

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

May 30, 2019

Mr. Craig R. Hoeflerlin
Vice President, Operations Services
Spire Missouri Inc. East
700 Market Street
St. Louis, MO 63101

CPF 1-2019-0010M

Dear Mr. Hoeflerlin:

From November 6-8, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Spire Missouri Inc. East's (Spire) procedures for Functional Integrity of Underground Natural Gas Storage in St. Louis, Missouri. Specifically, the Florissant Dome Storage field in Florissant, Missouri was inspected.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Spire's plans or procedures, as described below:

1. § 192.12 Underground natural gas storage facilities.

(e) Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.

Spire's written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1171 were inadequate. Specifically, Spire's procedures for the functional integrity of the reservoir and wells failed to describe the integrity work being performed.

During the inspection, Spire presented 26 standards that cover various integrity activities, but did not have prescriptive procedures associated with the standards.

2. § 192.12 Underground natural gas storage facilities.

(e) Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.

Spire's written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1171 were inadequate. Specifically, Spire's written procedures for annular pressure thresholds did not specify what the thresholds were in accordance with API RP 1171, Section 9.3.2 Well Integrity Monitoring.

During the inspection, Spire informed PHMSA that annular pressures outside the normal range would be further investigated. Clearly defined thresholds are necessary to know when/if further evaluations are necessary for annular pressures.

3. § 192.12 Underground natural gas storage facilities.

(e) Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.

Spire's written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1171 were inadequate. Specifically, Spire's written procedures for the blowout contingency plan (BCP) were inadequate because the BCP had not been developed.

Operators are required to develop and implement a BCP in accordance with API RP 1171, Section 10.6.3 Blowout Contingency Plan.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Spire Missouri Inc. East maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2019-0010M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*