



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

12300 W. Dakota Ave., Suite 340
Lakewood, CO 80228

VIA ELECTRONIC MAIL TO: scott.smith@spireenergy.com

November 12, 2025

Mr. Scott Smith
President - Spire Storage West, LLC
Clear Creek Storage Company, LLC
3773 Richmond Ave., Suite 300
Houston, Texas 77046

**CPF 5-2023-048-NOPV
Closure Letter**

Dear Mr. Smith:

On September 20, 2024, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued to Clear Creek Storage Company, LLC (Clear Creek) a Final Order in the above-referenced case. This Order included a Compliance Order. On November 19, 2024, Clear Creek provided an initial response to the Compliance Order. On December 5, 2024, Clear Creek requested by letter an extension to January 31, 2025 to complete the compliance terms. On January 31, 2025, Clear Creek requested an additional extension to February 28, 2025. On February 28, 2025, PHMSA received a letter from Clear Creek regarding the remaining terms of the Compliance Order. Based on our review of the documentation Clear Creek provided in the November 19, 2024 and February 28, 2025 letters, it has been determined that Clear Creek has complied with the terms of the September 20, 2024 Final Order.

Regarding Item 1, the Compliance Order required Clear Creek to develop and test an internal communications plan to manually operate the pipeline during a SCADA failure or outage. Based on the records Clear Creek submitted, Item 1 has been completed.

Regarding Item 2, the Compliance Order required Clear Creek to develop a procedure to test any backup SCADA systems and then perform said test(s). According to the records submitted, Clear Creek indicated in its response that as part of its expansion project, the company has built a new control room with a new SCADA system. Clear Creek's response included an amended

procedure but stated that it no longer has any backup SCADA systems. Accordingly, Item 2 has been completed.

Accordingly, this case is now closed, and no further action is contemplated with respect to the matters involved in this case. Thank you for your cooperation in this matter.

Sincerely,

DUSTIN B HUBBARD Digitally signed by DUSTIN B HUBBARD
Date: 2025.11.12 08:53:53 -07'00'

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 J. Dunphy (#22-239215)
Randy Wilson, Director, Pipeline & System Integrity – Randy.Wilson@spireenergy.com