



Wild Goose Storage, LLC
A Rockpoint Gas Storage Company

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October 13, 2023

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 1-2023-054-NOA

Dear Mr. Burrough:

Wild Goose Storage, L.L.C. (WGS) 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 WGS procedures from August 15-19, 2022. On the basis of the inspection, PHMSA identified apparent inadequacies found within WGS's procedures and issued a Notice of Amendment which was received by WGS on September 14, 2023.

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

- **Attachment #1** – WGS responses to Notice of Amendment findings
- **Attachment #2** – Excerpt from WGS Well & Reservoir Integrity Management Plan Manual highlighting revisions to well remediation procedures to address compromised mechanical integrity

If you have any questions, or require more information, please contact me at **greg.clark@rockpointgs.com** or at (209) 368-9277 x3.

Sincerely,

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

Gregory N. Clark
Senior Compliance Manager

Enclosures

cc: A. Anderson, G. Bozarth, M. Fournier, H. Gold, D. Smolinski (via e-mail)