

RECEIVED JUL 01 2019
KH



Spire Inc.
700 Market
St. Louis, MO 63101

June 28, 2019

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: CPF 1-2019-0010M

Dear Mr. Burrough:

Spire has reviewed PHMSA's Notice of Amendment letter dated May 30, 2019, pertaining to the Underground Storage Inspection completed in November 2018. Spire's response to the Notice of Amendment is enclosed.

Should you have any questions or need additional information regarding this matter, please contact me at (205) 365-7846 or Mr. Randy Wilson at (205) 326-2987.

Sincerely,

A handwritten signature in black ink that reads "Bob Gardner".

Bob Gardner
Director, Compliance and Pipeline Integrity

Enclosure

CC: Craig Hoeflerlin Lan Lam
George Godat Laura Kleckley
Randy Wilson
Bob Noelker

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.

Company Response: Spire is developing new procedures and enhancing existing procedures associated with the standards reviewed during the November 2018 audit. The procedures will cover integrity activities required under API RP 1171. Spire plans to complete associated procedures by July 31, 2019.

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.

Company Response: Spire defined upper thresholds for annulus pressures in June 2019 and added the thresholds to Spire's inspection form. The procedure has been updated to reflect the newly-defined thresholds and the appropriate steps to take if a threshold is exceeded.

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.

Company Response: Spire has developed a draft of the Blowout Contingency Plan. The plan is currently under review. We expect the plan to be implemented by July 31,2019.