U.S. Department
of Transportation
Pipeline and Hazardous Materials Safety

901 Locust Street, Suite 480
Kansas City, MO 64106

NOTICE OF AMENDMENT

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 3-2025-023-NOA

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) procedures for the highly volatile liquid ("HVL") Laclede / Chouteau Island pipeline in Saint Louis, Missouri.

As a result of the inspection, PHMSA has identified the apparent alleged inadequacies found within Spire's plans or procedures. The items inspected and the alleged inadequacies are described below:

1. § 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's written Integrity Management Program ("IMP") was inadequate because it did not specifically require maintaining for the useful life of the pipeline documents to support the decisions and analyses to implement and evaluate each element of the integrity management program listed in paragraph (f) of § 195.452. Specifically, while the IMP had the general language of § 195.452(l)(1) in Section 15.3, the procedures did not specifically require documentation of decision-making in regard to the individual elements required by § 195.452(f). In particular, Spire's IMP did not direct documentation of the identification and selection of preventive and mitigative measures ("PMMs"), required by § 195.452(f)(6).

During the inspection, Spire representatives enumerated specific PMMs that Spire implemented, but when requested by PHMSA, Spire was unable to 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.

Spire must amend its procedures to ensure that documents to support the decisions and analyses for selecting PMMs are recorded and maintained in a written record for the useful life of the pipeline, to include the reasoning for the determinations, what hazards the measures are intended to address, the personnel making the decisions, and the dates that they were made and implemented.

2. § 195.422 Pipeline repairs.

(a) Each operator shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.

Spire's procedures pertaining to welding and other "hot work" activities were inadequate to ensure that repairs are made in a safe manner and performed in a way that prevents damage to persons or property. Specifically, Spire's procedures were inconsistent regarding the need to purge product or take other steps to reduce the particular hazards associated with working on an active HVL pipeline. Operating Procedures Manual (OPM) Appendix D, Spire Standard NGL-10701J Purging of Highly Volatile Liquid (HVL) Mains for Repair or Abandonment stated: "Before HVL lines can be repaired or abandoned, all product must first be removed from the pipeline. See NGL Operations Procedure 3020." Procedure 3020 described purging of the HVL lines. In addition, OPM section 403 stated that maintenance personnel shall be trained "to safely repair pipeline facilities using special precautions such as isolation and purging where HVL is involved."

However, other portions of Spire's procedures discussed hot work without any reference to purging or other special precautions. Welding specification W-100.G "In Service Welding Procedure" stated that it is applicable to Spire NGL, Inc., implying that welding may be performed on the HVL line while it is pressurized and/or conveying product. Welding specification W-100.1 and procedure NGL-10500L both discussed hot tapping, and W-100.1 also stated "Low hydrogen electrodes (E7018) shall be used on pressurized ("in-service") mains, static or flowing."

Cadwelding procedures also failed to address whether any special precautions were needed when working on HVL pipelines.

Spire must amend its procedures to clearly and consistently identify under what conditions in-service welding, such as installation of repair sleeves, cadwelding of cathodic test leads, or other applicable activities, may be performed on the HVL lines.

3. § 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…
(b) . . . .
(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:
(1) . . . .
(5) Investigating and analyzing pipeline accidents and failures, including sending the failed pipe, component, or equipment for laboratory testing or examination where appropriate, to determine the cause(s) and contributing factors of the failure and to minimize the possibility of a recurrence.
(d) . . . .
(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs:
(1) . . . .
(9) Providing for a post accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found.

Spire's procedures regarding the post-accident investigation process were inadequate because they lacked sufficient detail to comply with § 195.402(e)(9). During the inspection, the operator reported that there is a Safety Management Systems (SMS) group which is intended to carry out root cause analysis for accidents. PHMSA reviewed a draft document referred to as "SOP Element 5" addressing this process. However, the draft SOP at the time of inspection only referenced natural gas procedures and requirements. Spire's OPM at the time of inspection did not mention the SMS group's responsibilities. The operator reported that Spire's Claims Department would be responsible for preserving and submitting specimens needed for laboratory analysis, such as metallurgical examination of failed pipe fragments, but the OPM did not address this.

Spire must amend its procedures to clearly and consistently define which parties are responsible for each component of the accident investigation and the post-accident review of emergency procedure effectiveness, ensure that relevant documents are appropriately cross-referenced, and incorporate hazardous liquid procedures and requirements into the SMS process where applicable.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement 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 CFR § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within thirty (30) 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 maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to the Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2025-023-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

DAVID A BARRETT

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

cc: Randy Wilson, Director, Pipeline & System Integrity

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