

WARNING LETTER

VIA ELECTRONIC MAIL TO: scott.smith@spireenergy.com,
randy.wilson@spireenergy.com

October 14, 2025

Mr. Scott R. Smith
President
Spire Midstream
3773 Richmond Avenue, Suite 300
Houston, TX 77046

CPF 3-2025-019-WL

Dear Mr. Smith:

From October 16 to October 24, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), conducted an inspection of Spire Midstream's (Spire) highly volatile liquid ("HVL") Laclede / Chouteau Island pipeline in Saint Louis, Missouri.

As a result of the inspection, it is alleged that Spire has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

- 1. § 195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) *General.* Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

Spire failed to keep its manual of written procedures at locations where operations and maintenance activities are conducted. During the field portion of the inspection, a PHMSA inspector requested Spire's field operations personnel to demonstrate that they could access the electronic version of the emergency plan. These personnel were unable to do so. Hard copies of the manual of written procedures were not present at the field location where this request was made. Because operations personnel could not access the emergency procedures, Spire did not comply with § 195.402(a). The regulation requires that operations personnel can access these procedures at the locations where operations and maintenance activities are conducted, either by providing electronic access or by distributing and maintaining up-to-date hard copies at those locations.

2. § 195.452 Pipeline integrity management in high consequence areas.

(a)

(l) *What records must an operator keep to demonstrate compliance?*

(1) An operator must maintain, for the useful life of the pipeline, records that demonstrate compliance with the requirements of this subpart. At a minimum, an operator must maintain the following records for review during an inspection:

(i)

(ii) Documents to support the decisions and analyses, including any modifications, justifications, deviations and determinations made, variances, and actions taken, to implement and evaluate each element of the integrity management program listed in paragraph (f) of this section.

Spire failed to maintain records documenting its decisions and analyses regarding the selection of the preventive and mitigative measures (PMMs) required by §§ 195.452(f)(6) and 195.452(i). During the inspection, Spire representatives were able to enumerate specific PMMs that Spire implemented, but upon PHMSA's request, Spire could not provide documentation to support its PMM analysis and decision making, to include who made the PMM determinations, when they were made, or the basis of the decision making. Therefore, Spire failed to comply with § 195.452(l)(1)(ii). The regulations require the PMM selection process to be sufficiently documented. It should be noted that this recordkeeping requirement is applicable to all elements of integrity management that fall under § 195.452(f), such as changes to assessment methods or frequency.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024 the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023 the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023 the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to

a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022 the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021 the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021 the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Spire being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2025-019-WL**. 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).

Sincerely,

David Barrett
Acting Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Randy Wilson, Director, Pipeline & System Integrity, Spire Midstream
randy.wilson@spireenergy.com