



Spire Inc.
605 Richard Arrington Jr Blvd N
Birmingham, AL 35203

January 19, 2025

Mr. Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

RE: CPF 3-2024-075-NOA
Spire STL Pipeline, LLC – OPID 39886

Dear Mr. Ochs:

Spire has reviewed the two items from the referenced Notice of Amendment letter sent on December 20, 2024 for the STL Pipeline facility. Spire does not contest the items and is submitting the following responses.

Item #1 – Procedural Manual for Operations, Maintenance and Emergencies: The External Corrosion SOP for the STL Pipeline has been revised to include the recommended interruption cycle option. An alternative action of temporarily disconnecting all decouplers on the pipeline for the reading cycle was also included. Please see attachment 190.A Spire STL Pipeline External Corrosion SOP for the revised procedure.

Item #2 – Procedural Manual for Operations, Maintenance and Emergencies: Section 7.4.8.1 of the STL Pipeline O&M Manual has been revised to reference SOP 190.E Atmospheric Corrosion. The SOP has also been revised with the appropriate selections and definitions for atmospheric corrosion inspections. Please see attachment SOP 190.E Atmospheric Corrosion SOP and the attached excerpt from the O&M plan referencing this procedure.

If you need additional detail, please feel free to contact me at (205) 337-1337.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Wilson", written over a horizontal line.

Randy Wilson
Director, Pipeline and System Integrity

CC: Mr. Scott Smith
Mr. Mark Lowe
Ms. Nicole Christianer