



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

February 2, 2024

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

RE: CPF 5-2023-048-NOPV
Spire Clear Creek Storage Company, LLC – OPID 39934

Dear Mr. Hubbard:

Spire has reviewed the four items from the referenced violation report sent on November 2, 2023 for the Clear Creek facility and is submitting the following responses. 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. Jason Dunphy
Mr. Craig Hoferlin

1. § 191.22 National Registry of Operators.

(a) ...

(c) ***Changes.*** Each operator of a gas pipeline, gas pipeline facility, UNGSF, LNG plant, or LNG facility must notify PHMSA electronically through the National Registry of Operators at <https://portal.phmsa.dot.gov> of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

(i) Construction of any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs \$10 million or more. If 60-day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;

(ii) Construction of 10 or more miles of a new pipeline;

Clear Creek failed to notify PHMSA not later than 60 days before the start of construction of the Clear Creek Storage Company Expansion Project, as required. During the control room inspection that took place from September 26 to 30, 2023, the PHMSA inspector observed various construction activities at the Clear Creek Storage plant site, including moving dirt and welding. However Clear Creek did not file the National Registry Notification, until December 9, 2022 ¹ which was 78 days after the observed commencement of construction activities, and at least 138 days after the time § 191.22(c)(1) requires.

Therefore, Clear Creek failed to notify PHMSA 60 days prior to the start of construction on the Clear Creek Storage Company Expansion Project as required.

Spire Response - Item #1 – Notification of Construction: For the noted construction project, Spire had not considered the preparatory dirt work in the area as basis of the physical well and pipeline project. For any future construction notifications, Spire will include the project preparatory work as a basis for the notification date.

2. § 192.631 Control room management.

(a) ...

(c) ***Provide adequate information.*** Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1) ...

(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;

Clear Creek failed to test and verify its internal communications plan at least once each calendar year, but at intervals not to exceed 15 months, to provide adequate means for manual operation of the pipeline safely. Specifically, during inspection, Clear Creek could not provide documentation demonstrating it had tested and verified its internal communications plan for the years 2019, 2020 and 2021.

Therefore, Clear Creek failed to test and verify its internal communication plan as required pursuant to § 192.631(c)(3).

Spire Response - Item #2 – Internal Communication Plan Test: Spire has completed a review of the Internal Communication Plan and has also verified the schedule for a test and verification to be completed and documented annually.

3. § 192.631 Control room management.

(a) ...

(c) ***Provide adequate information.*** Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1) ...

(4) **Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months;**

Clear Creek failed to complete the required test of any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months. Specifically, Clear Creek could not provide any documentation demonstrating it had tested the backup SCADA system, which is collocated with the primary server, at least once each calendar year, but at intervals not to exceed 15 months for the years 2019, 2020 and 2021.

Therefore, Clear Creek failed to test its backup SCADA systems at least once a calendar year, at intervals not to exceed 15 months, as required.

Spire Response - Item #3 – Backup SCADA System Test: Spire does not currently have a back-up control room for Clear Creek Storage. This information has also been included in the updated Control Room Management Plan (CRM).

However, a new control room at Clear Creek is under construction with the facility expansion project. Once its operation initiates (anticipated in November 2024), we will have the ability to operate both facilities (Clear Creek or Belle Butte) from either the Clear Creek or Belle Butte control room. The CRM Plan, which will apply to both control rooms, will be updated to reflect this operational setup upon completion.

4. § 192.631 Control room management.

(a) ...

(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms.

Clear Creek failed to develop a written alarm management plan as required by §192.631(e). Specifically, a review of the Clear Creek Control Room Management manual demonstrated that the manual did not contain a written alarm management plan.² Clear Creek utilizes a SCADA system to operate the natural gas storage field including wells, pipelines, gas plant and all other associated equipment.

Therefore Clear Creek failed to develop and use a written alarm management plan as required per § 192.631(e).

Spire Response - Item #4 – Written Alarm Management Plan: The Clear Creek Control Room Manual (CRM) has been revised to include all sections of §192.631. Spire has completed development of the written alarm management plan and has incorporated it into the revised CRM.