



**Troy A. Bauer**  
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January 27, 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 1-2021-073-NOA**

Dear Mr. Burrough,

SoCalGas writes this letter in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Notice of Amendment (NOA) (CPF 1-2021-073-NOA) dated December 16, 2021 (Notice) which was received by SoCalGas via Electronic Mail on December 28, 2021. On January 3, 2022, PHMSA confirmed the 30-day deadline to respond to the Notice is January 27, 2022. The Notice addresses the Underground Natural Gas Storage (UNGS) inspections conducted from October 20, 2020 through October 23, 2020, 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 (SIMP.2) to more clearly specify what information will be collected and used to assess threat and hazard interaction in accordance with American Petroleum Institute (API) Recommended Practice (RP) 1171, Section 8.3.2.

SoCalGas hereby notifies the Regional Director of the amendments made to its procedures to address the Notice. SoCalGas elects not to contest the Notice. Enclosed are SoCalGas's amendments to SIMP.2 (Appendix A) to include specific details on what information will be collected and used to assess threat and hazard interaction. In addition, the amendment to Section 3 of SIMP.2 has been updated to clarify that the data collected will be used to assess threat and hazard interactions.

SoCalGas is committed to continuing to comply with PHMSA UNGS regulations and enhancing its existing underground natural gas storage safety and integrity program. SoCalGas believes this response addresses the items listed in the Notice.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to be 'Troy A. Bauer', with a stylized flourish at the end.

**Troy A. Bauer**  
Pipeline Safety and Compliance Manager

Attachment