



Spire STL Pipeline LLC
700 Market Street
St. Louis, Missouri 63101

August 27, 2021

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington DC 20426

Re: Docket Nos. CP17-40-000 and -001
Spire STL Pipeline LLC
Corrective Action Status Report No. 23 – for period of August 20 to August 27, 2021

Dear Secretary Bose:

On August 3, 2018, the Federal Energy Regulatory Commission (“Commission” or “FERC”) issued an order granting Certificates of Public Convenience and Necessity to Spire STL Pipeline LLC (“Spire STL”) in the above-referenced dockets.¹ On March 18, 2021, FERC issued an Order on Environmental Compliance addressing comments previously filed by the Illinois Department of Agriculture.² As a result of the March 18 Order, the Commission required Spire STL to undertake certain corrective actions on specific landowner properties. In addition, ordering paragraph (F) of the March 18 Order requires Spire STL to file updated status reports with the Commission on a weekly basis until the corrective actions are complete. In compliance with Ordering Paragraph F, Spire STL files this corrective action status report, which covers the period from August 20 to August 27.

If you have any questions, please do not hesitate to contact me at 314-354-6539 or Dave.Feeman@SpireEnergy.com or Sean Jamieson, General Counsel, at 346-308-7555 or Sean.Jamieson@SpireEnergy.com regarding this matter. Thank you.

Sincerely,

David L. Feeman

David L. Feeman
General Manager
Spire STL Pipeline LLC

cc: All Parties on Service List
Christine Crumpton, Office of Energy Projects, FERC
Gertrude Fernandez-Johnson, Office of Energy Projects, FERC

¹ *Spire STL Pipeline LLC*, 164 FERC ¶ 61,085 (2018) (“Certificate Order”).

² *Spire STL Pipeline LLC*, 174 FERC ¶ 61,219 (2021) (“March 18 Order”).

CERTIFICATE OF SERVICE

I hereby certify that on this, the 27th day of August 2021, I have caused a copy of the foregoing document to be served, by electronic mail, upon all parties listed on the service list compiled by the Office of the Secretary, Federal Energy Regulatory Commission, for the above-referenced proceeding.

/s/ Russell Kooistra

Russell Kooistra
Troutman Pepper Hamilton Sanders LLP
401 9th Street, NW, Suite 1000
Washington, DC 20004
(202) 274-2872
russell.kooistra@troutman.com



CORRECTIVE ACTION STATUS

Corrective Actions Per Ordering Paragraph A (decompaction, rock removal)

As reported in previous Corrective Action Status Reports (“CASR”), Spire STL presented remediation plans to address the corrective actions described in the March 18 Order and discussed these remediation efforts with landowners **or otherwise communicated such plans to landowners’ counsel**. In addition to the corrective actions in the March 18 Order, each remediation plan addresses other issues for landowners that Spire STL has been monitoring in this proceeding through its status reports.³ Table 1 below lists each underlying issue from the March 18 Order by tract and a schedule for the corrective action activities to be performed.⁴

Spire STL has agreed with landowner Davis that remediation activities south of stream SIL-CDK-033 may begin next week, so long as weather and soil conditions are suitable. Davis also requested a remediation plan specific to the area south of stream SIL-CDK-033, which Spire STL is currently developing. At this time, Davis did not agree to permit Spire to remediate north of stream SIL-CDK-033. Davis’ **representation** has also conveyed to Spire STL that Davis would prefer to self-perform the remediation activities within the agriculture portion of his property. Separately, Spire STL has confirmed through discussions with landowner Meyer that he would prefer that remediation activities do not begin until after the crops are harvested. Meanwhile, Spire STL discussed with representation for landowner Gettings about beginning remediation activities now because Gettings has not planted any vegetation within the right-of-way this year. Gettings’ representation told Spire STL that they will discuss the request with Mr. Gettings and report back to Spire STL.

Spire STL still has not received a preferred alternative date from **landowners’** counsel representing Brown and Steckel. However, landowner Brown has agreed to discuss access and temporary workspace needed to **undertake the corrective actions at the Brown’s property**. Such discussions are scheduled to occur next week. Spire STL also confirmed with landowner Steckel that Spire STL can likely start fixing minor restoration concerns on his property, and that he would be willing to further discuss the restoration activities under the March 18 Order and the access required to perform those activities after crops are harvested. Further discussions with Steckel are scheduled for next week. Finally, Spire STL has still not been able to secure clear consent from Brown and Steckel to access the temporary workspace to begin the corrective actions in the March 18 Order and its June 15, 2021 filing for injunctive relief remains pending.⁵ Spire STL will continue to schedule such remediation in the event Spire STL and these landowners agree to a resolution on access and temporary workspace limits at a specific, alternative timeframe as requested by landowner.⁶

³ See, e.g., *Spire STL Pipeline LLC*, Docket Nos. CP17-40-000 and -001, Status Report No. 85 – FERC Inspection Response at 3-7, dated March 23, 2021 (listing all issues by tract and landowner).

⁴ Any other landowner issues that go beyond the scope of the March 18 Order will continue to be monitored and addressed in Spire STL’s monthly status reports, consistent with what it has previously done in these proceedings. In addition, as reported in its previous Corrective Action Status Reports, Spire STL has resolved all outstanding issues, including the corrective actions described in the March 18 Order, with landowners Jones and Willis. See also *Acknowledgement of Resolution with Spire, CLC, and Forrest Jones*, Docket Nos. CP17-40-000, et. al, dated June 1, 2021 (confirming settlement reached between Spire STL and Jones); *Acknowledgement of Resolution with Spire, CLC, and Rusty & Gayle Willis*, Docket Nos. CP17-40-000, et. al, dated June 1, 2021 (confirming settlement reached between Spire STL and Willis).

⁵ Spire STL notes that the United States District Court for the Southern District of Illinois has now stayed its eminent domain litigation. As a result, and for the time being, Spire STL is prevented from seeking injunctive relief against Gettings. Nevertheless, STL Pipeline will continue to try to engage with the landowner in order to come to a resolution on access and temporary workspace limits.

⁶ Because the March 18 Order requires restoration activities to be conducted over the construction right-of-way, not just the permanent right-of-way, Spire STL needs access to these areas in order to complete all restoration activities required by the March 18 Order. See, e.g., March 18 Order at Ordering Paragraph (B) (requiring soil sampling throughout the construction right-of-way).



Corrective Actions Per Ordering Paragraph B (post-decompaction soil sampling)
Not yet started, per March 18 Order.

Corrective Actions Per Ordering Paragraph C (leveling, recontouring)
See above actions per Ordering Paragraph A.

Corrective Actions Per Ordering Paragraph D (erosion)
See above actions per Ordering Paragraph A.

Corrective Actions Per Ordering Paragraph E (agricultural inspector)
Spire STL has a qualified and approved agricultural inspector present to monitor the corrective action activities.

ACTIVITIES PLANNED FOR NEXT REPORTING PERIOD

Spire STL will provide a remediation progress update for the Davis property, a schedule for remediation activities on the Gettings property, and an update on **Spire STL's discussions with** Brown and Steckel.

PROBLEMS ENCOUNTERED/INSTANCES OF NON-COMPLIANCE OBSERVED BY AGRICULTURAL INSPECTOR

Not yet started (see above corrective action status; corrective actions have not yet started on relevant tracts described in the March 18 Order).

LANDOWNER COMPLAINTS RELATED TO CORRECTIVE ACTIONS

None to date (see above corrective action status; corrective actions have not yet started).

CORRESPONDENCE RECEIVED FROM REGULATORY PERMITTING AGENCIES REGARDING NONCOMPLIANCE

None to date.

CONSTRUCTION PHOTOGRAPHS

No photos for this reporting period.

Table 1

Spire STL Pipeline Project									
Landowner	Tract #	Milepost	Commission Ordered Conditions	Most Recent Landowner Contact Dates	Remediation Plan	Spire STL Comments	Photo	Date Remediation Scheduled	Date Remediation Completed
Davis	IL-SC-018.000	2.65-2.94	Soil decompaction	8/25/2021	Spire STL has previously provided an updated remediation plan to the landowner. Spire STL is currently developing a remediation plan specific to the area south of stream SIL-CDK-033 at the request of landowner.	Davis has confirmed for Spire STL that remediation activities south of stream SIL-CDK-033 may begin next week, so long as weather and soil conditions are suitable. Spire STL has also confirmed that landowner would like to self-perform the remediation activities within the agricultural portion of his property.		*	
			Rock removal	8/25/2021				*	
			Soil sampling	8/25/2021				*	
			Land leveling/recontouring	8/25/2021				*	
Brown	IL-GC-078.000 IL-GC-080.000 IL-GC-080.100 IL-GC-081.000	13.93-15.10	Soil decompaction	8/13/2021	Spire STL is updating the remediation plan with additional details regarding access and workspace limits and will transmit to the landowner prior to remediation.	Spire STL filed for injunctive relief to have access to the temporary workspace on landowners' respective properties to perform the corrective actions in the March 18 Order. Landowner has confirmed that they will discuss access and temporary workspace needed to undertake the corrective actions. Those discussions are scheduled to occur next week.		*	
			Rock removal	8/13/2021				*	
			Soil sampling	8/13/2021				*	
				8/13/2021				*	
Brown	IL-GC-091.000 IL-GC-092.000	17.08-17.83	Soil decompaction	8/13/2021	Spire STL is updating the remediation plan with additional details regarding access and workspace limits and will transmit to the landowner prior to remediation.	Spire STL filed for injunctive relief to have access to the temporary workspace on landowners' respective properties to perform the corrective actions in the March 18 Order. Landowner has confirmed that they will discuss access and temporary workspace needed to undertake the corrective actions. Those discussions are scheduled to occur next week.		*	
			Rock removal	8/13/2021				*	
			Soil sampling	8/13/2021				*	
Meyer	IL-GC-093.000 IL-GC-094.000	17.83-18.37	Soil decompaction	8/13/2021	Spire STL has provided an updated remediation plan to the landowner.	Landowner has notified Spire STL that he would prefer remediation activities occur after crops are harvested.		*	
			Rock removal	8/13/2021				*	
			Soil sampling	8/13/2021				*	
Steckel	IL-GC-110.000 IL-GC-111.000	22.88-24.38	Soil decompaction	8/18/2021	Spire STL is updating the remediation plan with additional details regarding access and workspace limits and will transmit to the landowner prior to remediation.	Spire STL filed for injunctive relief to have access to the temporary workspace on landowners' respective properties to perform the corrective actions in the March 18 Order. Spire STL had communications with the landowner that Spire STL can likely start fixing minor concerns and he would be willing to further discuss the restoration activities and the access required to perform those activities after the crops are harvested. Those discussions are scheduled to occur next week.		*	
			Rock removal	8/18/2021				*	
			Soil sampling	8/18/2021				*	
			Land leveling/recontouring	8/18/2021				*	
			Erosion	8/18/2021				*	
Steckel	IL-GC-116.000	24.99-25.28	Soil decompaction	8/18/2021	Spire STL is updating the remediation plan with additional details regarding access and workspace limits and will transmit to the landowner prior to remediation.	Spire STL filed for injunctive relief to have access to the temporary workspace on landowners' respective properties to perform the corrective actions in the March 18 Order. Spire STL had communications with the landowner that Spire STL can likely start fixing minor concerns and he would be willing to further discuss the restoration activities and the access required to perform those activities after the crops are harvested. Those discussions are scheduled to occur next week.		*	
			Rock removal	8/18/2021				*	
			Soil sampling	8/18/2021				*	
			Land leveling/recontouring	8/18/2021				*	
			Erosion	8/18/2021				*	
Gettings	IL-JC-149.000	29.88-30.39	Soil decompaction	8/25/2021	Spire STL has provided an updated remediation plan to the landowner.	Spire STL has asked if landowner would allow Spire STL to commence remediation activities now because no vegetation has been planted within the right-of-way this year. Spire STL is waiting to hear back from landowner in this regard.		*	
			Rock removal	8/25/2021				*	
			Soil sampling	8/25/2021				*	
			Land leveling/recontouring	8/25/2021				*	
Jones	IL-GC-029.000	4.18-4.38	Soil decompaction Rock removal Soil sampling			Spire STL has resolved all outstanding issues with landowner, including the corrective actions described in the March 18 Order.			
Willis	IL-GC-030.000	4.38-4.52	Soil decompaction Rock removal Soil sampling			Spire STL has resolved all outstanding issues with landowner, including the corrective actions described in the March 18 Order.			

*Date for scheduled remediation cannot be determined until temporary right-of-way access issue is resolved.