

May 9, 2019

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Kimberly D. Bose, Secretary

Re: Young Gas Storage Company, Ltd.;
Docket No. CP19-115-000
Response to Data Request – OEP/DPC/CB-1

Dear Ms. Bose:

On May 9, 2019, Young Gas Storage Company, Ltd. ("Young") received a data request ("Data Request") from the Office of Energy Projects ("OEP") for information pertaining to Young's Section 7(c) request to increase the total certificated gas storage inventory at its existing storage field. Accordingly, Young is herein filing with the Federal Energy Regulatory Commission ("Commission") its responses to the Data Request.

Description of Proceeding

On March 26, 2019, Young submitted its application, pursuant to Section 7(c) of the Natural Gas Act requesting a certificate of public convenience and necessity for authorization to increase the total certificated gas storage inventory at its existing storage field located in Morgan County, Colorado, by an additional 1 Bcf from the existing 9.95 Bcf up to 10.95 Bcf. Young seeks to inject 800 MMcf of additional base gas inventory into its storage field in order to enhance the deliverability characteristics of the storage field.

Description of Information Being Filed

Young is herein submitting its formal responses to the Data Request issued May 9, 2019.

Filing Information

Young is e-Filing this letter and responses with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

May 9, 2019

Respectfully submitted,

YOUNG STORAGE GAS COMPANY, LTD.

By /s/
William D. Wible
Vice President, Regulatory

Enclosures

Cc: Mr. Asif Balbale

YOUNG GAS STORAGE COMPANY, LTD.
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Dated May 9, 2019 in Docket No. CP19-115-000

1. Provide further explanation how the proposed tariff withdrawal curve(s) demonstrates that Young's proposal would provide up to three days of additional peak deliverability.

Response:

Young proposes to increase the base gas quantity of the field by 800 MMcf. The increase in base gas changes the working gas allocation of the total gas in place. The current tariff deliverability breakpoint of the field is at 60.12% of Maximum Allowable Capacity ("MAC") (3.48 Bcf). The proposed tariff deliverability breakpoint will be at 49% of MAC (2.84 Bcf) with the increase in the base gas. The calculation of available peak deliverability days is included below. The Maximum Daily Withdrawal Quantity ("MDWQ") is defined as 1/29th of shippers MAC. The MAC is 5.79 Bcf, 1/29th of this quantity is 199.655, rounded to 200 MMcf/d for this illustration.

Current

100% MAC – 60.12% MAC = 39.88% MAC
39.88% MAC = 2.31 Bcf (5.79 Bcf × 39.88%)
2.31 Bcf ÷ 200 MMcf/d = **11.58 peak days of deliverability**

Proposed

100% MAC – 49% MAC = 51% MAC
51% MAC = 2.95 Bcf (5.79 Bcf × 51%)
2.95 Bcf ÷ 200 MMcf/d = **14.76 peak days of deliverability**

Response prepared by or under the supervision of:

Timothy W. Griffin
Manager, Engineering Reservoir
719-520-4242

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2. Provide withdrawal curves plotting withdrawals (in MMcf/d) vs. capacity (in Bcf) for the existing and proposed scenarios that demonstrate that Young's proposal would provide up to three days of additional peak deliverability. Clearly label all axes and plot lines.

Response:

Attachments 1 and 2 are included to show how the tariff curve (% Average Daily Withdrawal Quantity ("ADWQ") vs % MAC) relates to the requested plot of withdrawals (in MMcf/d) vs capacity (in Bcf). Attachment 1 shows the relationship in Withdrawal Rate (MMcf/d) vs MAC %. Attachment 2 shows the relationship in Withdrawal Rate (MMcf/d) vs Working Inventory (Bcf). The difference between the current and proposed curves relates to up to three days of additional peak deliverability.

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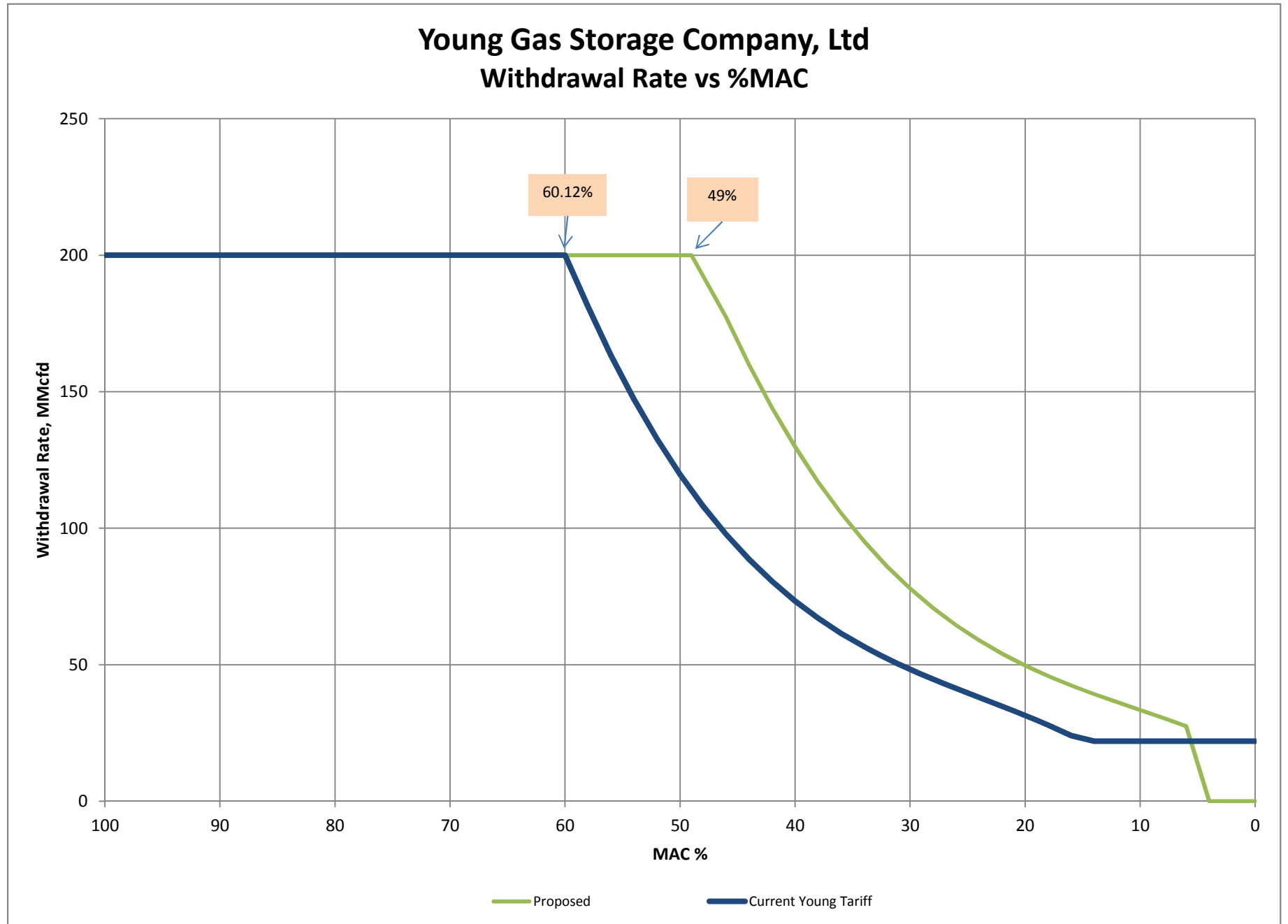
3. Provide any additional data that would demonstrate that Young's proposal would provide up to three days of additional peak deliverability.

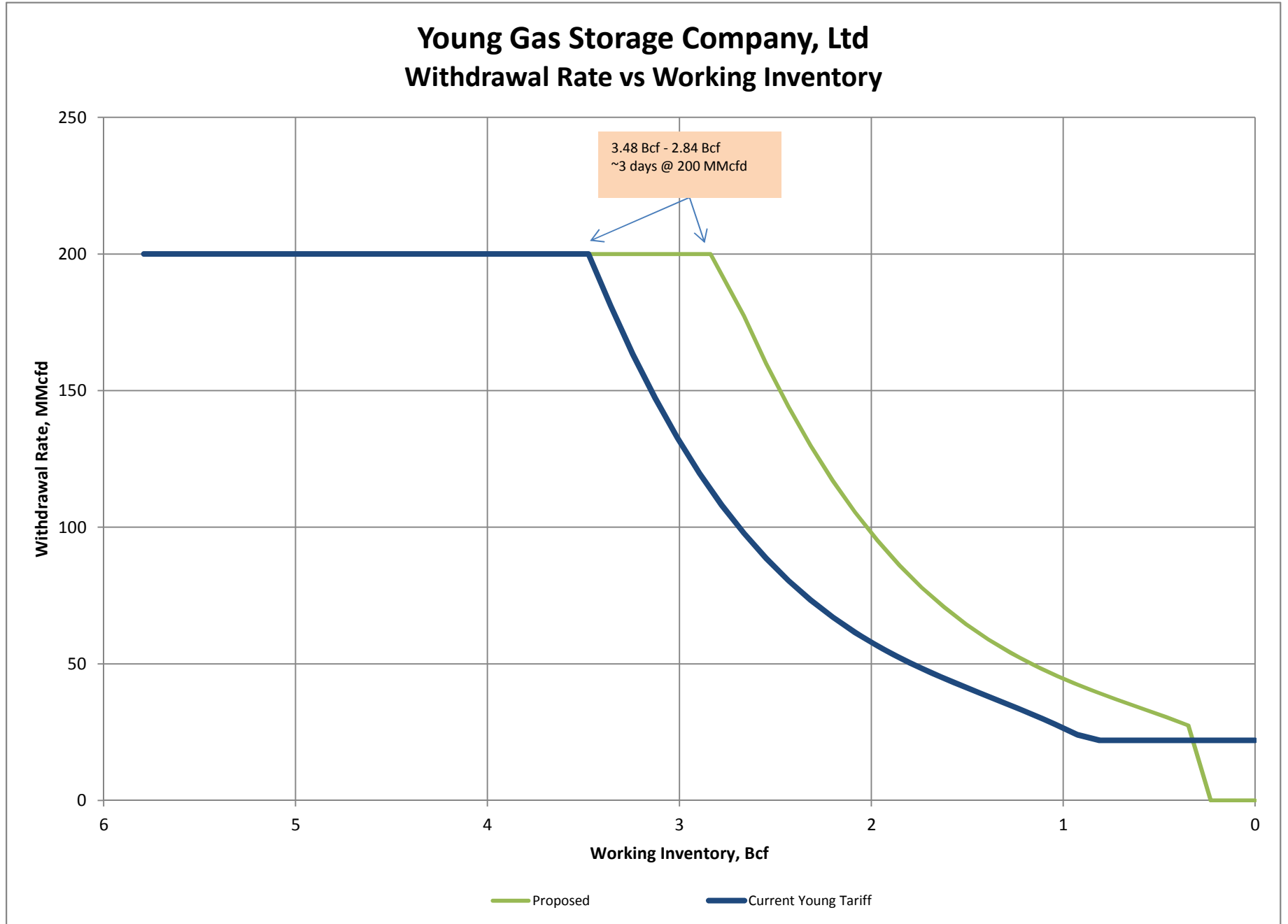
Response:

No additional data provided.

Response prepared by or under the supervision of:

Timothy W. Griffin
Manager, Engineering Reservoir
719-520-4242





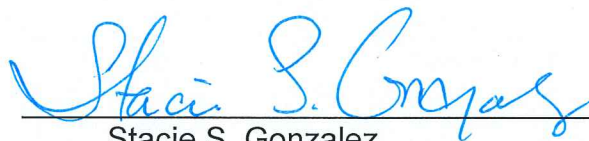
STATE OF COLORADO)
)
COUNTY OF EL PASO)

WILLIAM D. WIBLE, being first duly sworn, on oath, says that he is the Vice President of the Regulatory Department of Young Gas Storage Company, Ltd.; that he has read the Responses filed on May 9, 2019, to the Office of Energy Projects' Data Request dated May 9, 2019 in Docket No. CP19-115-000, and that he is familiar with the contents thereof; that, as such Vice President, he has executed the same for and on behalf of said Company with full power and authority to do so; and that the matters and facts set forth therein are true to the best of his information, knowledge and belief.



William D. Wible
Vice President, Regulatory

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 9th day of May 2019.



Stacie S. Gonzalez
Notary Public, State of Colorado
My Commission Expires: February 21, 2022



Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing documents to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 9th day of May, 2019.

/s/

Francisco Tarin

Two North Nevada Avenue
Colorado Springs, Colorado 80903
(719) 667-7517