

**AFFIDAVIT PURSUANT**  
**TO 10 CFR 2.390**

Interim Storage Partners LLC       )  
State of Maryland                       )       SS.  
County of Howard                       )

I, Jeffery Isakson, depose and say that I am Chief Executive Officer/President, Interim Storage Partners LLC duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information that is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought applies to the following documents listed below:

- Enclosure 2 of E-55363 RAI Responses to GS-4, CB-1, CB-2 and CB-3
- Enclosure 5 of E-55363 Attachment LU-2-1
- Enclosure 5 of E-55363 Attachment WR-5-1
- Enclosure 7 of E-55363 Environmental Report Markup Pages 7-6 and 7-9
- Enclosure 7 of E-55363 Environmental Report Markup Pages Tables 3.1-3 and 7.2-5
- Enclosure 7 of E-55363 Environmental Report Markup Pages Figures 3.1-5, 3.1-6, 3.1-7, and 3.1-8
- Enclosure 7 of E-55363 Environmental Report Markup Pages Attachments 3-4 and 3-6
- Enclosure 11 of E-55363 CMEC Report (2015)
- Enclosure 12 of E-55363 HEC-HMS Input for the Flood Plain Report
- Enclosure 13 of E-55363 Native Files

These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Interim Storage Partners LLC in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

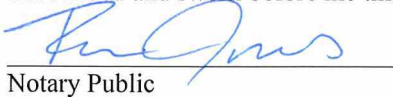
- 1) The information sought to be withheld from public disclosure involves ecological, geological, and geophysical information and data – including maps – concerning location of wells, cultural and historic resources, ecological resources, and geophysical features related to the siting of the WCS CISF; Cost information; and Input/Output files which are owned and have been held in confidence by Interim Storage Partners LLC.
- 2) The information is of a type customarily held in confidence by Interim Storage Partners LLC, and not customarily disclosed to the public. Interim Storage Partners LLC has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of Interim Storage Partners LLC, because the information consists of descriptions of the ecological, geological, and geophysical resources on and adjacent to the WCS CISF, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product or project to better compete with Interim Storage Partners LLC, take marketing or other actions to improve their product's or project's position or impair the position of Interim Storage Partners LLC product or project, and avoid developing similar data in support of their processes, methods or apparatus.

Further the deponent sayeth not.



Jeffery Isakson  
Chief Executive Officer/President, Interim Storage Partners LLC

Subscribed and sworn before me this 30<sup>th</sup> day of August, 2019.



Notary Public

My Commission Expires 10 / 16 / 23

