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October 17, 2011

Mr. Eric Chiang
California Public Utilities Commission
505 Van Ness Ave, 4th Floor
San Francisco, CA 94610

Subject: Central Valley Natural Gas Storage Project – Request for Amendment to Variance No. 13 to allow the Servicing and Refueling of Hydrostatic Test Pumping Equipment within 100 feet of Environmental Sensitive Resources

Dear Eric:

Central Valley Gas Storage, LLC (CVGS) is requesting the CPUC issue an amendment to Variance No. 13 (installation of a temporary pipeline and pumps to withdrawal water for hydrostatic testing) to allow the pumps and associated equipment (electrical generator) to be serviced and refueled within 100 feet of sensitive environmental resources (specifically the Glenn-Colusa Canal and adjacent drainage D-62) as long as secondary containment measures are in place. As you are aware, APM HAZ-1 (implement equipment maintenance and refueling restrictions), states that no refueling, storage, servicing, or maintenance of equipment will be allowed within 100 feet of sensitive environmental resources. We are requesting that the CPUC allow servicing and refueling activities occur within 100 feet of the canal and adjacent drainage as long as secondary containment measures are in place. The environmental monitor will document that the secondary containment measures are in place prior to any refueling or servicing of the pumping equipment and electrical generator.

Please let me know if you have any questions.

Regards,

A handwritten signature in black ink that reads "Jim Kiefer".

Jim Kiefer
Director Project Development
Central Valley Gas Storage

CC:

David Hochart/Scott Eckardt, Dudek
Homer Savage, Fluor
Sue Bushnell Bergfalk, ICF International

