



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

November 13, 2025

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

RE: CPF 3-2025-023-NOA
NGL Pipeline – OPID 11032

Dear Mr. Barrett:

Spire has reviewed the three items from the referenced October 14, 2025 Notice of Amendment letter for the NGL Pipeline facility. Spire does not contest the items and is submitting the following responses.

Item #1 – Pipeline Integrity Management in High Consequence Areas: Section 9.3 of the Integrity Management Plan for the NGL Pipeline is being revised to include the process to retain records documenting the decisions and analyses for selecting P&M Measures. Please see the attachment “Spire NGL IMP Manual 9.3” and “Form 7-1”.

Item #2 – Pipeline Repairs: Spire is updating the repair procedures to better address purging or other special precautions. Spire requests a 60-day extension to complete the process for updating and aligning those procedures and will submit the revised plans upon completion.

Item #3 – Procedural Manual for Operation, Maintenance, and Emergencies: Section 402c of the O&M manual is being revised to indicate that the SMS department is responsible for conducting the accident investigation. Please see the attached “Spire NGL Operating Procedure Manual_402c” for the revision.

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", with a stylized flourish at the end.

Randy Wilson
Director, Pipeline and System Integrity

CC: Mr. Scott Smith Mr. Mark Lowe
Mr. Trey Kuchar Mr. Dave Feeman
Ms. Daniella Donaldson