) are exposed to electrocution hazards from a 240 volt flexible cord that is under the mud house while working on the centrifugal pumps and electrical panel box below it.

RINGO DRILLING I, L.P. WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1910.305(g)(2)(iii) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 314301854, CITATION NUMBER 02, ITEM NUMBER 002, ISSUED ON NOVEMBER 3, 2010. THIS ITEM BECAME FINAL ORDER ON NOVEMBER 23, 2010, WITH RESPECT TO A WORKPLACE LOCATED AT RINGO DRILLING RIG #18 OZONA, TX

RINGO DRILLING I, L.P. WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1910.305(g)(2)(iii) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 313123390, CITATION NUMBER 01, ITEM NUMBER 001, ISSUED ON MAY 21, 2010. THIS ITEM BECAME FINAL ORDER ON JUNE 14, 2010, WITH RESPECT TO A WORKPLACE LOCATED AT RINGO DRILLING RIG #8 POST, TX.

RINGO DRILLING I, L.P. WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1910.305(g)(2)(iii) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 311314769, CITATION NUMBER 01, ITEM NUMBER 001, ISSUED ON AUGUST 11, 2008. THIS ITEM BECAME FINAL ORDER ON SEPTEMBER 2, 2008, WITH RESPECT TO A WORKPLACE LOCATED AT RINGO DRILLING RIG #8 SAN ANGELO, TX.

Pursuant to 29 CFR 1903.19, within ten (10) calendar days, the employer must submit an abatement plan describing the actions it is taking to ensure employee(s) are not exposed to the hazards of electrocution from flexible cords with failed strain reliefs.

Date By Which Violation Must be Abated: 12/13/2011
Proposed Penalty: \$ 55000.00

See pages 1 through 7 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563

Citation 2 Item 3 Type of Violation: Repeat

29 CFR 1910.334(a)(2)(i): Portable cord and plug connected equipment and flexible cord sets (extension cords) were not visually inspected before use and before any shift for external defects (such as loose parts, deformed and missing pins, or damage to outer jacket or insulation) and for evidence of possible internal damage (such as pinched or crushed outer jacket). Cord and plug connected equipment and flexible cord sets (extension cords) which remain connected once they are put in place and are not exposed to damage need not be visually inspected until they are relocated:

- a) Ground floor of mud house, Rig #17: The employer does not visually inspect flexible cord sets located next to the mud house of drilling rig #17. On June 2, 2011 and at times prior thereto, there is a 240 volt flexible cord set that is plugged into an outlet above an electrical panel next to the centrifugal pumps under the mud house. The flexible cord set has a cut that has penetrated the outer jacket insulation. The flexible cord set was installed on May 30, 2011. Employee(s) are exposed to electrocution hazards while working around the mud house.

RINGO DRILLING I, L.P. WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1910.334(a)(2)(i) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 314301854, CITATION NUMBER 01, ITEM NUMBER 006B, ISSUED ON NOVEMBER 3, 2010. THIS ITEM BECAME FINAL ORDER ON NOVEMBER 23, 2010, WITH RESPECT TO A WORKPLACE LOCATED AT RINGO DRILLING RIG #18 OZONA, TX.

Pursuant to 29 CFR 1903.19, within ten (10) calendar days, the employer must submit an abatement plan describing the actions it is taking to ensure employee(s) are not exposed to the hazards of electrocutions from damaged flexible cord sets.

Date By Which Violation Must be Abated: 12/13/2011
Proposed Penalty: \$ 27500.00



Jeff R. Funke, CSP
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
Suite 203
800 Dolorosa St.
San Antonio, TX 78207
Phone: (210)472-5040 FAX: (210)472-5045



INVOICE/ DEBT COLLECTION NOTICE

Company Name: Ringo Drilling I, L.P.
Inspection Site: Texas RT 163 & Rt 190 Rig #17, Ozona, TX 79563
Issuance Date: 11/17/2011

Summary of Penalties for Inspection Number 315625079

Citation 1, Serious	= \$	20200.00
Citation 2, Repeat	= \$	110000.00
TOTAL PROPOSED PENALTIES	= \$	130200.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above or the amounts agreed to in an Informal Settlement Agreement. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance.

OSHA does not agree to any restrictions or conditions put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.


Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest. Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is 1%. Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review

Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges. A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent. Information on any delinquent claims may be disclosed to commercial credit reporting agencies, private debt collectors, and/or referred to the Internal Revenue Service for collection.

Administrative Costs. Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for second and subsequent demand letters sent in an attempt to collect the unpaid debt. Costs will not be assessed for first demand letters and payment default letters.



Jeff R. Funke, *CSR*
Area Director

11/17/11