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April 25, 2019

Submitted via Certified Mail

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: Grama Ridge Storage and Transportation, LLC
Notice of Amendment, CPF 1-2019-0002M

Dear Mr. Burrough,

On February 12, 2019 Grama Ridge Storage and Transportation, LLC (Grama Ridge) received the reference Notice of Amendment (NOA), CPF 1-2019-0002M, issued by the Pipeline and Hazardous Materials Safety Administration. The NOA is a result of the September 11-13, 2018 inspection of Grama Ridge's procedures for Functional Integrity of Underground Natural Gas Storage for the storage facility Enstor operates in Eunice, New Mexico. Enstor has been in ongoing dialogue with Mr. Sam Aguirre, General Engineer with PHMSA's Western Region, for further clarification on the two cited procedures. Mr. Aguirre attended the September inspection and has been a great assistance in clarifying the intent of the NOA according to PHMSA's expectations.

Enstor, Grama Ridge has elected not to contest the allegations set forth in the NOA. Therefore, in accordance with the instructions set forth in the NOA, Enstor is revising its procedures as follows:

1. Grama Ridge Operations Procedure 9. - Annular Pressure Monitoring Procedure: Grama Ridge has revised this procedure to more effectively evaluate each annular gas occurrence and define the threshold levels determined from well integrity evaluation and from risk assessments as required by API RP 1171.
2. Grama Ridge Operations Procedure 7. - Wellhead Valve Maintenance Procedure: Grama Ridge has revised this procedure to more effectively indicate the process of maintaining, repairing, or replacing isolation valves as required by API RP 1171.

If you require further information or clarification, please contact Todd Cash, Director, Compliance at 281-374-3085 or todd.cash@enstorinc.com

Kindest regards,

A handwritten signature in black ink, appearing to read "Todd Cash", with a long horizontal flourish extending to the right.

Todd Cash
Director, Compliance
Enstor Gas, LLC