



Lodi Gas Storage, L.L.C.
A Rockpoint Gas Storage Company
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December 18, 2021

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
robert.burrough@dot.gov

VIA ELECTRONIC MAIL

RE: Notice of Amendment CPF 1-2021-067-NOA

Dear Mr. Burrough:

Lodi Gas Storage, L.L.C. (LGS) submits this written response to the Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding the subject Notice of Amendment. Acting as an agent of PHMSA, the California Geologic Energy Management Division (CalGEM) conducted an inspection of LGS procedures from September 15-18, 2020. On the basis of the inspection, PHMSA identified apparent inadequacies found within LGS's procedures and issued a Notice of Amendment which was received by LGS on November 19, 2021.

LGS responds to the subject Notice of Amendment in accordance with option (c) located within the "Response Options for Pipeline Operators in Enforcement Proceedings" guidance document:

- c. If you are contesting the Notice of Amendment but are not requesting an oral hearing, submit written explanations, information, or other materials in answer to the allegations in the Notice and stating your reasons for objecting to the Notice of Amendment items in whole or in part;*

Specifically, LGS addresses the Notice of Amendment findings as noted by PHMSA in the following enclosed documents:

- **Attachment #1** – LGS responses to Notice of Amendment findings
- **Attachment #2** – Well workover procedure for Lambie S-1A

If you have any questions, or require more information, please contact me at **greg.clark@rockpointgs.com** or at (209) 368-9277 x21.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gregory N. Clark".

Gregory N. Clark
Compliance Manager

Enclosures

cc: File #S3.03
A. Anderson, M. Fournier, H. Gold, D. Smolinski (via e-mail)