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June 15, 2022

Via Electronic Mail

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

Re: CPF 1-2022-052-NOA

Dear Mr. Burrough,

Southern California Gas Company (SoCalGas) writes this letter in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Notice of Amendment (NOA) (CPF 1-2022-052-NOA) dated May 10, 2022 (Notice) which was received by SoCalGas on May 17, 2022. On May 31, 2022, PHMSA confirmed the deadline to respond to the Notice was June 16, 2022. The Notice addresses the Underground Natural Gas Storage (UNGS) inspections conducted from October 11, 2021, through October 15, 2021, by the California Geologic Energy Management Division (CalGEM), acting as an Agent for the PHMSA, at SoCalGas's four storage fields (Aliso Canyon, Honor Rancho, Playa del Rey, and La Goleta).

The Notice directed SoCalGas to amend its procedures (Gas Standard 224.0000) to include the actions that must be taken if manual wellhead valves require repair or replacement in accordance with American Petroleum Institute (API) Recommended Practice (RP) 1171, Section 9.3.2. SoCalGas elects not to contest the Notice. SoCalGas hereby notifies the Regional Director of the amendments made to its procedures to address the Notice. Enclosed are SoCalGas's amendments to Gas Standard 224.0000 (Section 6.7) to include the actions that must be taken if manual wellhead valves require repair or replacement.

In addition, SoCalGas requests confidential treatment of certain pages of the attached Gas Standard (pages 25 to 28). These pages contain confidential information, including manufacturer manuals and procedures which are considered trade secrets under 18 U.S. Code Chapter 90. As instructed in the Notice, SoCalGas is marking "confidential" on each page of the original document it would like to keep confidential; SoCalGas is also including, along with the original document, a second copy of the original document with the confidential commercial information deleted.

SoCalGas is committed to continuing our efforts of enhancing its existing underground natural gas storage safety and integrity program. SoCalGas believes this response addresses the items listed in the Notice.

Please contact me at (949) 697-2539 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

Attachments

224.0000 – confidential sections removed

224.0000 – original