



ROPES & GRAY LLP
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October 10, 2023

BY POST

Attorney General John Formella
Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
DOJ-CPB@doj.nh.gov

Re: Data Incident

Dear General Formella:

We write on behalf of our client, West Texas Gas (“WTG”), to inform you of a recent security incident that may have affected the personal information of 20 New Hampshire residents.

WTG became aware of potential unauthorized activity on its systems. Upon discovering the incident, WTG immediately launched an investigation to determine the extent of any unauthorized activity. This investigation concluded that the unauthorized third party had gained access to certain systems in the WTG network, copied certain files and deleted others.

As a result, WTG conducted a lengthy and complex review of the stolen files to determine what personal data may have been affected. The types of personal information accessed varied between individuals but may have included

. Individuals identified as having their personal information in the files were sent notification letters on October 9, 2023. WTG is not aware of any fraudulent activity associated with the theft of this personal information.

Upon discovering the incident, WTG immediately launched an investigation to determine the scope of any unauthorized activity, notified law enforcement, and implemented additional measures designed to enhance the security of its network. These efforts include using a market leading threat monitoring tool and updating other controls. Since implementing these measures, WTG has not observed any further unauthorized activity. Additionally, although WTG has no evidence of any misuse of personal information related to this incident, WTG offered notified individuals complimentary use of Equifax Credit Watch™ Gold, for .

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Attorney General John Formella

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Additional information on credit monitoring services and a telephone number that consumers may call for further information and assistance is included in the attached sample notification made to the affected parties, which was mailed on October 9. If you have any questions, please reach out to us at .

Sincerely,

Kevin J. Angle



Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

<<Name 1>>
<<Address 1>>
<<Address 2>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Notice of Data Breach

Dear <<Name 1>>:

We are writing to share with you information regarding a recent incident involving files that contained your personal information. While we have no evidence of any misuse of personal information related to this incident, we are providing you with information about the event, our response to it, and additional measures you can take if you wish to do so.

What Happened?

On May 27, 2023, we became aware of unauthorized activity on our systems. Upon discovering the incident, we immediately launched an investigation to determine the extent of any unauthorized activity. We concluded that an unauthorized third party gained access to certain systems in our network beginning on approximately May 16, 2023, copied certain files, and deleted other files. After conducting a lengthy and complex review of the stolen files, we have determined that your personal data may have been affected. While the unauthorized party potentially had access to your information, we want to reiterate that we have no evidence of any misuse of personal information related to this incident.

What Information Was Involved?

Our review of the stolen files determined that the information related to you may have included your

What We Are Doing.

Upon discovering the incident, we immediately launched an investigation to determine the scope of any unauthorized activity, notified law enforcement, and implemented additional measures designed to enhance the security of our network. These efforts include using a market leading threat monitoring tool and updating other controls. Since implementing these measures, we have not observed any further unauthorized activity.

What You Can Do.

Although we have no evidence of any misuse of personal information related to this incident, it is always advisable to regularly review your financial accounts and report any suspicious or unrecognized activity. The enclosed "General Information About Identity Theft Protection" provides further information about steps that you can take. Federal regulatory agencies recommend vigilance for the next _____ and that you report any suspected incidents of fraud to the relevant financial institution immediately. Furthermore, the Federal Trade Commission provides a wealth of advice and recommendations for consumers on how to protect themselves from and respond to identity theft in the event that such information is needed.

Other Important Information.

In order to assist you with this vigilance, we are offering you complimentary use of Equifax Credit Watch™ Gold, for two years, should you wish to participate. Details of this offer and your activation code are included in the enclosed form. While we hope that this service provides some peace of mind, the opportunity to subscribe to these services is not intended to suggest that you are at risk of harm.

Please be assured that we are working hard to prevent this type of security matter from occurring in the future. If you need more information about this incident, please call _____, Monday through Friday from 8:00 a.m. to 8:00 p.m. Central Time, excluding U.S. holidays.

Sincerely,

Will Schleier
Chief Financial Officer



Enter your Activation Code: <<ACTIVATION CODE>>

Enrollment Deadline: <<Enroll Deadline>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of <<ACTIVATION CODE>> then click “Submit” and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click “Continue”.
If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.
Once you have successfully signed in, you will skip to the Checkout Page in Step 4
2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click ‘Sign Me Up’ to finish enrolling.
You’re done!
The confirmation page shows your completed enrollment.
Click “View My Product” to access the product features.

GENERAL INFORMATION ABOUT IDENTITY THEFT PROTECTION

It is always advisable to regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com by calling toll free 1.877.322.8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below:

- **Equifax**, P.O. Box 740241, Atlanta, Georgia 30374-0241. 1.800.685.1111. www.equifax.com
- **Experian**, P.O. Box 9532, Allen, TX 75013. 1.888.397.3742. www.experian.com
- **TransUnion**, 2 Baldwin Pl., P.O. Box 1000, Chester, PA 19016. 1.800.916.8800. www.transunion.com

Fraud Alert: You may contact the fraud department of the three major credit bureaus to request that a “fraud alert” be placed on your file. A fraud alert notifies potential lenders to verify your identification before extending credit in your name.

Equifax:	Report Fraud:	1.800.685.1111
Experian:	Report Fraud:	1.888.397.3742
TransUnion:	Report Fraud:	1.800.680.7289

Security Freeze for Credit Reporting Agencies: You may request a security freeze on your credit reports. A security freeze prohibits a credit reporting agency from releasing any information from a consumer’s credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. It is free to place, lift or remove a security freeze. You must separately place a security freeze on your credit report at each credit bureau. To do so, you must contact the credit bureaus by phone, mail, or secure electronic means:

- **Equifax:** P.O. Box 105788, Atlanta, GA 30348, 1.800.349.9960, www.Equifax.com
- **Experian:** P.O. Box 9554, Allen, TX 75013, 1.888.397.3742, www.Experian.com
- **TransUnion:** P.O. Box 2000, Chester, PA 19106, 1.888.909.8872, www.TransUnion.com

To request a security freeze, you will need to provide the following:

- Your full name (including middle initial, Jr., Sr., Roman numerals, etc.),
- Social Security number
- Date of birth
- Address(es) where you have lived over the prior five years
- Proof of current address such as a current utility bill
- A photocopy of a government-issued ID card
- If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

If you request a freeze online or by phone, the agency must place the freeze within one business day. The credit bureaus have three business days after receiving a request by mail to place a security freeze on your credit report, and they must also send confirmation to you within five business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze. To lift the freeze to allow a specific entity or individual access to your credit report, you must contact the credit reporting agencies and include: (1) proper identification; (2) the PIN number or password provided to you when you placed the security freeze; and (3) the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available.

You also have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit https://files.consumerfinance.gov/f/documents/bcfc_consumer-rights-summary_2018-09.pdf or www.ftc.gov.

Steps You Can Take if You Are a Victim of Identity Theft

- File a police report. Get a copy of the report to submit to your creditors and others that may require proof of a crime.
- Contact the U.S. Federal Trade Commission (FTC). The FTC provides useful information to identity theft victims and maintains a database of identity theft cases for use by law enforcement agencies. File a report with the FTC by calling the FTC's Identity Theft Hotline: 1-877-IDTHEFT (438-4338); online at <http://www.ftc.gov/idtheft>; or by mail at Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580.
- Keep a record of your contacts. Start a file with copies of your credit reports, the police reports, any correspondence, and copies of disputed bills. It is helpful to log conversations with creditors, law enforcement officials, and other relevant parties.

Additional Steps to Avoid Identity Theft: The FTC has further information about steps to take to avoid identity theft at: <http://www.ftc.gov/idtheft>; calling 1-877-IDTHEFT (438-4338); or write to Consumer Response Center, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580.

State Specific Information

Iowa residents may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. This office can be reached by visiting the website at www.iowaattorneygeneral.gov, calling (515) 281-5926 or requesting more information from the Office of the Attorney General, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, IA 50319.

New Mexico residents are reminded that you have the right to obtain a police report and request a security freeze as described above and you have rights under the Fair Credit Reporting Act as described above.

Oregon residents may obtain information about preventing identity theft from the Oregon Attorney General's Office. This office can be reached by visiting the website at www.doj.state.or.us, calling (503) 378-4400 or requesting more information from the Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.

Rhode Island residents are reminded that you have the right to obtain a police report and request a security freeze as described above. The consumer reporting agencies may require that you provide certain personal information (such as your name, Social Security Number, date of birth and address) and proper identification (such as a copy of a government- issued ID card and a bill or statement) prior to honoring your request. Residents can learn more by contacting the Rhode Island Office of the Attorney General by phone at 1.410.274.4400 or by mail at 150 South Main Street, Providence, Rhode Island 02903.

Vermont residents may learn helpful information about fighting identity theft, placing a security freeze, and obtaining a free copy of your credit report on the Vermont Attorney General's website at <https://ago.vermont.gov/>.