



3335 N. Lewsi Ave., Sioux Falls, SD, 57104

Reference: Paradigm Construction – 811 Complaint [File: OC24-016]

Greetings,

This letter, is in response to the complaint filed alleging Paradigm Construction failed to call in locates to the 811 system prior to digging on the Creekside Heights Apartment complex currently under construction at 3276 Jim St., Rapid City, South Dakota, 57701. Additionally, this letter is in acknowledgment of the findings of the board in file OC24-016 and to state the intent to comply with the findings, but also for Paradigm Construction to ensure compliance moving forward.

Shortly after this alleged incident, Superintendent Dustin Ladd – the subject of the complaint – resigned from his position as the Superintendent of the Creekside Heights jobsite, therefore is no longer employed by Paradigm Construction. As of May 2024, Paradigm Construction hired Superintendent – Brad Woodward to supervise and manage the Creekside jobsite. As the COO of Paradigm, I assure all concerned Sup Woodward understands instilling safety, training and in this case ensuring the 811 – the South Dakota One Call Laws are followed in its entirety. Project Manager – Zach Beitzel has taken a position in our Sioux Falls Office.

On September 30, 2024, an in-house 30-minute safety meeting was held at the Paradigm Construction Office located at 11835 Quaal Rd., Blackhawk, SD, 57718. As directed, the meeting consisted of line staff, Superintendents, a Project Manager [PM] and myself the COO. As the COO, I led the training and discussion of the SDCL requirements and utilized the 811 Website as the focus of our training and a training roster of those attended was completed.

Moving forward, PC intends to fulfill the remaining requirements of the board findings as follows: 1) no further violations in the next 12 months – goal would be to no further violations, ever; 2) myself and PM – Nathan Meirose will attend the Damage Prevention Meeting in 2025; 3) conduct continued safety meeting underscoring the importance of the 811 program; 4) foster a positive jobsite relationship and hold regular face-to-face meeting with the Respondent – Magellan Pipeline Representative.

As the Chief Operations Officer, I will commit to continued 811 training, as well as instilling the importance of the 811 Call Before You Dig” program across the spectrum of all Paradigm Construction jobsites in their entirety.

Enclosed with this letter is the training roster by name of those attending the training and a check for \$750.00 for the imposed fine.

Respectfully,

Jeff Norris
Chief Operations Officer
Paradigm Construction
11835 Quaal Road
Rapid City, SD, 57718

Date: 9/30/24

Subject: 811 Call Before You Dig Training / 30 min

1. Nathan Meisner



2. Ashton Anderson

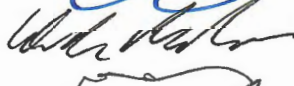
ASD
~~ASD~~

3. Kody Miles



4. Sean Sullivan

5. Blake Robinson

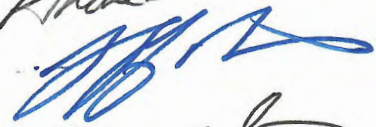


6. Tom Anderson

7. Andrew Wick



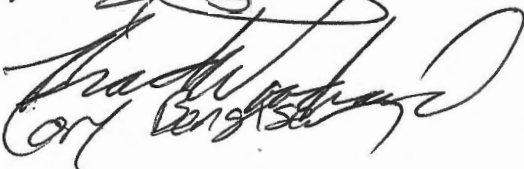
8. Teff Norris



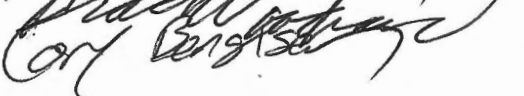
9. BRIAN SWENTBY



10. Brad Woodard



11. Cory Bengtson



12.