



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

901 Locust Street, Suite 480  
Kansas City, MO 64106

**NOTICE OF PROBABLE VIOLATION  
AND  
PROPOSED COMPLIANCE ORDER**

**VIA ELECTRONIC MAIL TO: scott.smith@spireenergy.com;  
randy.wilson@spireenergy.com; nicole.christianer@spireenergy.com**

February 3, 2026

Scott Smith  
President  
Spire STL Pipeline, LLC  
3773 Richmond Ave  
Houston, TX 77046

**CPF 3-2026-004-NOPV**

Dear Mr. Smith:

From July 9, 2025 to December 11, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the procedures and records of Spire STL Pipeline, LLC, Spire MoGas Pipeline, LLC, and Spire Storage West, LLC, for the gas rule in St. Louis, MO. Spire STL Pipeline, LLC, Spire MoGas Pipeline, LLC, and Spire Storage West, LLC are all subsidiaries of Spire, Inc. (Spire).

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. **§ 192.5 Class locations.**
  - (a) . . . .
  - (b) Except as provided in paragraph (c) of this section, pipeline locations are classified as follows:
    - (1) . . . .
    - (3) A Class 3 location is:
      - (i) Any class location unit that has 46 or more buildings intended for human occupancy;

(ii) ....

**(d) An operator must have records that document the current class location of each gas transmission pipeline segment and that demonstrate how the operator determined each current class location in accordance with this section.**

Spire failed to provide records that demonstrate it determined each current class location in accordance with § 192.5(b), per the requirement of § 192.5(d). Specifically, Spire failed to properly identify several locations where a class location unit had 46 or more buildings intended for human occupancy. PHMSA discovered the following misidentified class locations during a review of Spire’s “MoGas Master MOP and Class Locations” record and Keyhole Markup Language Zipped (KMZ) data:

| Pipeline Segment        | Approximate<br>Latitude Longitude |                         | Approx. Length of<br>Misidentified<br>Class 3 (feet) |
|-------------------------|-----------------------------------|-------------------------|------------------------------------------------------|
|                         | Start                             | End                     |                                                      |
| Salem                   | 37.975865°, -91.729682°           | 37.963269° -91.731907°  | 5,280                                                |
| South Point to Sullivan | 38.361790°, -90.993143°           | 38.356016° -91.009336°  | 5,280                                                |
| OM to South Point       | 38.787890°, -90.830739°           | 38.786824° -90.831731°  | 3,400                                                |
| OM to South Point       | 38.777301° -90.834703°            | 38.765340°, -90.839160° | 500                                                  |
| Curryville to OM        | 39.018230°, -90.853062°           | 38.997920°, -90.837059° | 7,000                                                |

Spire’s MoGas Operations and Maintenance Manual (MoGas O&M), Section 3.01, required Spire to determine the class locations of its pipelines and keep records of these determinations. Despite the requirements of § 192.5 and MoGas O&M procedures, Spire misidentified multiple sites, resulting in the current class location not being in accordance with § 192.5(b). Therefore, Spire violated § 192.5(d).

## **2. § 192.605 Procedural manual for operations, maintenance, and emergencies.**

**(a) General.** Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Spire failed to follow its manual of written procedures in accordance with § 192.605(a). Specifically, Spire failed to follow its MoGas O&M, Section 8.01, “HCA and MCA Identification,” which required Spire to identify Moderate Consequence Areas (MCAs) and determine the length of the MCAs based on:

The length of the moderate consequence area extends axially along the length of the pipeline from the outermost edge of the first potential impact circle containing either 5 or more buildings intended for human occupancy; or any portion of the

paved surface, including shoulders, of any designated interstate, freeway, or expressway, as well as any other principal arterial roadway with 4 or more lanes, to the outermost edge of the last contiguous potential impact circle that contains either 5 or more buildings intended for human occupancy, or any portion of the paved surface, including shoulders, of any designated interstate, freeway, or expressway, as well as any other principal arterial roadway with 4 or more lanes.<sup>1</sup>

From a review of Spire’s pipeline system KMZ data of MCAs, PHMSA determined that Spire failed to identify the following MCA locations containing 5 or more buildings intended for human occupancy or a roadway with 4 or more lanes:

| Pipeline Segment         | Approximate<br>Latitude Longitude |                         | Approx. Length<br>of Unidentified<br>MCA (feet) |
|--------------------------|-----------------------------------|-------------------------|-------------------------------------------------|
|                          | Start                             | End                     |                                                 |
| Curryville to OM         | 39.124838°, -90.965988°           | 39.120801°, -90.959220° | 1,300                                           |
| Curryville to OM         | 39.012526°, -90.848279°           | 39.010268°, -90.846771° | 900                                             |
| Curryville to OM         | 39.006092°, -90.843932°           | 39.004519°, -90.842822° | 645                                             |
| West Alton to Wood River | 38.871205°, -90.206415°           | 38.870769°, -90.205256° | 370                                             |
| West Alton to Wood River | 38.859303°, -90.111434°           | 38.859507°, -90.109019° | 700                                             |
| OM to South Point        | 38.818413°, -90.809458°           | 38.813139°, -90.810452° | 1,850                                           |
| OM to South Point        | 38.529058°, -90.972973°           | 38.528012°, -90.976338° | 1,200                                           |
| South Point to Sullivan  | 38.528186°, -90.977330°           | 38.527608°, -90.977987° | 350                                             |
| Salem                    | 37.978157°, -91.725231°           | 37.977542°, -91.726879° | 600                                             |
| Salem                    | 37.948599°, -91.734195°           | 37.947419°, -91.734301° | 430                                             |

#### Proposed Civil Penalty

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 \$2,391,412 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.

<sup>1</sup> This language mirrors the regulatory definition of moderate consequence area found at 49 CFR § 192.3.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to propose a civil penalty assessment at this time.

Proposed Compliance Order

With respect to items 1 and 2 pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Spire. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

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. All material you submit in response to this enforcement action may be 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 your receipt of this Notice, you have 30 days to respond as described in the enclosed *Response Options*. 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 a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. The Region Director may extend the period for responding upon a written request timely submitted demonstrating good cause for an extension.

In your correspondence on this matter, please refer to **CPF 3-2026-004-NOPV** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

Enclosures: *Proposed Compliance Order*  
*Response Options for Pipeline Operators in Enforcement Proceedings*

cc: Randy Wilson, Director, Pipeline & System Integrity, Spire STL Pipeline, LLC,  
randy.wilson@spireenergy.com  
Nicole Christianer, Manager, Transmission Integrity, Spire STL Pipeline, LLC,  
nicole.christianer@spireenergy.com

## **PROPOSED COMPLIANCE ORDER**

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Spire a Compliance Order incorporating the following remedial requirements to ensure the compliance of Spire with the pipeline safety regulations:

- A. In regard to Item 1 the Notice pertaining to misidentified class locations, Spire must submit to PHMSA, for review and approval, a plan which includes timeframes, to determine the current class location of the segments listed in the Notice within **30** days and complete the approved plan within **180** days of receipt of the Final Order.
- B. In regard to Item 2 of the Notice pertaining to unidentified MCAs, Spire must submit to PHMSA, for review and approval, a plan which includes timeframes, to identify the extent of the MCAs for the segments listed in the Notice within **30** days and complete the approved plan within **180** days of receipt of the Final Order.
- C. It is requested (not mandated) that Spire maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Director, Central Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.