



May 28, 2024

Submitted 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: Grama Ridge Storage and Transportation, LLC
Notice of Amendment, CPF 1-2024-044-NOA

Dear Mr. Burrough,

On April 30, 2024, Grama Ridge Storage and Transportation, LLC (Grama Ridge) received the reference Notice of Amendment (NOA), CPF 1-2024-044-NOA, issued by the Pipeline and Hazardous Materials Safety Administration. The NOA is a result of the December 4-7 and February 20, 2024 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. Tuan Tran, PHMSA General Engineer, for further clarification on the cited procedures. Mr. Tran conducted the December inspection and has been a great assistance in clarifying the intent of the NOA according to PHMSA's wishes.

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

- OM1302 (Wellhead Safety Inspections): Additional language, in accordance with API RP 1171 section 9.3.2., has been added to the referenced "Test Procedure" section to clarify which valves are to be tested and how "isolation" should be verified.
- Site-specific (including individual wells) wellhead valve lists have been developed to clearly identify which valves are to be tested in accordance with OM1302.

If you require further information or clarification, please contact Todd Cash, Vice President, Compliance & Sustainability 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 line extending to the right.

Todd Cash
Vice President, Compliance & Sustainability
Enstor Gas, LLC

CC: Paul Bieniawski