

Missouri Department of Natural Resources

From: Carey, Daniel <daniel.carey@dnr.mo.gov>
Sent: Thursday, March 30, 2017 10:32 AM

To: Ali Trunzo Cc: Lori Ferry

Subject: RE: Spire STL Pipeline - Coldwater Creek

Ali,

Thank you for coordinating changed pipeline plans with USACE FUSRAP and DNR.

Missouri DNR has no concerns regarding USACE's assessment of the proposed change.

Dan

From: Ali Trunzo [mailto:A.Trunzo@gaiconsultants.com]

Sent: Thursday, March 30, 2017 8:48 AM

To: Carey, Daniel **Cc:** Lori Ferry

Subject: Spire STL Pipeline - Coldwater Creek

Dan,

GAI, on behalf of Spire STL Pipeline LLC (Spire), previously coordinated with you regarding the crossing of Coldwater Creek as part of the proposed Spire STL Pipeline Project, located in St. Charles and St. Louis Counties, Missouri. Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield 24-inch pipeline (referred to as the "North County Extension").

The North County Extension proposes to cross Coldwater Creek via horizontal directional drill, as shown on the attached figure. The crossing location is approximately 0.3 miles downstream of the previously evaluated crossing location.

We coordinated with Jon Rankins, the USACE FUSRAP contact, regarding this proposed change, and he confirmed that there are no concerns with contaminants of concern and no utility support is required. A copy of this correspondence is attached.

Does Missouri DNR have any concerns with this assessment?

Thank you,

Ali

Alessandra M. Trunzo

Project Environmental Specialist

385 E. Waterfront Drive, Homestead, PA 15120-5005

Direct 412.399.5096 Office 412.476.2000 Email a.trunzo@gaiconsultants.com

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From: Ali Trunzo

Sent: Thursday, March 30, 2017 9:48 AM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline - Coldwater Creek

Attachments: 3-29-17 Email from J Rankins USACE.PDF; Hwy_67_Coldwater_Creek_HDD_Map_2017_03

_23.pdf

From: Ali Trunzo

Sent: Thursday, March 30, 2017 9:48 AM

To: 'Carey, Daniel' <daniel.carey@dnr.mo.gov>
Cc: Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: Spire STL Pipeline - Coldwater Creek

Dan,

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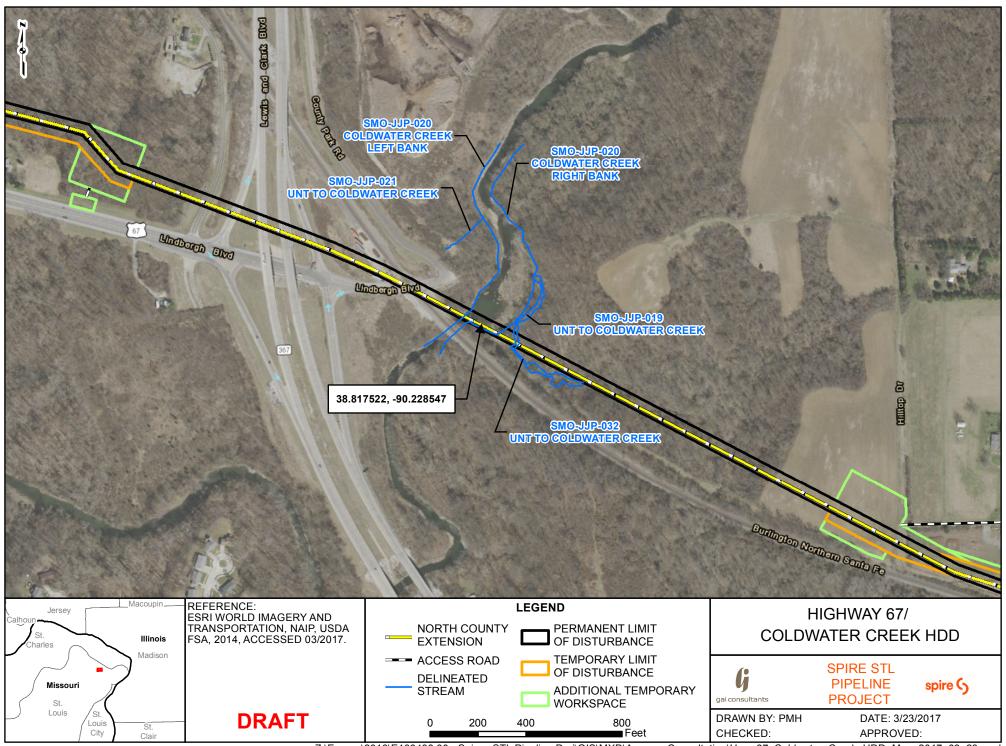
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From: Rankins, Jonathan E CIV USARMY CEMVS (US) < Jonathan.E.Rankins@usace.army.mil>

Sent: Wednesday, March 29, 2017 6:39 PM

To: Ali Trunzo

Cc: Lori Ferry; Prebianca, Jacob A CIV CEMVS CEMVD (US)

Subject: RE: Spire STL Pipeline - Coldwater Creek

No utility support required

----Original Message-----

From: Ali Trunzo [mailto:A.Trunzo@gaiconsultants.com]

Sent: Wednesday, March 29, 2017 4:42 PM

To: Rankins, Jonathan E CIV USARMY CEMVS (US) < Jonathan.E.Rankins@usace.army.mil> Cc: Lori Ferry < L.Ferry@gaiconsultants.com>; Prebianca, Jacob A CIV CEMVS CEMVD (US)

<Jacob.A.Prebianca@usace.army.mil>

Subject: [Non-DoD Source] RE: Spire STL Pipeline - Coldwater Creek

Jon,

Thank you for evaluating this area. To clarify, would utility support still not be required for this crossing?

Ali

----Original Message-----

From: Rankins, Jonathan E CIV USARMY CEMVS (US) [mailto:Jonathan.E.Rankins@usace.army.mil]

Sent: Wednesday, March 29, 2017 5:06 PM

To: Ali Trunzo < A.Trunzo@gaiconsultants.com>; Prebianca, Jacob A CIV CEMVS CEMVD (US)

<Jacob.A.Prebianca@usace.army.mil>
Cc: Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: RE: Spire STL Pipeline - Coldwater Creek

No concerns regarding FUSRAP COC's at this new location. We have historic sample data in this area that indicates background levels of COC's.

JR

----Original Message-----

From: Ali Trunzo [mailto:A.Trunzo@gaiconsultants.com]

Sent: Wednesday, March 29, 2017 9:58 AM

To: Prebianca, Jacob A CIV CEMVS CEMVD (US) < Jacob.A. Prebianca@usace.army.mil>

Cc: Rankins, Jonathan E CIV USARMY CEMVS (US) < Jonathan. E. Rankins@usace.army.mil>; Lori Ferry

<L.Ferry@gaiconsultants.com>

Subject: [Non-DoD Source] Spire STL Pipeline - Coldwater Creek

Jacob,

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longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield
24-inch pipeline (referred to as the "North County Extension").

The North County Extension proposes to cross Coldwater Creek via horizontal directional drill, as shown on the attached figure. The crossing location is approximately 0.3 miles downstream of the previously evaluated crossing location.

Are there any concerns regarding contamination with this proposed crossing?

Thank you,

Ali

Alessandra M. Trunzo
Project Environmental Specialist

385 E. Waterfront Drive, Homestead, PA 15120-5005

Direct 412.399.5096 Office 412.476.2000 Email a.trunzo@gaiconsultants.com <mailto:a.trunzo@gaiconsultants.com >

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March 28, 2017

Mr. Mike Irwin Water Protection Program Section 401 Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Mr. Irwin:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that the Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

Amended Project Description

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new, greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC

interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75 feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act ("NEPA") process began (initiation of FERC Pre-filing process);
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- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
- September 2017 (Anticipated) Draft NEPA Document Published; and
- December 2017 (Anticipated) FERC Decision on Application.

Construction is anticipated to commence in January 2018.

On behalf of Spire, we'd like to take this opportunity to invite the Missouri Department of Natural Resources to provide comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

your perry

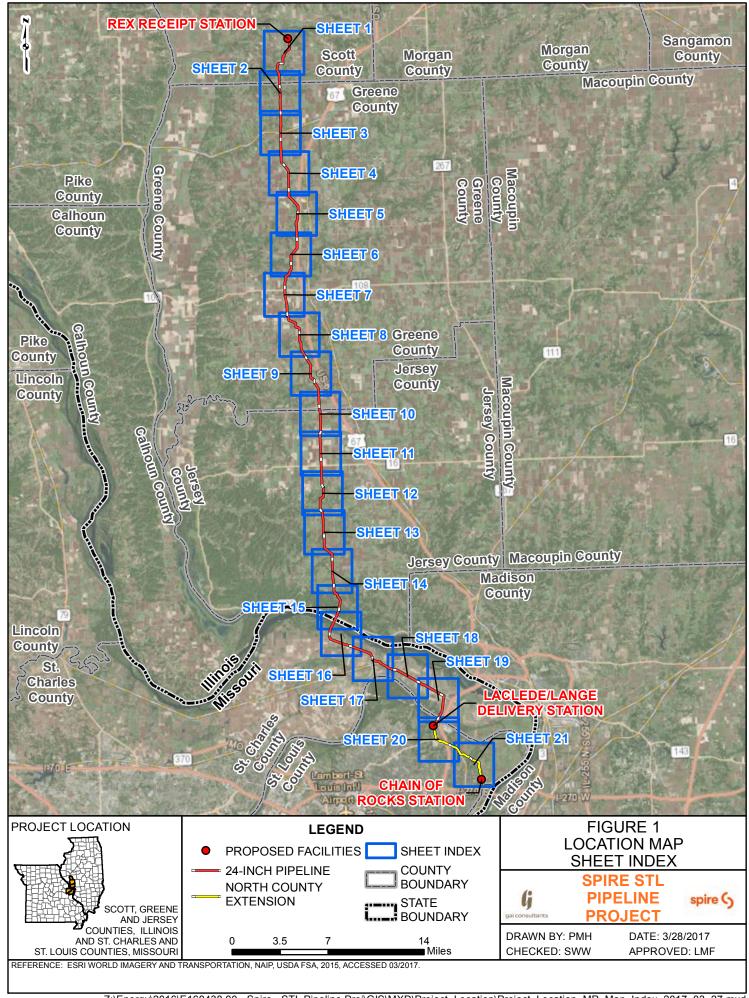
Lori M. Ferry

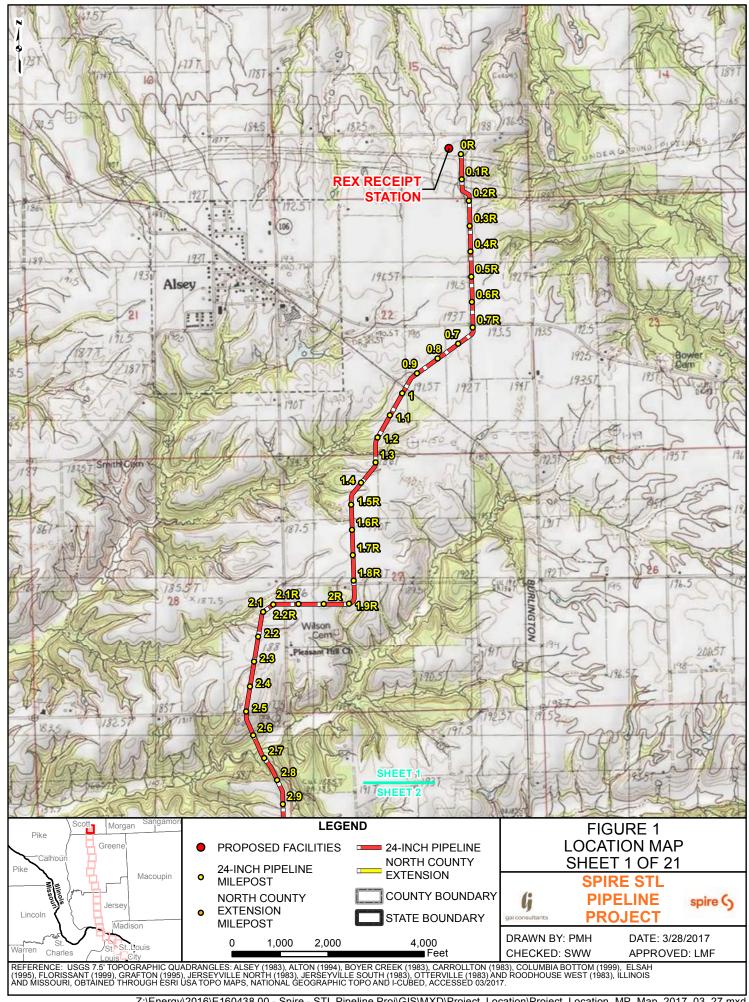
Environmental Manager

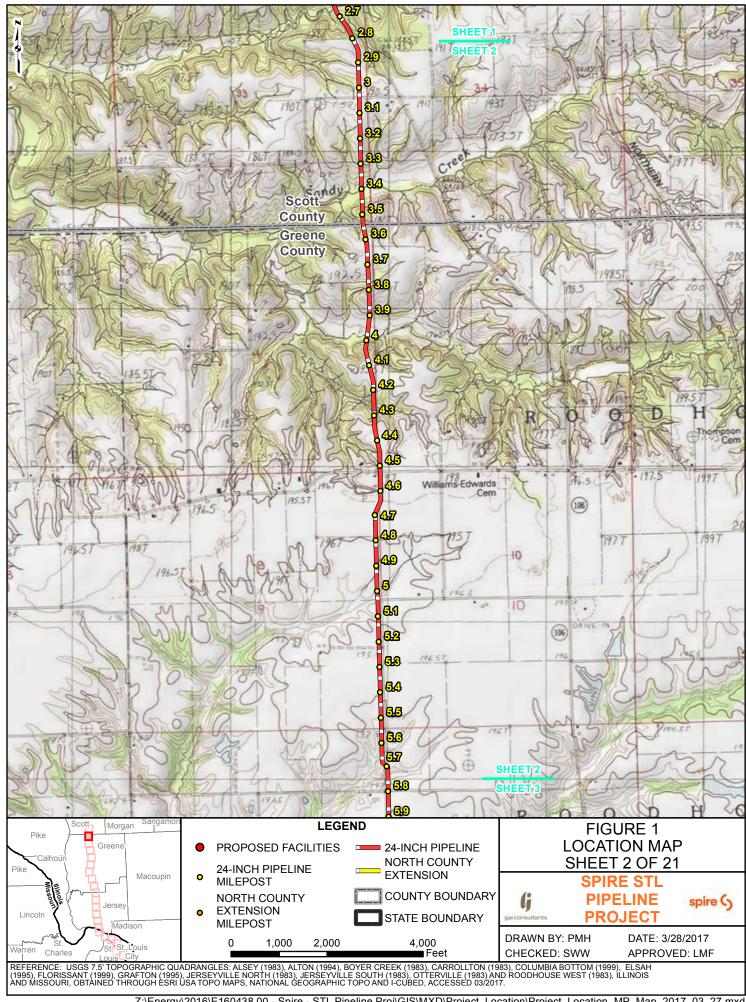
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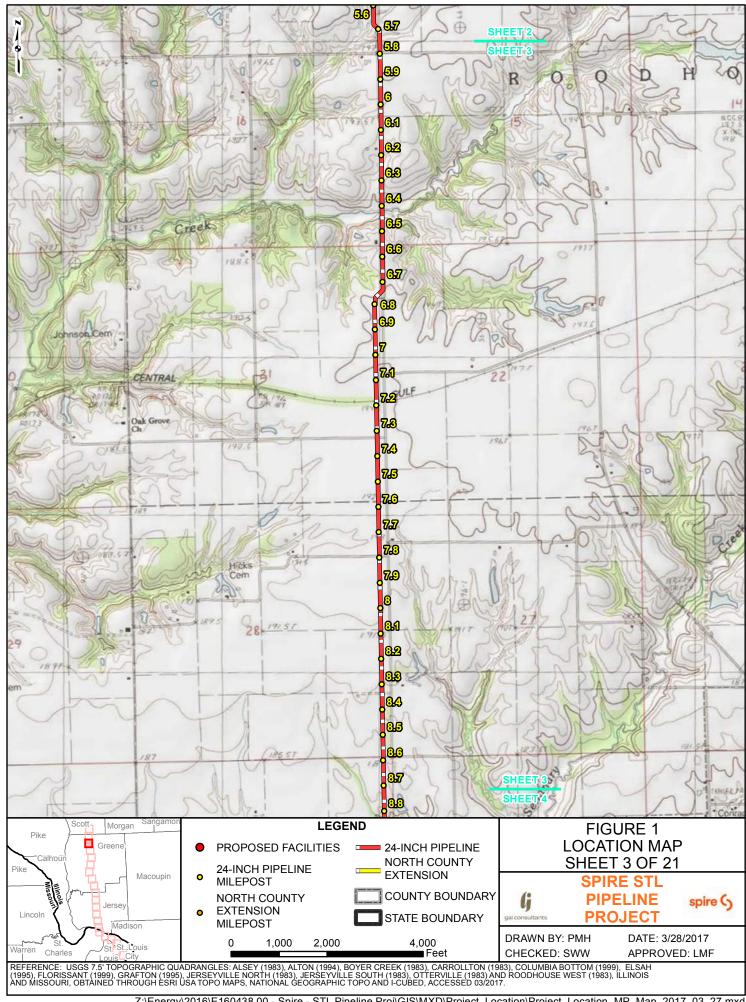
Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

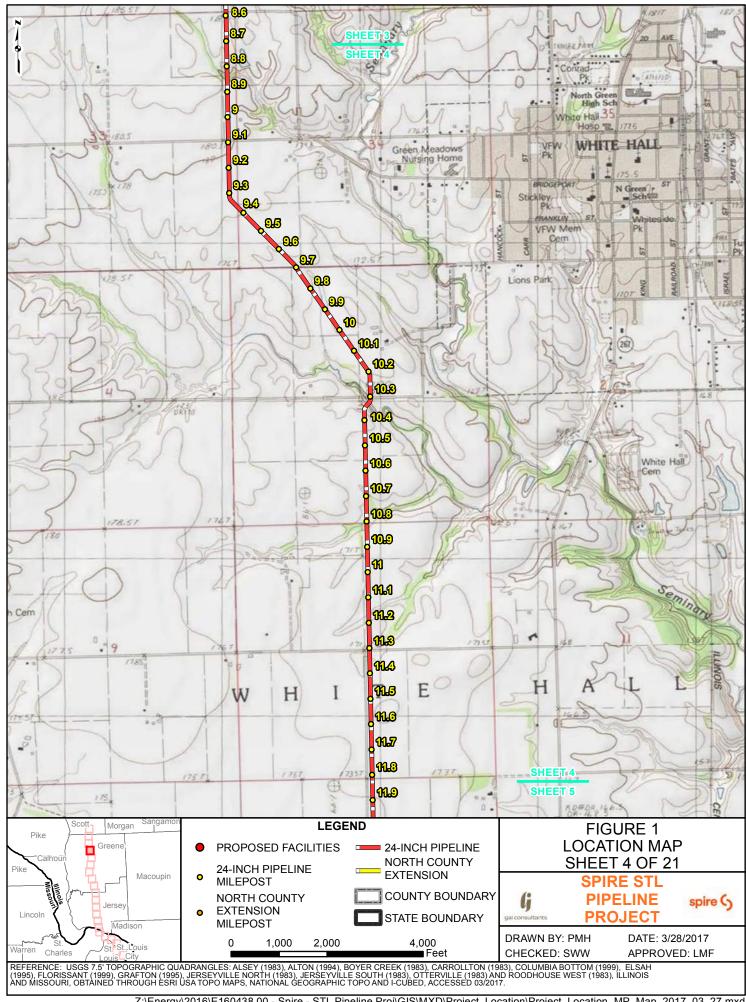
ATTACHMENT USGS TOPOGRAPHIC MAP (FIGURE 1)

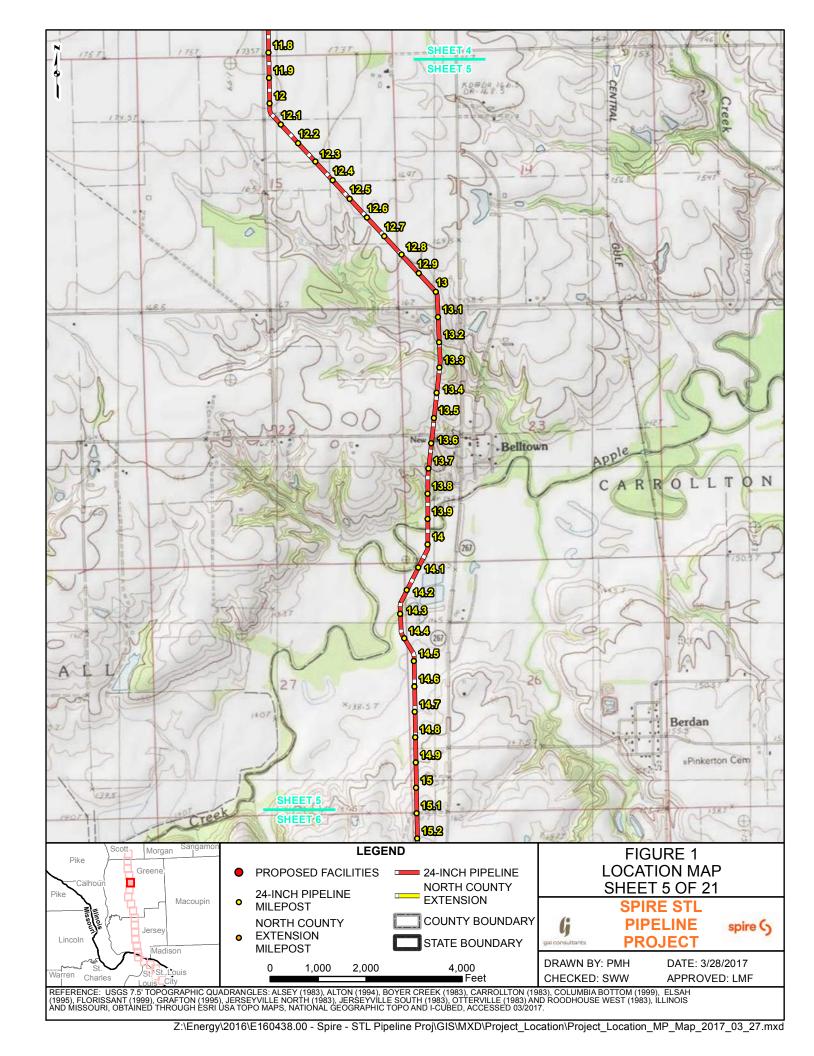


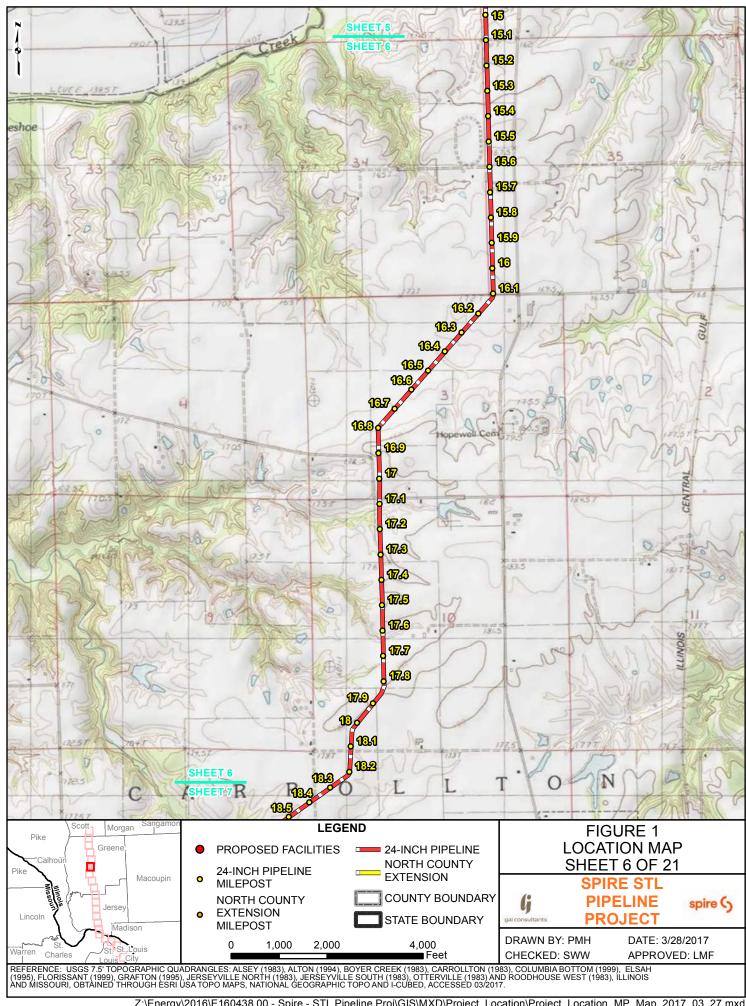


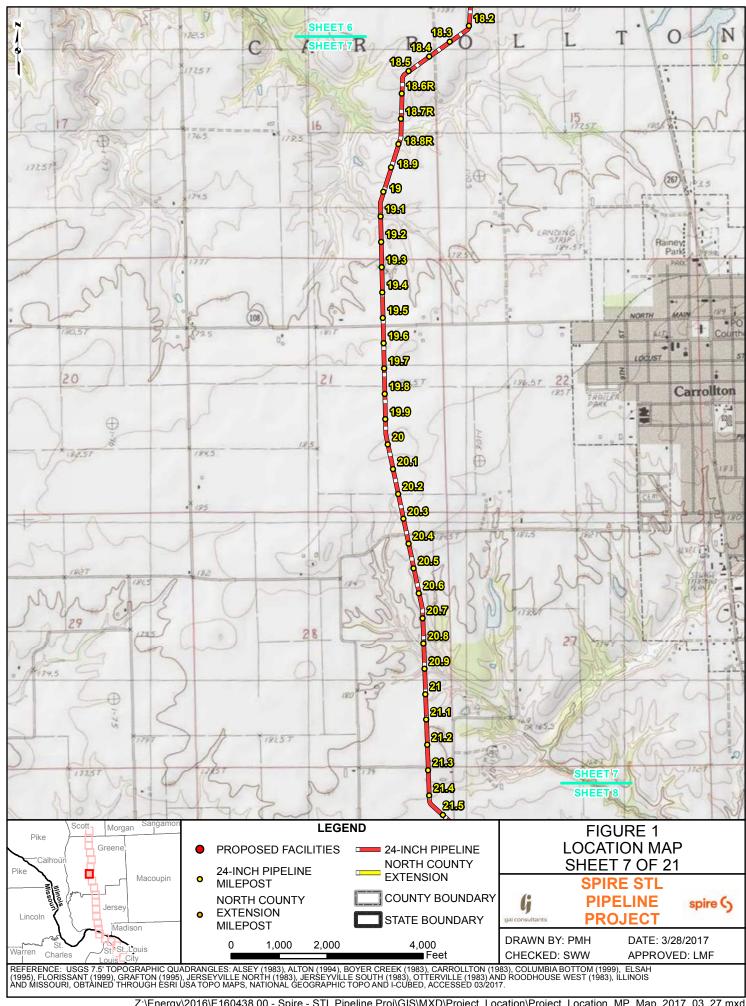


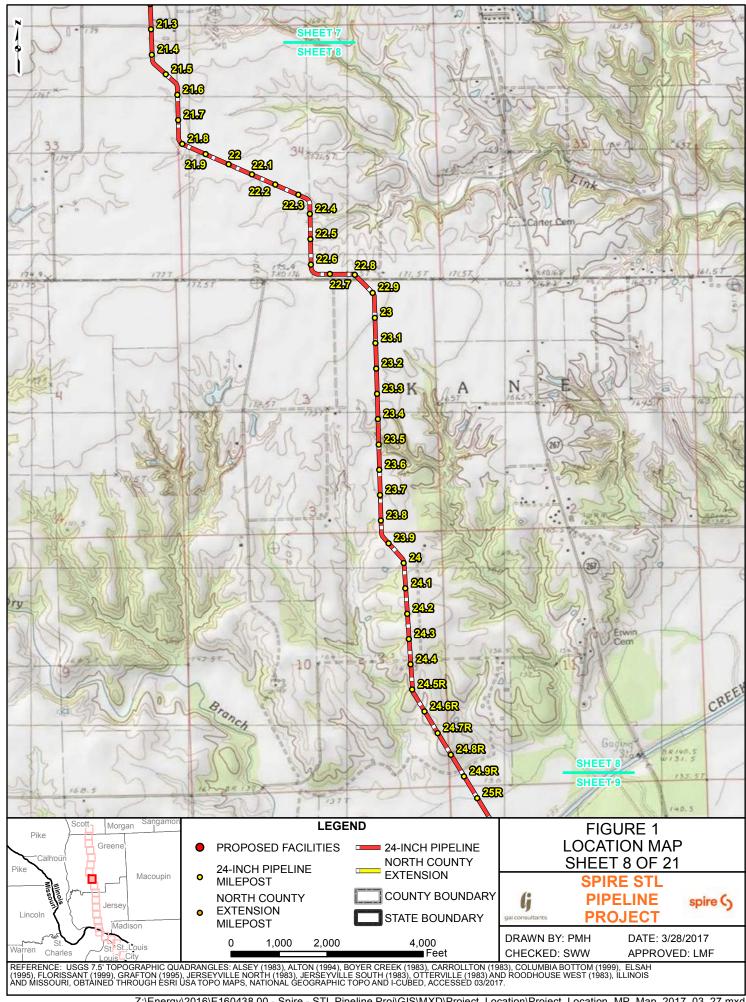


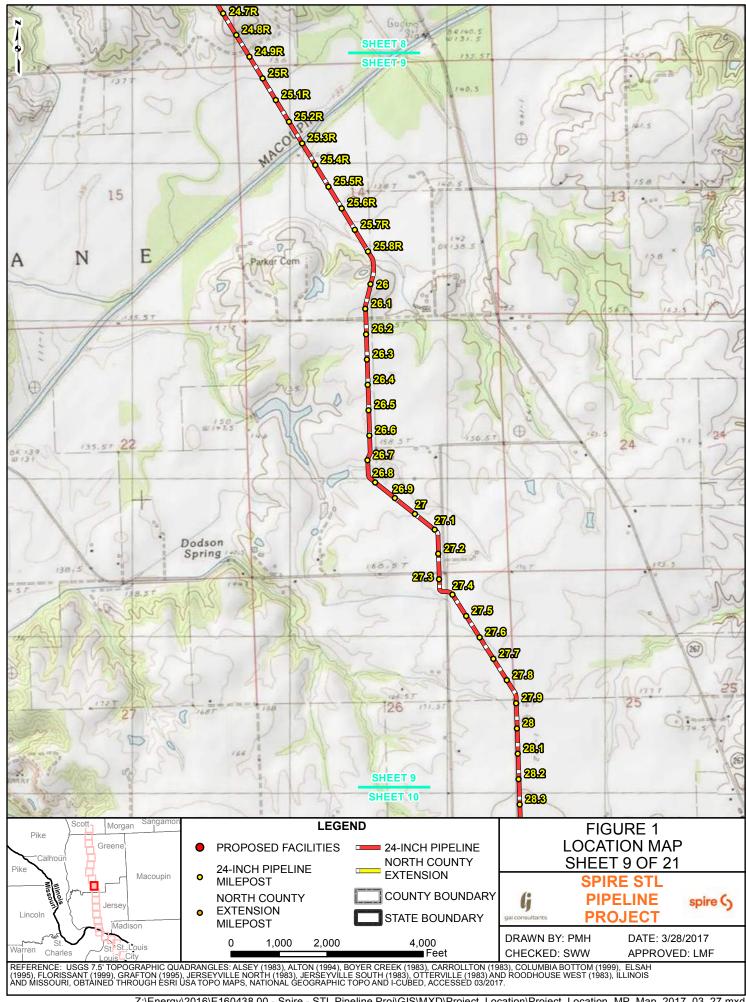


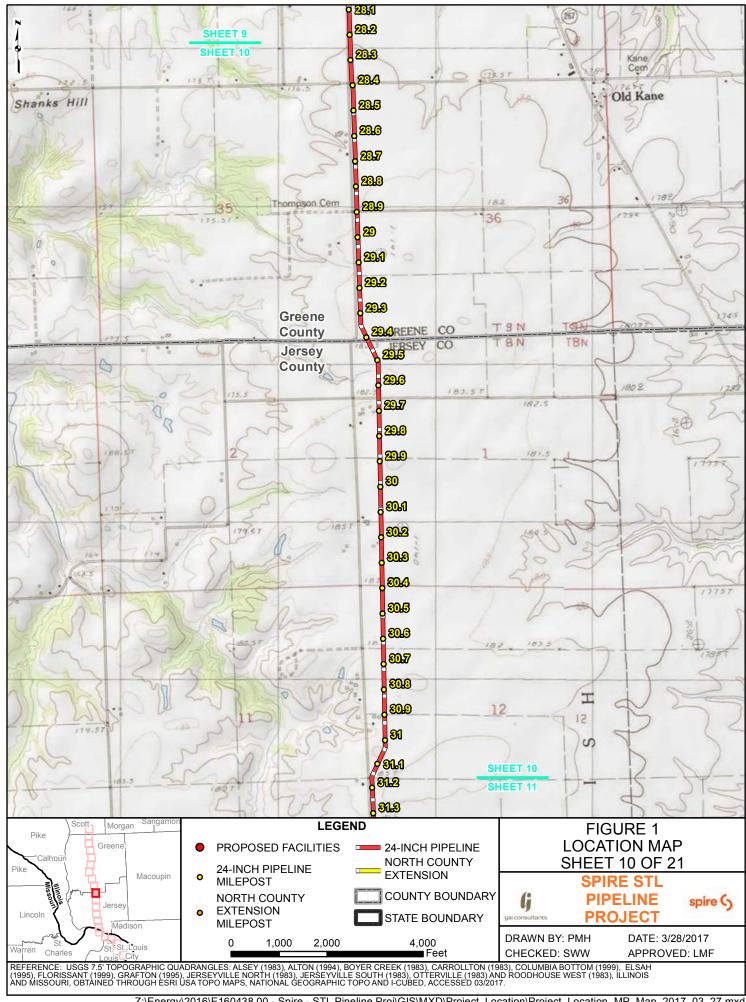


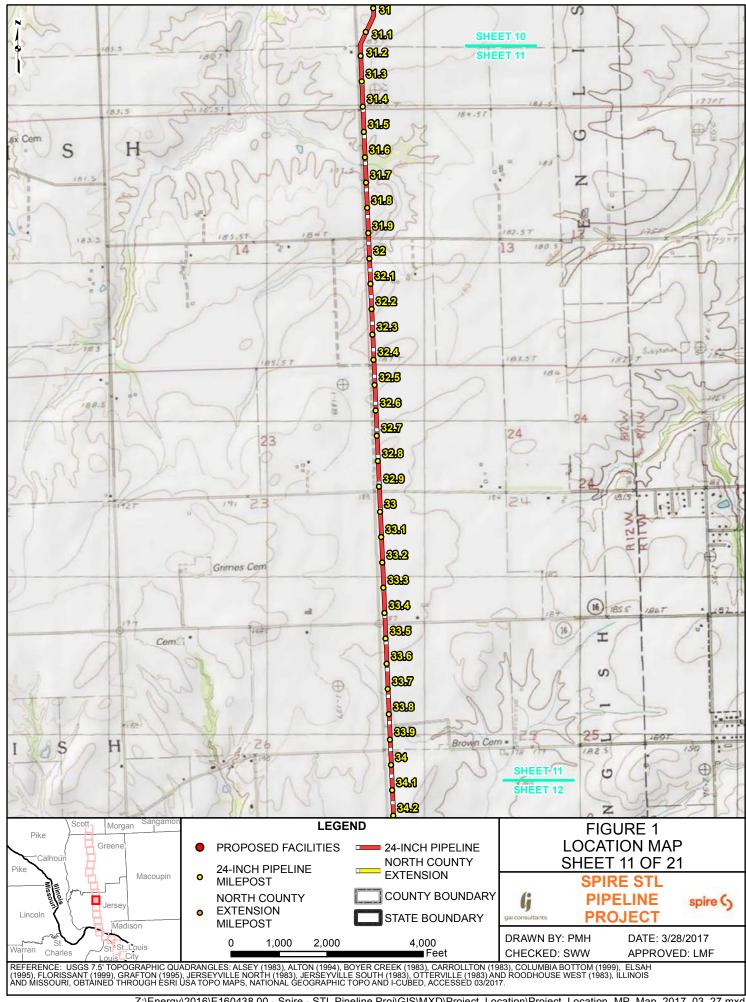


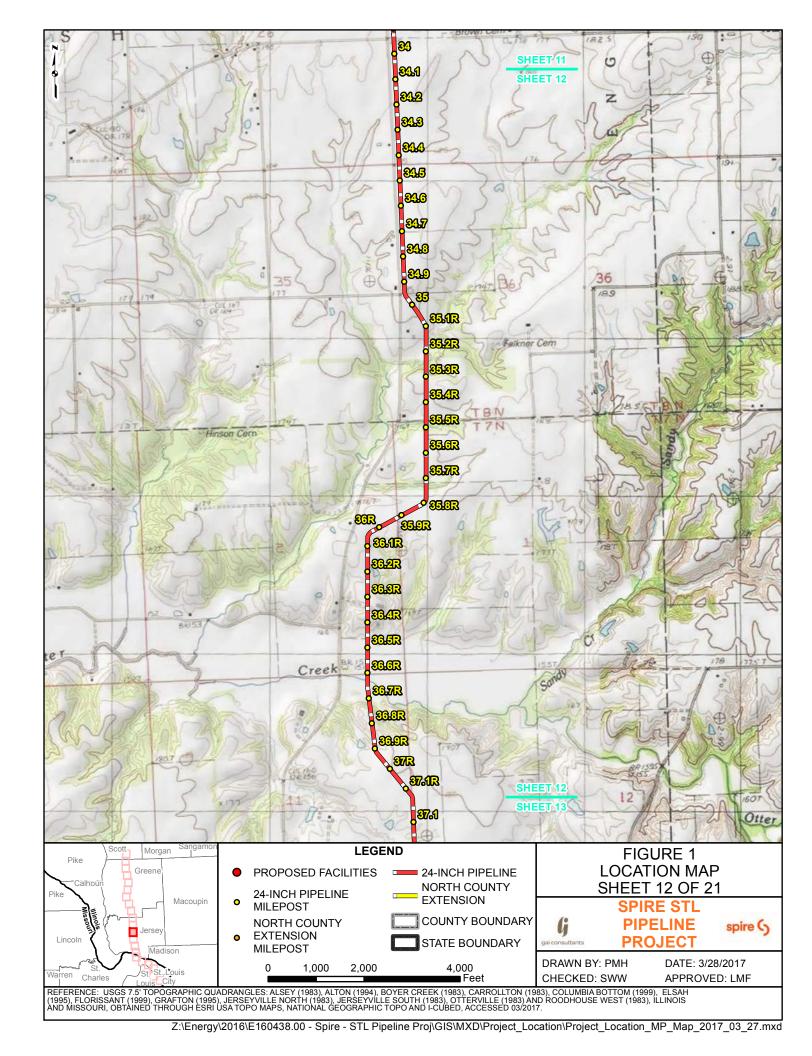


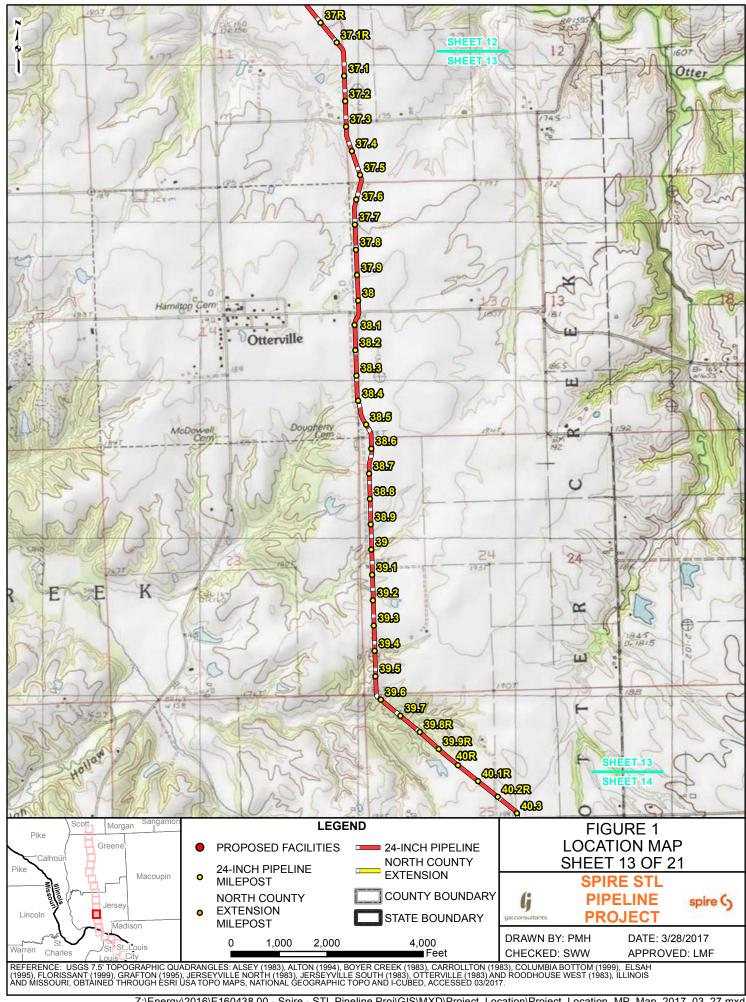


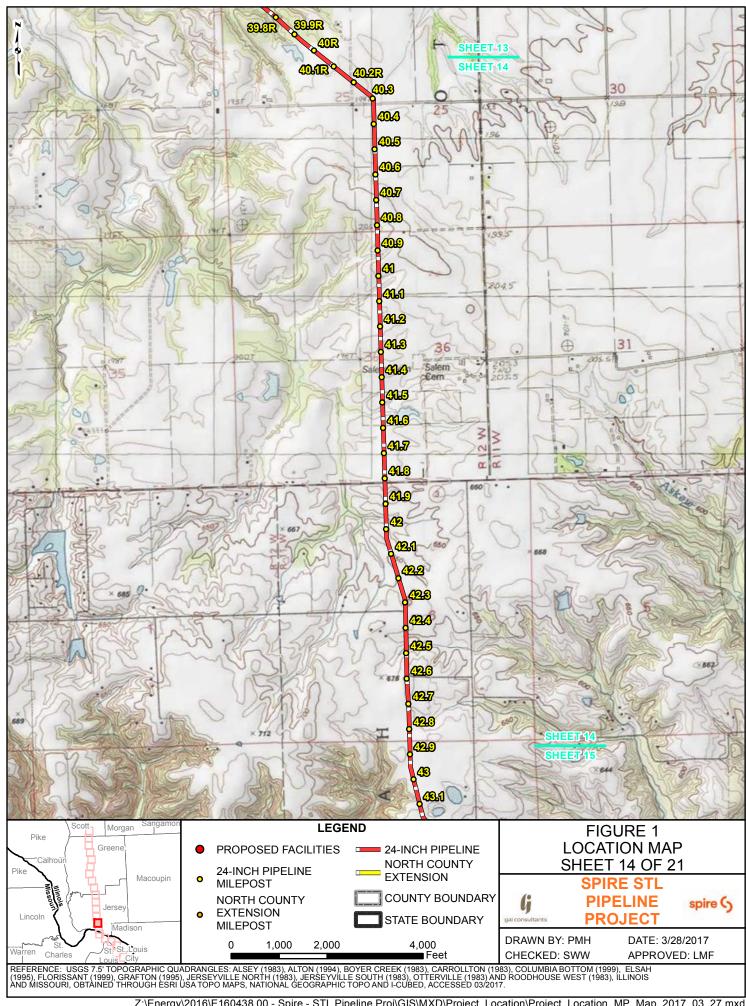


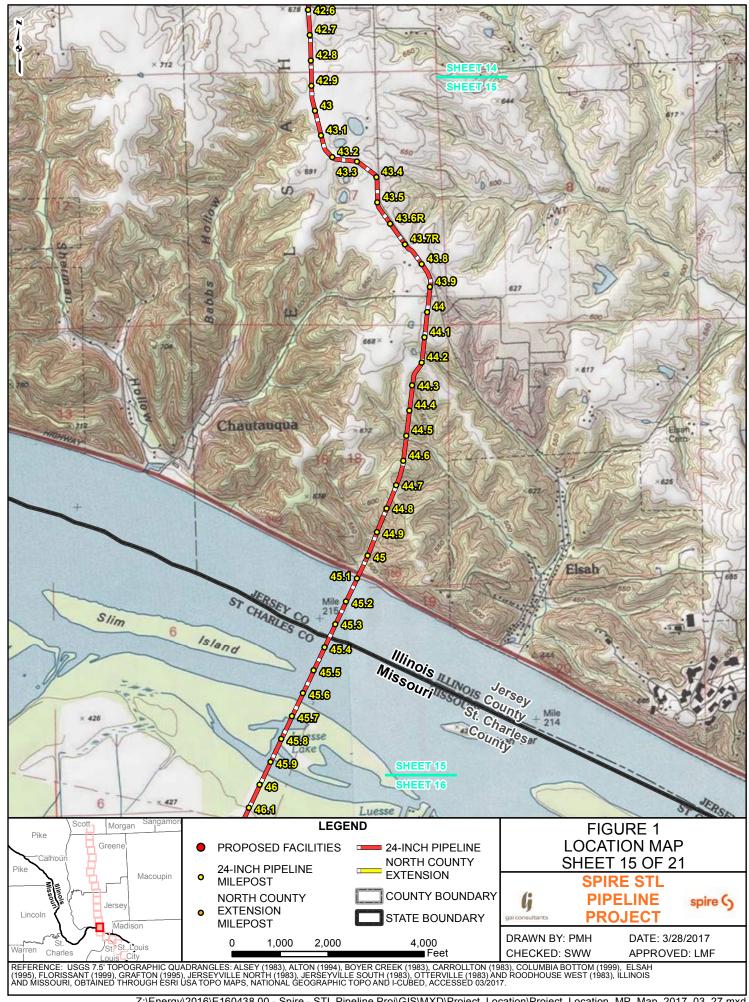


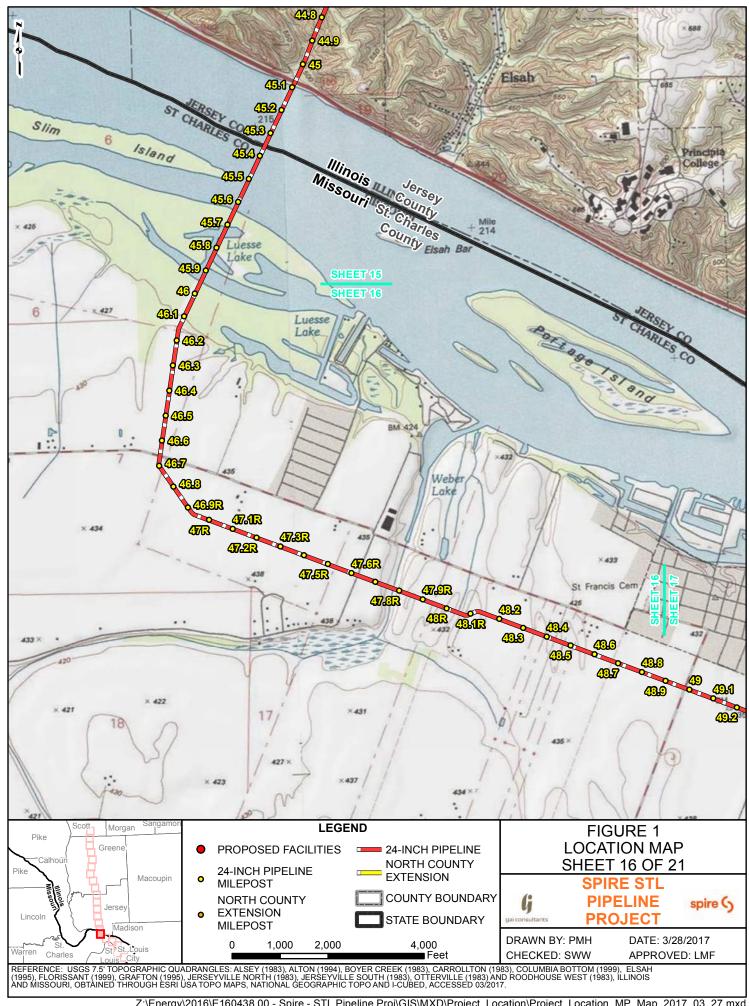


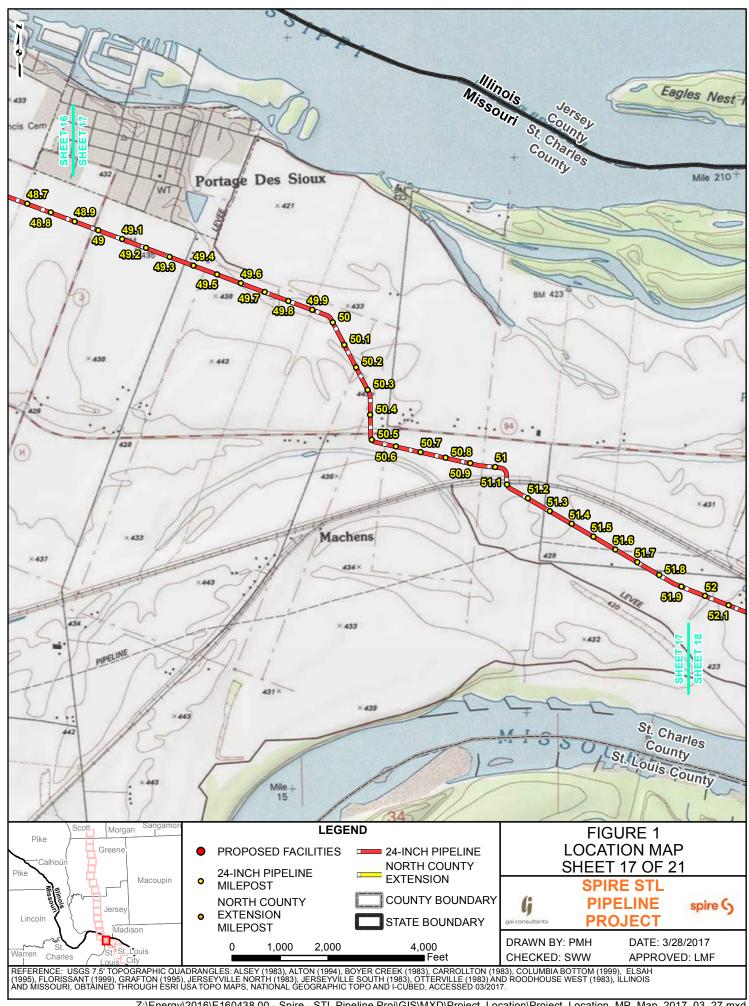


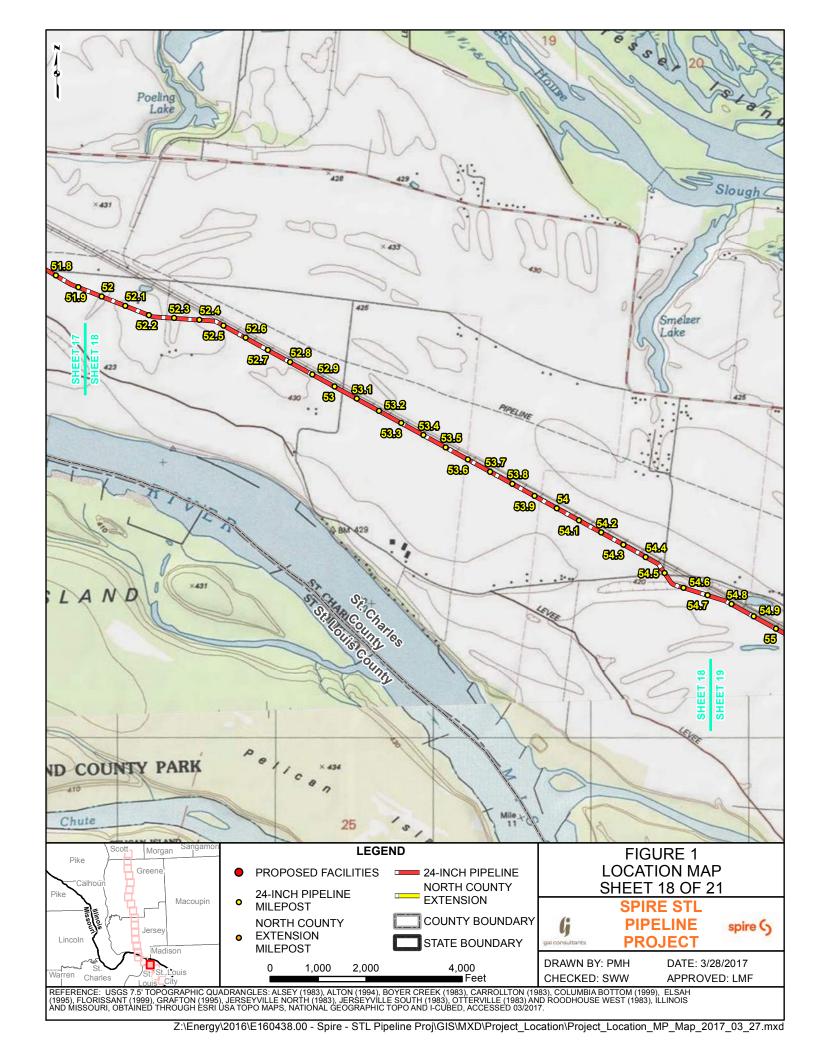


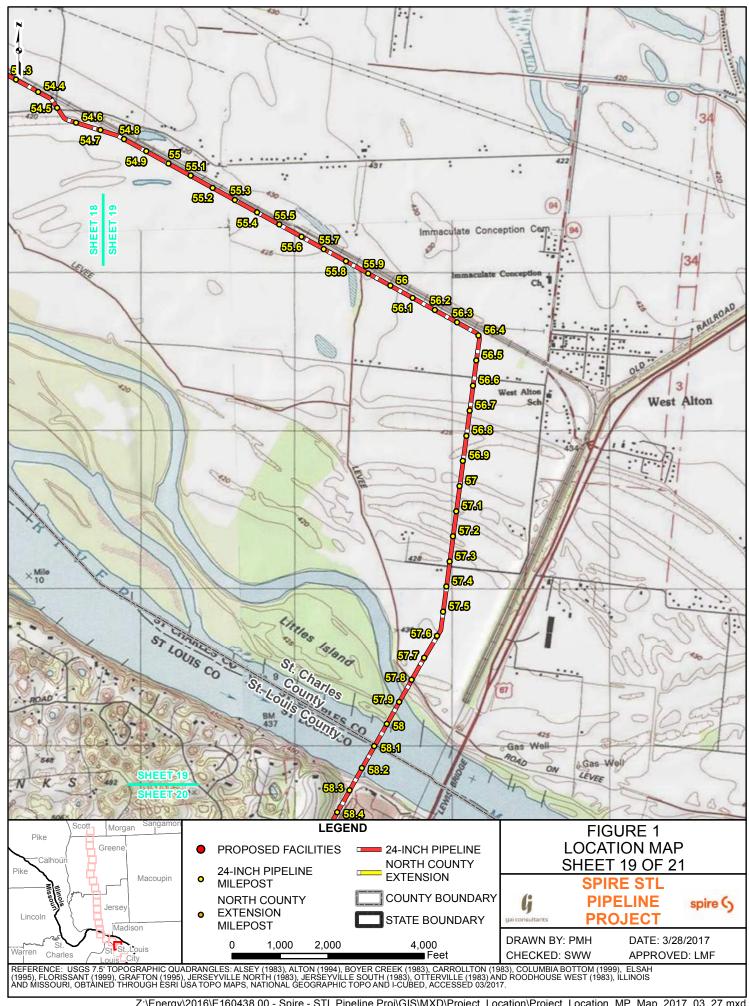


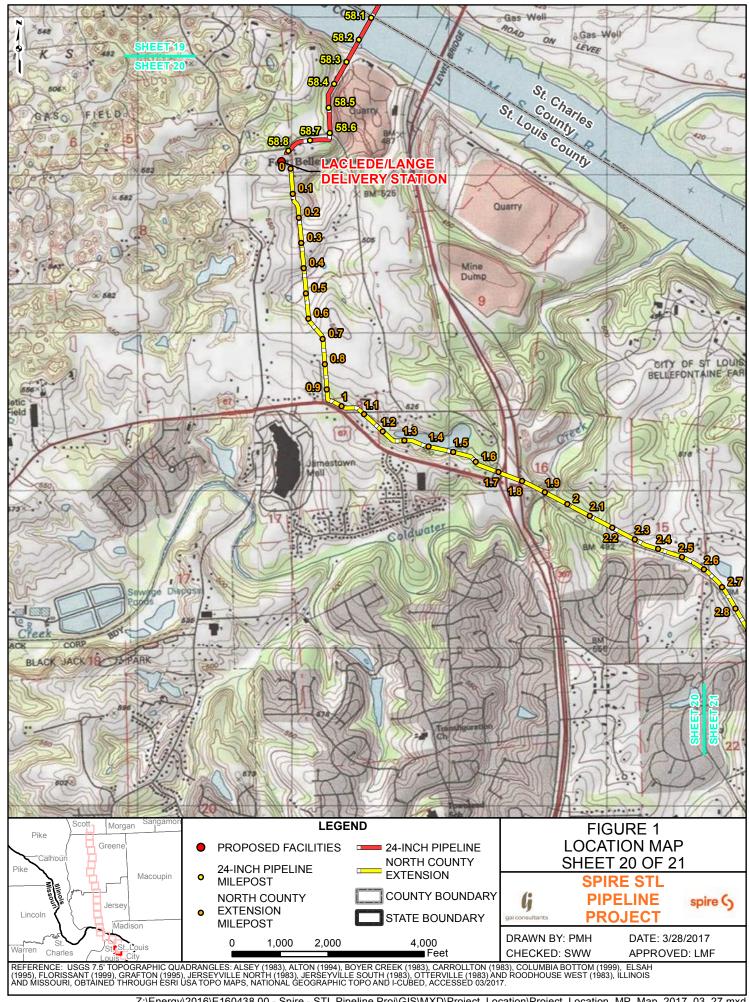


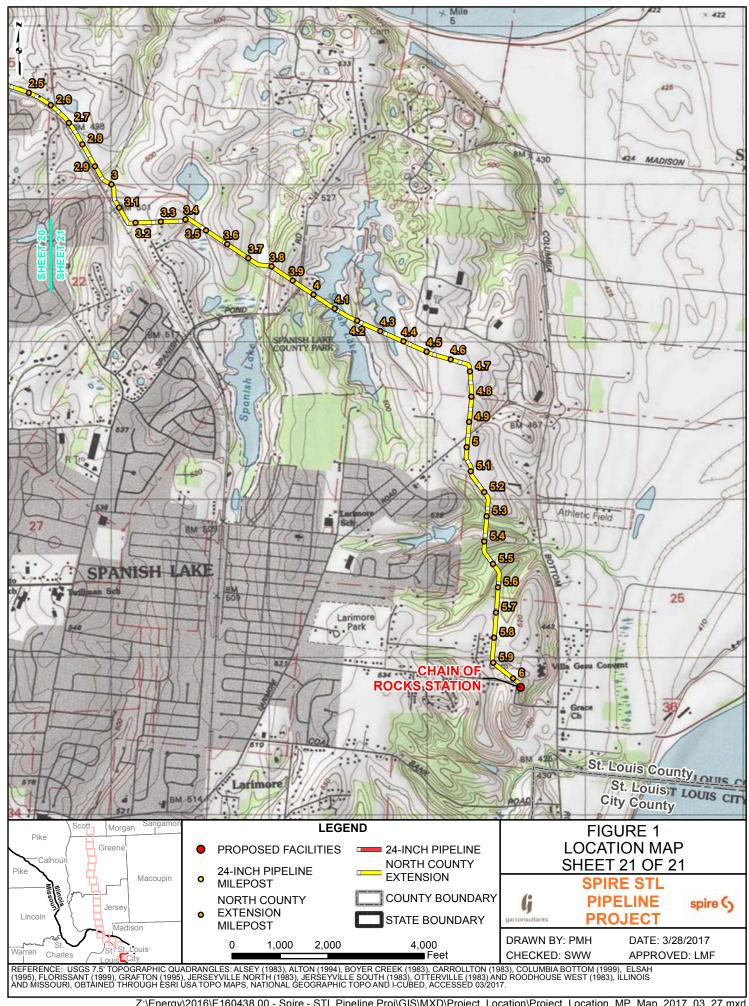














March 28, 2017

Ms. Sara Parker Pauley Director Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Ms. Parker Pauley:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

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If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

your perry

Lori M. Ferry

Environmental Manager

LMF/ka

Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)



March 28, 2017

Mr. Paul Mueller Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Mr. Mueller:

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with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

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Sincerely,

GAI Consultants, Inc.

primperry

Lori M. Ferry

Environmental Manager

LMF/ka

Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

From: Ali Trunzo

Sent: Friday, February 03, 2017 12:59 PM

To: Ali Trunzo

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

From: Ali Trunzo

Sent: Friday, February 03, 2017 12:58 PM **To:** 'Tomlin, Ken' <ken.tomlin@dnr.mo.gov>

Cc: Jaafari, Maher <maher.jaafari@dnr.mo.gov>; Tiffany Anders <T.Anders@gaiconsultants.com>; Baker, Everett

<Everett.Baker@dnr.mo.gov>

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Ken,

Thank you for the input. We spoke with Mr. Mark Warner of Portage des Sioux today, and he confirmed that the city does not have any local regulations or zoning ordinances regarding the half-mile buffer protection area.

Thank you,

Ali

From: Tomlin, Ken [mailto:ken.tomlin@dnr.mo.gov]

Sent: Friday, February 03, 2017 10:50 AM

To: Ali Trunzo < <u>A.Trunzo@gaiconsultants.com</u>>; Baker, Everett < <u>Everett.Baker@dnr.mo.gov</u>> **Cc:** Jaafari, Maher < maher.jaafari@dnr.mo.gov>; Tiffany Anders < T.Anders@gaiconsultants.com>

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Ms. Trunzo – from a regulatory perspective, the ½-mile buffer protection area around a public water well is not an enforceable standard at the state level. Local governments are encouraged to manage these areas to prevent contamination to their raw water source and many implement local ordinances or zoning regulations to protect these areas; however, such activities are largely at the discretion of the well owner. Portage des Sioux would need to be contacted to determine whether there are any local regulatory protections in place. I believe Mr. Jaafari is out of the office today, but he may offer additional recommendations in the coming days. Please let me know if I may be of any additional assistance and thank you for your inquiry – Sincerely,

Ken

Kenneth P. Tomlin

Source Water Assessment and Protection Coordinator Water Protection Program – Public Drinking Water Branch PO Box 176, Jefferson City, MO 65102-0176 Office Phone: (573) 526-0269

Office Fax: (573) 751-3110



From: Carey, Daniel <daniel.carey@dnr.mo.gov>
Sent: Friday, February 03, 2017 11:49 AM

To: Ali Trunzo

Subject: Spire STL Pipeline - Coldwater Creek

Ms. Trunzo,

Our office is in receipt of some email correspondence between GAI and United States Army Corps of Engineers (USACE, Jacob Prebianca and Jonathon Rankins) regarding pipeline work near Coldwater Creek. We concur with USACE's assessment regarding the pipeline work area.

If the location or scope of GAI work near Coldwater Creek changes, we recommend GAI update and again consult with USACE before proceeding.

Thanks,
Daniel Carey
Missouri Department of Natural Resources
FUSRAP Project Oversight
(314) 877-3047 Office
(314) 265-4272 Cell

From: Tomlin, Ken <ken.tomlin@dnr.mo.gov>
Sent: Friday, February 03, 2017 10:50 AM

To: Ali Trunzo; Baker, Everett
Cc: Jaafari, Maher; Tiffany Anders

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Ms. Trunzo – from a regulatory perspective, the ½-mile buffer protection area around a public water well is not an enforceable standard at the state level. Local governments are encouraged to manage these areas to prevent contamination to their raw water source and many implement local ordinances or zoning regulations to protect these areas; however, such activities are largely at the discretion of the well owner. Portage des Sioux would need to be contacted to determine whether there are any local regulatory protections in place. I believe Mr. Jaafari is out of the office today, but he may offer additional recommendations in the coming days. Please let me know if I may be of any additional assistance and thank you for your inquiry –

Sincerely,

Ken

Kenneth P. Tomlin

Source Water Assessment and Protection Coordinator Water Protection Program – Public Drinking Water Branch PO Box 176, Jefferson City, MO 65102-0176

Office Phone: (573) 526-0269 Office Fax: (573) 751-3110



Promoting, Protecting and Enjoying our Natural Resources. Learn more at dnr.mo.gov.

From: Ali Trunzo [mailto:A.Trunzo@gaiconsultants.com]

Sent: Thursday, February 02, 2017 4:00 PM

To: Tomlin, Ken; Baker, Everett **Cc:** Jaafari, Maher; Tiffany Anders

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Ken and Everett,

We wanted to circle back with you regarding the public water well at the Portage Des Sioux plant. Have you heard anything further if there are concerns with the pipeline crossing the 0.5-mile buffer?

Additionally we spoke with Eric Gilstrap yesterday to clarify the status of agency coordination and permitting currently in progress for this Project.

Thank you,	
Ali	
	 -

From: Ali Trunzo

Sent: Friday, February 03, 2017 9:18 AM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline - Coldwater Creek **Attachments:** Attachment_USACE Correspondence.pdf

From: Ali Trunzo

Sent: Friday, February 03, 2017 9:18 AM

To: 'eric.gilstrap@dnr.mo.gov' <eric.gilstrap@dnr.mo.gov>

Subject: Spire STL Pipeline - Coldwater Creek

Eric,

Attached is the record of correspondence with the US Army Corps of Engineers FUSRAP program regarding the crossing of Coldwater Creek for the Spire STL Pipeline Project in St. Louis County, Missouri. The USACE determined that there is no contamination or pathway for future contamination at the proposed crossing. Please let us know if MDNR has concerns.

Thank you again for your assistance on this Project.

Ali

Alessandra M. Trunzo

Project Environmental Specialist

385 E. Waterfront Drive, Homestead, PA 15120-5005

Direct 412.399.5096 Office 412.476.2000 Email a.trunzo@gaiconsultants.com

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GAI Consultants provides local expertise to worldwide clients in the energy, transportation, development, government, and industrial markets.

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From: Lori Ferry

Sent: Wednesday, October 12, 2016 12:38 PM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline

----Original Message-----

From: Rankins, Jonathan E MVS [mailto:Jonathan.E.Rankins@usace.army.mil]

Sent: Wednesday, October 12, 2016 11:37 AM To: Lori Ferry <L.Ferry@gaiconsultants.com>

Subject: RE: Spire STL Pipeline

Correct, there is not contamination or pathway for future contamination at that location.

----Original Message-----

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]

Sent: Wednesday, October 12, 2016 11:34 AM

To: Rankins, Jonathan E MVS < Jonathan. E. Rankins@usace.army.mil>

Subject: [EXTERNAL] RE: Spire STL Pipeline

Hi Jon,

We received the email below. Thank you for looking into this so quickly.

Just to confirm, there is no utility support needed because there is an unlikely chance of the contamination being an issue at our proposed crossing location? Just wanted to verify the determination.

We will continue to coordinate with your offices if this proposed crossing location changes.

Thank you again,

Lori Ferry

----Original Message-----

From: Prebianca, Jacob MVS [mailto:Jacob.A.Prebianca@usace.army.mil]

Sent: Wednesday, October 12, 2016 11:22 AM To: Jayme Fuller < J. Fuller@gaiconsultants.com>

Cc: Lori Ferry <L.Ferry@gaiconsultants.com>; Ali Trunzo <A.Trunzo@gaiconsultants.com>; Rankins, Jonathan E MVS

<Jonathan.E.Rankins@usace.army.mil>

Subject: RE: Spire STL Pipeline

Jayme,

The USACE radiation safety officer Jon Rankins has reviewed this location and determined that no utility support is required. Please contact Jon with any further questions regarding this determination.

Jon Rankins
Jonathan.E.Rankins@usace.army.mil
O:314-260-3933
M:314-399-5505

Thanks,

Jacob Prebianca

Project Engineer USACE FUSRAP O 314-731-7661
C 314-422-8954
Original Message From: Jayme Fuller [mailto:J.Fuller@gaiconsultants.com] Sent: Thursday, September 29, 2016 3:31 PM To: Prebianca, Jacob MVS <jacob.a.prebianca@usace.army.mil> Cc: Lori Ferry <l.ferry@gaiconsultants.com>; Ali Trunzo <a.trunzo@gaiconsultants.com> Subject: [EXTERNAL] Spire STL Pipeline</a.trunzo@gaiconsultants.com></l.ferry@gaiconsultants.com></jacob.a.prebianca@usace.army.mil>
Hi Jacob,
Per our discussion earlier this week, I have attached a figure outlining the new proposed crossing of Coldwater Creek. The crossing will be offset from the existing crossing and Spire would like to open cut the crossing rather than bore under as originally proposed. I have asked the engineers to estimate soil disturbance calculations for the crossing within the mapped floodplain and across the creek. They are estimating 780 cubic yards of soil disturbance in this area (see the attached sketch).
Spire would like to have this area sampled as soon as possible so they can have an understanding of what they will be getting into prior to construction. Construction is not planned until 2018 however, because this project is regulated by FERC, we have to list and understand all potential impacts associated with the project early on in the process.
Please let me know when your team may be able to sample this location, if is needed at all.
Thanks!
Jayme L. Fuller, Environmental Manager
GAI Consultants, Inc.
Charleston Office I 300 Summers Street, Suite 1100, Charleston WV 25301
Indianapolis Office I 6420 Castleway West, Indianapolis, IN 46250

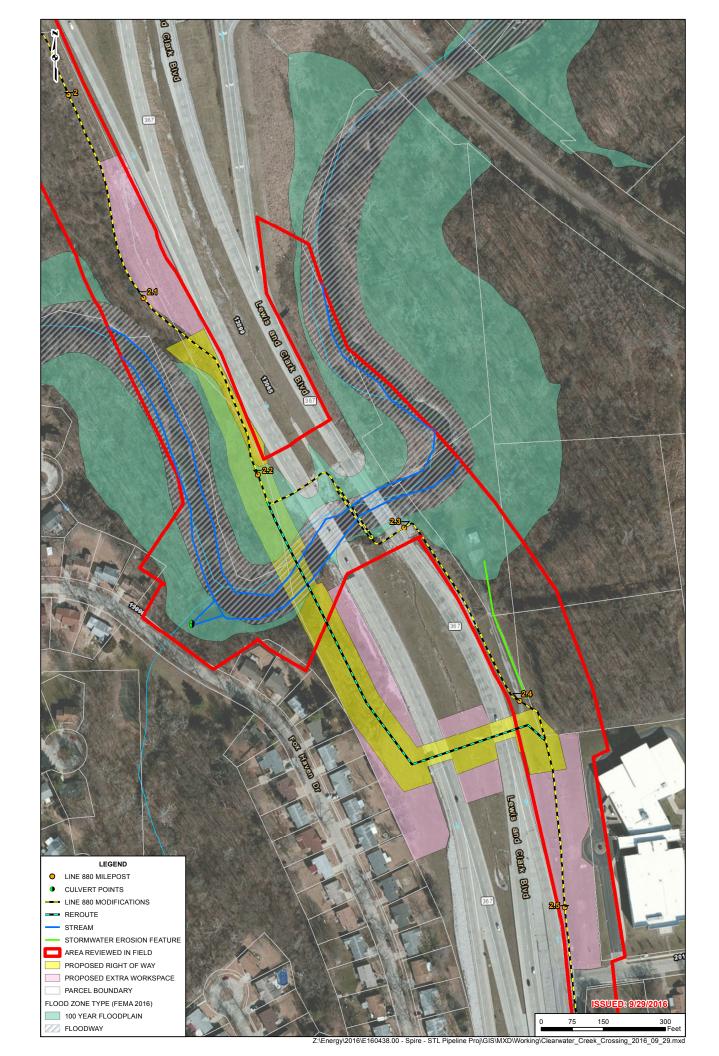
1-234-203-0763 | C 614.499.6258 | <BlockedBlockedhttp://www.facebook.com/gaiconsultants>

<BlockedBlockedhttps://twitter.com/GAIConsultants>

<BlockedBlockedhttps://www.youtube.com/user/gaiconsultants>

<BlockedBlockedhttps://www.linkedin.com/company/gai-consultants-inc.>
<BlockedBlockedhttp://gaiconsultants.com/corporate_blog/index.php>

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Project Name	Spire STL Pipeline		
Project #	372453	Page 1	Of 3
	Line 880 – Coldwater Creek	_	
Subject	Soils Removal Calculation	Sheet #	_1
Calculated By	Tyler Olynciw	Date	9/28/2016
Checked By	Dave Goncalves	, Date	9/28/2016
	9/	7.	

Coldwater Creek Soils Removal Calculation

Revision

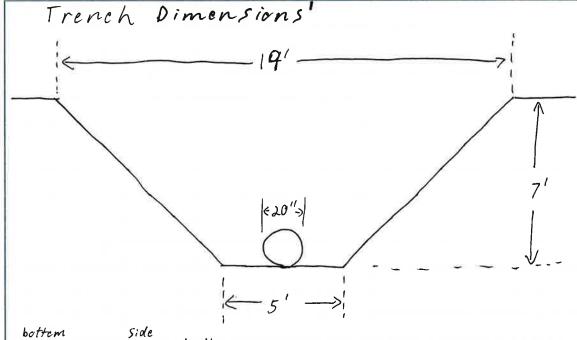
1. Calculation of soils needing to be removed within the 100 year flood plain of Coldwater Creek.

- Tyler Olynciw

2.



Project Name Spire	- Coldwater	Creek	Crossing
Project #	Page	_of	
Subject	Sheet #		
Calculated by	Date		
Checked by	Date		



bottem Side Width depth width depth 5'x7' + 7'x7' = 84 feet 2

> 84 feet x 250 feet long = 21,000 feet 3 of dirt = 780 Cy 3

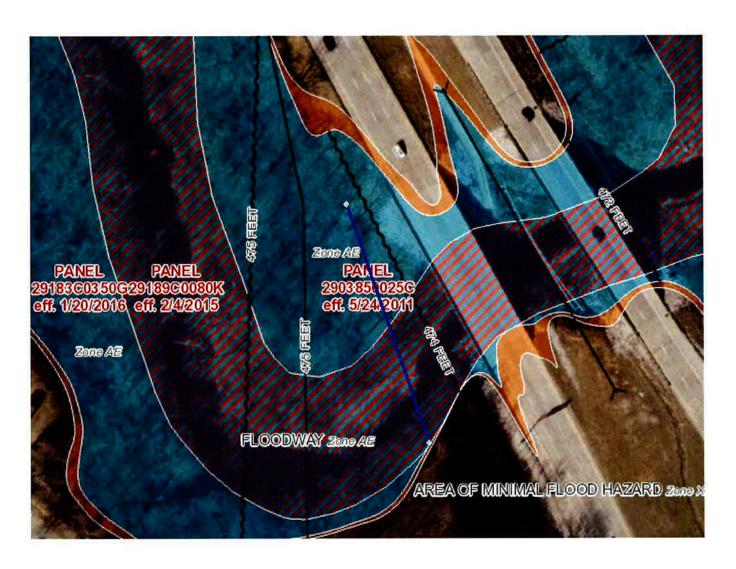
Assumptions

1. Trench dimensions based on previous project

experience & compliance with OSHA requirements.

Length of Crossing based on soils removal within

the FEMA 100-year flood plain. (see attached)



From: Ali Trunzo

Sent: Thursday, February 02, 2017 5:01 PM

To: Ali Trunzo

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

From: Ali Trunzo

Sent: Thursday, February 02, 2017 5:00 PM

To: 'ken.tomlin@dnr.mo.gov' <ken.tomlin@dnr.mo.gov>; 'Everett.Baker@dnr.mo.gov' <Everett.Baker@dnr.mo.gov> **Cc:** 'maher.jaafari@dnr.mo.gov' <maher.jaafari@dnr.mo.gov>; Tiffany Anders <T.Anders@gaiconsultants.com>

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Ken and Everett,

We wanted to circle back with you regarding the public water well at the Portage Des Sioux plant. Have you heard anything further if there are concerns with the pipeline crossing the 0.5-mile buffer?

Additionally we spoke with Eric Gilstrap yesterday to clarify the status of agency coordination and permitting currently in progress for this Project.

Thank you,

Ali

Alessandra M. Trunzo

D 412.399.5096 Email a.trunzo@gaiconsultants.com



ENGINEERING, PLANNING, AND ENVIRONMENTAL CONSULTING SINCE 1958

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From: Tomlin, Ken [mailto:ken.tomlin@dnr.mo.gov]

Sent: Tuesday, January 24, 2017 4:38 PM

To: Tiffany Anders < <u>T.Anders@gaiconsultants.com</u>> **Cc:** Vitello, Diane < <u>Diane.Vitello@dnr.mo.gov</u>>

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

FYI

From: Tomlin, Ken

Sent: Tuesday, January 24, 2017 4:13 PM

To: Lepper, Erin

Cc: Vitello, Diane; Jaafari, Maher

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

A small map...

telephone log



Date: 2/1/2017

Project / Admin. No.: E160438.00

Call From: Ali Trunzo

Company: GAI Consultants

Phone No.: 412.399.5096

Call To: Eric Gilstrap

Company: MDNR

Phone No.: 314-416-2960

Subject: Spire STL - Follow up

cc:

Summary of Discussion, Decisions, and Commitments:

Called Mr. Gilstrap to discuss his January 25, 2017 email summarizing permitting considerations for the Project. Provided an update on the Project, including:

- Spire is in coordination with the USACE regarding the Coldwater Creek crossing and the USACE
 confirmed there are no concerns with contamination. Spire has also applied for and received individual
 401 Water Quality Certification from MDNR for this crossing.
 - a. Mr. Gilstrap would like to circulate the USACE's response on this crossing. Contamination has been discovered at surprising locations on the creek, and for MDNR and Spire's sake, MDNR is currently recommending a monitor on site during construction. MDNR would like to review the USACE findings and determine their recommendations.
- Spire has submitted applications to the USACE under NWP-12. With the exception of Coldwater Creek, other crossings meet the conditions of the automatic 401 water quality certification.
- Spire will obtain the necessary hydrostatic discharge and land disturbance permits prior to construction.
- 4. Spire is coordinating with David Meyer of the USACE.
- 5. Spire is awaiting information from MDNR regarding the Project's proximity to the public water well at Portage Des Sioux.
 - a. Mr. Gilstrap confirmed to reach out to Everett Baker and Ken Tomlin for an update.

At Mr. Gilstrap's request, discussed which aspects of the Project are new vs existing. For the new HDD crossing of the Mississippi River, Mr. Gilstrap expressed concern that if the pipe would be drag chained into place that the disturbance could affect a surface water downstream at the Chain of Rocks treatment facility for St. Louis and recommended notifying the water authority. Clarified that the crossing would be constructed via HDD, with positive geotechnical study results, therefore no in-river disturbance was proposed.

Subject: FW: Natural Gas Pipeline Project

Attachments: 201701250954.pdf

From: Gilstrap, Eric [mailto:eric.gilstrap@dnr.mo.gov]

Sent: Wednesday, January 25, 2017 11:59 AM **To:** Tiffany Anders < T.Anders@gaiconsultants.com >

Cc: Jaafari, Maher <maher.jaafari@dnr.mo.gov>; Baker, Everett <Everett.Baker@dnr.mo.gov>; Franklin, Dorothy

<dorothy.franklin@dnr.mo.gov>; Stout, Robert <robert.stout@dnr.mo.gov>; Wieberg, Chris

<<u>chris.wieberg@dnr.mo.gov</u>>; Bax, Stacia <<u>stacia.bax@dnr.mo.gov</u>>

Subject: FW: Natural Gas Pipeline Project

Ms. Anders,

I work with Everett and Maher at Missouri Department of Natural Resources. They mentioned you are currently gathering information.

Here are some contact names and numbers regarding various topics you might find applicable to you. I apologize if this is redundant, or different from, any information you may have already obtained. If the information is different, there may be something I misunderstood. If the latter please let me know or feel free to discuss the matter with other contacts you may already be working with in the Department.

- 1. As the pipeline crosses Coldwater Creek in North St. Louis County, there will be a need for coordination with a Corps of Engineers project office related to environmental cleanups. You can find further information here: http://www.mvs.usace.army.mil/Missions/Centers-of-Expertise/Formerly-Utilized-Sites-Remedial-Action-Program/ or you can contact Jo Anne Wade or Jonathan Rankins directly at (314) 260-3905. Concerns related to contamination most likely wouldn't cause a re-routing or any other similar drastic impact. The impact would most likely be the some or all of the following: some additional planning and communication, possibly some additional sampling/field support/removal of materials by the Corps, being aware of or wanting to attend some of their public meetings regarding remediation work being done in the creek. Another contact on this topic would be Dan Carey, with MoDNR, at (314) 877-3047.
- 2. Regarding 401 water quality certifications, the contact with Water Pollution Control is Stacia Bax or Mike Irwin: (573) 526-4586.
- 3. Regarding permitting for discharges related to hydrostatic testing pf pipelines, Stacia can also provide advice regarding whether to go through her or one of the regions. An example of this permit can be found here: http://dnr.mo.gov/env/wpp/permits/issued/docs/G670000.pdf
- 4. Obtainment of a land disturbance permit MIGHT be need to address some of the work. An example of a permit that is most likely to be applicable to this situation would be found here: http://dnr.mo.gov/env/wpp/permits/issued/docs/R100000.pdf Please also contact Stacia if you have questions.
- 5. Forms to apply for one of the above mentioned permits can be found here: http://dnr.mo.gov/forms/780-0795-f.pdf
- 6. Local Corps of Engineers contacts regarding impacts access to local streams and waterways would be Samantha Hollenberg of Jennifer Skiles: 'Hollenberg, Samantha L CIV (US)' < Samantha.L.Hollenberg@usace.army.mil; 'Jennifer.L.Skiles@usace.army.mil'

Best wishes,

Eric

Eric Gilstrap, P.E.

Engineering and Compliance Assistance Unit Missouri Department of Natural Resources – St. Louis Regional Office (314) 416-2960 eric.gilstrap@dnr.mo.gov

From: Baker, Everett

Sent: Tuesday, January 24, 2017 11:31 AM

To: Franklin, Dorothy **Cc:** Jaafari, Maher

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

I am forwarding this email train to you to make you aware of a proposed construction project in your region. Maher was first contacted in October but was going to be out of the office and asked me if I would help. I made some preliminary comments and talked to Ms. Matthews on the telephone. At that time they were proposing a pipeline that would extend deeply into St Charles County and cross the Missouri River south of I-70 but said the plan was somewhat tentative. Since then I received a telephone call and email from a Ms. Anders with a new proposed and hopefully firmer plan (attached) so Maher and I decided that it was time to involve the region. I do not know where the company is on applying for land disturbance, 404 or 401 permits but it is probably time to remind them these permits have to be obtained. Do you know of any other permits that might be required?

From a drinking water standpoint the well a Portage Des Sioux looks to be the only well that will be impacted unless there are some public wells that I have missed. If there are please let us know. The pipeline will probably have little impact on the Portage Des Sioux well but I would feel more confident with more information. Could you have someone look in the region's files and see if you have more information on the construction of this well? I am most interested in the depth of soil over the aquafer and in the depth of the protective outer casing of the well. If you do not have more information on the well perhaps one of your staff could contact the system to see if they have more information. We would certainly appreciate any other comments that you may have concerning the proposed project.

From: Jaafari, Maher

Sent: Monday, January 23, 2017 3:36 PM

To: Baker, Everett

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

I'll call you tomorrow after 8:30. Thanks

From: Baker, Everett

Sent: Monday, January 23, 2017 10:27 AM

To: Jaafari, Maher

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

I received a call from Ms. Anders concerning this issue. They are going to dig within 1,400 feet of the Portage de Sioux water supply well. The well is an alluvial well with a total depth of 116 feet and a yield of 250 gpm. The public water system supply map and data sheet tells me that the well has a casing depth of 106 feet which must be the inner casing depth and not the protective outer casing. I assume the grouted outer casing is around 20 feet in depth. I have no data on whether there are any protective clay or soil layers between the surface and the well formation or of the hydraulic gradient of the groundwater in the area. The pipeline people tell me that they will install a cover over the pipeline of 7 feet which means they well be digging a trench that is around 10 feet deep. I do not think that the pipeline trench will

THE DIVISION OF HEALTH OF MISSOURI

October 26, 1966

Navironmental Services

Honorable Vincent M. Billers Mayor of Portage Des Soulx Portage Des Souix, Missouri

Dear Mayor Lilers:

Enclosed herewith is a Report on Plans and Specifications for New Public Water Supply Facilities, Portage Des Scuix, Missouri, which I believe is self-explanatory. -

By the direction of J. P. Russell, M.D., Director, Section of Hospital and Technical Services.

Very truly yours,

Robert C. Miller, P.S. Chief. Water Supply

RSM-DDS:dl

cc: Caty Clark R. M. Harrison and Associates Addatatet Health Office No. 3

Spelosure

AMI-Engr

UCT 28 1966

DISTRICT HEALTH OFFICE No. 3

THE DIVISION OF HEALTH OF MISSOURI

REPORT ON PLANS AND SPECIFICATIONS FOR NEW PUBLIC WATER SUPPLY FACILITIES PORTAGE DES SOUIX, MISSOURI

October 26, 1966

INTRODUCTION

Flans and specifications for new public water supply facilities for Portage Des Souix, Missouri, were submitted for review and approval by R. M. Harrison and Associates, Consulting Engineers, St. Louis, Missouri.

BRIEF DESCRIPTION

In general, the plans and specifications provide for the construction of a gravel wall well as a source of supply, water treatment facilities, and the necessary distribution system for a complete waterworks system.

A gravel wall well approximately 90 feet deep will serve as the source of supply. The δ -inch well casing will extend approximately 80 feet below ground level. The annular space between the drill hole and casing will be sealed with dement grout to a depth of at least 20 feet below ground level. The well will be equipped with a submersible type pump with a capacity of 70 gallons per minute. Additional well appurtenances will include a water level depth gauge, sampling tap, and breather pipe. Water will discharge from the well through a forced draft aerator, then to a steel sedimentation basin which will provide a total detention time of approximately 2 hours. Chlorine for disinfection purposes and a solution for pH control will be applied to the aerator effluent line. A centrifugal type pump with a capacity of 50 gallons per minute will take suction from the sedimentation basin and discharge the water through two pressure sand filters. Each filter will be 60 inches in diameter and have a sidewall height of 60 inches. Filter media will include 24 inches of sand with an effective size of 0.50 mm to 0.55 mm and a uniformity coefficient of not greater than 1.65. Also included is the necessary supporting gravel and underdrain system. Additional filter appurtenances include pressure gauges for determining the loss of head, access manholes, air release valves, and sampling taps as included in the plans and specifications. Water will discharge from the pressure sand filters to a zeolite softener. The softener will be 54 inches in diameter and will have a sidewall height of 7 feet. Additional facilities will include the necessary valves, fittings, brine pumping facilities, rate of flow gauges, metering devices, controls, and other appurtenances as included in the plans and specifications.

Finished water storage facilities will include an elevated storage reservoir with a capacity of 50,000 gallons. The reservoir will be constructed and painted in accordance with American Water Works Association standard specifications.

The distribution system will include 21,700 lineal feet of 4-inch AC pipe, 5000 lineal feet of 6-inch AC pipe, 150 meters and service connections, along with the necessary valves, fittings, hydrants and other appurtenances

THE DIVISION OF HEALTH OF MISSOURI

Portage Des Souix

m 2

October 26, 1966

as included in the plans and specifications. An alternate for cast iron pipe in lieu of the AC pipe is included in the bid proposal.

After completion of construction and prior to placing into service, all of the facilities will be disinfected.

COMMENTS

This approval of the plans and specifications is given with the understanding that the gravel wall well will be constructed initially and the chemical and bacteriological quality of the water determined prior to the construction of the other water supply facilities.

APPROVAL OF PLANS

The plans and specifications described above were examined as to sanitary features of design which may affect the operation of the sanitary works, including size, capacities of the units, and factors which may affect the efficiency and ease of operation. Approval of the plans and specifications as regards these points is hereby given.

Approval of these plans and specifications is given with the understanding that final inspection and approval of the completed works shall be made by the Division of Health before same is accepted and placed in operation. This approval terminates two years from the date appearing on this report unless construction is begun on the described work prior to that date or unless extension of the approval is secured in writing from the Division of Health.

In the examination of plans and specifications, the Division of Health does not examine the structural features of design or efficiency of mechanical equipment. This approval does not include approval of these features.

The Division of Health reserves the right to withdraw the approval of these plans and specifications at any time it is found that additional treatment or alterations are necessary to assure reasonable operating efficiency and to afford adequate protection to public health.

001 28 PAS

Donald D. Sayre,

Assistant Chief

No. 3 Water Supply

DISTRICT HEALTH OFFICE No. 3

SUPPLY Portage des Sjourx

WELL DATA:

WASS—AND MAN MAN AND AND AND AND AND AND AND AND AND A		A A STATE OF THE S				
	Well No.	Well No.	Well No.	Well No.	Well No.	Well No.
Date Drilled	1761					
Local Designation	Tree Consent man					-
	Allewal					
	1911					
	106:51					
Casing Material	5601					
Size Hole Below Casing Point						
Static Water Level	f house f					
Draw Down and Yield	10' @580gpm					
	Mo. Rich Allen		According to Tropped			
Top Seal (Method)	Soll King		ere-salar varies and			
	P. Crait	The state of the s				
Pump Type	Sulm Tuhus					
	Poerless					
Capacity	120 gm					
Pump Setting		V PORTO CONTRACTOR CON				
	Yes					
	101 - 18					
		,				
6 4 5						
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Date Plugged.....

	Well No. 1	Well No. 2	Well No. 3	Well No. 4	Well No. 5	Well No. 6
Approximate Elevation						
Туре	Alluvial					
Depth	116'		<i></i>			
Depth and Size of Casing	106'- 8"	-12"	Lincl. 10 A	T. SCreen	8"diam.)	
Material			<u> </u>			
Static Water Level	_17'	<u> </u>				
Draw Down	10' @5009	019				
Yield	800-1000 90	n (Estimate	d)			
Water-Bearing Strata	1 2 2 3/22					
Thickness	1					
Depth						
Top Seal	Split ring					
Bottom Seal	1 /					
Pit	W					
Drain or Ejector	700					
Outlet of Drain	A LA MALAGRAPHICA PARA					
Pump Type	Supm. Turb					
Manufacturer	Peerless					
Power	3 HP					
Capacity	KIELINA 12	0 90m				
Surface Drainage						
	1967					
Source of Contamination						
						-

SKETCH:

DEFECTS:

PUBLIC WATER SUPPLY RECORD

FORM E 2.02

CITY TOPTOGE DES			Charman and and
Population 370			
Date Constructed Completeo			
Approximate Cost		Design Engineer HOFFISON	& Assoc St. Loui
Railroad Supplied		Superintendent	
Number of Connections	(Operator	
Average Consumption		Mayor	
Maximum Consumption		City Clerk	
Per Cent Metered	6	City H. O	
Approved		Owner	
		· .	
Last Completed City Valuation			
Bonded Indebtedness: Water	Sewers	Others	
		······	
Private or City Officials			
			<u></u>
SOURCE: Ground Water 1155	ssippi River o	1/uvium	
	***************************************	,	***************************************

		. '	
SOURCE: Surface Water		Sewers	Ahove Source
V V V V V V V V V V V V V V V V V V V			
SOURCE: Impounded Supply:			
Drainage Area	Capacity	Water Area	Max. Depth
i	Capacity	The Tree	Print Depth
2			
3			
Used for Recreational Purposes			
Propagation of Fish		Supervision	

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Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

Attachments: pipe_wells.pdf

From: Tomlin, Ken [mailto:ken.tomlin@dnr.mo.gov]

Sent: Tuesday, January 24, 2017 4:38 PM

To: Tiffany Anders < <u>T.Anders@gaiconsultants.com</u>> **Cc:** Vitello, Diane < Diane. Vitello@dnr.mo.gov>

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

FYI

From: Tomlin, Ken

Sent: Tuesday, January 24, 2017 4:13 PM

To: Lepper, Erin

Cc: Vitello, Diane; Jaafari, Maher

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

A small map...

From: Lepper, Erin

Sent: Tuesday, January 24, 2017 1:12 PM

To: Tomlin, Ken **Cc:** Vitello, Diane

Subject: Fwd: Drinking Water Concerns - Natural Gas Pipeline Project

Sent from my iPhone

Begin forwarded message:

From: "Franklin, Dorothy" < dorothy.franklin@dnr.mo.gov >

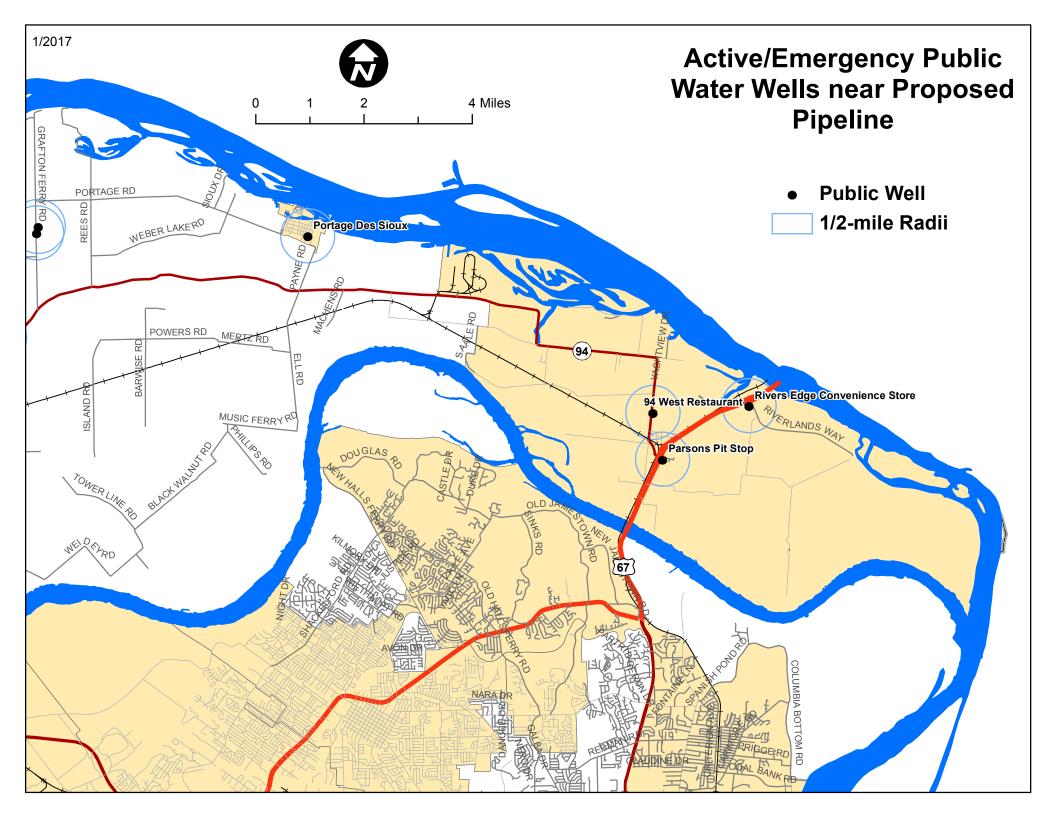
To: "Lepper, Erin" < Erin. Lepper@dnr.mo.gov>

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

Erin.

Usually these projects get sent through multiple departments to look for possible impacts of the project. I'm not sure if this particular pipeline is being routed yet for review or not since the request below to SLRO came from drinking water program and Everett Baker. I'm not sure now who is handling these but assume it is someone from the Director's office still so thought we might want to make sure their request is getting circulated everywhere it should be.

Dorothy Franklin
St. Louis Regional Office Director
Missouri Department of Natural Resources
7545 S. Lindbergh, Suite 210
St. Louis, MO 63125
PH(314)416-2960
FAX(314)416-2970



Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Begin forwarded message:

From: "Tomlin, Ken" <ken.tomlin@dnr.mo.gov>

Sent: Tuesday, January 24, 2017

To: "Tiffany Anders" < <u>T.Anders@gaiconsultants.com</u>> **Cc:** "Vitello, Diane" < <u>Diane.Vitello@dnr.mo.gov</u>>

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

Ms. Anders – in case this has not been forwarded to you. There will be a follow-up e-mail with additional information also. Please let me know if questions and thanks-

Ken

Kenneth P. Tomlin

Source Water Assessment and Protection Coordinator Water Protection Program – Public Drinking Water Branch PO Box 176, Jefferson City, MO 65102-0176 Office Phone: (573) 526-0269 Office Fax: (573) 751-3110

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From: Tomlin, Ken

Sent: Tuesday, January 24, 2017 4:12 PM

To: Lepper, Erin

Cc: Vitello, Diane; Jaafari, Maher; Baker, Everett

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

FYI – Please forward as appropriate.

Attached is a copy of the well log for the Portage des Sioux well. The log shows up to five feet of a silty/clay layer on the surface that overlies sand (drillers are required to report layers in increments of five feet, so the silty clay may be less than five feet thick). I've also attached the assessment report for this well. There are other wells in close proximity to the route.

I'll see if I can dig up well logs and related info for these other wells in a follow-up e-mail. Thanks, Ken

From: Lepper, Erin

Sent: Tuesday, January 24, 2017 1:12 PM

To: Tomlin, Ken

Cc: Vitello, Diane

Subject: Fwd: Drinking Water Concerns - Natural Gas Pipeline Project

Sent from my iPhone

Begin forwarded message:

From: "Franklin, Dorothy" < dorothy.franklin@dnr.mo.gov>

To: "Lepper, Erin" < Erin.Lepper@dnr.mo.gov>

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

Erin,

Usually these projects get sent through multiple departments to look for possible impacts of the project. I'm not sure if this particular pipeline is being routed yet for review or not since the request below to SLRO came from drinking water program and Everett Baker. I'm not sure now who is handling these but assume it is someone from the Director's office still so thought we might want to make sure their request is getting circulated everywhere it should be.

Dorothy Franklin
St. Louis Regional Office Director
Missouri Department of Natural Resources
7545 S. Lindbergh, Suite 210
St. Louis, MO 63125
PH(314)416-2960
FAX(314)416-2970

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From: Baker, Everett

Sent: Tuesday, January 24, 2017 11:31 AM

To: Franklin, Dorothy **Cc:** Jaafari, Maher

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

I am forwarding this email train to you to make you aware of a proposed construction project in your region. Maher was first contacted in October but was going to be out of the office and asked me if I would help. I made some preliminary comments and talked to Ms. Matthews on the telephone. At that time they were proposing a pipeline that would extend deeply into St Charles County and cross the Missouri River south of I-70 but said the plan was somewhat tentative. Since then I received a telephone call and email from a Ms. Anders with a new proposed and hopefully firmer plan (attached) so Maher and I decided that it was time to involve the region. I do not know where the

company is on applying for land disturbance, 404 or 401 permits but it is probably time to remind them these permits have to be obtained. Do you know of any other permits that might be required?

From a drinking water standpoint the well a Portage Des Sioux looks to be the only well that will be impacted unless there are some public wells that I have missed. If there are please let us know. The pipeline will probably have little impact on the Portage Des Sioux well but I would feel more confident with more information. Could you have someone look in the region's files and see if you have more information on the construction of this well? I am most interested in the depth of soil over the aquafer and in the depth of the protective outer casing of the well. If you do not have more information on the well perhaps one of your staff could contact the system to see if they have more information. We would certainly appreciate any other comments that you may have concerning the proposed project.

From: Jaafari, Maher

Sent: Monday, January 23, 2017 3:36 PM

To: Baker, Everett

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

I'll call you tomorrow after 8:30. Thanks

From: Baker, Everett

Sent: Monday, January 23, 2017 10:27 AM

To: Jaafari, Maher

Subject: FW: Drinking Water Concerns - Natural Gas Pipeline Project

I received a call from Ms. Anders concerning this issue. They are going to dig within 1,400 feet of the Portage de Sioux water supply well. The well is an alluvial well with a total depth of 116 feet and a yield of 250 gpm. The public water system supply map and data sheet tells me that the well has a casing depth of 106 feet which must be the inner casing depth and not the protective outer casing. I assume the grouted outer casing is around 20 feet in depth. I have no data on whether there are any protective clay or soil layers between the surface and the well formation or of the hydraulic gradient of the groundwater in the area. The pipeline people tell me that they will install a cover over the pipeline of 7 feet which means they well be digging a trench that is around 10 feet deep. I do not think that the pipeline trench will affect the yield of the well but it could leave it more vulnerable to contamination. It is hard to say without more information on the well. Ms. Anders does need us to reply to her.

From: Tiffany Anders [mailto:T.Anders@qaiconsultants.com]

Sent: Tuesday, January 17, 2017 11:38 AM

To: Baker, Everett **Cc:** Jaafari, Maher

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Mr. Baker,

I am following up on my colleague's email and your response back in October regarding the proposed natural gas pipeline in St. Charles and St. Louis Counties. I also recently spoke with the Wellhead Protection Program's Kyle Rollins who said Ken Tomlin may be the local MDNR contact; I have reached out to Mr. Tomlin by phone and have been

unable to reach him. In the meantime, I also wanted to circle back to you now that we have more information from the pipeline company, Spire.

The attached figure displays Spire's currently proposed pipeline location at the Mississippi River and Missouri River; these river crossings are planned to be constructed by horizontal directional drill (HDD) method. No water supply intakes were located within 3 miles downstream of the river HDD crossings. However, the Mississippi River HDD location is currently proposed 2.5 miles upstream of the Portage Des Sioux Water Plant. MDNR public data suggests this Water Plant includes an active water well. Additionally, as the proposed pipeline route heads east-southeast from the Mississippi River HDD crossing, pipeline construction methods will be a typical depth to cover of five feet in ag fields where the construction workspace passes about 1,450 feet south of the Water Plant. This is within the MDNR's standard 0.5-mile buffer zone of a public water source.

At this time, GAI on behalf of Spire, would like to know if there are any public water concerns with the locations of either HDD drill or the within the 0.5 mile buffer of the Water Plant. Based on our research at this time, MDNR information suggests alluvial recharge at the Mississippi River typically occurs with high flows stages of the river where groundwater moves from bedrock to the alluvium. Given the distance and depth (well below river bottom) of the HDDs and shallow construction at the 0.5 mile buffer of the Water Plant, are there any MDNR crossing restrictions for these areas as currently proposed?

Thank you for your time. I look forward to hearing back from and will be available by phone or email.

Best, Tiffany

Tiffany Anders

Project Environmental Specialist

GAI Consultants

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From: Baker, Everett [mailto:Everett.Baker@dnr.mo.gov]

Sent: Monday, October 24, 2016 11:17 AM

To: Jaafari, Maher <<u>maher.jaafari@dnr.mo.gov</u>>; Erin Matthews

<erin.matthews@gaiconsultants.com>

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

I can only speak to the concerns the department may have concerning public drinking water systems. Other environmental concerns about the pipe line and crossings must be answered by other programs within the department. As with any construction project our biggest concern is its proximity to water supply sources and facilities. The city of St.

Charles has wells in the Missouri/Mississippi River alluvium in the general vicinity of where the pipe line seems to be crossing the Missouri River. A water supply line from St. Louis to St. Charles crosses the Missouri River near St. Charles and provides over half of the water used by St. Charles. For exact locations you should talk to the city of St. Charles. St. Charles County PWSD #2 also has wells in the Missouri River Alluvium. The wells are located south of St. Charles on the west side of the river near the Weldon Springs Conservation Area. Again for more exact location you should contact the water district.

We do not have specific concerns about horizontal directional drilling of river crossings other than the holes dug to drill or access the new crossing. If HDD is used to construct part of the pipeline the mud used during drilling can plug portions of the alluvial aquafer and affect well yield. Again this depends on proximity.

From: Jaafari, Maher

Sent: Wednesday, October 19, 2016 11:50 AM

To: 'Erin Matthews'

Cc: Baker, Everett; Jaafari, Maher

Subject: RE: Drinking Water Concerns - Natural Gas Pipeline Project

Erin,

I'm reviewing your request and I'll let you know as soon as possible. However, I'll be out of the office for a week. Therefore, I copied Mr. Everett Baker who can provide you with an answer while I'm out of the office. Please let me know if you have more question.

Thank you

Maher Jaafari, P.E., Chief Infrastructure Permits and Engineering Section Public Drinking Water Branch Water Protection Program Missouri Department of Natural Resources (573) 751-1127

From: Erin Matthews [mailto:erin.matthews@gaiconsultants.com]

Sent: Tuesday, October 18, 2016 12:04 PM

To: Jaafari, Maher

Subject: Drinking Water Concerns - Natural Gas Pipeline Project

Hello,

I am working on a FERC filing for a proposed natural gas pipeline project that is anticipated to cross the Mississippi River in St. Charles County and the Missouri River in St. Louis County via horizontal directional drills (HDD). I've noticed that the Mississippi and Missouri Rivers are designated as drinking water supply streams and I've located one water well for the Portage Des Sioux Public Water Treatment Facility 2.5-miles downstream of the Project's crossing of the Mississippi River. No public source water areas were located downstream of the Project's crossing of the Missouri River. The HDD contingency plan is currently being drafted and we are continuing our coordination for applicable state and federal permits for the Project, however does the public water supply department typically have additional concerns with the HDDs under the rivers?

Thanks for your assistance,

Erin M. Matthews

Project Environmental Specialist

GAI Consultants, Inc.

385 East Waterfront Drive, Homestead, PA 15120-5005

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CONFIDENTIALITY NOTICE: This communication contains confidential information belonging to the sender and may be legally privileged. This communication is solely for the use of its intended recipient. If you are not the intended recipient, inform the sender of the error and remove this email from your system. If this transmission includes any technical information, design data, and/or recommendations, they are provided only as a matter of convenience and may not be used for final design and/or construction

^{*} Please update your records with my new direct telephone number

telephone log



Date: 01/23/2017 E160438.00 Project / Admin. No.: Call From: Tiffany Anders Company: **GAI Consultants** Phone No.: 346.231.7172 Everett Baker, Public Drinking Water Program Call To: Company: Missouri Department of Natural Resources 573.751.1300 Phone No.: Subject: Portage Des Sioux Water Plant and HDD Crossings Lori Ferry cc: **Summary of Discussion, Decisions, and Commitments:**

Ms. Anders spoke with Ms. Everett Baker of MDNR Public Drinking Water Program to confirm if he and Mr. Mahar Jaafari received our email communication follow-up on January 17, 2017 regarding the location of Spire's HDD crossings and construction within the 0.5-mile buffer of the Portage Des Sioux water plant. Mr. Baker confirmed he saw the email and we are to await response from Mr. Jaafari. Mr. Baker's initial impressions after reviewing the email were that HDD crossings were far enough away from public water sources, however, he was going to take a closer look at the Portage Des Sioux water plant location and potential for recharge impacts.



Missouri State Historic Preservation Office





April 21, 2017

Ms. Judith Deel Missouri State Historic Preservation Office 1101 Riverside Drive Jefferson City, Missouri 65101

Re: Spire STL Pipeline Project; St. Charles and St. Louis Counties, Missouri Submittal of Technical Report - Phase II Archaeological Testing at Site 23SC2219 SHPO Log #: 061-MLT-16

Dear Ms. Deel:

On behalf of Spire STL Pipeline LLC ("Spire"), a wholly-owned subsidiary of Spire Inc., GAI Consultants, Inc. ("GAI") is submitting for your review and comment the enclosed report on Phase II Archaeological Testing at Site 23SC2219, located within the proposed Spire STL Pipeline Project ("Project") in St. Charles County, Missouri.

Spire is seeking authorization from the Federal Energy Regulatory Commission pursuant to Section 7(c) of the Natural Gas Act to construct and operate the proposed Project, located in Scott, Greene, and Jersey Counties, Illinois, and in St. Charles and St. Louis Counties, Missouri. The total length of the Project pipelines will be approximately 104 kilometers (km) (65 miles [mi]), of which 31.43 km (19.53 mi) are in Missouri.

Site 23SC2219 was identified during GAI's Phase I survey of the Project in 2016, and was further investigated during supplemental Phase I work in 2017. The results of Phase I investigations of the site are included in a Phase I report (Scuoteguazza et al. 2017a), which has been reviewed by your office (review letter dated March 23, 2017), and in a Phase I addendum report (Scuoteguazza et al. 2017b), which will be submitted for your review in April 2017. Based on the results of Phase I survey Site 23SC2219 consists of the remains of a multicomponent Middle Archaic to Mississippian period occupation on a low terrace above the Mississippi River floodplain, with maximum dimensions of 134 x 515 meters (m) (441 x 1688 feet [ft]).

Subsequent to completion of Phase I studies, Spire revised the Project Limit of Disturbance (LOD) to cross the narrow, central portion of the site. At Spire's request, GAI conducted Phase II testing of Site 23SC2219 in March 2017. The Phase II Area of Potential Effect (APE) consisted of the generally 27.4-m (90-ft) wide pipeline LOD, expanding to a maximum of 50 m (165 ft) in an area of additional temporary workspace adjacent to Weber Lake Road. Proposed Project impacts within the APE will include excavation of an approximately 2.1-m (7-ft) wide pipe trench to a depth of approximately 3.0 m (10 ft) below ground surface along the pipeline centerline, as well as topsoil stripping in the agricultural field, vehicular traffic and equipment laydown, and road boring within the additional temporary workspace adjacent to Weber Lake Road.

Based on the results of Phase II testing, the portion of Site 23SC2219 located within the Project APE has moderate integrity and a low research potential. It is concluded that archaeological investigations conducted to date have exhausted the site's information potential within the Phase II Project APE. Portions of the site outside the Project APE could provide additional important information and may be eligible for listing in the National Register of Historic Places, under Criterion D. However, no further work is recommended for the site within the Phase II APE.

GAI, on behalf of Spire, is requesting your review and concurrence of the attached technical report presenting the Phase II archaeological testing results and recommendations for Site 23SC2219 within the Project APE.

We look forward to continuing to work with you on this Project. Please contact Mr. Eric Scuoteguazza at 412.399.5188 or e.scuoteguazza@gaiconsultants.com, if there are questions regarding this report.

Sincerely,

GAI Consultants, Inc.

Eric P. Scuoteguazza, M.A., M.B.A., RPA Senior Manager, Cultural Resources

Scustegy

Lori M. Ferry

Environmental Project Manager

ontmelerry

EPS:LMF/djz

Attachment: Technical Report Phase II Archaeological Testing at Site 23SC2219, Spire STL

Pipeline Project, St. Charles and St. Louis Counties, Missouri

References

Scuoteguazza, E. P., R. B. Duncan, J. Glenn, A. Hood, M. Mooney, S. Pugh-Rose, E. Tidlow, and E. Williams

2017a *Technical Report, Phase I Archaeological Survey, Spire STL Pipeline Project, St. Charles and St. Louis Counties, Missouri.* Prepared by GAI Consultants, Inc., Aurora, Illinois, for Spire, Inc.

Scuoteguazza, E. P., L. Arco, A. Hood, S. Pugh-Rose, and S. Williams

2017b Technical Report – Addendum I, Phase I Archaeological Survey, Spire STL Pipeline Project, St. Charles and St. Louis Counties, Missouri. Prepared by GAI Consultants, Inc., Aurora, Illinois, for Spire, Inc.





April 21, 2017

Ms. Judith Deel Missouri State Historic Preservation Office 1101 Riverside Drive Jefferson City, Missouri 65101

Re: Spire STL Pipeline Project; St. Charles and St. Louis Counties, Missouri Submittal of Architectural and Historical Resources Addendum Reconnaissance Survey Report

SHPO Log #: 061-MLT-16

Dear Ms. Deel:

Spire STL Pipeline LLC ("Spire"), a wholly owned subsidiary of Spire Inc., is seeking authorization from FERC pursuant to Section 7(c) of the Natural Gas Act to construct and operate the proposed Spire STL Pipeline Project (Project) located in Scott, Greene, and Jersey Counties, Illinois, and St. Charles and St. Louis Counties, Missouri.

The proposed Project will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with Laclede Gas Company ("LGC"). The second segment of new, greenfield pipeline (referred to as the "North County Extension"), will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable Mississippi River Transmission, LLC ("Enable MRT") and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day. No compression will be required. The Project also includes the construction of three new metering and regulating stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The APE for the survey accounts for areas of physical disturbance (direct impacts), as well as potential visual impacts (indirect impacts) introduced by the proposed Project. The direct APE for architectural studies is defined related to the construction right-of-way, aboveground facilities, and access roads. The indirect impact APE is defined as the viewshed from the proposed construction right-of-way, aboveground pipeline facilities, and access roads related to the Project.

GAI previously identified 54 architectural and historical resources for the Spire STL Pipeline Project, summarized in a report submitted to the MOSHPO on January 26, 2017. The addendum survey resulted in the identification of 12 additional architectural and historical resources in St. Louis County, Missouri. Of the 12 newly identified architectural and historical resources, one (GAI-65/Villa Gesu Covenant) is recommended eligible for NRHP listing under Criteria C. No impacts to the resource

related to the proposed Project are anticipated. The remaining identified architectural and historical resources lack sufficient integrity and/or significance to be recommended eligible for NRHP listing.

GAI, on behalf of Spire, is requesting your review and concurrence of the attached report presenting the architectural results and recommendations for the Project.

We look forward to continuing to work with you on this Project. Please contact Eric Scuoteguazza at (412) 399-5188 or e.scuoteguazza@gaiconsultants.com, if there are questions regarding this report.

Sincerely,

GAI Consultants, Inc.

You merry

Lori M. Ferry

Environmental Project Manager

Eric P. Scuoteguazza, M.A., M.B.A., RPA Senior Manager, Cultural Resources

EPS/LMF

Attachment: Architectural and Historical Resources Reconnaissance Report; Spire STL

Pipeline Project; St. Charles and St. Louis Counties, Missouri



GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532-4644

April 21, 2017

Ms. Judith Deel Missouri State Historic Preservation Office 1101 Riverside Drive Jefferson City, Missouri 65101

Re: Submittal of Technical Report - Addendum I Phase I Archaeological Survey SHPO Log #: 061-MLT-16 Spire STL Pipeline Project St. Charles and St. Louis Counties, Missouri

Dear Ms. Deel:

Spire STL Pipeline LLC ("Spire"), a wholly owned subsidiary of Spire Inc., is seeking authorization from the Federal Energy Regulatory Commission pursuant to Section 7(c) of the Natural Gas Act to construct and operate the proposed Spire STL Pipeline Project ("Project") located in Scott, Greene, and Jersey Counties, Illinois, and St. Charles and St. Louis Counties, Missouri. The total length of the Project pipelines will be approximately 65 miles, of which 19.53 miles are in Missouri.

GAI Consultants, Inc. ("GAI") conducted a supplemental Phase I archaeological survey in February and March 2017 to survey (1) alternative Project alignments surveyed to avoid impacts to archaeological sites that may meet the requirements for listing in the National Register of Historic Places ("NRHP"); (2) parcels where survey permission has been granted since the initial Phase I field session concluded in December 2016, and; (3) the 6-mile-long alignment of the proposed North County Extension pipeline. The Area of Potential Effect ("APE") for the supplemental archaeological investigations was defined as the area of ground disturbance anticipated for the construction activities. For the purposes of the supplemental Phase I archaeological survey, the APE consisted of a 300-foot-wide study corridor centered on the proposed pipeline route for both the 24-inch pipeline and the North County Extension, a 100-foot- wide study corridor for proposed access roads, and the footprint of the workspace needed for staging areas, cathodic protection groundbeds, and horizontal directional drill ("HDD") bore pits/pull-back areas.

The total APE for the Missouri portion of the Project was 317.15 hectares (783.7 acres). Of this, 51.48 hectares (127.2 acres) was surveyed during the supplemental Phase I investigation in February and March 2017, 183.35 hectares (453.08 acres) was previously surveyed, and 65.5 hectares (161.87 acres) was not surveyed due to land access restrictions or avoidance via HDD.

In total, five archaeological sites and nine isolated finds were identified during supplemental Phase I survey of the Missouri APE. Sites 23SC2218 and 23SC2219 may meet the requirements for listing in the NRHP. Based on current Project design plans, Site 23SC2218 is located outside the construction right-of-way and will not be impacted by the proposed Project. Therefore, GAI recommends no further work at Site 23SC2218. A Phase II eligibility evaluation was conducted at Site 23SC2219 in March 2017, the results of which will be submitted to the Missouri State Historic Preservation Office under separate cover. The remaining sites (23SC2213, 23SL2403, and 23SL524) are recommended Not Eligible, and no further work is recommended. The nine isolated finds are all recommended Not Eligible for the NRHP. Two sites that may meet the requirements for NRHP listing (Sites 23SC2215 and 23SC2216) identified during the initial Phase I survey for the Project are not located within the construction right-of-way and will not be impacted.

GAI, on behalf of Spire, is requesting your review and concurrence of the attached addendum technical report presenting the archaeological results and recommendations for the Project.

We look forward to continuing to work with you on this Project. Please contact Mr. Eric Scuoteguazza at 412.399.5188 or e.scuoteguazza@gaiconsultants.com, if there are questions regarding this report.

Sincerely,

GAI Consultants, Inc.

your merry

Eric P. Scuoteguazza, M.A., M.B.A., RPA Senior Manager, Cultural Resources

Lori M. Ferry

Environmental Project Manager

EPS:LMF/gmg

Attachments: Attachment 1 (Technical Report - Addendum I, Phase I Archaeological

Survey) and Attachment 2 (Section 106 Survey Memo)





April 10, 2016

Ms. Judith Deel Compliance Coordinator Missouri State Historic Preservation Office 1101 Riverside Drive Jefferson City, Missouri 65101

Re: Unanticipated Discoveries Plan for Cultural Resources
Spire STL Pipeline LLC
Spire STL Pipeline
St. Charles and St. Louis Counties, Missouri

Dear Ms. Deel:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"), located in Scott, Greene, and Jersey Counties in Illinois and in St. Charles and St. Louis Counties in Missouri. Spire retained GAI Consultants, Inc. to conduct required cultural resources studies. Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies.

On October 28, 2016, Spire had provided the Missouri State Historic Preservation Office with the Project's Unanticipated Discoveries Plan for Cultural Resources in Missouri. Spire has revised the Unanticipated Discoveries Plan for Cultural Resources in Missouri, based on the Commission's and Missouri State Historic Preservation Office's comments to the previous submission. I have enclosed a copy of that revised plan for your review and for your files.

Thank you for your consideration of this matter. If you have any questions regarding this submission, please feel free to contact me at 412.399.5188, or by e-mail at e.scuoteguazza@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

Eric Scuoteguazza

Senior Cultural Resources Manager

Attachment: Unanticipated Discoveries Plan for Cultural Resources in Missouri

oril 10, 2017 roject E160438.00
ATTACHMENT: UNANTICIPATED DISCOVERIES PLAN FOR CULTURAL RESOURCES IN MISSOURI



Spire STL Pipeline Project

Unanticipated Discoveries Plan for Cultural Resources in Missouri

FERC Docket No. CP17-40-000

January 2017

Public



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Unanticipated Discoveries Plan for Cultural Resources in Missouri		
1.1	References	. 4



Acronyms and Abbreviations

FERC Federal Energy Regulatory Commission

MDNR Missouri Department of Natural Resources

MO SHPO Missouri State Historic Preservation Office

NHPA National Historic Preservation Association

NRHP National Register of Historic Places

Project Spire STL Pipeline Project

SHPO State Historic Preservation Office

Spire STL Pipeline LLC

UDP Unanticipated Discoveries Plan

spire 5

Unanticipated Discoveries Plan for Cultural Resources in Missouri

This Unanticipated Discoveries Plan ("UDP") details the procedures that will be implemented by Spire STL Pipeline LLC ("Spire") and its contractors to handle the unanticipated discovery of cultural resources that may be encountered during construction of the proposed Spire STL Pipeline Project ("Project"). This plan was developed in accordance with 36CFR800.13 (Post-Review Discovery clause), 36CFR Part 61 Professional Qualifications Standards, as well as the following regulations:

- The Missouri Department of Natural Resources' (MDNR) Guidelines for Archaeological Survey and Reports (MDNR No Date); and
- Missouri Revised Statute 194.400 through 194.410 (Unmarked Human Burial Sites)

All construction work force members have the responsibility to monitor construction sites for potential archaeological remains throughout construction. Archaeological remains consist of man-made objects or features greater than 50 years of age. These remains include, but are not limited to, items such as artifacts (e.g., stone flakes, stone tools, ceramics, glass, architectural material), fire pits, building foundations, and human remains. If, during the course of construction, potential archaeological remains are identified, the Environmental or Chief Inspector will immediately halt work in the vicinity (minimum of 25 feet) of the potential find. The Environmental Inspector will notify the Spire Environmental Project Manager. Work in the immediate area of the discovery will not resume until treatment of the discovery has been completed.

The Spire Environmental Project Manager will notify the Missouri State Historic Preservation Office ("MO SHPO") and the Federal Energy Regulatory Commission ("FERC"), and will hire an archaeological consultant who will evaluate the site and provide an immediate verbal recommendation to Spire, the FERC, and the MO SHPO regarding the eligibility status of the site, in accordance with state and federal guidelines. Spire's Environmental Manager will continue to consult with the FERC and MO SHPO, as per the requirements of Section 106 of the National Historic Preservation Act of 1966 ("NHPA"). If the discovery is determined to be Native American in origin, FERC will contact tribal representatives that requested to be consulting parties. Communications, such as consultation, transmittals, and reports, may be provided via e-mail, as appropriate and acceptable to each agency. Contact information for the various agencies is listed below:

spire (

Environmental Inspector

To be determined

Chief Inspector

To be determined

Spire Environmental Project Manager

Russell English
Spire, Inc.
700 Market Street
St. Louis, Missouri 63101
314-956-5221
russell.english@SpireEnergy.com

Spire Project Manager

Russell English
Spire, Inc.
700 Market Street
St. Louis, Missouri 63101
314-956-5221
russell.english@SpireEnergy.com

MO SHPO

Ms. Judith Deel, Compliance Coordinator Missouri Department of Natural Resources State Historic Preservation Office P.O. Box 176 Jefferson City, Missouri 65102-0176 573-751-7862 judith.deel@dnr.mo.gov

MDNR

Ms. Heather Gibb Missouri Department of Natural Resources State Historic Preservation Office P.O. Box 176 Jefferson City, Missouri 65102-0176 573-751-4589 heather.gibb@dnr.mo.gov

FERC

Laurie Boros, Archaeologist
Federal Energy Regulatory Commission
888 1st Street NE
Room 1A
Washington, D.C. 20426
202-502-8046
laurie.boros@ferc.gov

St Charles County Police Department

101 Sheriff Dierker Court O'Fallon, Missouri 63366 636-949-3000

St Louis County Police Department

7900 Forsyth Blvd St. Louis, Missouri 63105 636-529-8210

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If the unanticipated discovery is determined to be ineligible for inclusion in the National Register of Historic Places ("NRHP"), Spire will proceed with construction following written concurrence from the MO SHPO and approval from FERC. If the site is determined to be potentially eligible for inclusion in the NRHP, additional work, such as a Determination of Eligibility or Data Recovery, will be performed as required/approved by the MO SHPO and FERC. Further construction work at the site will be suspended until all criteria of Section 106 of the NHPA and other related federal and state regulations have been successfully completed. Construction activities will be kept a minimum of 25 feet from the site (dependent on the site type, location, construction design, and agency consultation) and separated from the site by temporary fencing.

In the event that human remains are discovered during construction, the Environmental or Chief Inspector will immediately halt work and notify the Spire Environmental Project Manager, the local law enforcement agency, and the MO SHPO. The Environmental Inspector will ensure that human remains are protected from further damage, intrusion, or removal until proper examinations can be performed. Provision for security to protect suspected burials from vandalism will be taken, including monitoring of the area. Discovery of human remains should not be made public, including but not limited to, conversations with local residents, posting on social media, or communication with news outlets. Construction activities including vehicle traffic will be kept a minimum of 25 feet from the remains (dependent on the location, construction design, and agency consultation) and separated by temporary fencing. If remains are found not to be of recent origin, the Spire Environmental Project Manager will contact the MO SHPO and FERC to ensure that relevant laws are followed. As soon as a determination has been made that the human remains are Native American, Spire will contact appropriate tribal representatives for the region in which the remains were found. If the remains are not Native American and not associated with a crime scene, guidance in National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places (Potter and Boland 1992) will be taken into account. A reasonable attempt will be made to identify the next of kin. Spire's Environmental Manager will notify FERC of the situation and will continue to keep FERC informed as to the progress of further consultation. Spire will attempt to redesign the Project to avoid impact to the human remains. Only if avoidance is not possible will Spire proceed with removal of the human remains.

If the unanticipated discovery of human remains is determined by the MO SHPO and FERC to be ineligible for inclusion in the NRHP, Spire will proceed with coordinating the proper removal of the remains through cooperation from the local police, the medical examiner, the MO SHPO, and FERC. Only after the human remains have been properly removed from the site should construction of the pipeline facilities in the site area be resumed.

Under no circumstances should human remains be removed from the site without completing all permitting and coordination processes with the local police, the medical examiner, the MO SHPO, Native American representatives as appropriate, and FERC. Further work at the site will be suspended until all criteria of Section 106 of the NHPA and other related state and federal regulations have been successfully completed.

spire 5

1.1 References

Potter E.W. and B.M. Boland. 1992. *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places*. U.S. Department of the Interior, National Park Service. Washington, D.C.

Missouri Department of Natural Resources (MDNR). No Date. *Guidelines for Archaeological Survey and Reports*. Missouri Department of Natural Resources, State Historic Preservation Office, St. Louis. Accessed electronically, September 2016, http://dnr.mo.gov/shpo/sectionrev.htm.



GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Ms. Judith Deel Compliance Coordinator Missouri State Historic Preservation Office 1101 Riverside Drive Jefferson City, MO 65101

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Ms. Deel:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that the Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

Amended Project Description

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new, greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC

interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75 feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act ("NEPA") process began (initiation of FERC Pre-filing process);
- August 2016 through March 2017 (Anticipated) Biological and Cultural Resource Surveys;
- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
- September 2017 (Anticipated) Draft NEPA Document Published; and
- December 2017 (Anticipated) FERC Decision on Application.

Construction is anticipated to commence in January 2018.

On behalf of Spire, we'd like to take this opportunity to invite the Missouri State Historic Preservation Office to provide comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

for merry

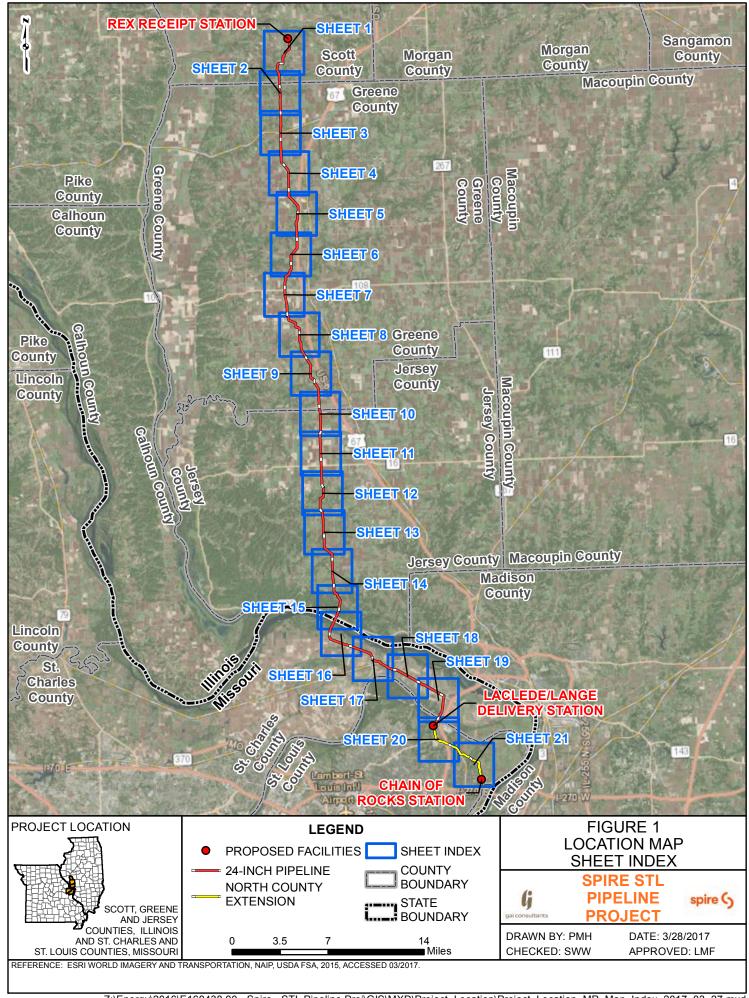
Lori M. Ferry

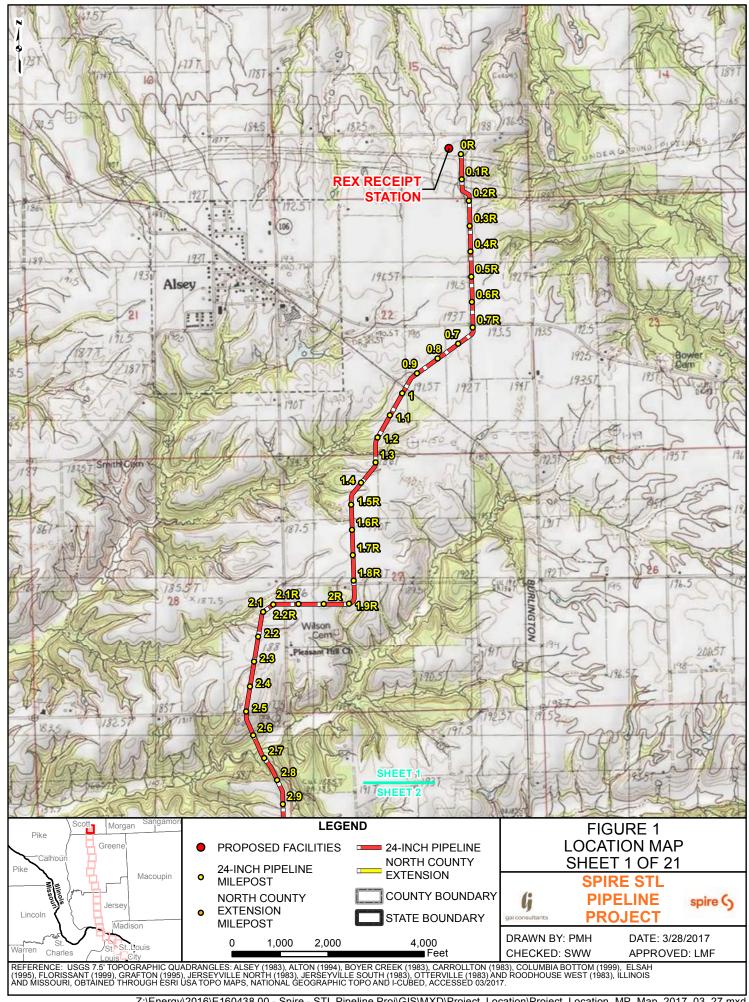
Environmental Manager

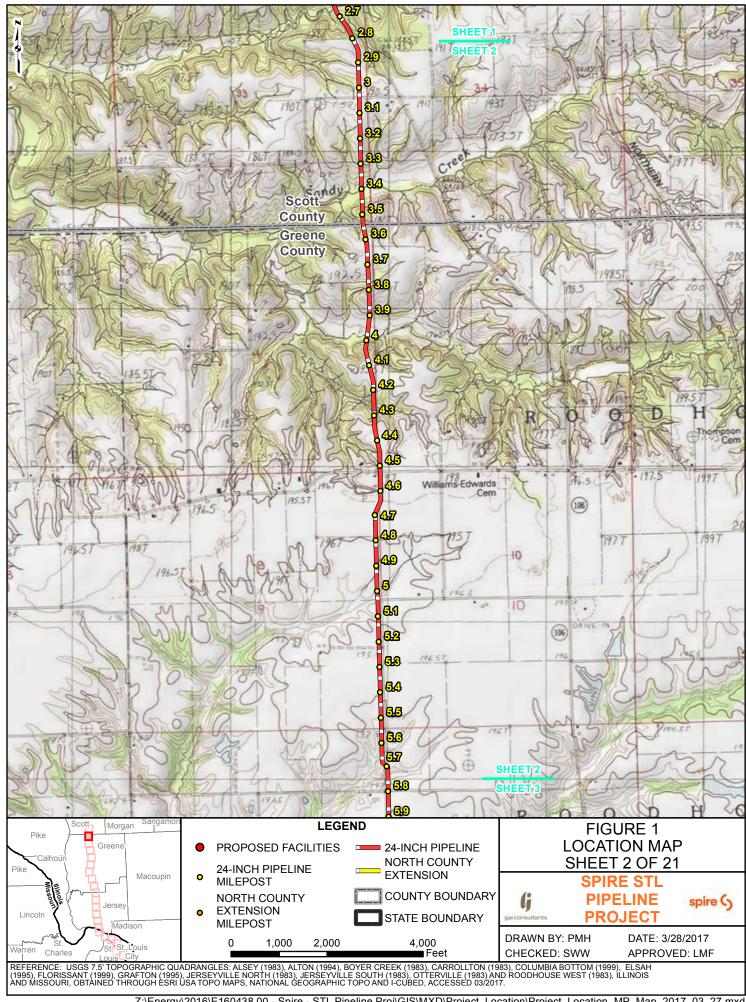
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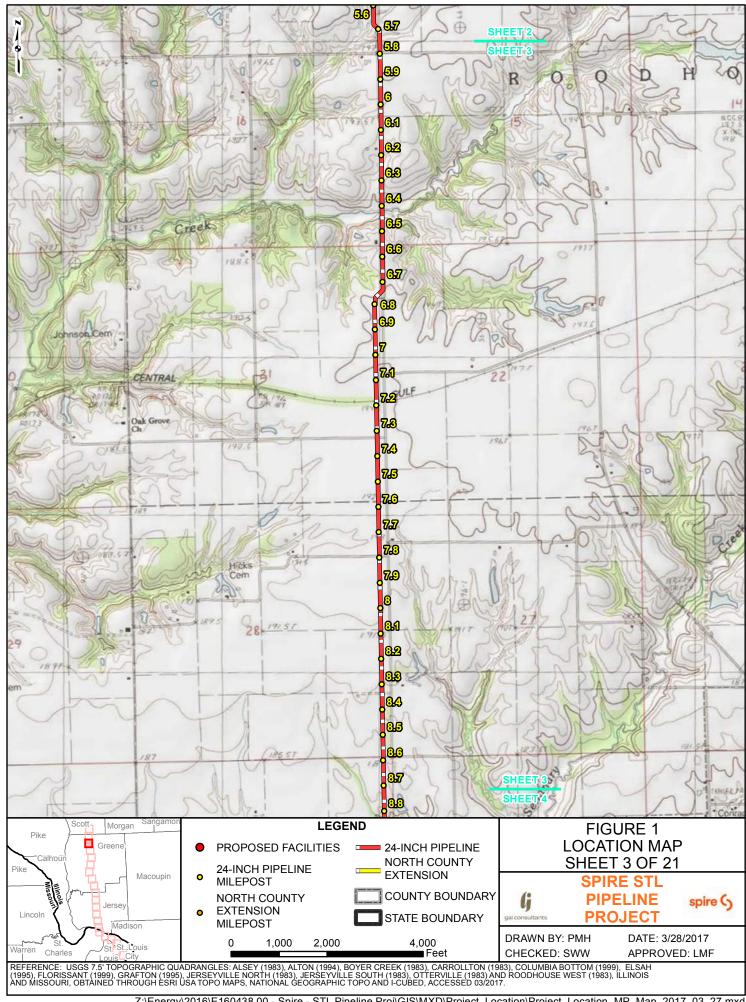
Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

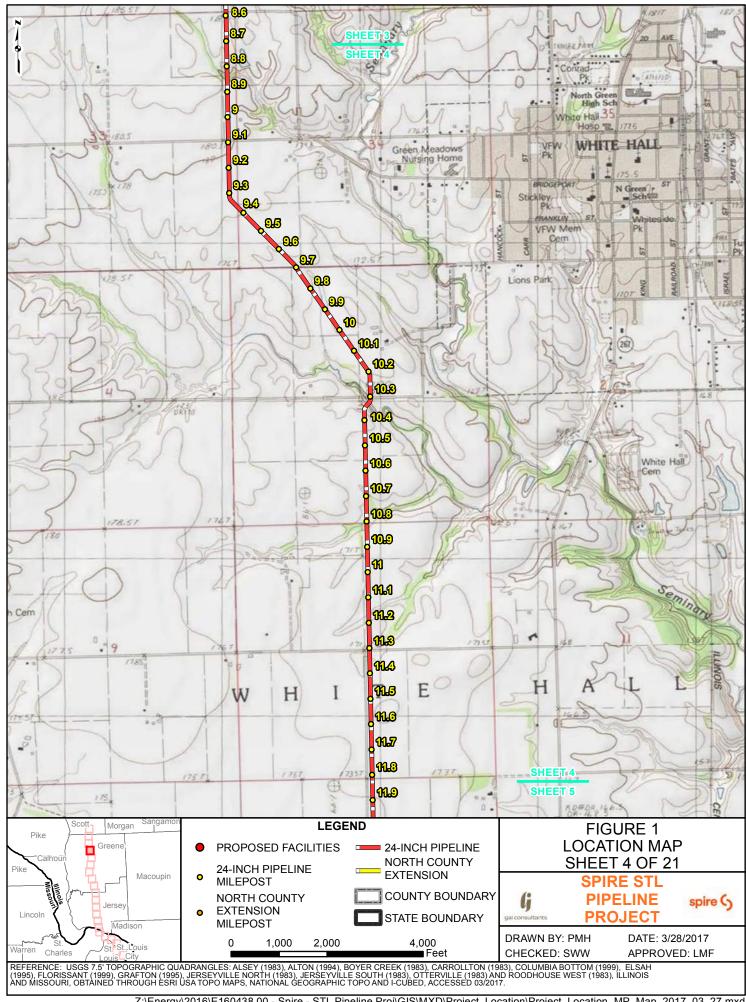
ATTACHMENT USGS TOPOGRAPHIC MAP (FIGURE 1)

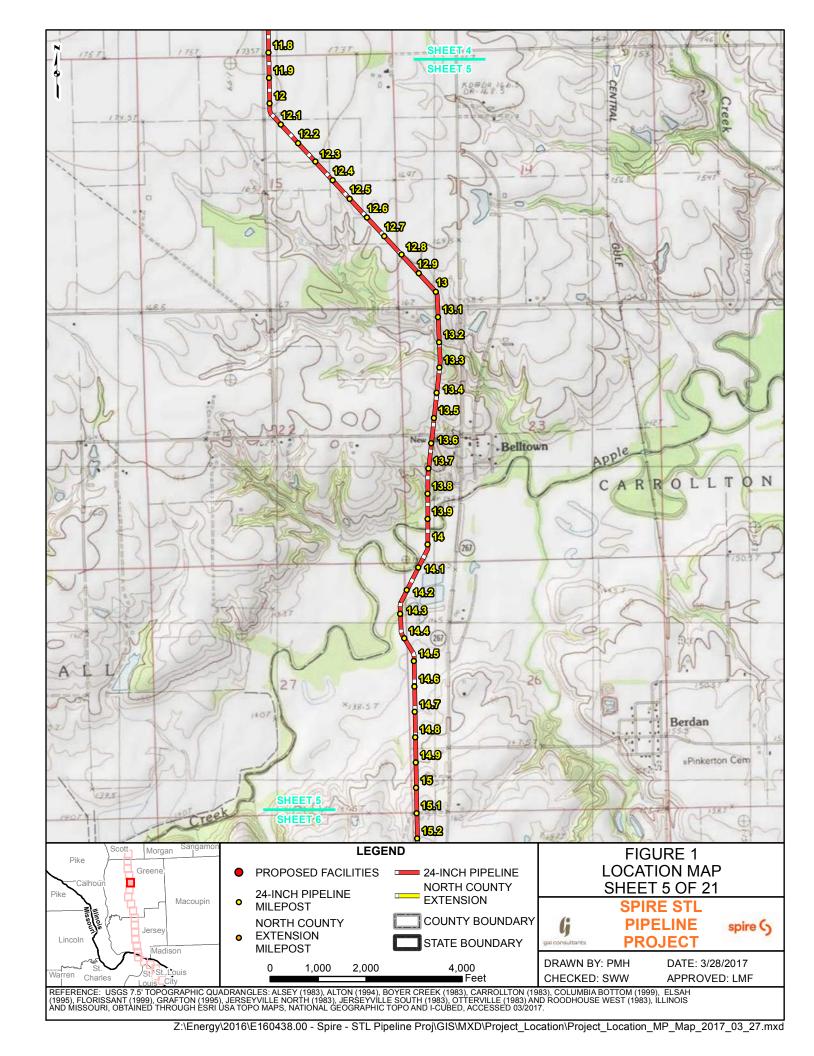


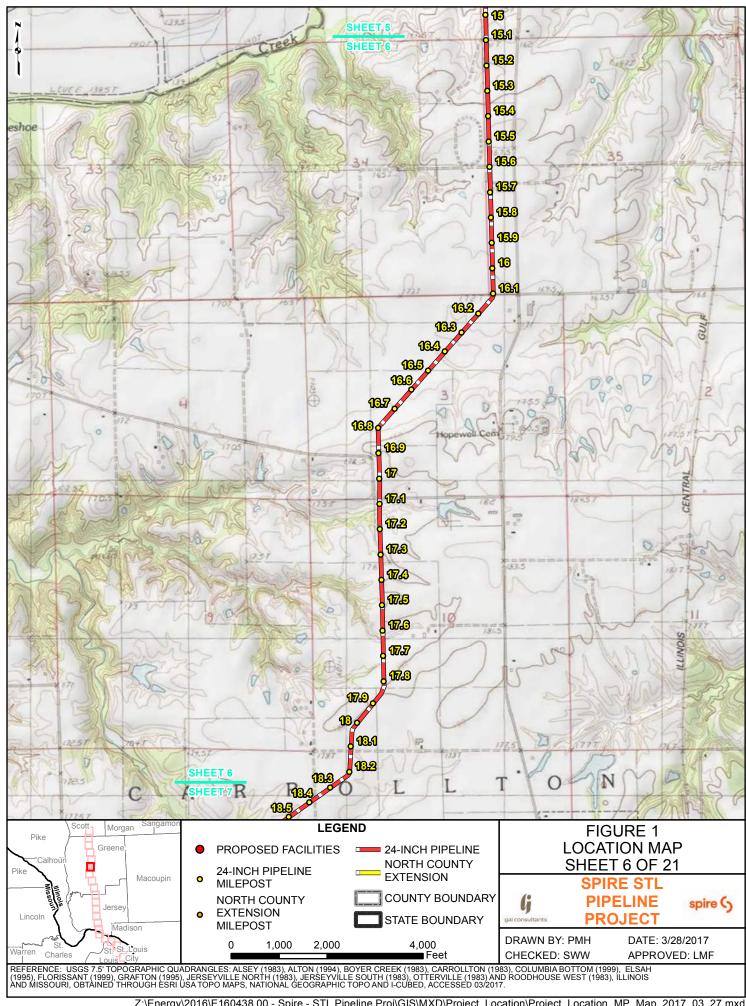


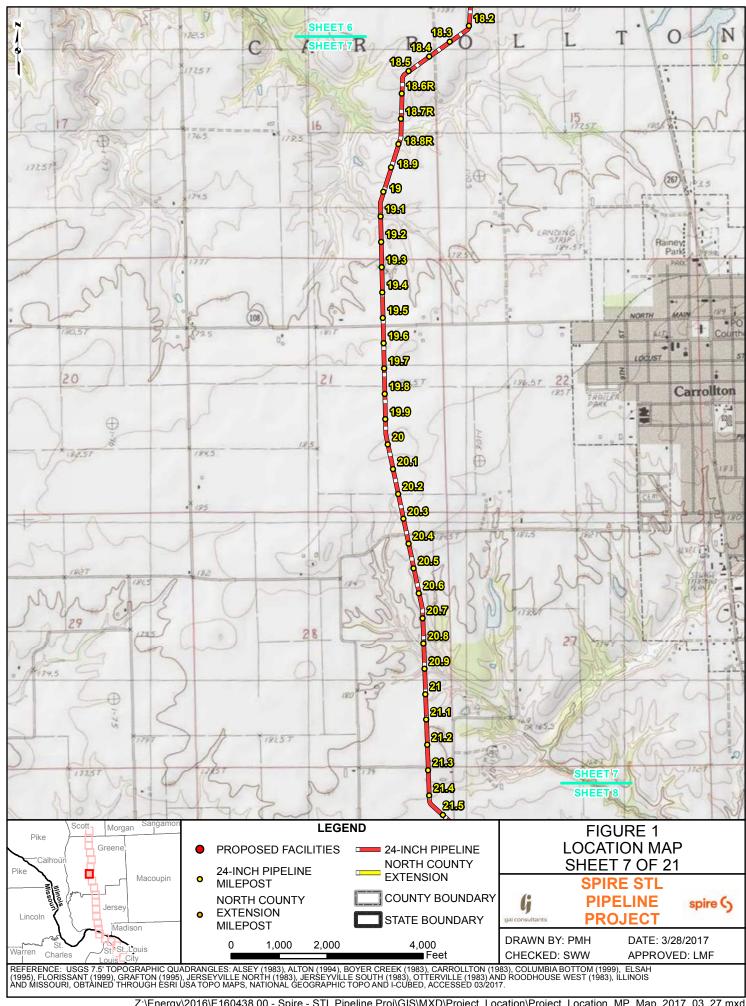


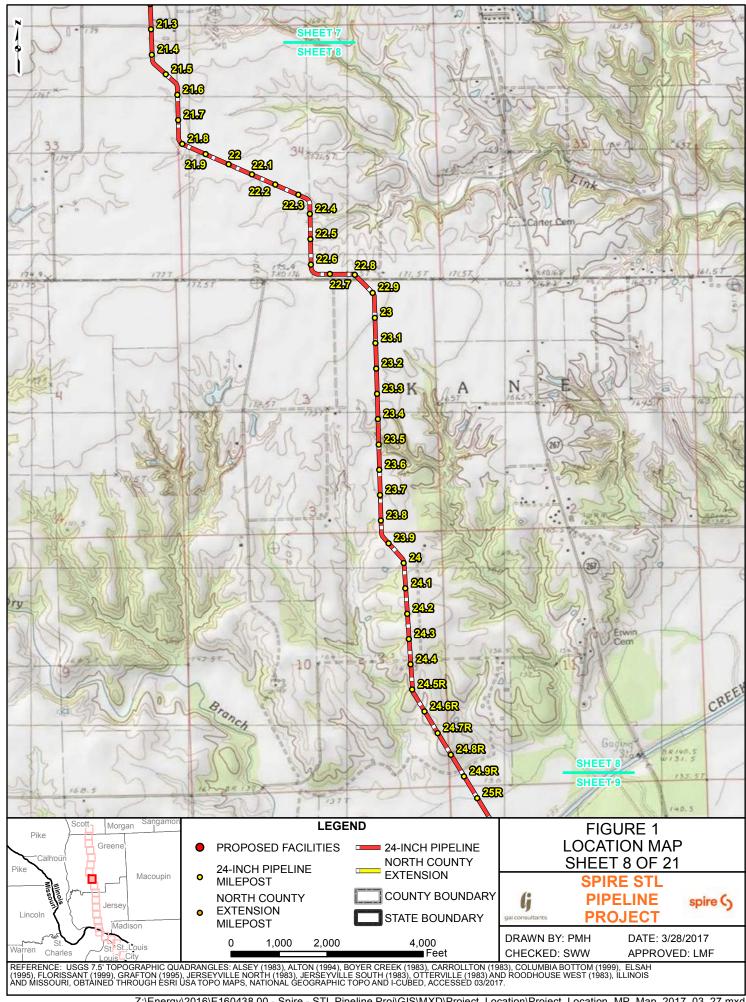


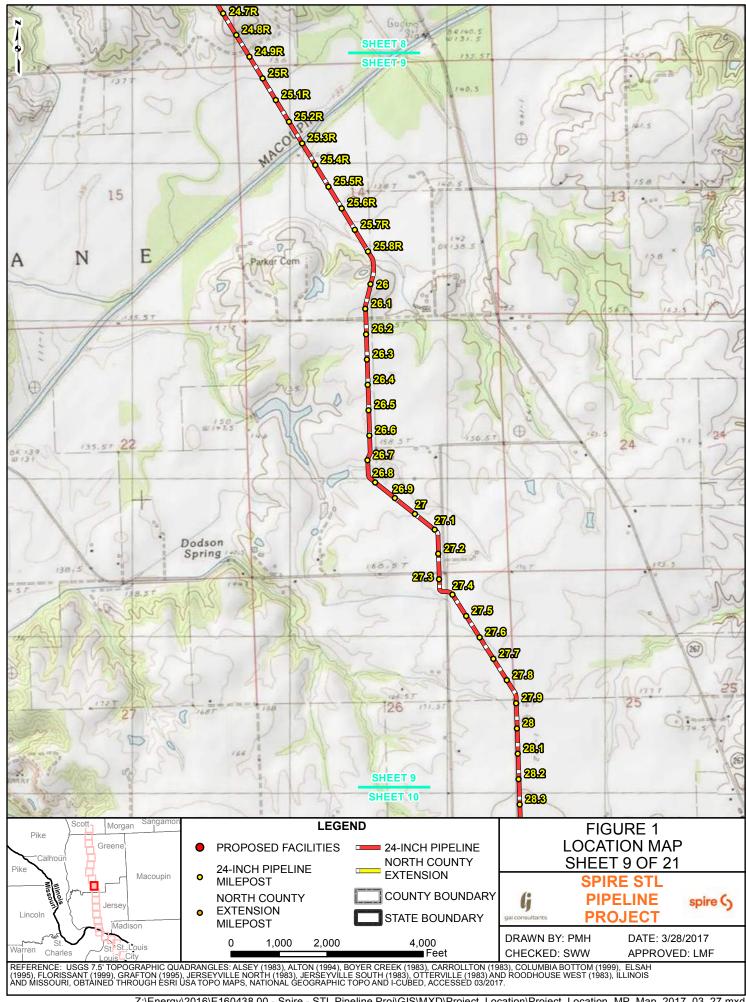


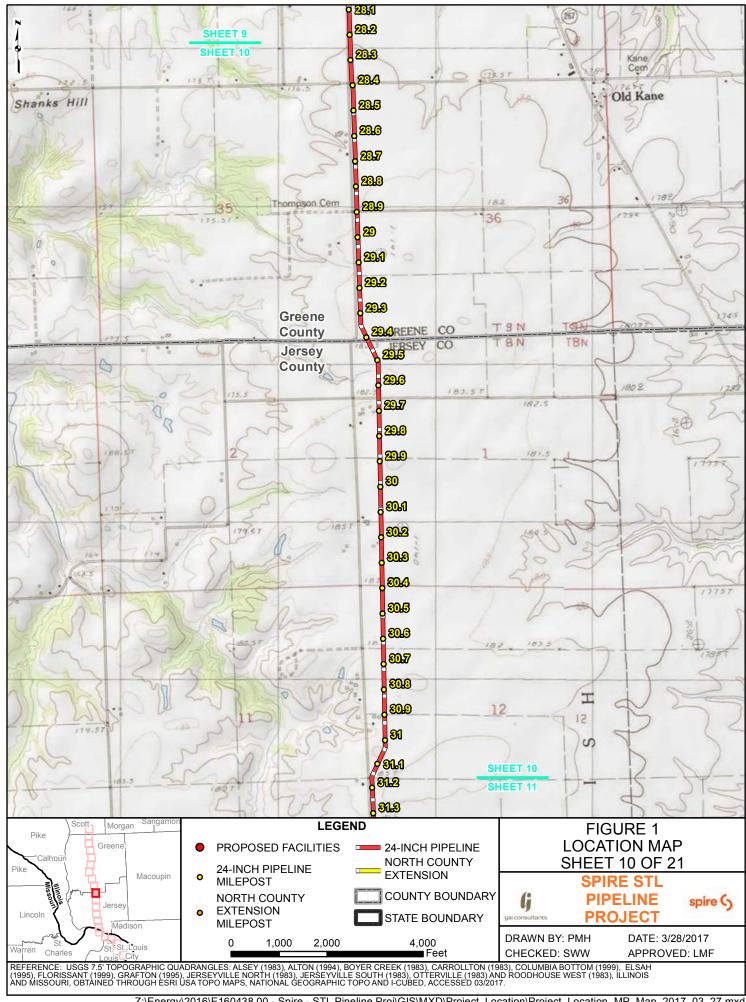


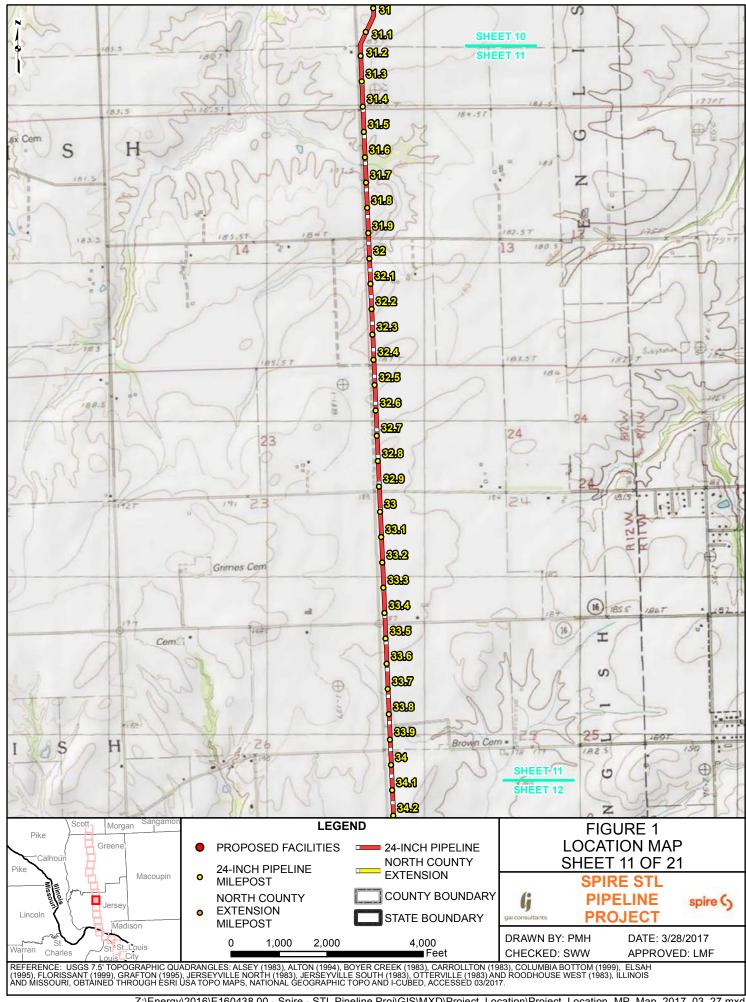


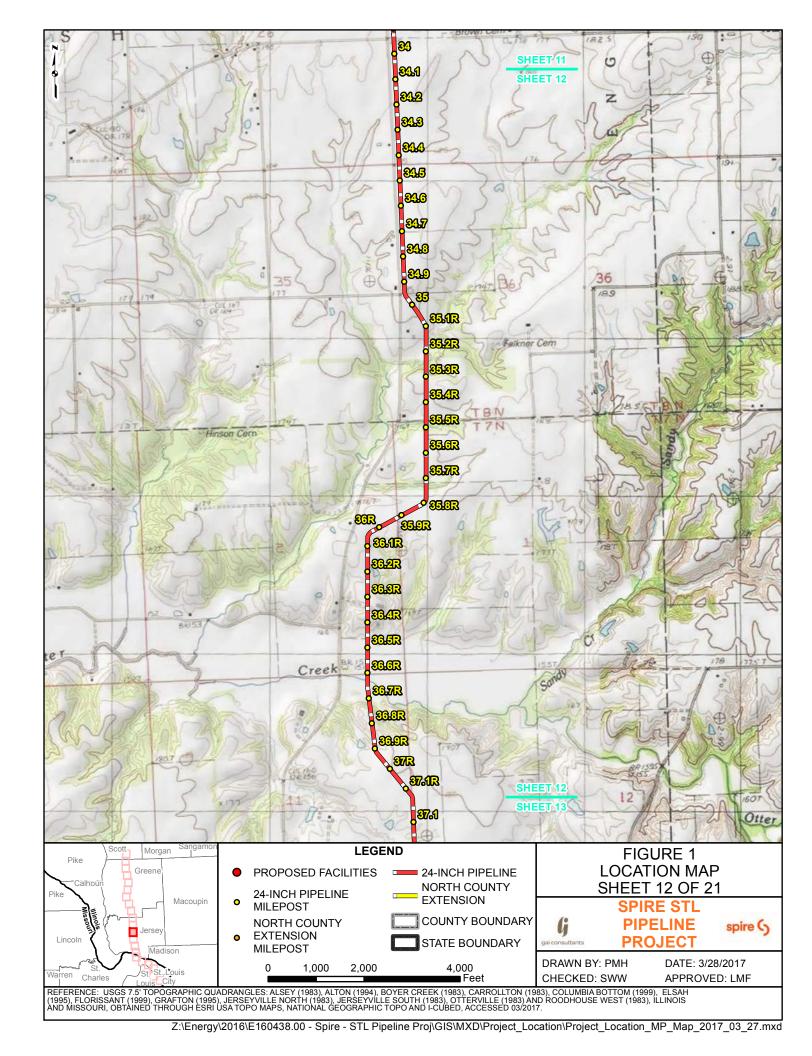


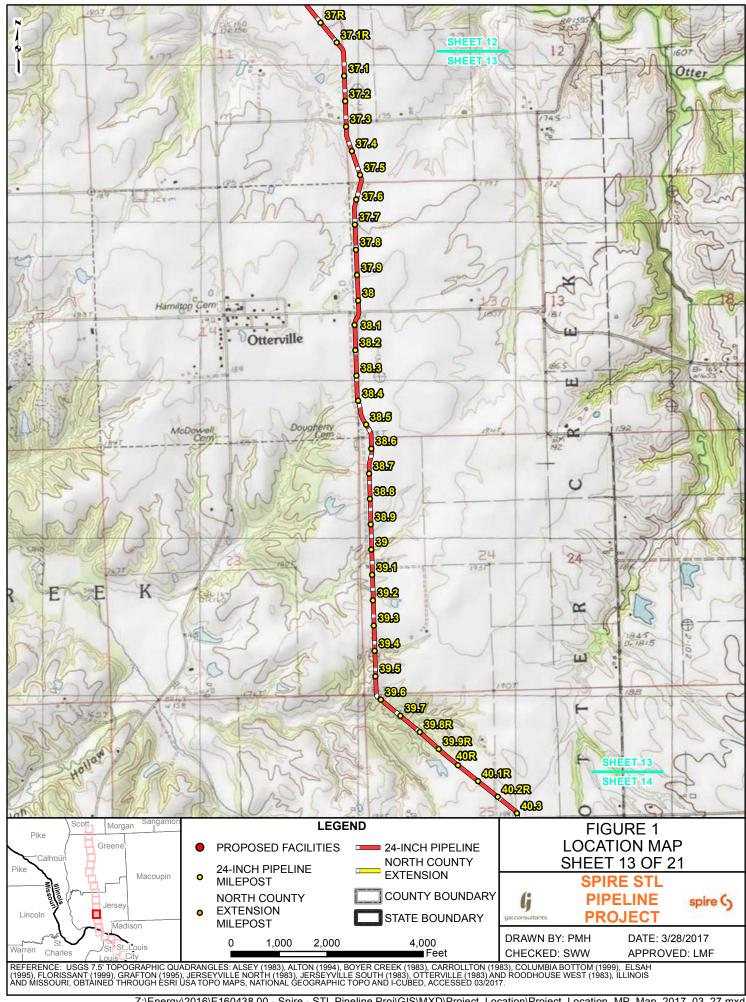


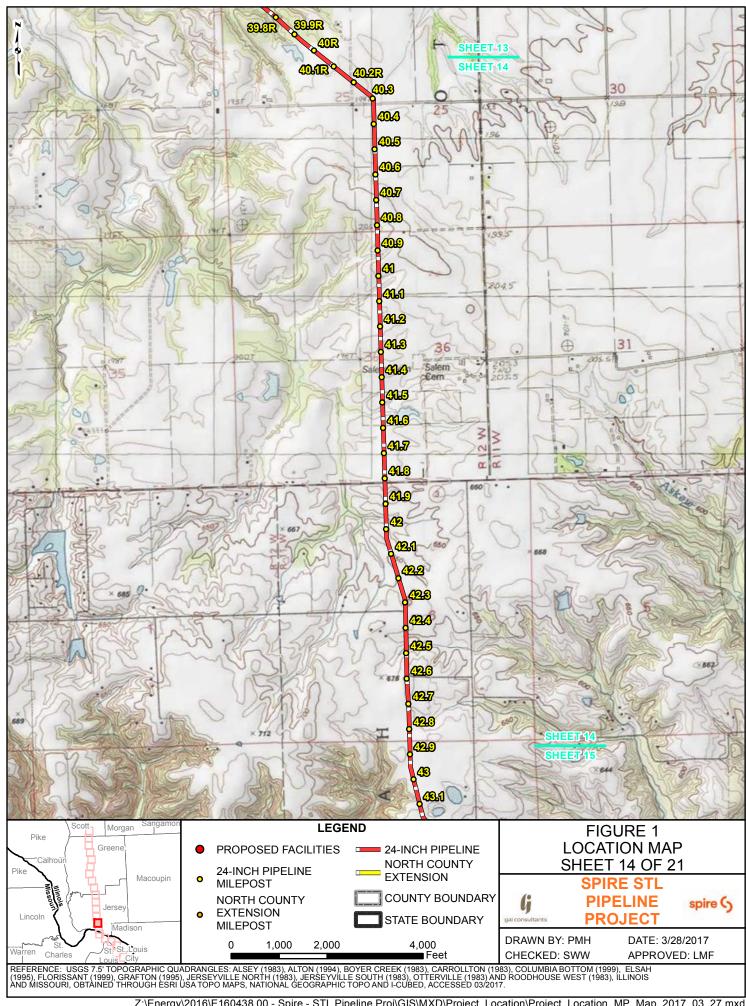


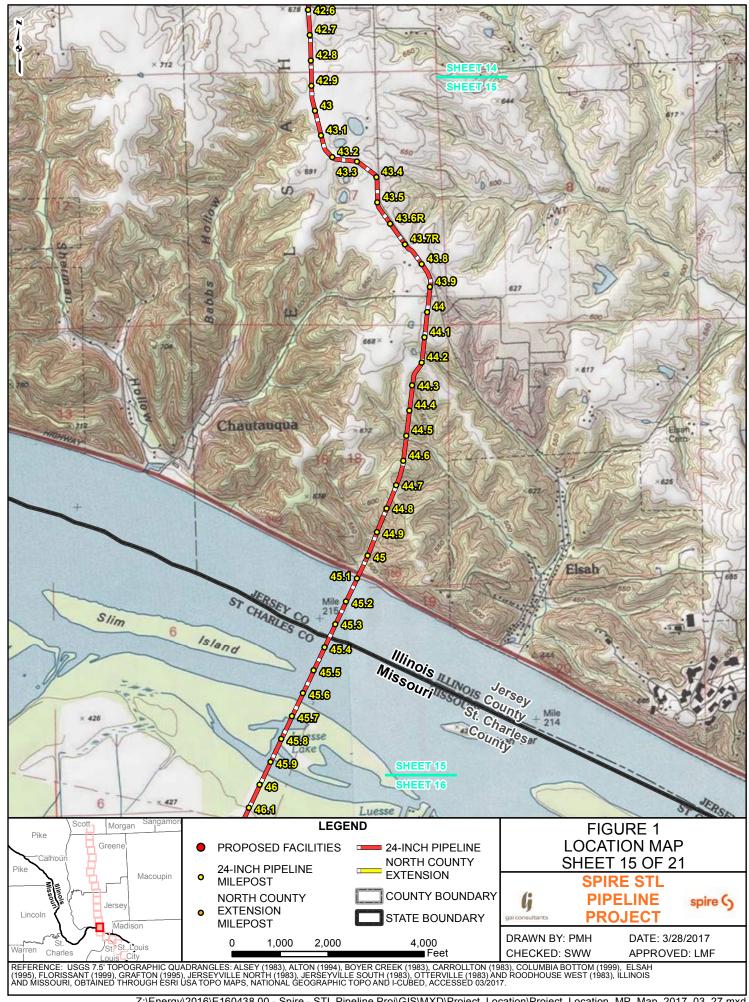


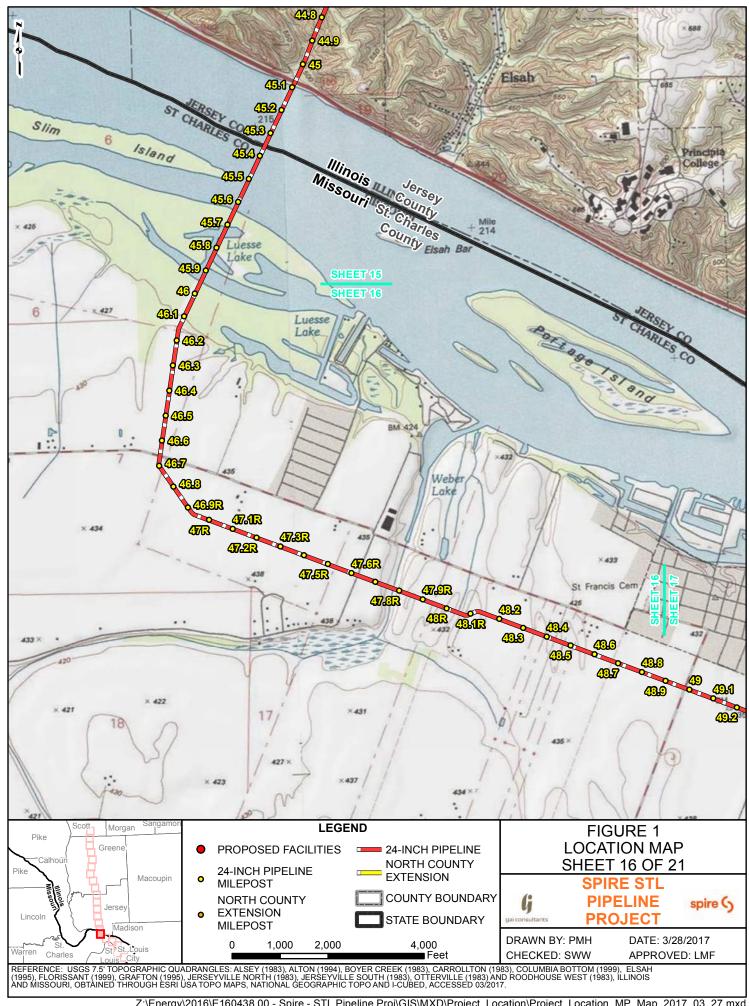


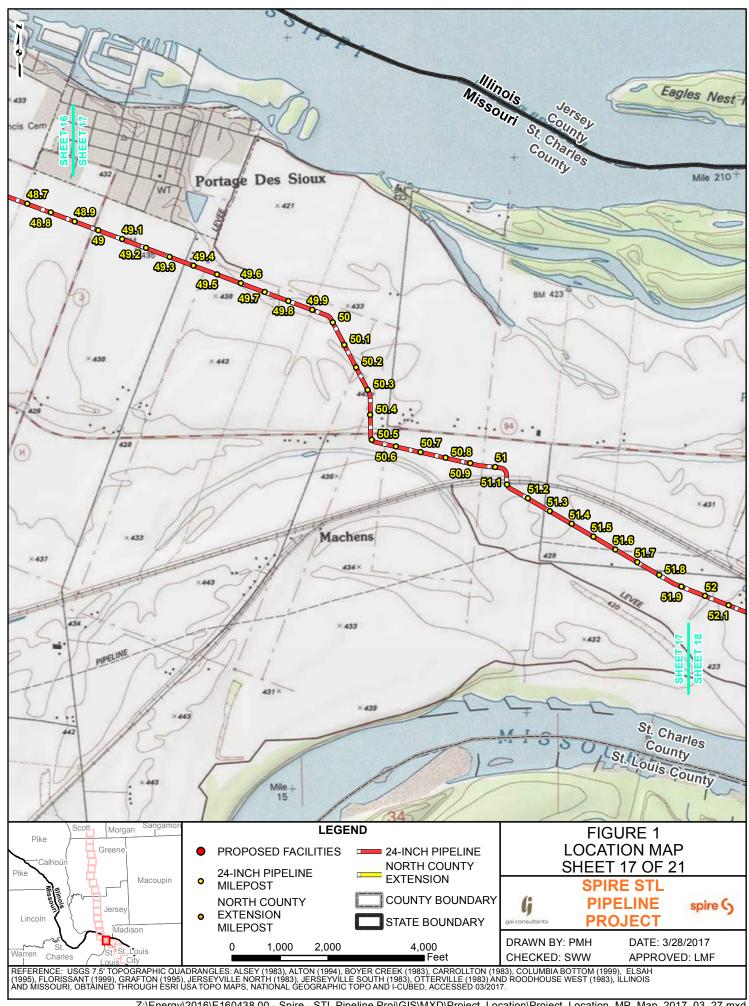


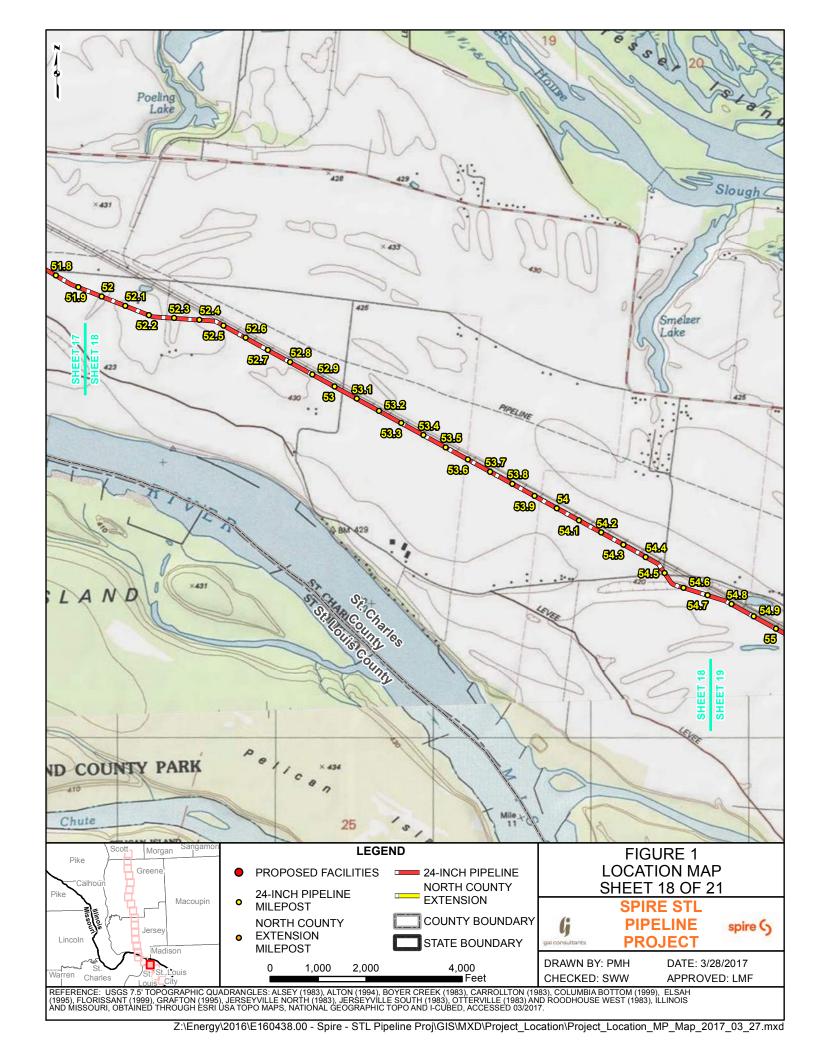


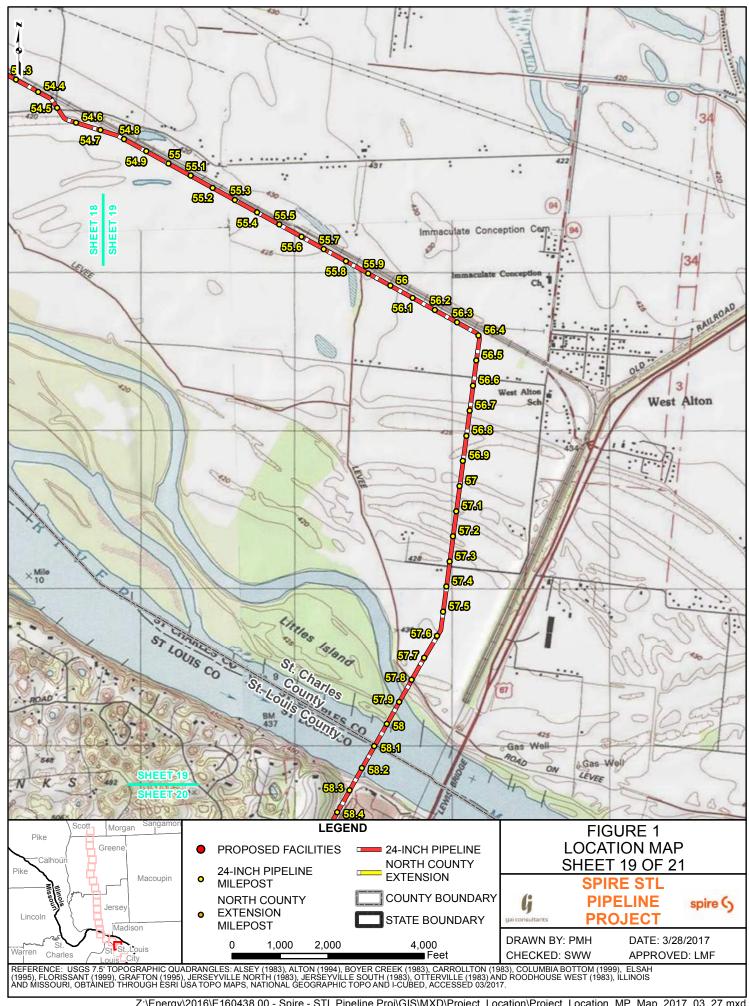


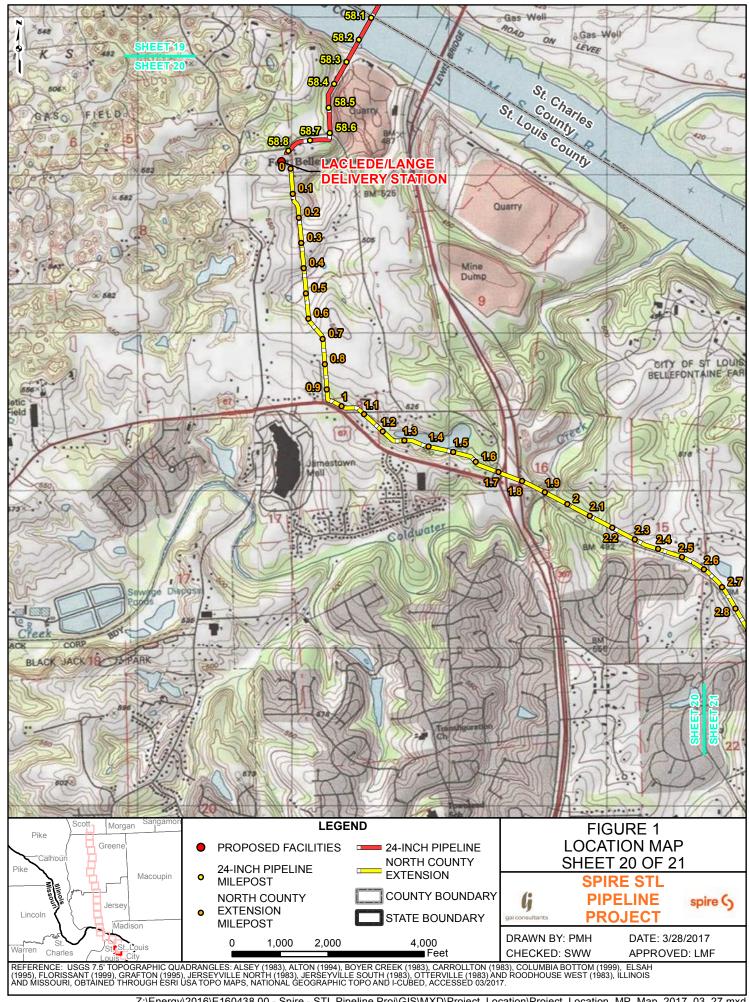


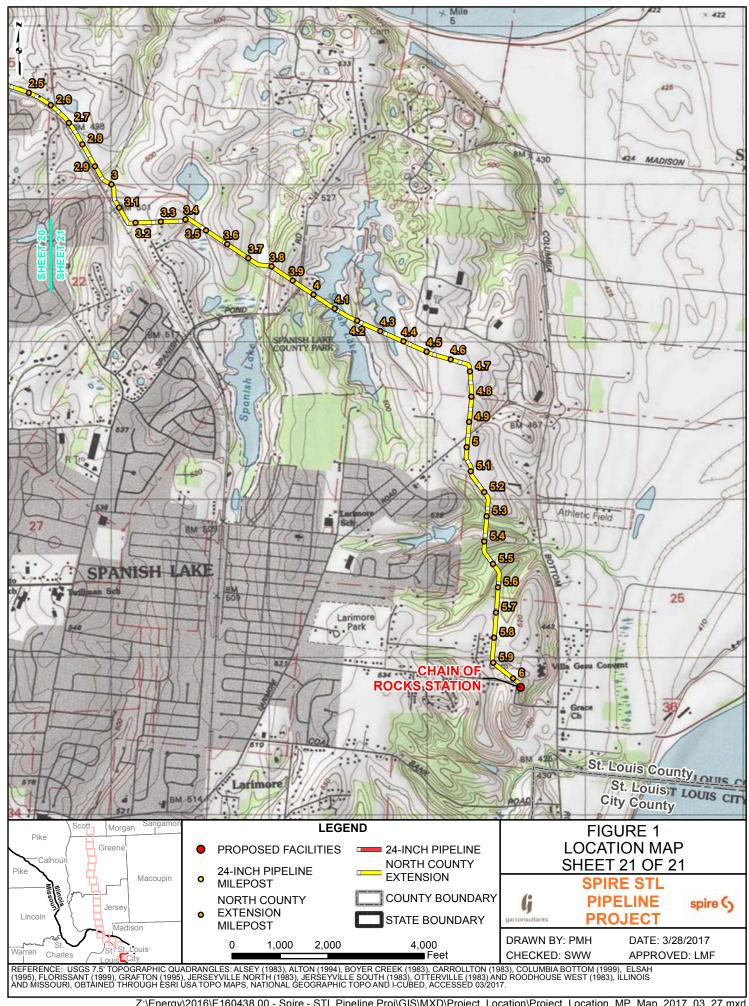












March 23, 2017

Eric P. Scuoteguazza
GAI Consultants, Inc.
1444 Farnsworth Avenue, Suite 303
Aurora, Illinois 60505

Re: Spire STL Pipeline Project (FERC) St. Charles & St. Louis Counties, Missouri

Dear Mr. Scuoteguazza:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which requires identification and evaluation of cultural resources.

We have reviewed the January 2017 draft reports entitled detailing the results of the Phase I archaeological survey and historic architectural survey. Based on this review we have the following comments:

- Please be consistent with the site descriptions by including in all transects; the percentage of
 visibility; if shovel tests were conducted and, if so, how many and what the results were (plow
 zone, intact, to what depth); if the site boundaries extend outside of the right-of-way, at least
 estimate how much additional site area might be beyond project boundaries.
- Figures 1.2 and 6.1 are referenced for each site. Please include the sheet number. It would also be most useful to include a map showing the site in relation to the project in the site description section.
- The maps attached to the site forms must use the official trinomial, not the field designation.
- Artifact illustrations and/or photographs should be included in the site descriptions and with the site forms.
- 23SC2213 how far outside of the right of way might this site extend? If only a small portion, then the recommendation for not eligible may be defended.
- 23SC2218 states that this site exhibits intact integrity. Was this determined by shovel tests? If so, how deep? Was there intact cultural material below the plow zone?
- 23SC2219 it is more appropriate to state the historic component does not have the potential to contribute to the possible eligibility of the site.
- 23SC2215 states that this site exhibits intact integrity. Was this determined by shovel tests? If so, how deep? Was there intact cultural material below the plow zone? Provide documentation to support the statement that there is a potential for deeply buried deposits.
- 23SC2211 Was shovel testing conducted to determine evidence or presence of features?
- 23SC5 Were additional historic records reviewed to determine if the mapped location of the trail is accurate? What changes or alterations to the landform have occurred?
- 23SL157 it is more accurate to state that there is no evidence of the site within the project area, and that there will be no effect.
- 23SL158 it is more accurate to state that there is no evidence of the site within the project area, and that there will be no effect.
- GAI-02 will require additional context before a determination of eligibility can be made.



- GAI-03 More and better photographs are needed for this farmstead, as well as a more detailed explanation for why the recommendation is for not eligible.
- GI-09 and GAI-33 More and better photographs, as well as more documentation of the surrounding subdivision will be required in order to determine if these properties are eligible or not.

We look forward to the opportunity to review a revised draft of these documents. If you have any questions, please write Judith Deel at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call 573/751-7862. Please be sure to include the SHPO Log Number (**061-MLT-16**) on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl, Ph.D. Director and Deputy State Historic Preservation Officer

TMP:jd

c Laurie Boros, FERC



Missouri Department of Conservation



March 28, 2017

Ms. Audrey Beres Policy Coordinator Missouri Department of Conservation 2901 West Truman Boulevard Jefferson City, Missouri 65109

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
St. Charles and St. Louis Counties, Missouri

Dear Ms. Beres:

In June 2016, Spire Pipeline LLC (Spire) initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project (Project) which consisted of approximately 59 miles of new, greenfield, 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline"), originating at an interconnection with the Rockies Express Pipeline LLC (REX) pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company (LGC) (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project) (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that the Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield, 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with the FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

Amended Project Description

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC interconnect through the northern portion of St. Louis County and terminate at a new interconnect

with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75-feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act (NEPA) process began (initiation of FERC Pre-Filing process);
- August 2016 through March 2017 (Anticipated) Biological and Cultural Resource Surveys;
- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
- September 2017 (Anticipated) Draft NEPA Document Published; and
- December 2017 (Anticipated) FERC Decision on Application.

Construction is anticipated to commence in January 2018.

Missouri

Approximately 13.5 miles of the 24-inch pipeline will be located in Missouri and traverse St. Louis and St. Charles Counties. Approximately six miles of the new 24-inch diameter North County Extension will be located in St. Louis County, Missouri. Two metering and regulating stations are proposed in St. Louis County, Missouri.

The Project facilities are shown on the attached United States Geological Survey ("USGS") Topographic Map (Figure 1). In addition, Spire has proposed the use/development of new and/or existing access roads throughout the Project area. Temporary staging areas will also be utilized to accommodate equipment staging and stockpiling of materials along the proposed corridor during construction.

Site Description

Missouri

The Missouri portion of the Project is located in St. Charles and St. Louis Counties, Missouri, and is depicted on the attached portions of the Grafton (1979), Elsah (1979), Alton (1979), Florissant (1979), and Columbia Bottom (1979), Missouri, USGS 7.5-minute series topographic maps (Figure 1).

The 24-inch pipeline is greenfield and crosses a primarily agricultural landscape. The North County Extension crosses agricultural, forested, and residential lands. The Project is located within the Marais Temps Clair-Mississippi River [USGS Hydrologic Unit Code (HUC) #071100090401], Outlet Missouri River (HUC #103002000804), Coldwater Creek (HUC #103002000803), and Maline Creek-Mississippi River (HUC #071401010401) watersheds.

On behalf of Spire we'd like to take this opportunity to invite the Missouri Department of Conservation to provide comments regarding the Project as it will be amended. We

appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255, or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

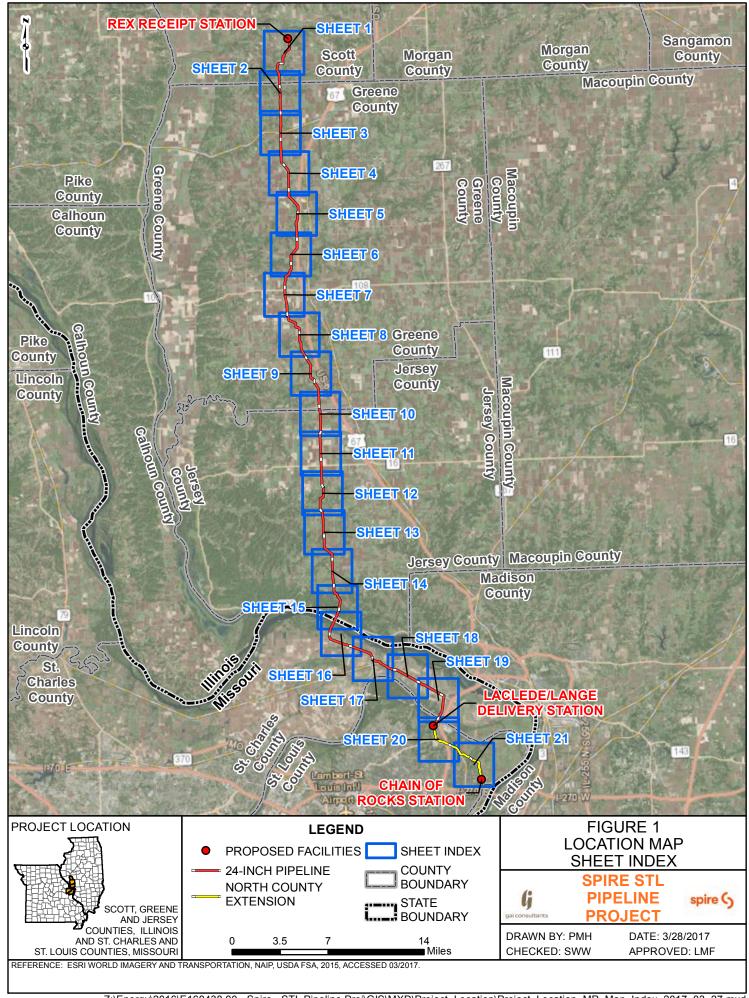
GAI Consultants, Inc.

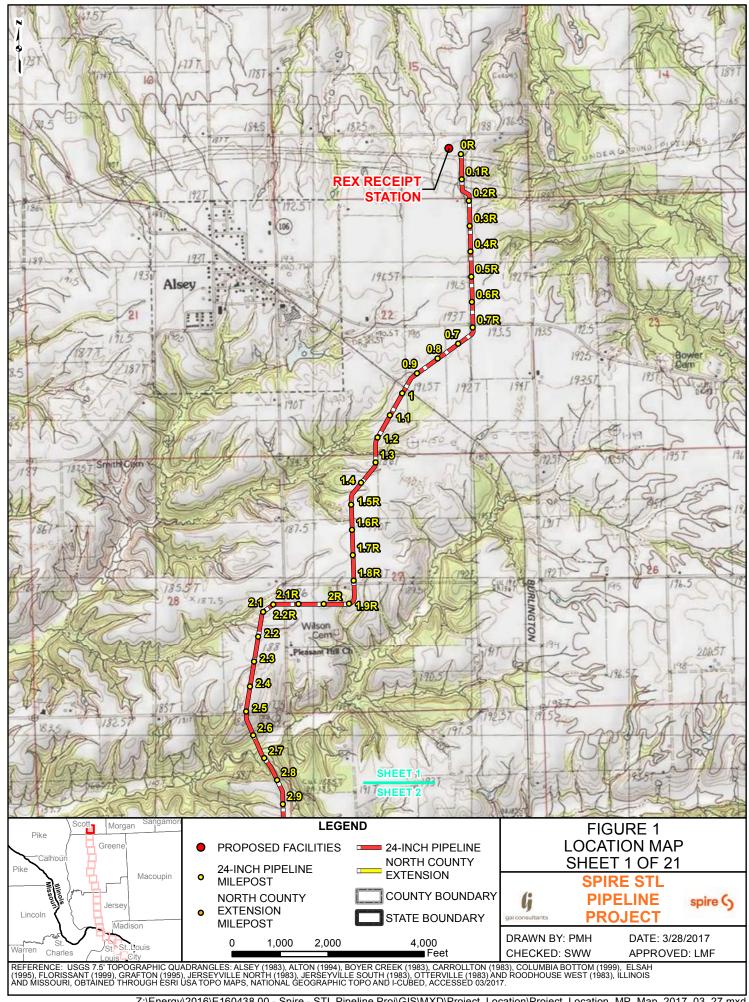
Lori M. Ferry

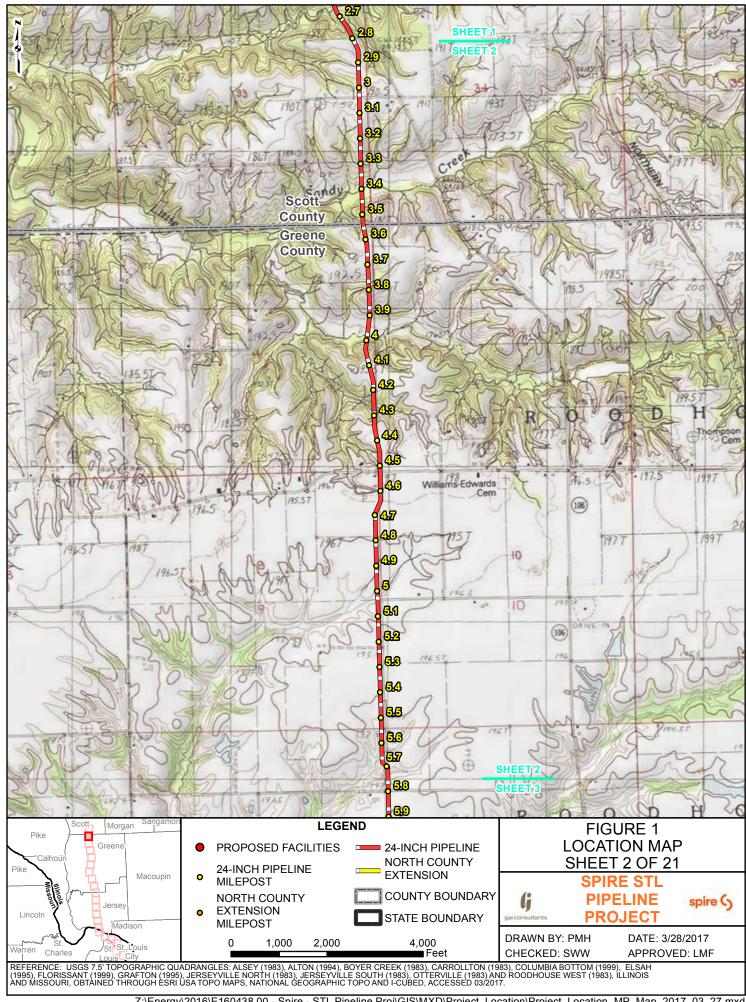
Environmental Manager

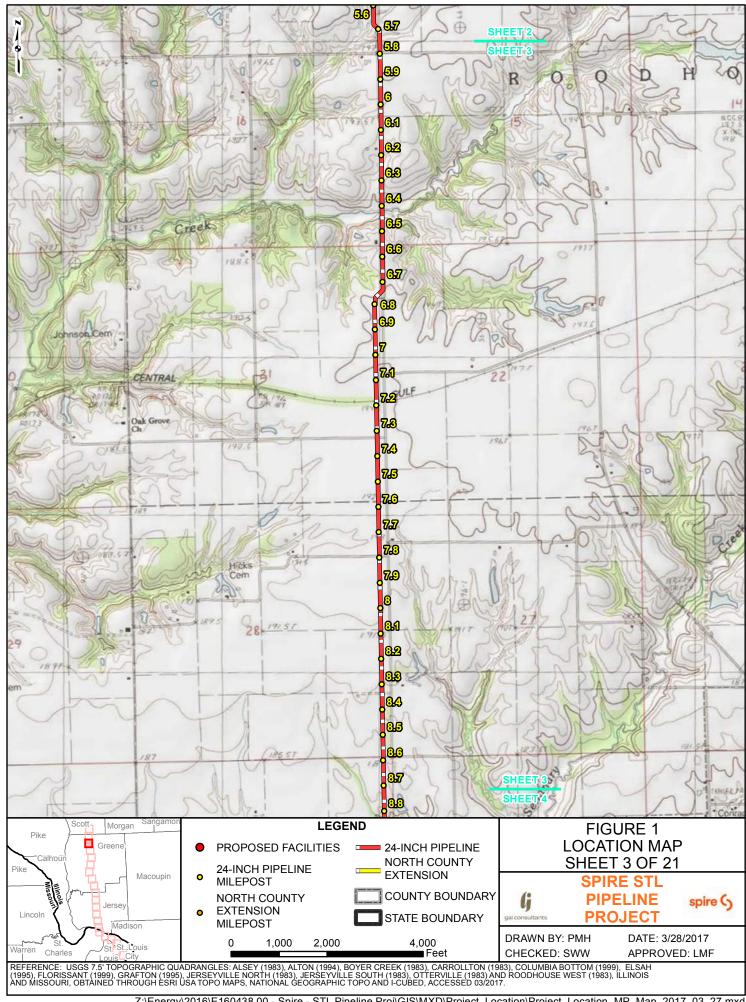
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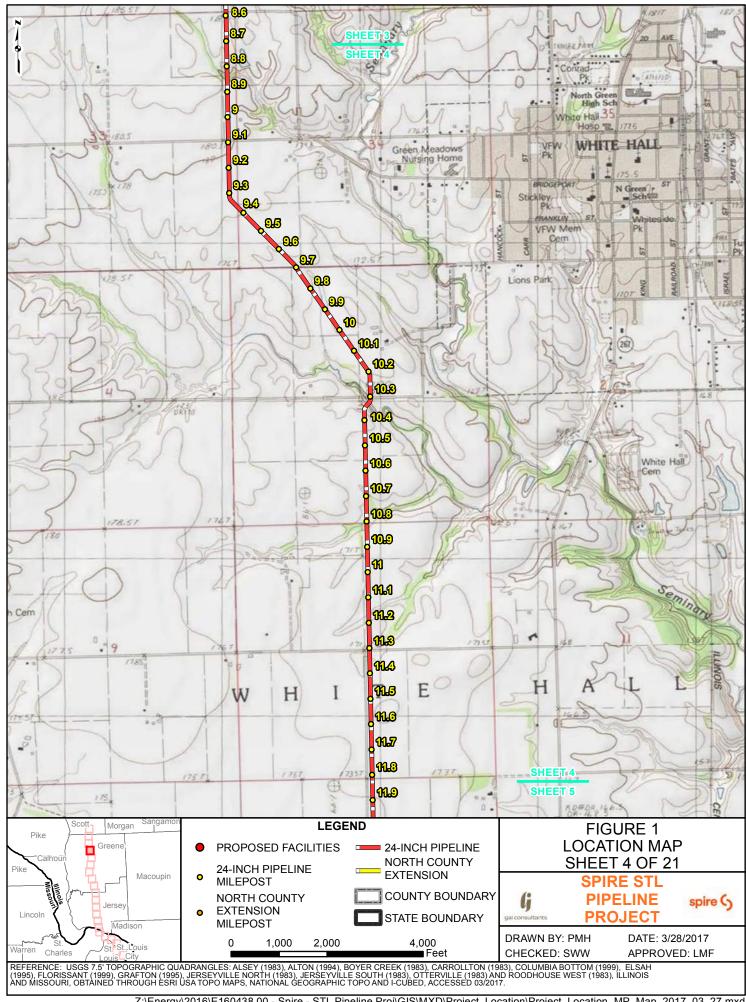
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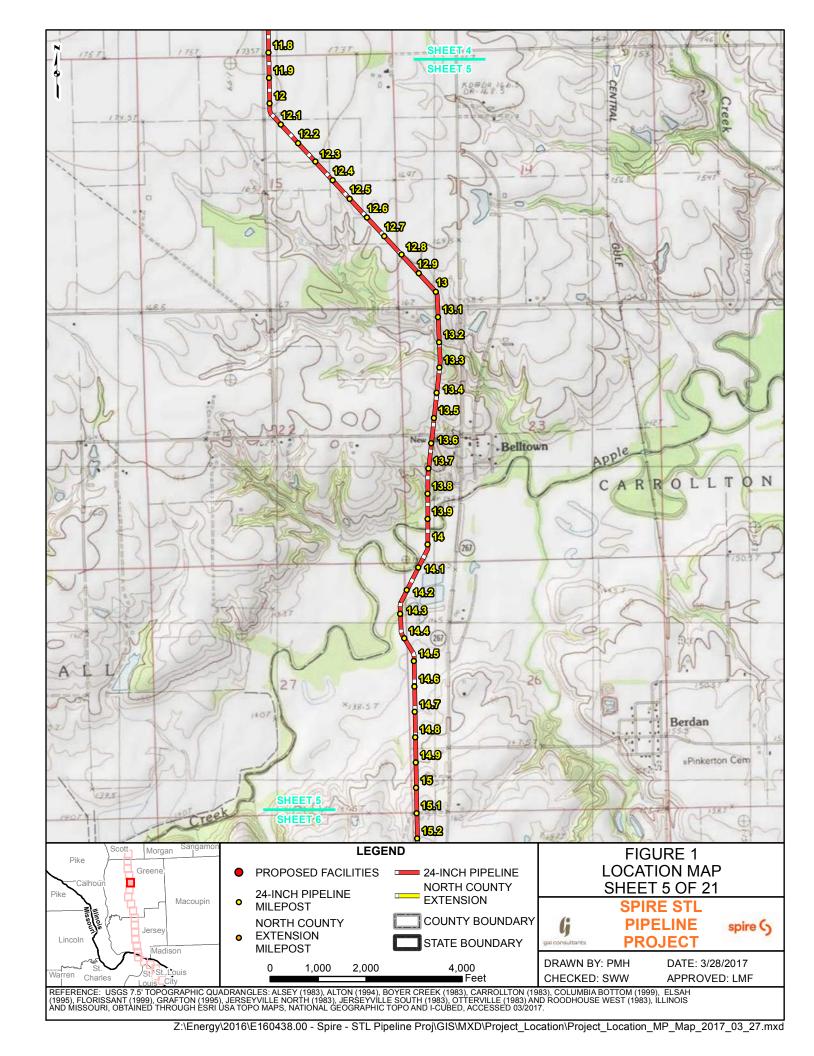


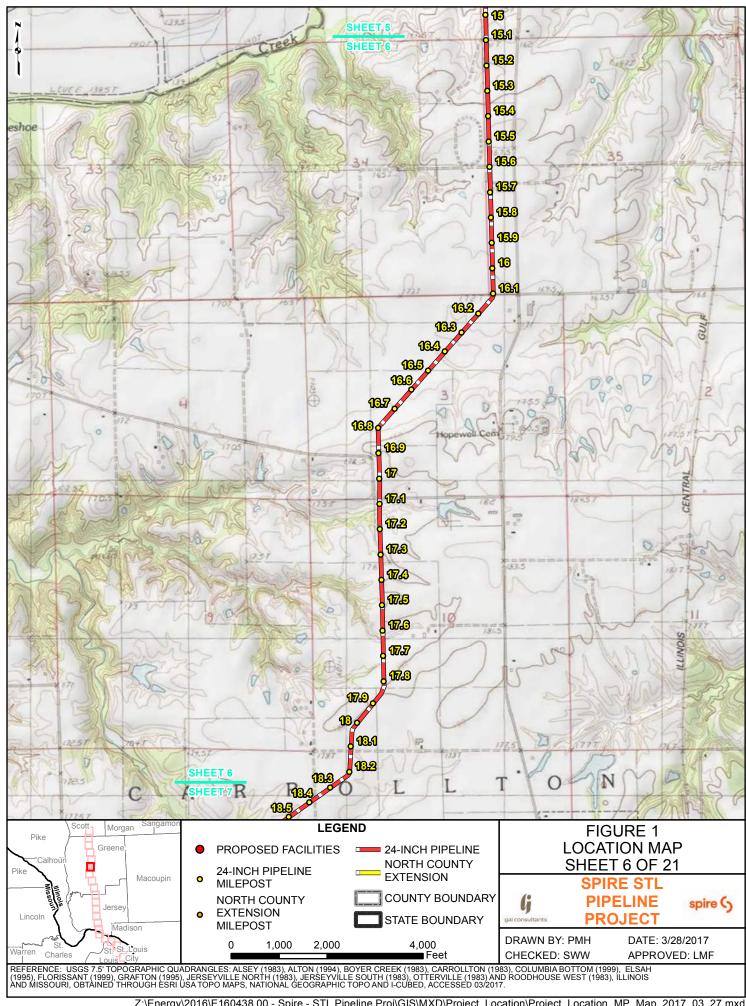


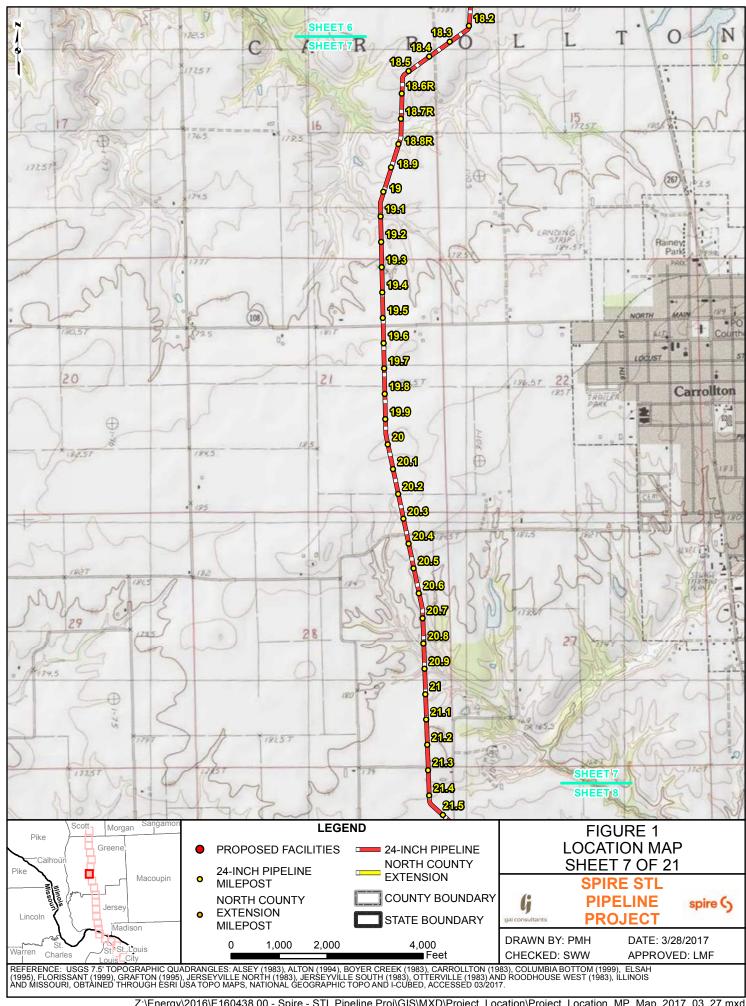


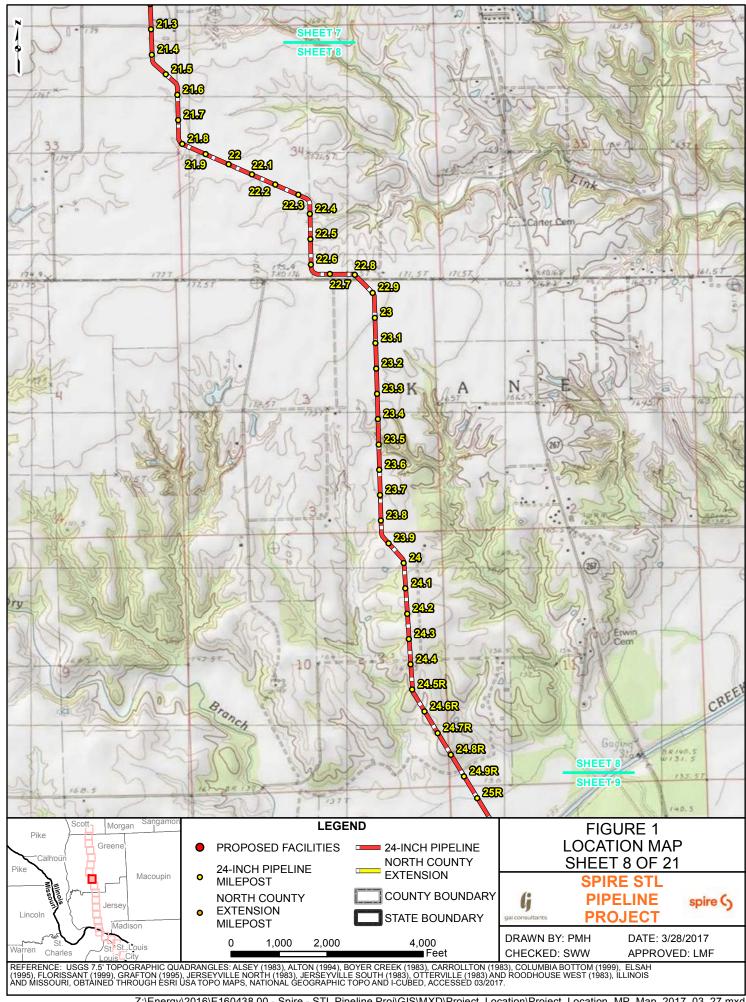


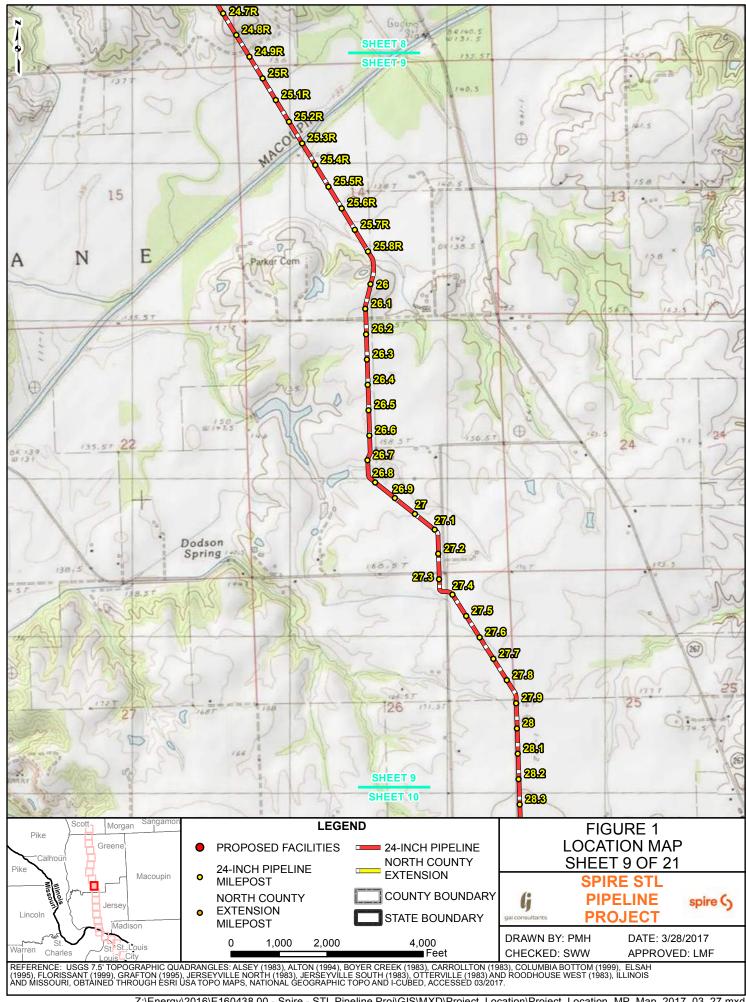


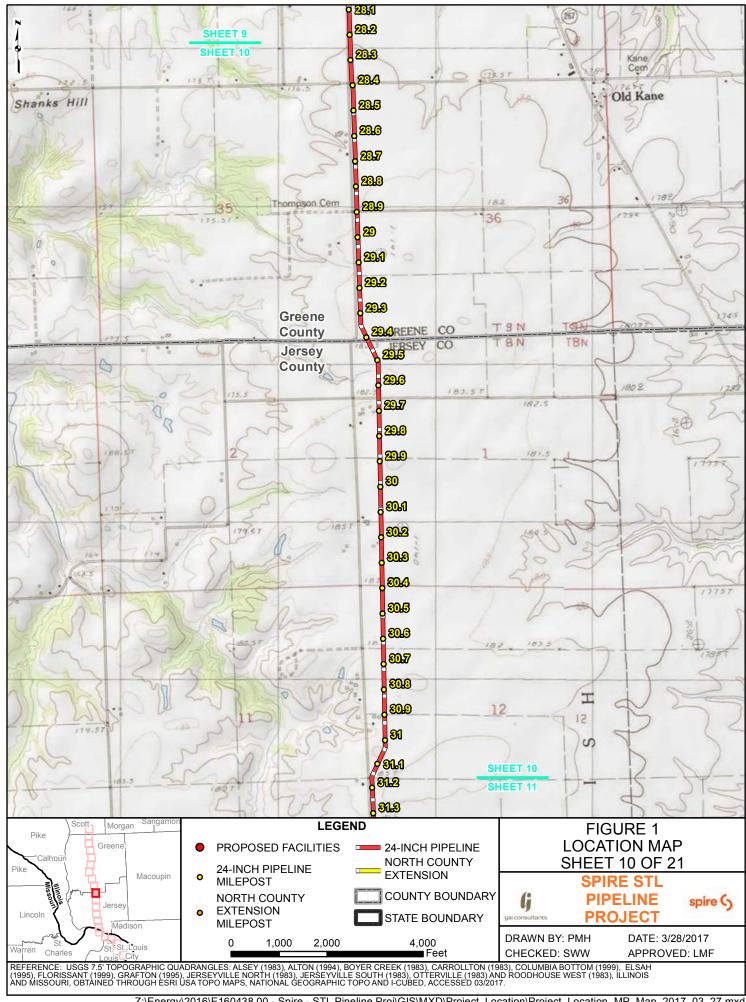


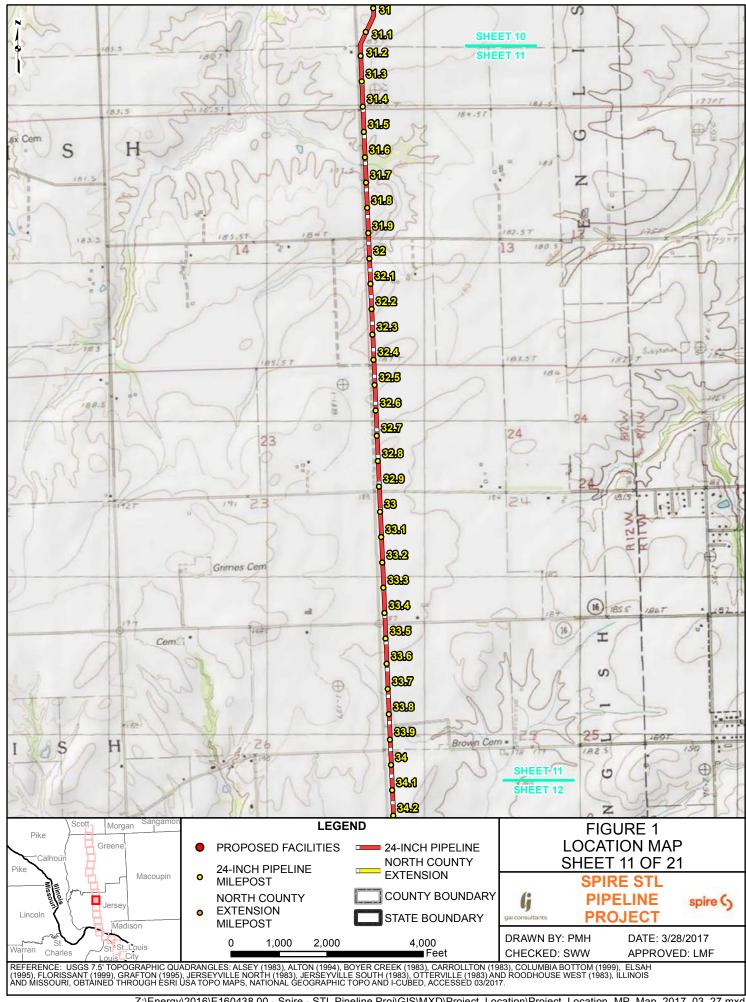


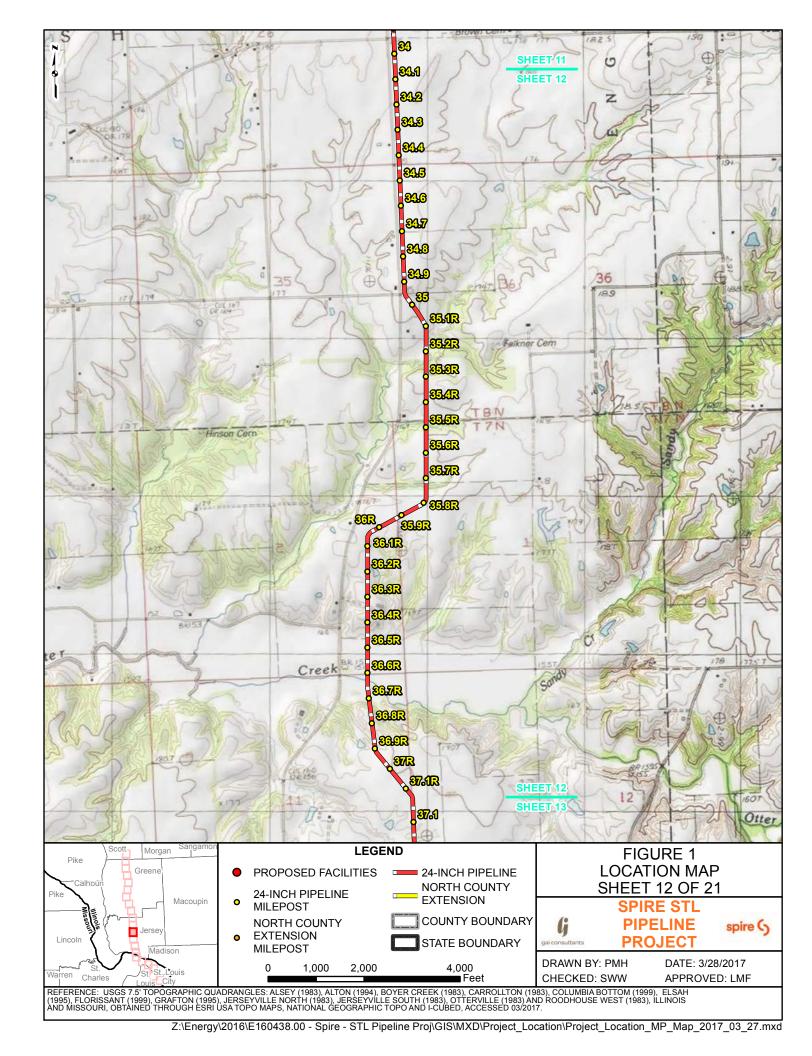


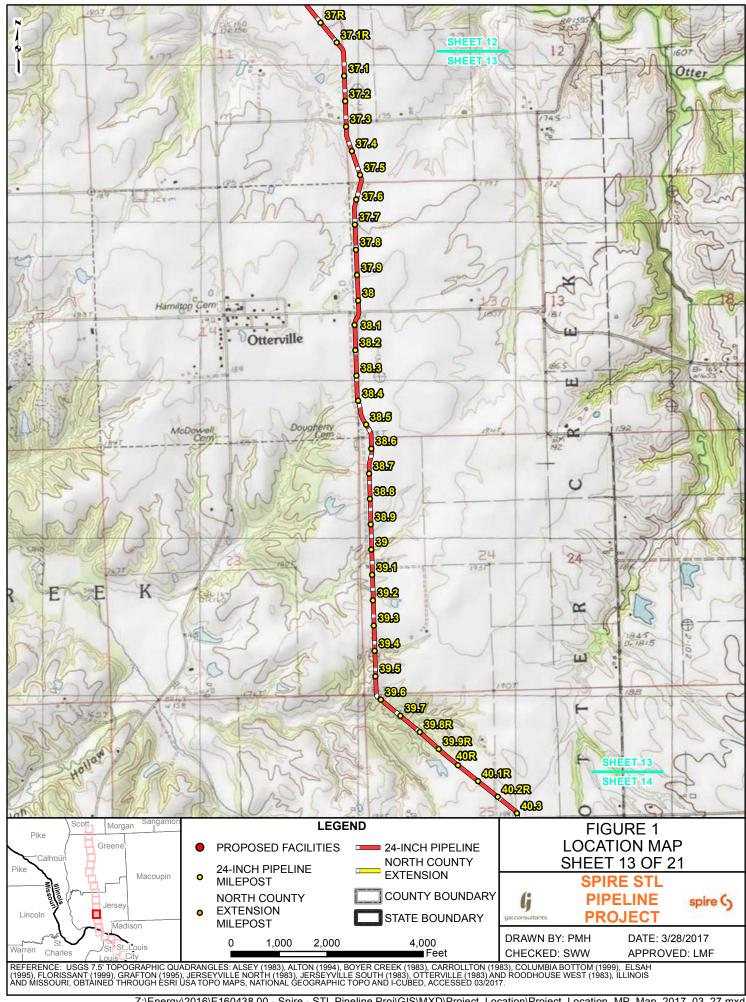


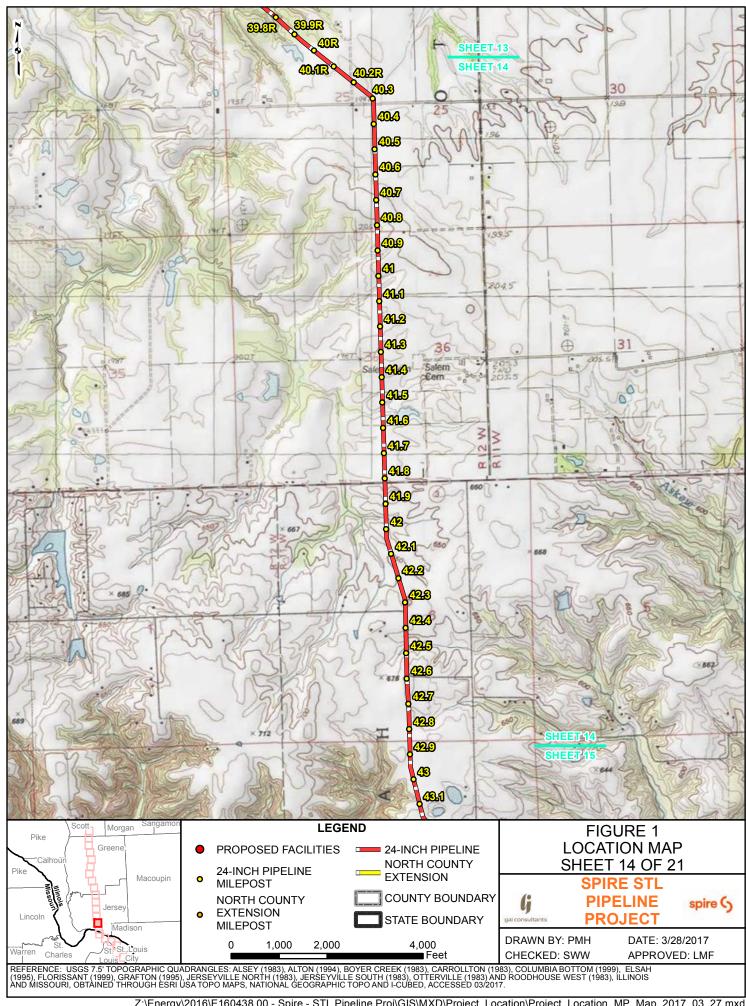


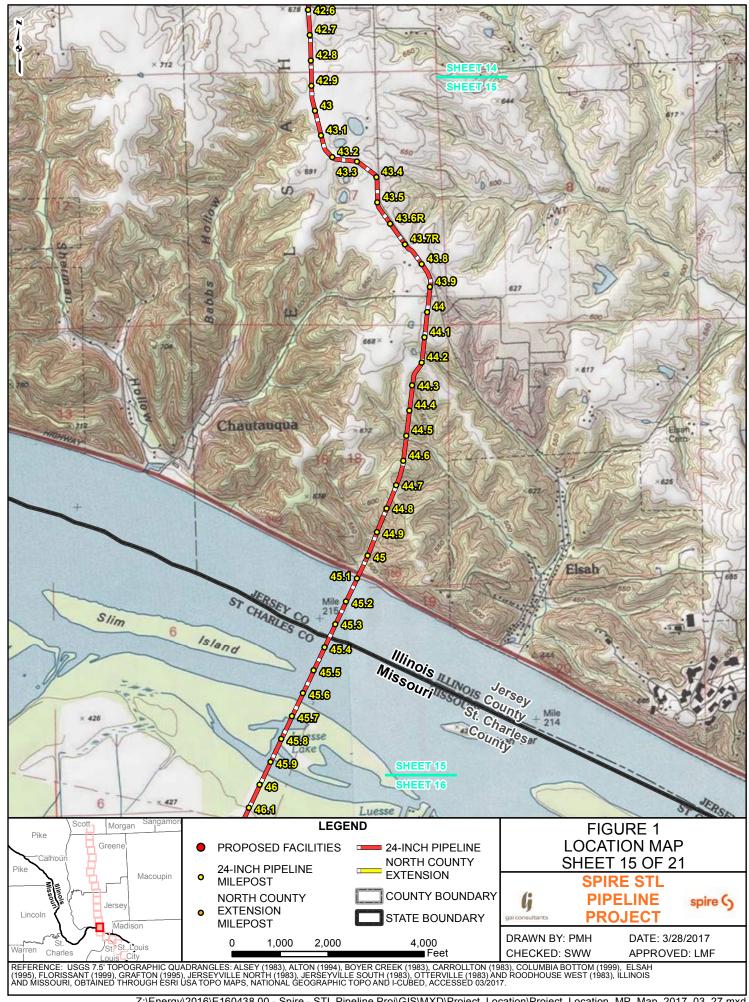


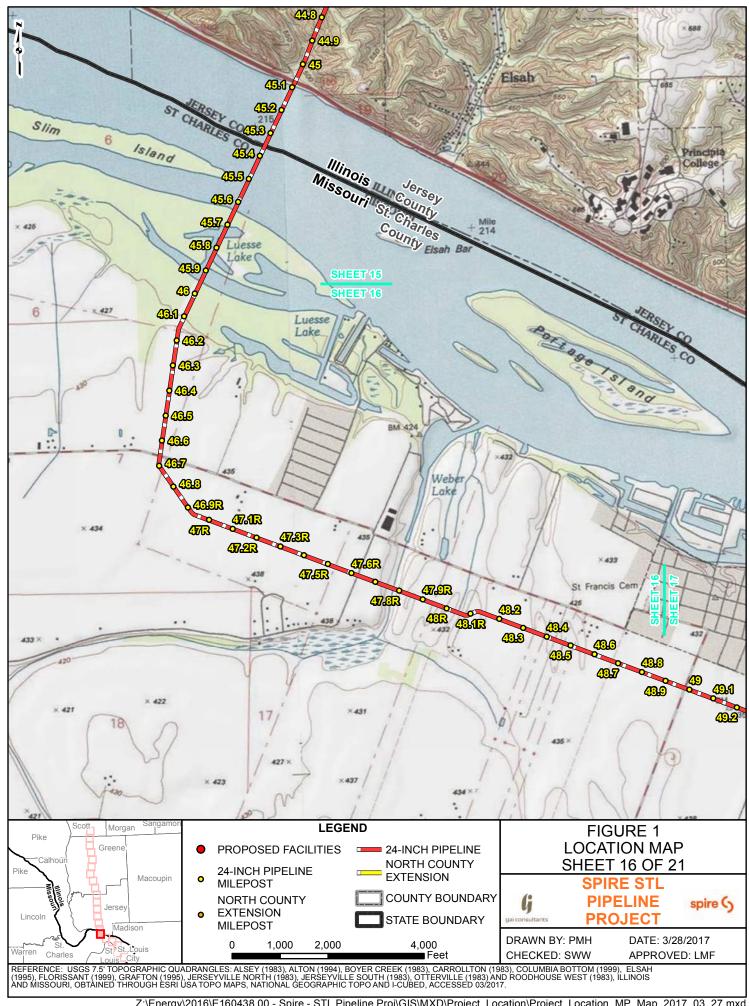


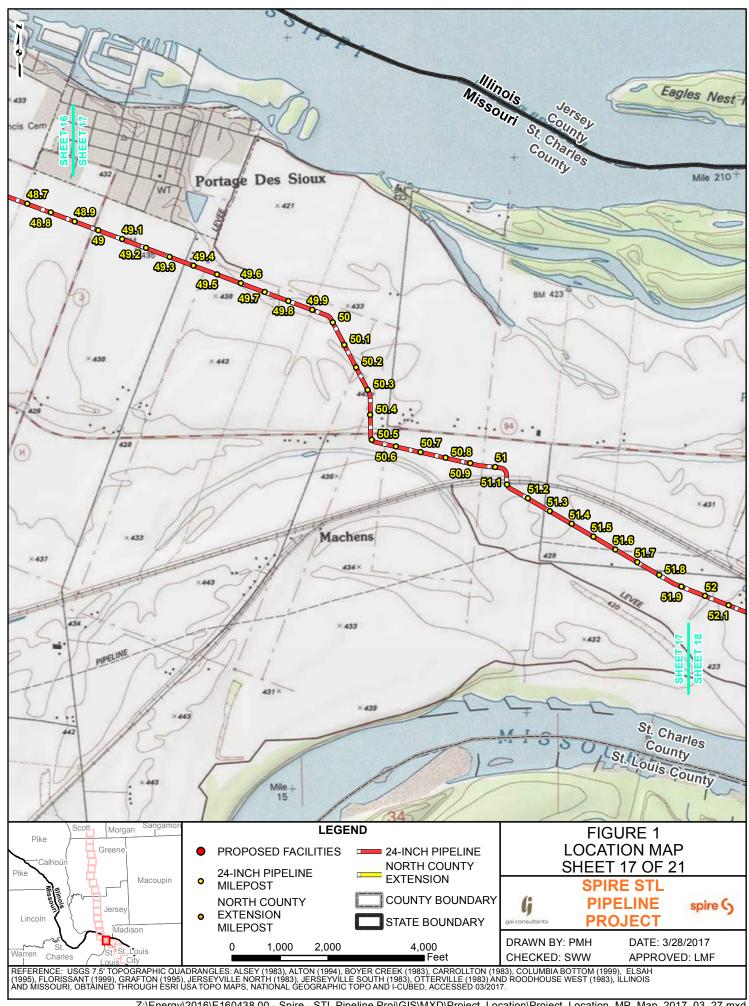


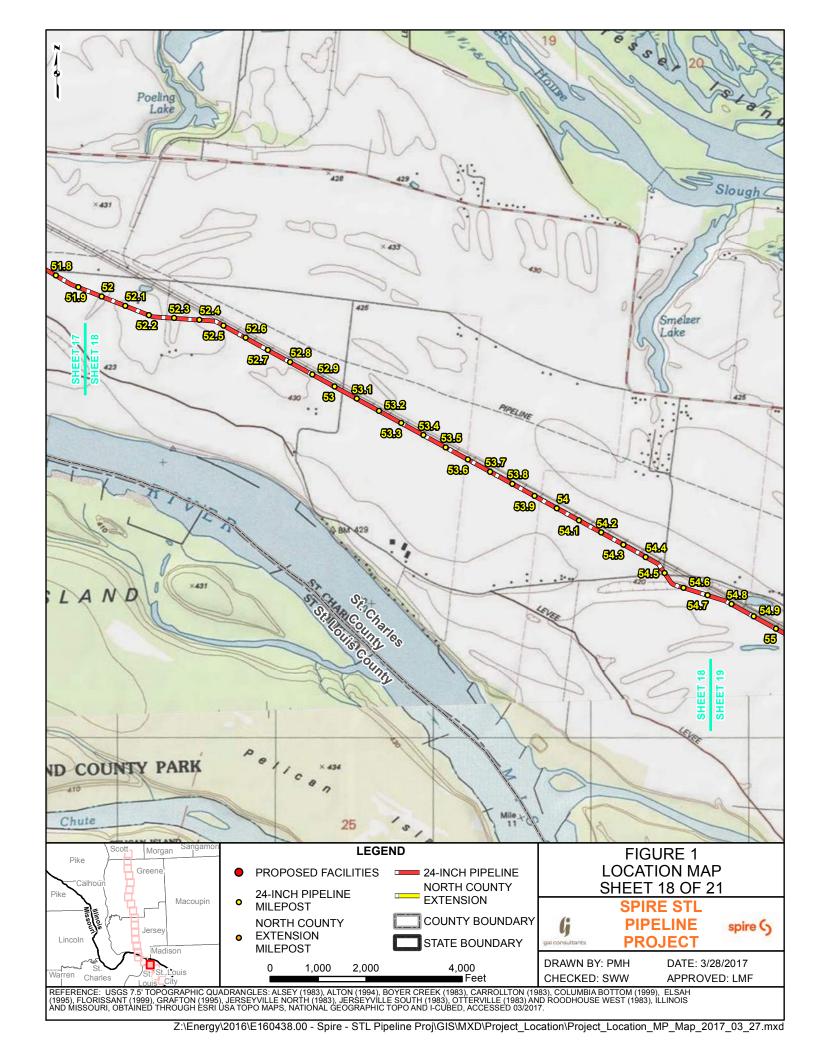


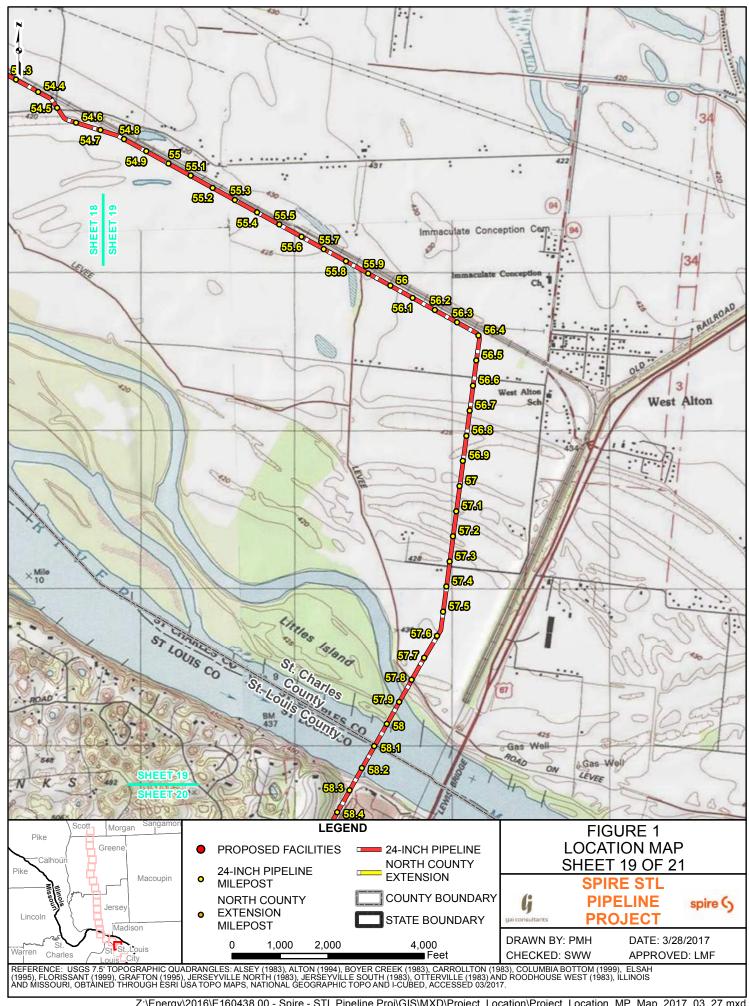


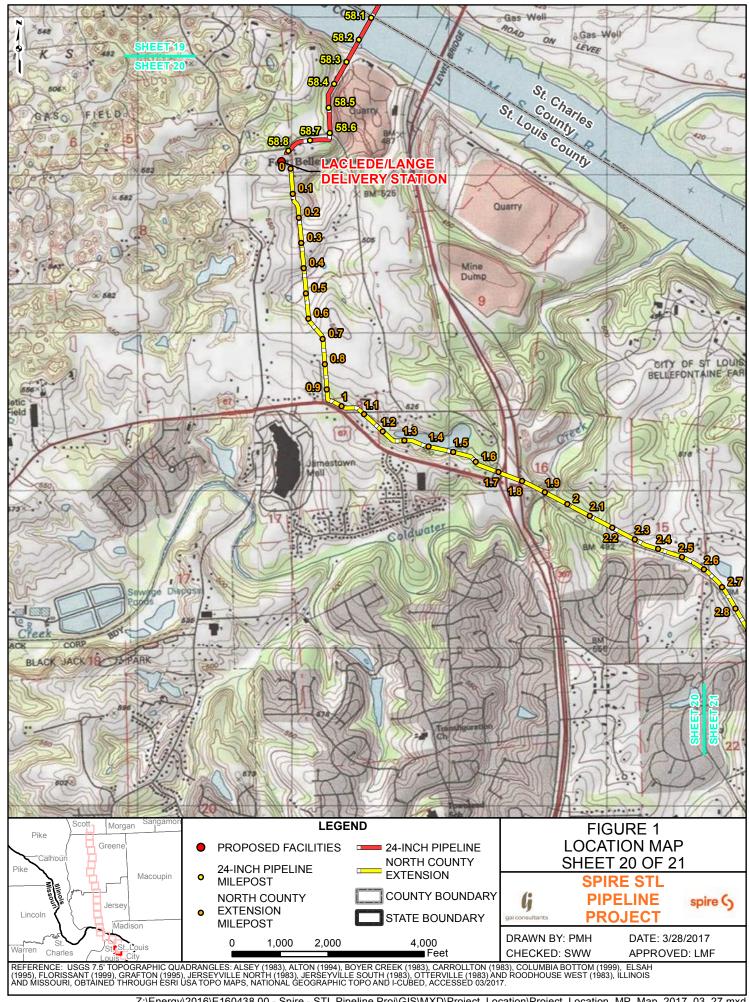


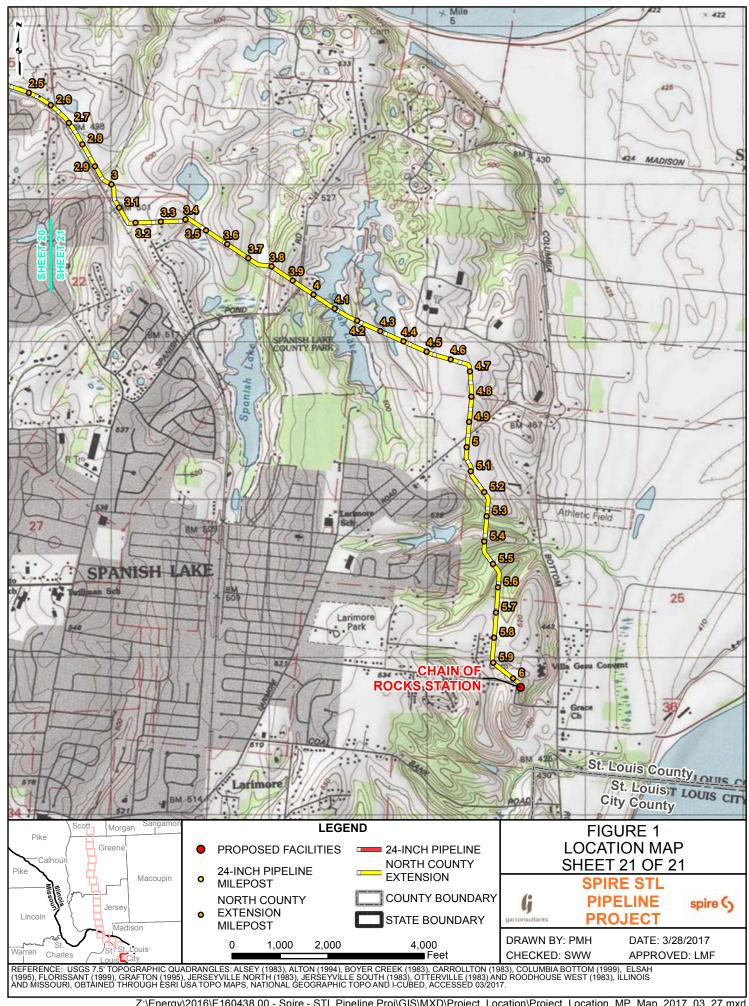














GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Mr. Gary Calvert Manager of Pools 24, 25 and 26 - Upper Mississippi Conservation Area Missouri Department of Conservation 3333 North Highway 79 Elsberry, MO 63343-201

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Mr. Calvert:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that the Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

Amended Project Description

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new, greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC

interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75 feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act ("NEPA") process began (initiation of FERC Pre-filing process);
- August 2016 through March 2017 (Anticipated) Biological and Cultural Resource Surveys;
- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
- September 2017 (Anticipated) Draft NEPA Document Published; and
- December 2017 (Anticipated) FERC Decision on Application.

Construction is anticipated to commence in January 2018.

On behalf of Spire, we'd like to take this opportunity to invite the Missouri Department of Conservation to provide comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

for merry

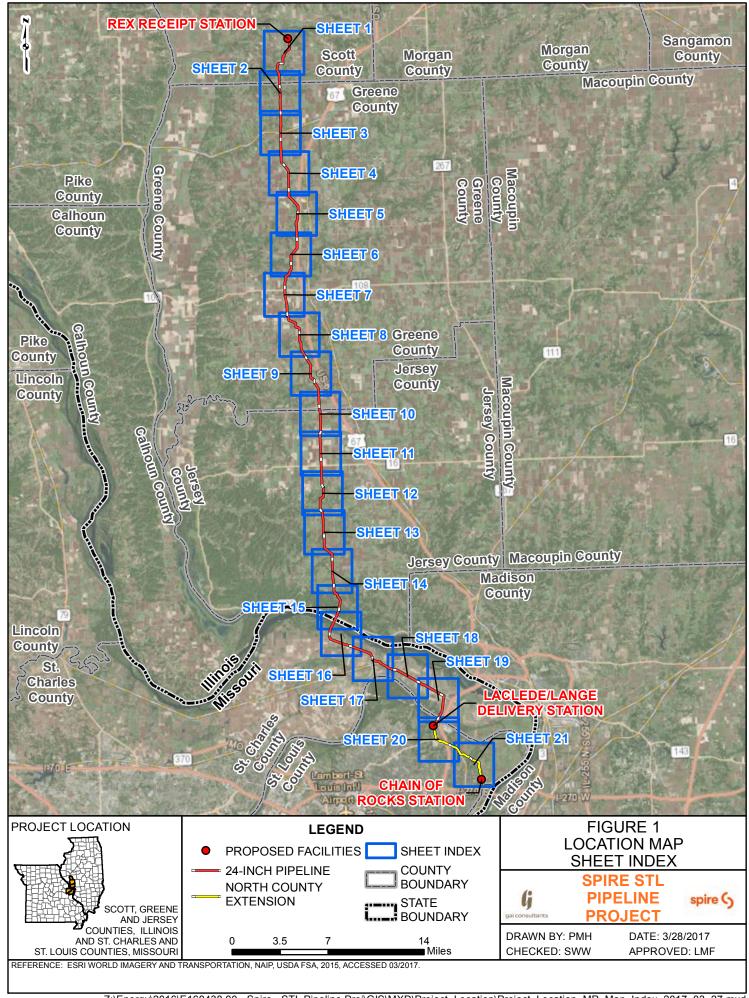
Lori M. Ferry

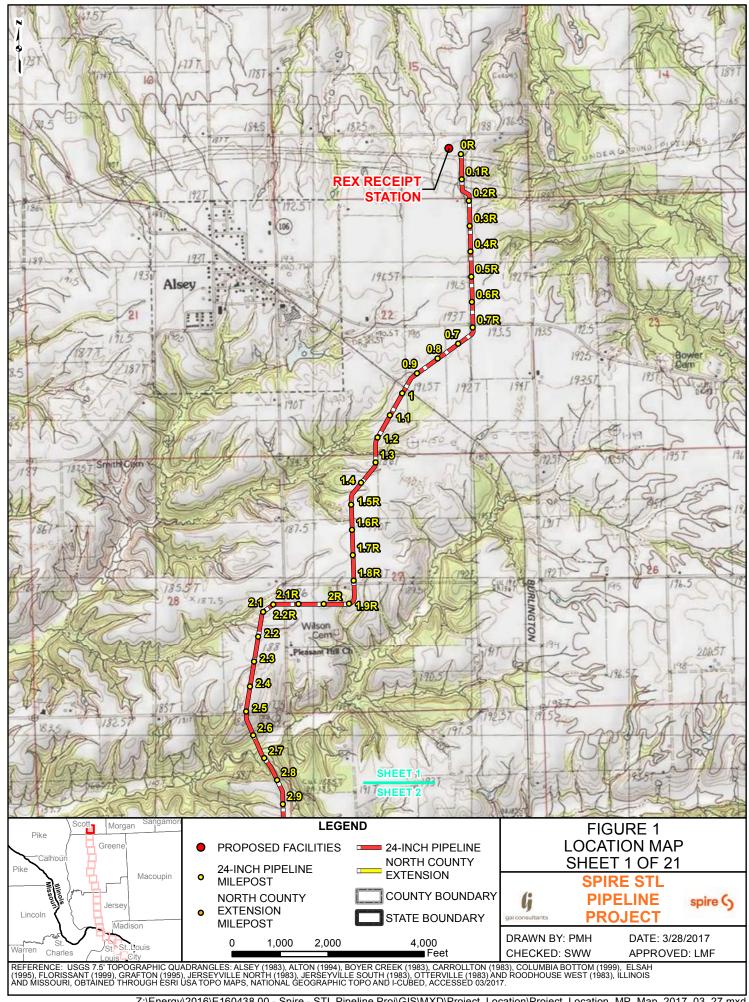
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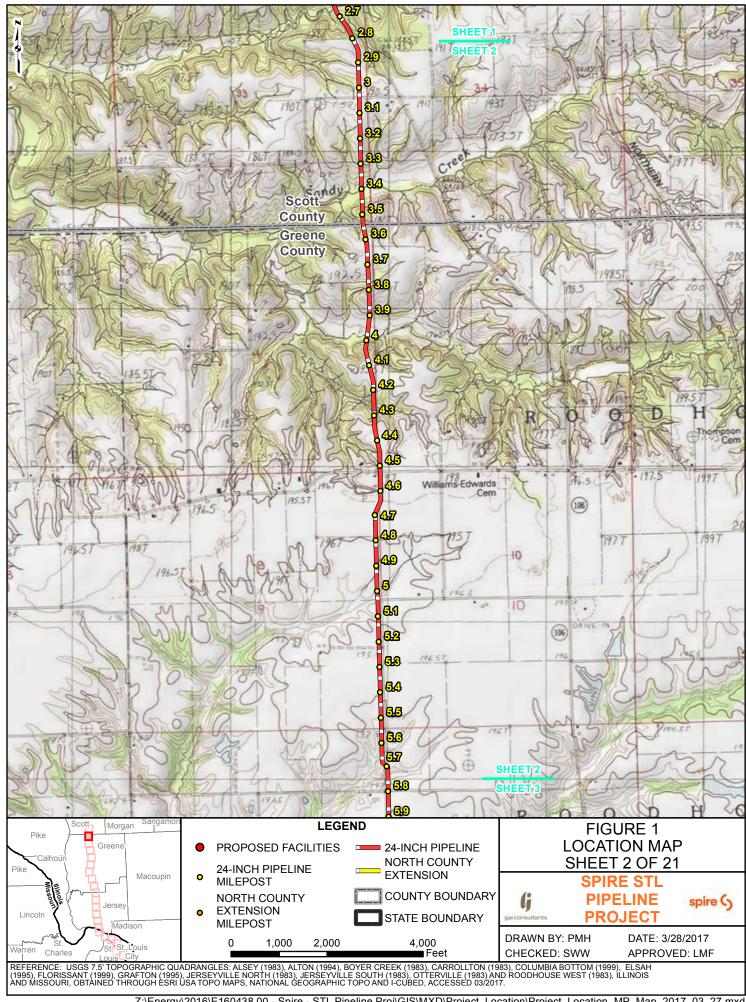
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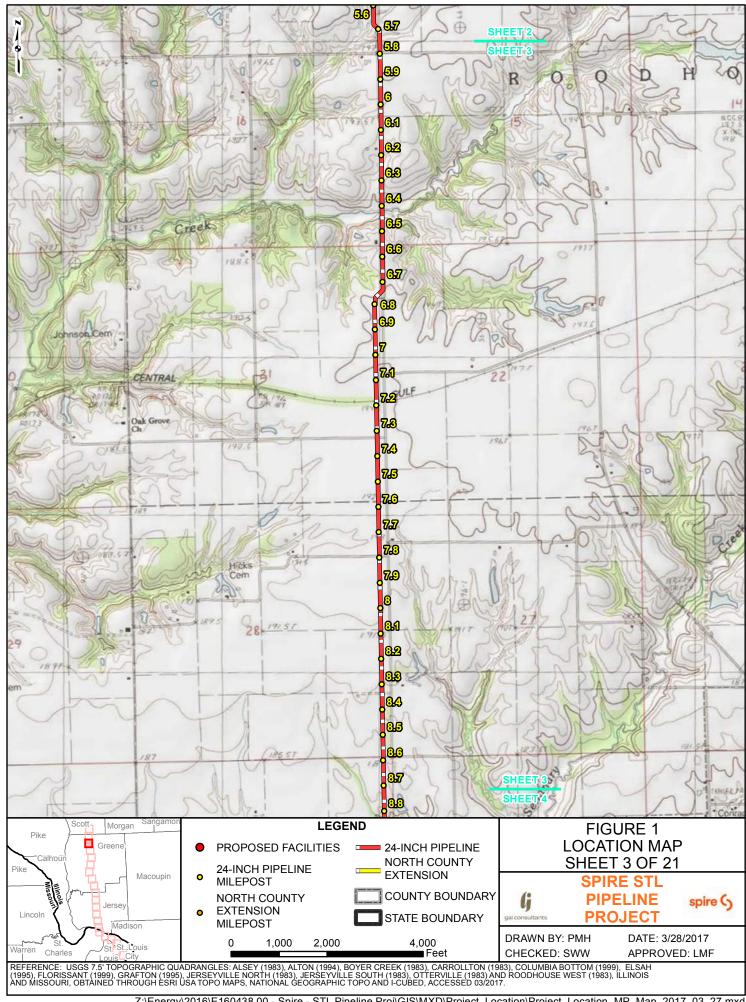
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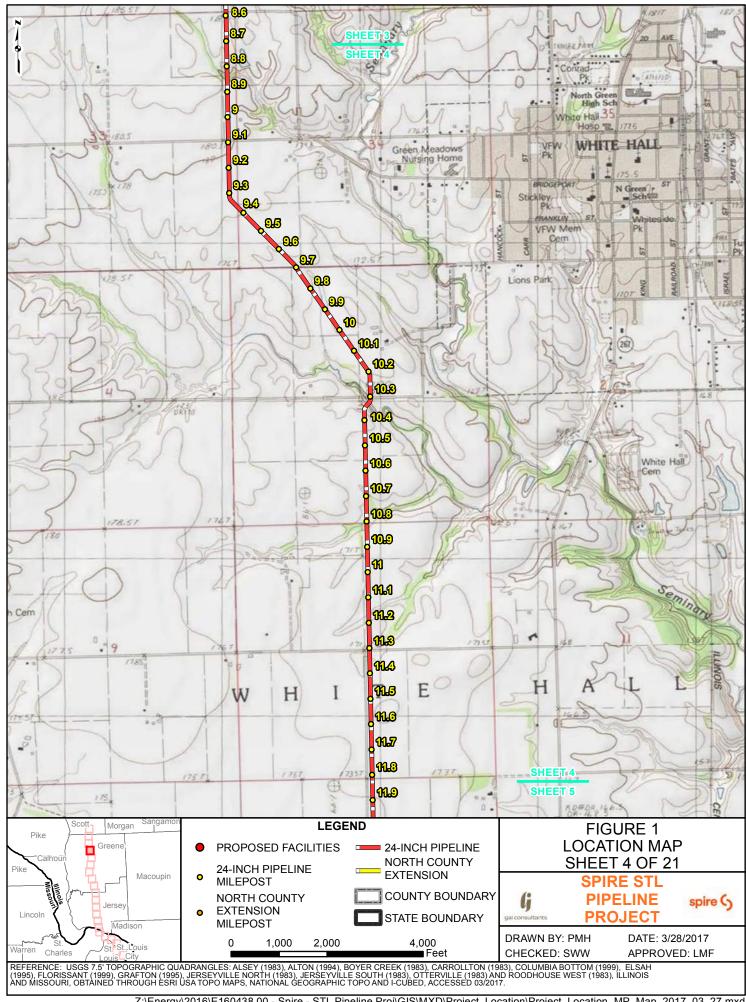
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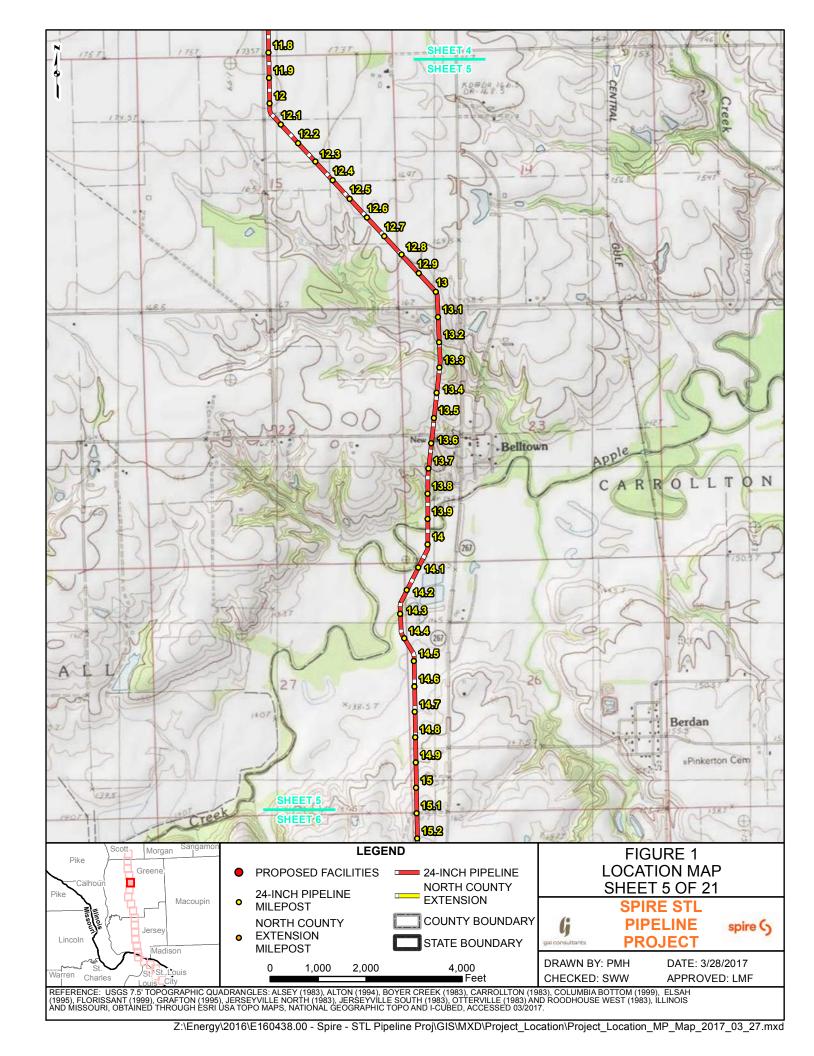


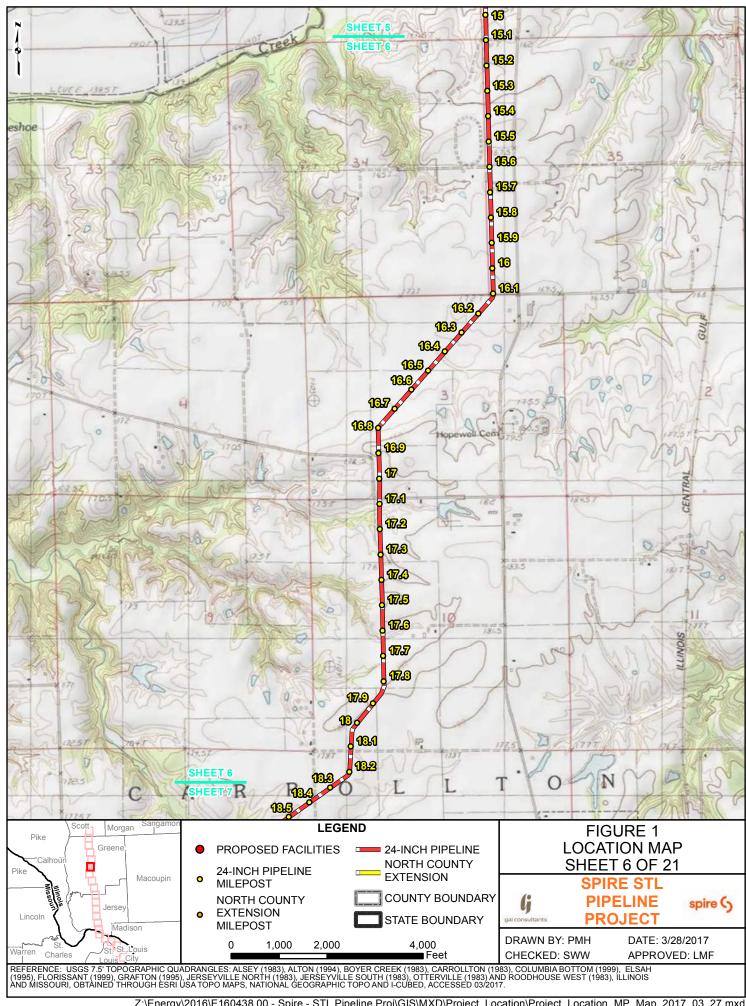


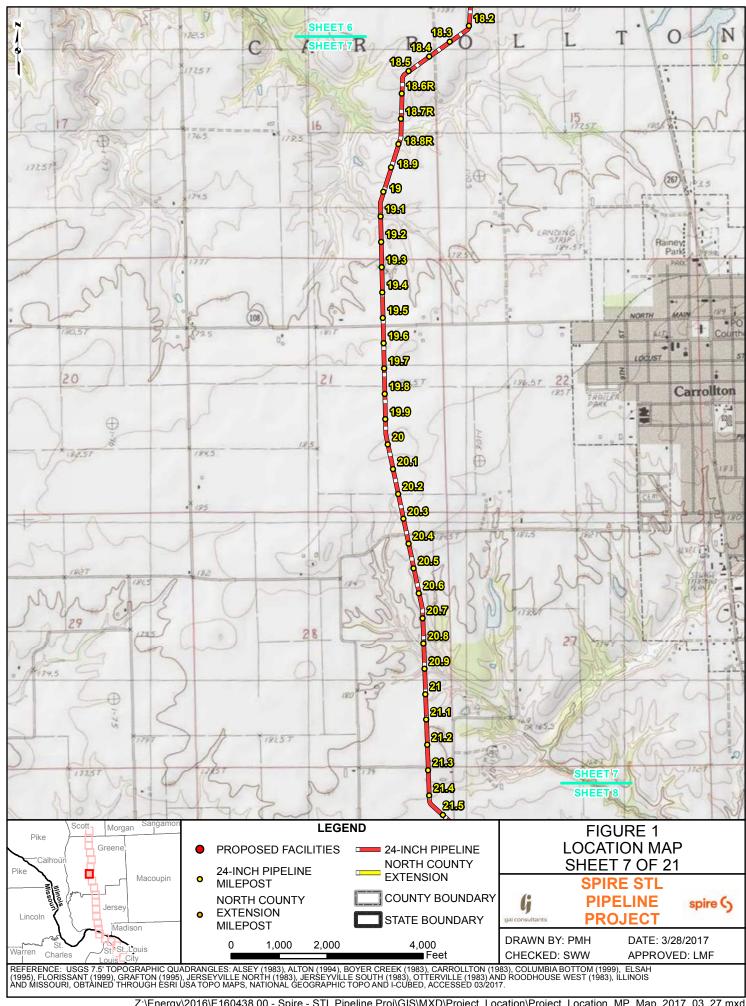


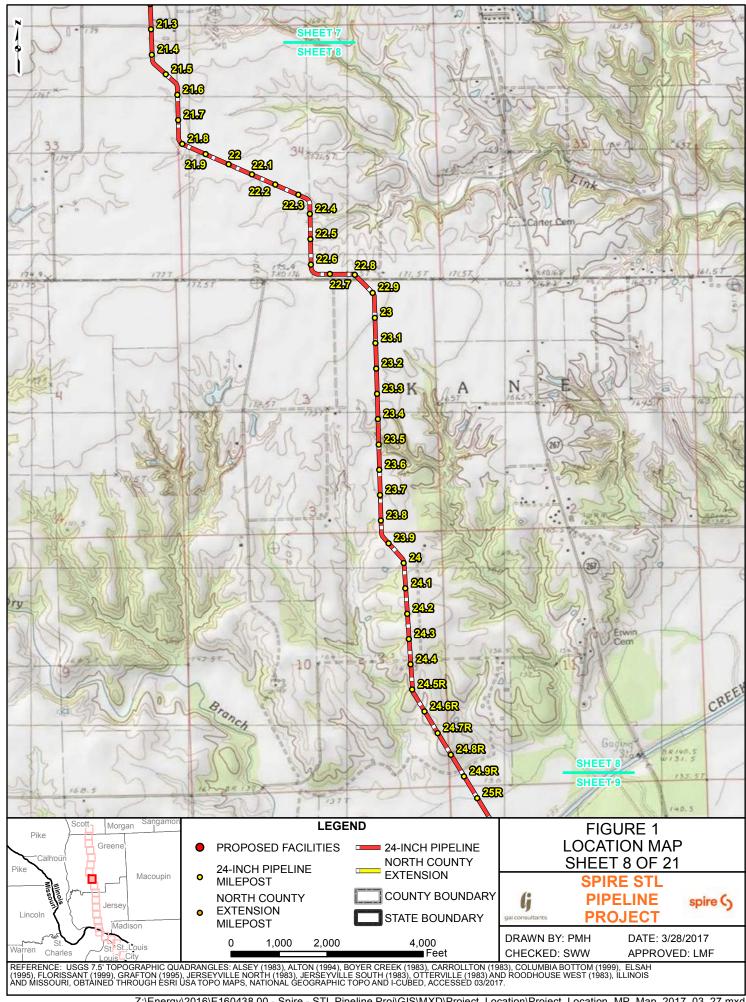


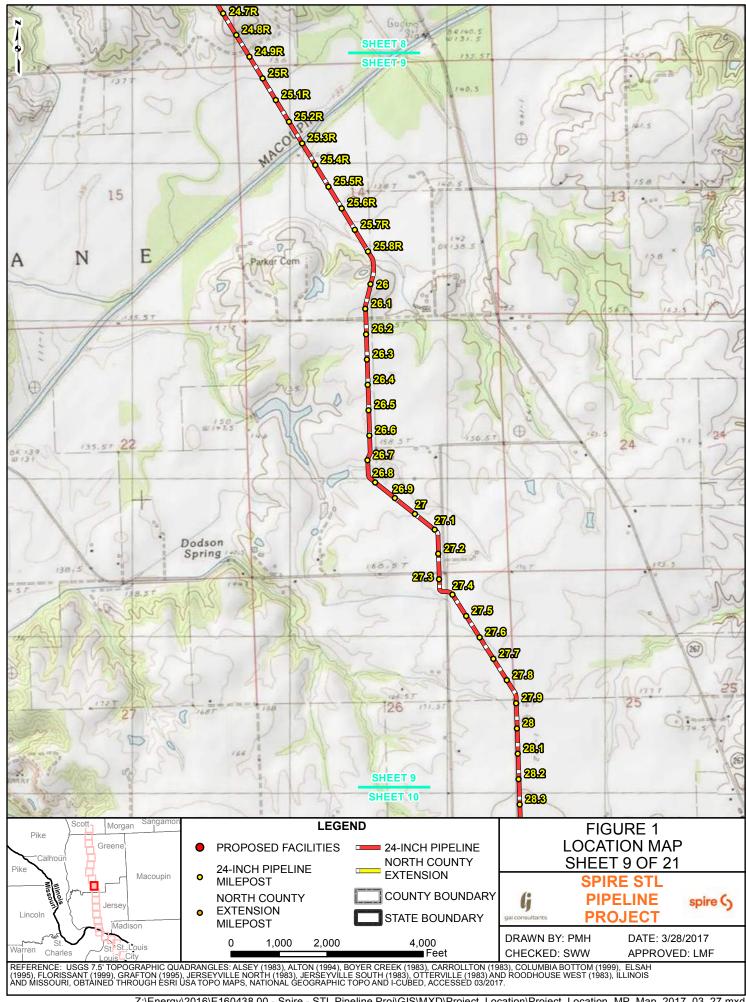


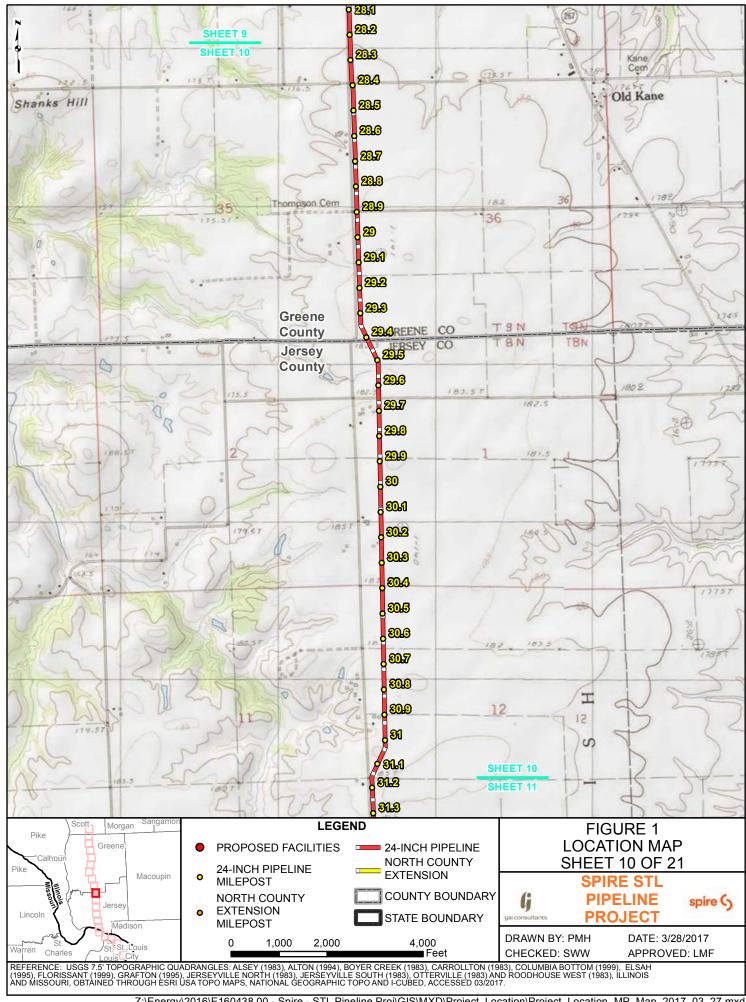


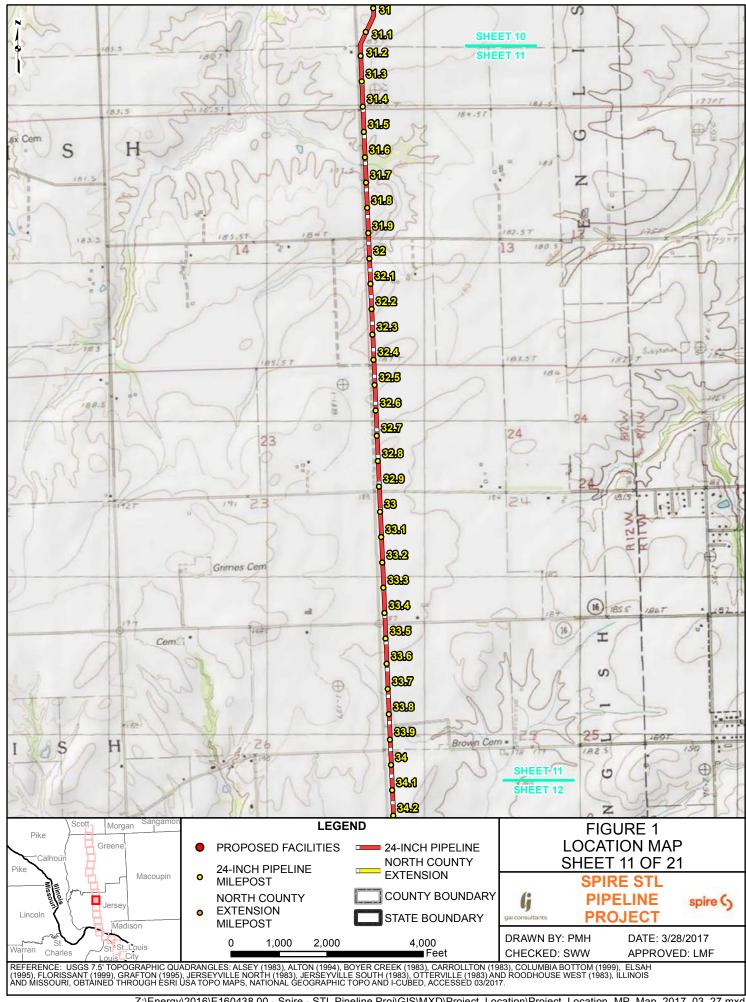


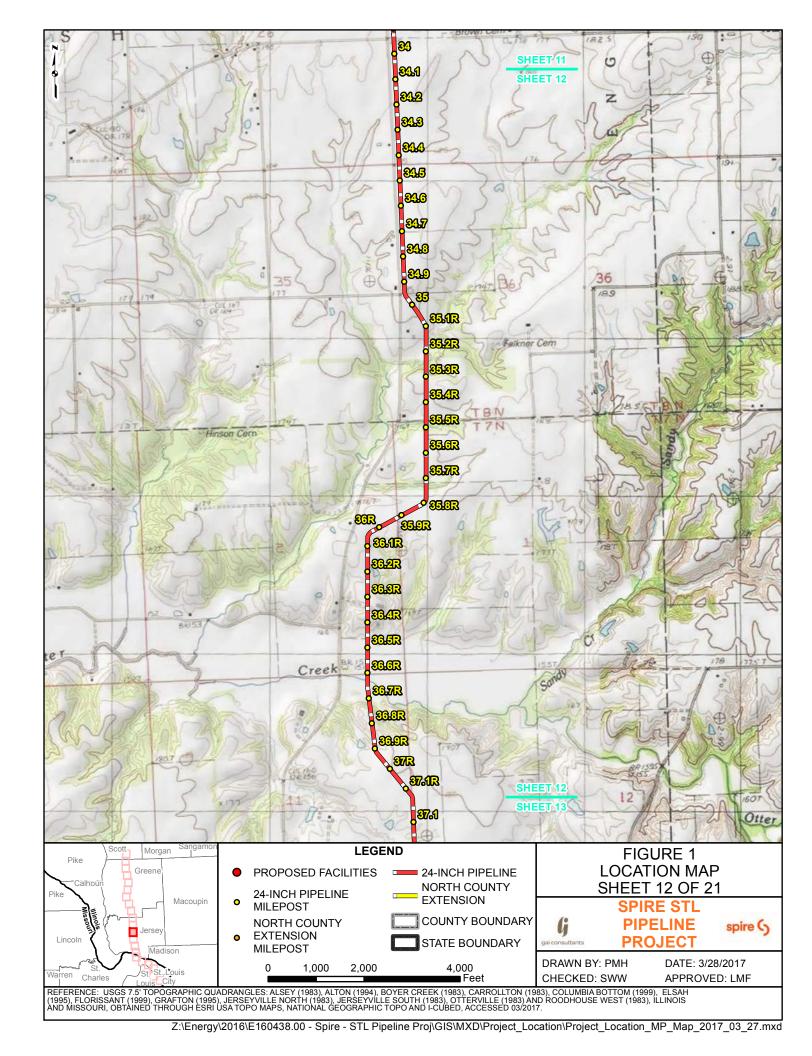


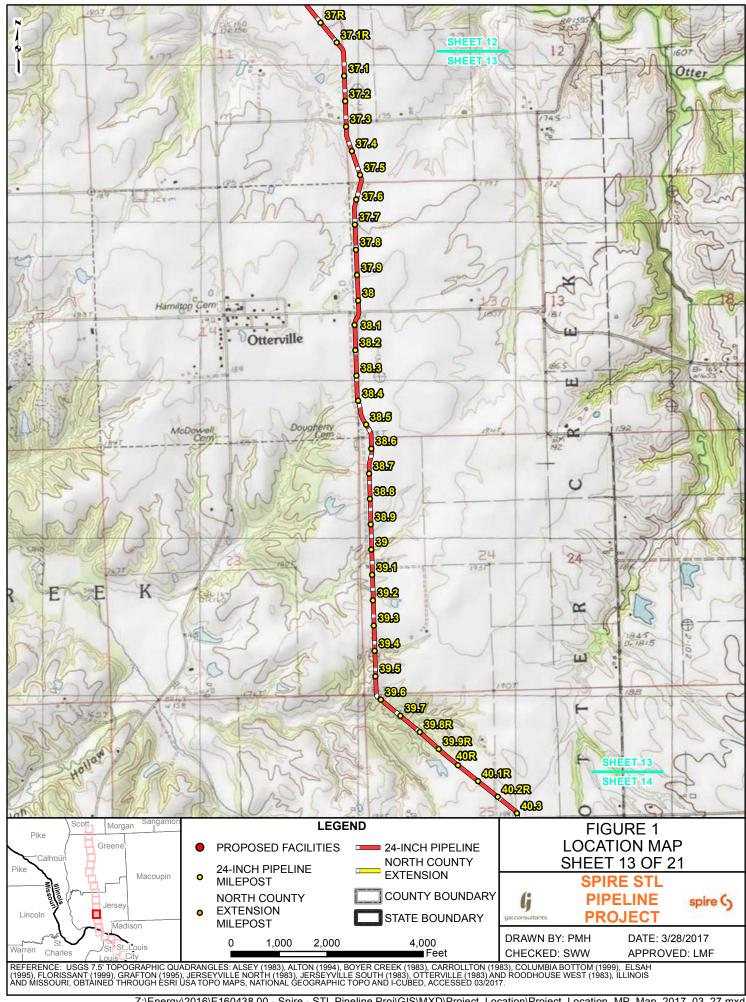


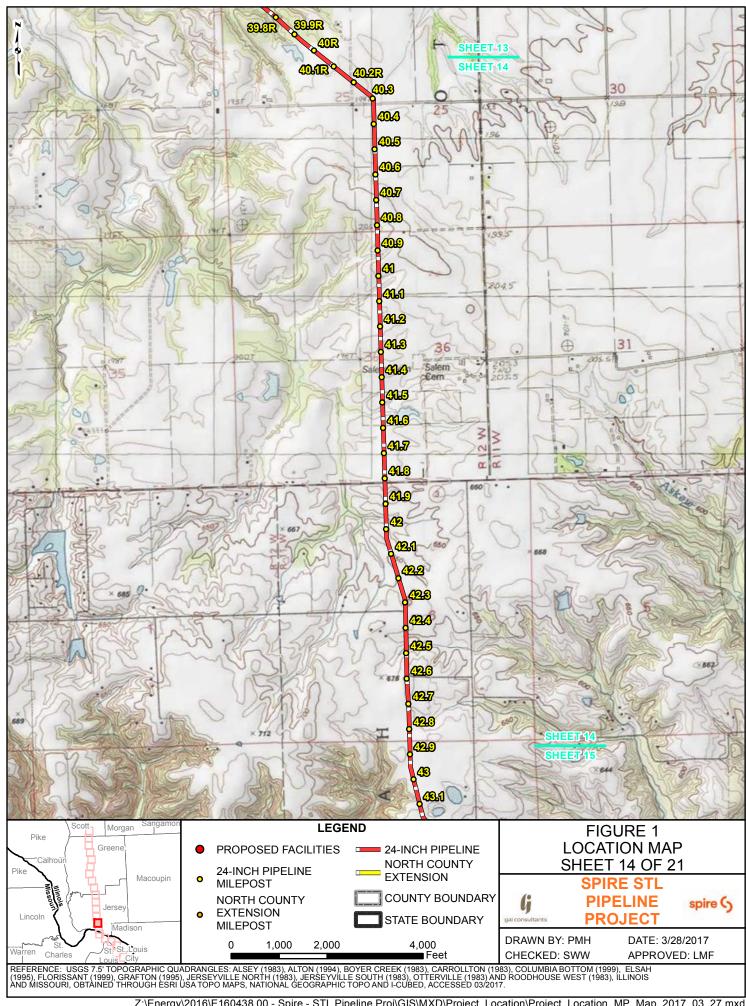


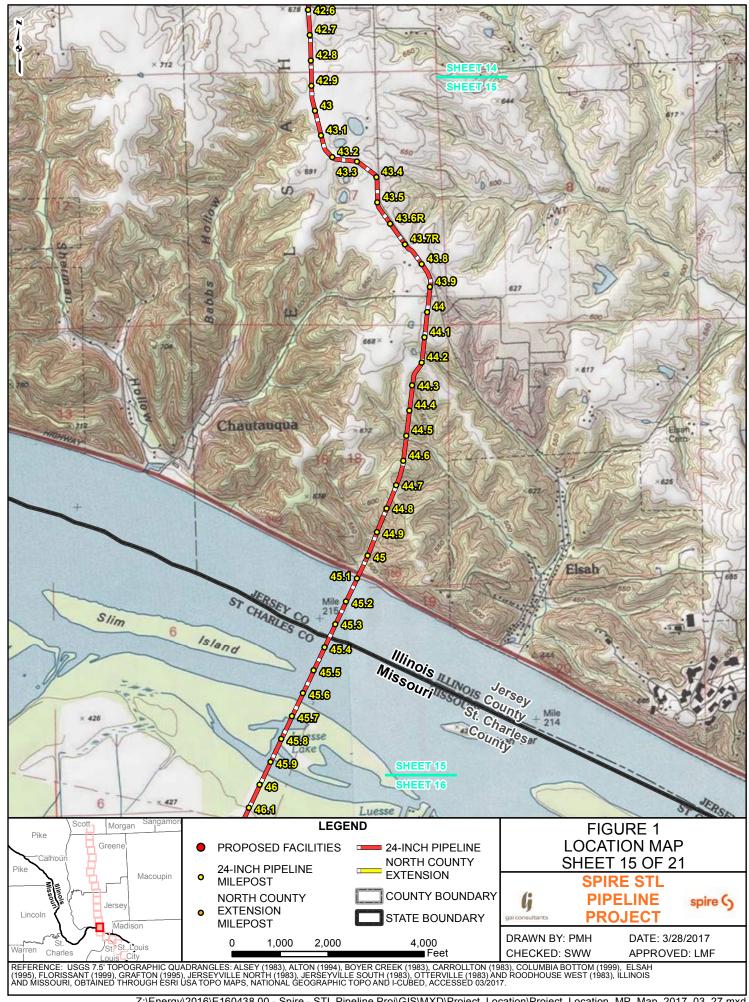


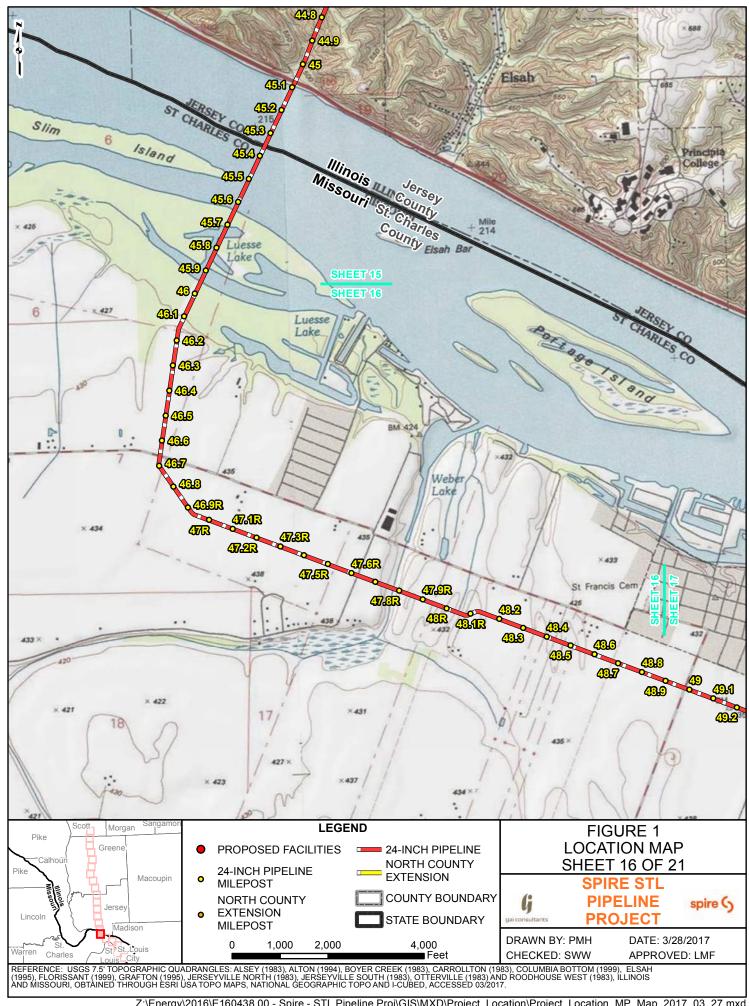


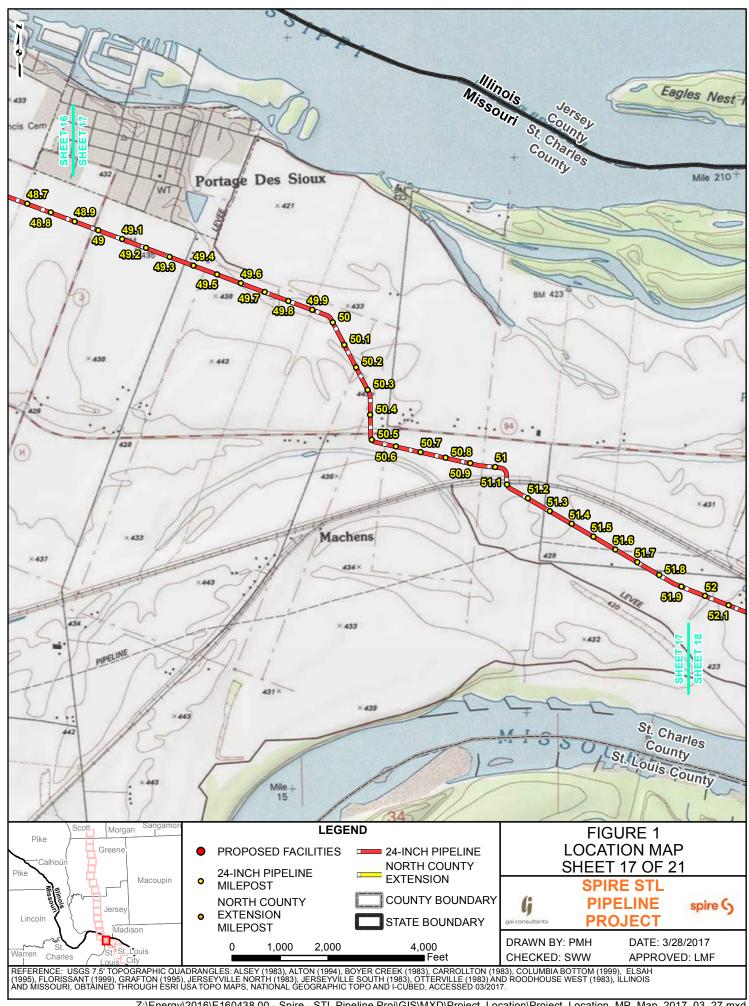


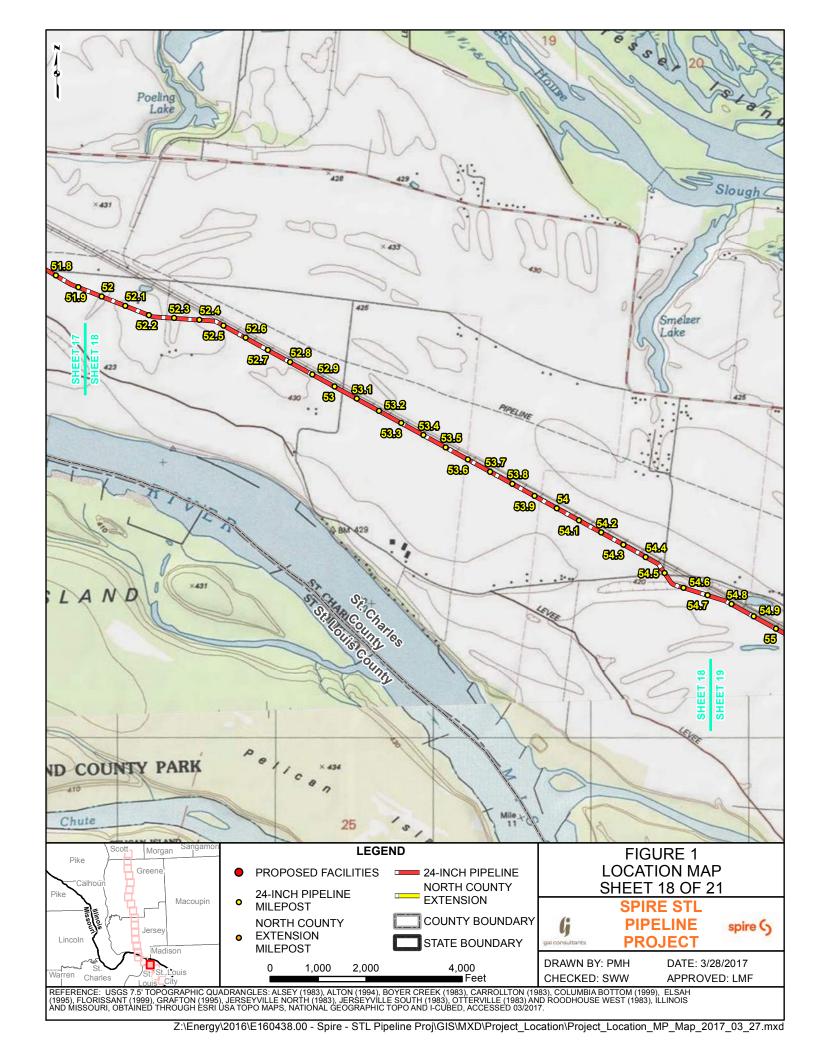


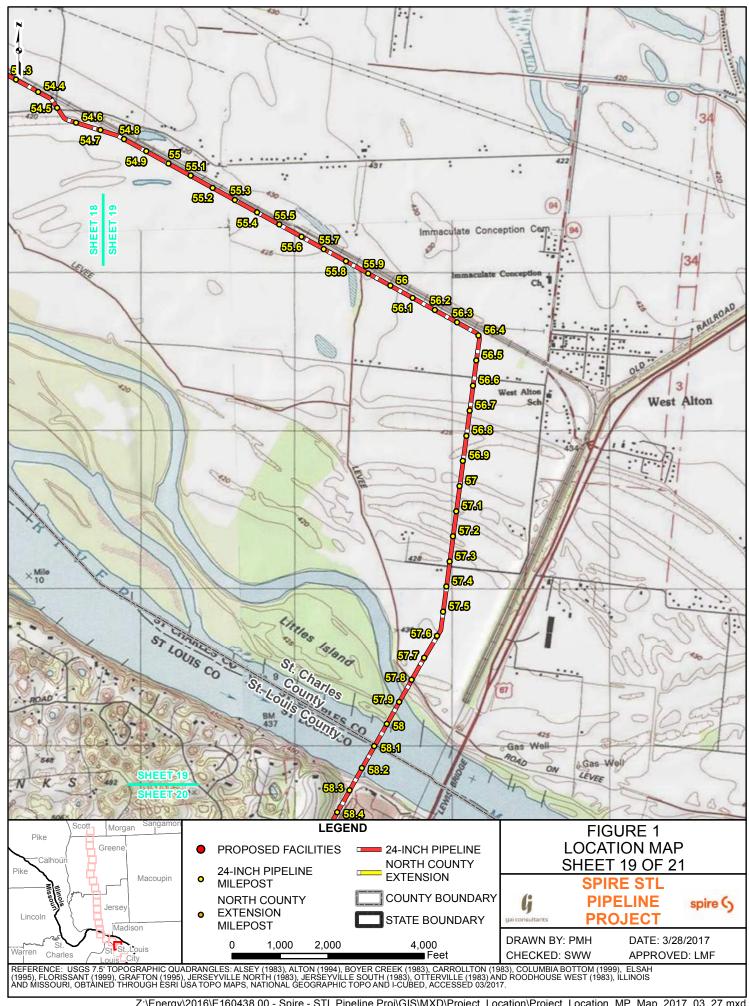


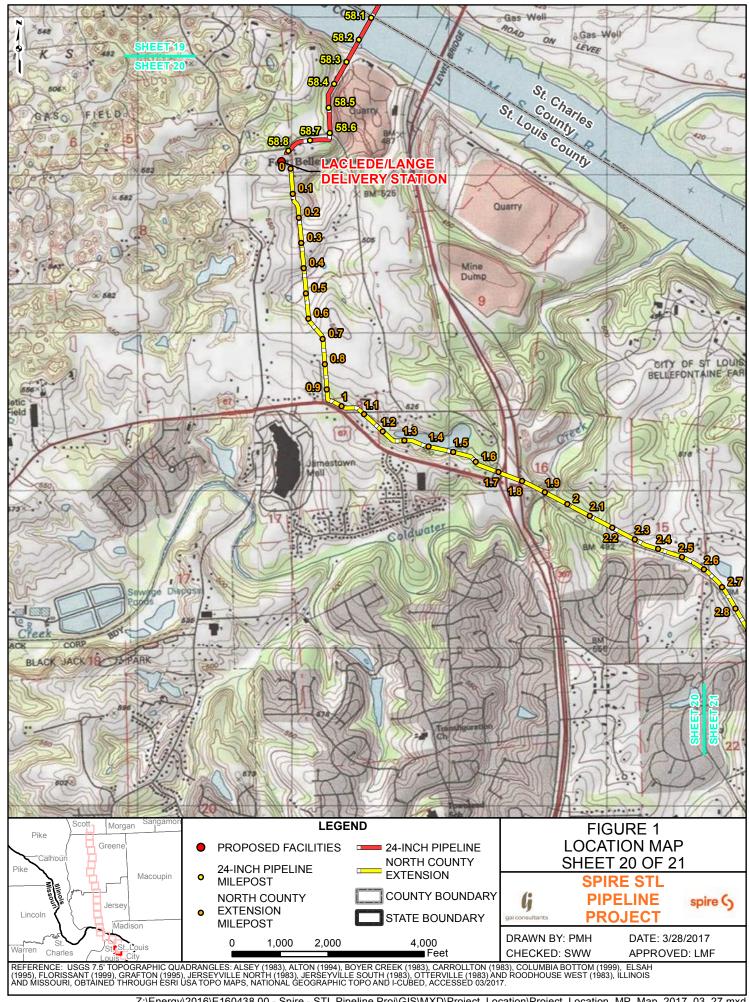


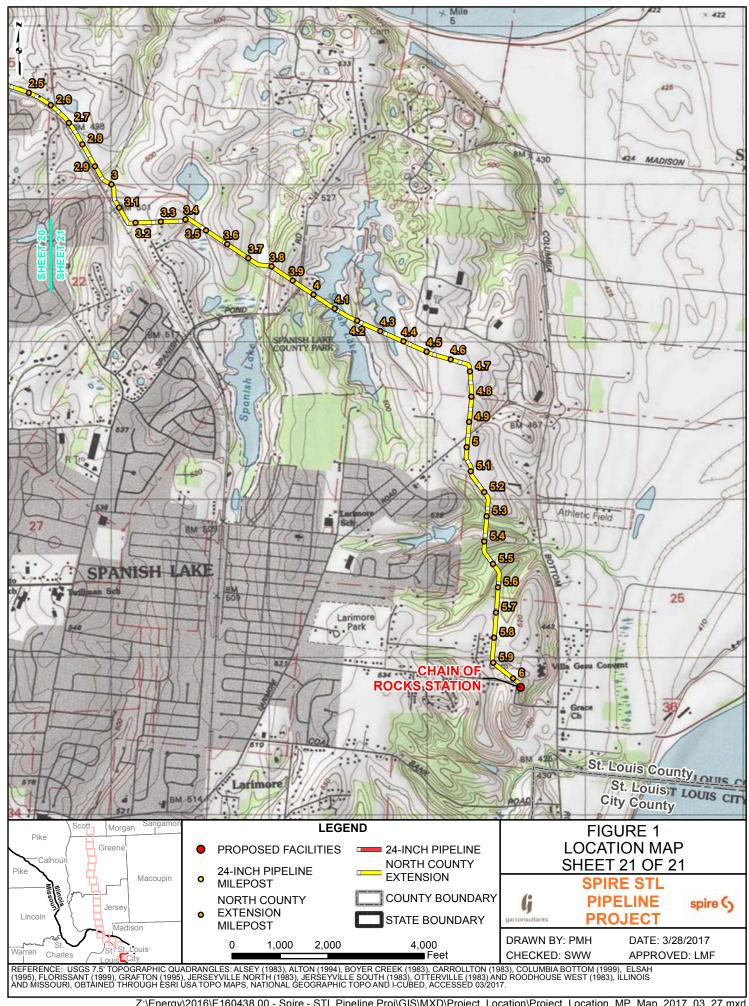












GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Mr. Raenhard Wesselschmidt Wildlife Management Biologist Missouri Department of Conservation - Wildlife 2360 Hwy D St. Charles, MO 63304

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

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If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

Jonemserry

Lori M. Ferry

Environmental Manager

LMF/ka

Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

telephone log



Date: 03/23/2017 E160438.00 Project / Admin. No.: Call From: Tiffany Anders Company: **GAI Consultants** Phone No.: 346.231.7172 Gary Calvert, MDOC Upper Mississippi Conservation Area Call To: Company: Missouri Department of Conservation Phone No.: 573-898-5905 Hunting at MDOC Upper Mississippi Conservation Area Subject: Lori Ferry cc: **Summary of Discussion, Decisions, and Commitments:**

Ms. Anders spoke with Mr Calvert regarding hunting at the Upper Mississippi Conservation Area. Mr. Calvert confirmed that the Upper Mississippi Conservation Areas are open to hunting, including waterfowl, turkey, and deer hunting. Hunting seasons at the Upper Mississippi Conservation Areas are open according to statewide regulations, with the exception of Dresser Island which is more restrictive. Missouri's 2016/2017 hunting seasons are available online at the MDOC website, however, they vary from year-to-year but generally are within a week or so. Ms. Anders stated that Spire will check back for hunting season dates as they become available and as they pertain to Spire's construction planning in the vicinity of the Upper Mississippi Conservation Area.

Ali Trunzo

From: Lori Ferry

Sent: Friday, March 10, 2017 4:34 PM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline-Bald Eagle Report

From: Lori Ferry

Sent: Friday, March 10, 2017 3:19 PM

To: 'audrey.beres@mdc.mo.gov' <audrey.beres@mdc.mo.gov>

Subject: Spire STL Pipeline-Bald Eagle Report

Hi Audrey,

I have attached courtesy copy of Spire's Bald Eagle Survey report. This information was also filed with FERC and USFWS today.

Hardcopies should be following in your office on Monday.

If you have any questions, please do not hesitate to contact me.

Thanks and have a great weekend, Lori

Lori Ferry

Environmental Manager-Energy Business Unit

GAI Consultants

Chicago Office | 1444 Farnsworth Avenue, Suite 303 Aurora, Illinois 60505 T 331.301.2002 M 630.605.5255 | gaiconsultants.com | f lins



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Missouri Department of Agriculture