

**Spire STL Pipeline
Agency Correspondence Tracking List
Appendix 1-C**

Agency Correspondence - Federal, State, Local Agencies, and Native American Tribes

Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence
FEDERAL													
United States Army Corps of Engineers ("USACE")													
USACE	St. Louis District	Chuck Frerker, PM	1222 Spruce Street	St. Louis	MO	63103-2833	314-331-8583	Charles.F.Frerker@usace.army.mil	Section 401/404, Section 10	6/3/2016	6/3/2016	Mr. Frerker	Telephone
										6/8/2016	6/20/2016	Mr. Frerker	Email
										6/24/2016	6/24/2016	Mr. Frerker	Email
										8/3/2016	8/3/2016	Mr. Frerker	Meeting
										6/27/2016	6/27/2016		Meeting
										6/30/2016	7/7/2016	Mr. Rodriguez Robles	Email
											7/13/2016		Email
										7/14/2016	7/14/2016	Mr. Rodriguez Robles	Telephone
										7/22/2016	7/28/2016	Mr. Rodriguez Robles	Telephone and Email
										8/2/2016			Email
										8/3/2016	8/3/2016	Mr. Rodriguez Robles	Meeting
										8/4/2016	8/4/2016	Mr. Rodriguez Robles	Email
										8/5/2016			Open House Invitation Letter
										8/19/2016			Letter
										9/1/2016			Email
										9/15/2016			Email
										-	9/21/2016	Mr. Rodriguez Robles	Email
										11/10/2016			Email
										11/29/2016			Email
										8/3/2016	8/3/2016	Mr. Meyer	Meeting
										8/4/2016	8/8/2016	Mr. Meyer	Email
										8/5/2016			Open House Invitation Letter
										-	10/7/2016	Mr. Meyer	Email
										11/29/2016			Email
										12/13/2016	12/13/2016	Mr. Meyer	Meeting
USACE	St. Louis District	David Meyer	1222 Spruce Street	St. Louis	MO	63103-2833		david.p.meyer@usace.army.mil		6/27/2016	6/27/2016		Meeting
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										11/29/2016			Email
										12/13/2016	12/13/2016	Mr. Meyer	Meeting
USACE	St. Louis District	Keith McMullen	1222 Spruce Street	St. Louis	MO	63103-2833	314-331-8582	Keith.A.McMullen@usace.army.mil	USACE Illinois Section Chief	6/27/2016	6/27/2016		Meeting
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
USACE	St. Louis District	Charlie Deutsch	1222 Spruce Street	St. Louis	MO	63103-2833	636-899-0082	charlie.deutsch@usace.army.mil	Biologist, Rivers Project Office	6/27/2016	6/27/2016		Meeting
										8/19/2016	8/23/2016	Mr. Deutsch	Email
										8/24/2016			Email
										6/27/2016	6/27/2016		Meeting
										7/21/2016	7/21/2016	Ms. Hoerner	Telephone
										7/20/2016	7/21/2016	Ms. Hoerner	Email
										7/29/2016	7/29/2016	Ms. Hoerner	Email
										8/3/2016	8/3/2016	Ms. Hoerner	Meeting
										8/5/2016			Open House Invitation Letter
										8/11/2016	8/19/2016	Ms. Hoerner	Email
										8/19/2016			Letter
										9/1/2016			Email
										9/20/2016	9/20/2016	Ms. Hoerner	Email
										11/29/2016			Email
USACE	St. Louis District	Dr. Teri Allen	1222 Spruce Street	St. Louis	MO	63103-2833	614-331-8084	Teri.C.Allen@usace.army.mil		8/3/2016	8/3/2016		Meeting
										11/1/2016			CD of Draft Environmental Report
										11/29/2016			Email
USACE	FUSRAP	Susan Adams	1222 Spruce Street	St. Louis	MO	63103-2833	314-422-7205	Susan.L.Adams@usace.army.mil	FUSRAP	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
USACE	St. Louis District	Jacob Prebianca	1222 Spruce Street	St. Louis	MO	63103-2833	314-731-7661	jacob.a.prebianca@usace.army.mil	FUSRAP	9/8/2016	9/13/2016	Mr. Prebianca	Email
										9/28/2016	9/28/2016	Mr. Prebianca	Telephone
										9/29/2016	10/6/2016	Mr. Prebianca	Email
										-	10/12/2016	Mr. Prebianca	Email
USACE	St. Louis District	Jonathan Rankins	1222 Spruce Street	St. Louis	MO	63103-2833		Jonathan.E.Rankins@usace.army.mil		10/12/2016	10/12/2016	Mr. Rankins	Email
USACE	St. Louis District	Matthew Hunn	1222 Spruce Street	St. Louis	MO	63103-2833		Matthew.J.Hunn@usace.army.mil	Chief, Emergency Management	11/29/2016			Email
USACE	St. Louis District - Missouri Section Chief	Robert S. Gramke	1222 Spruce Street	St. Louis	MO	63103-2833			NWP for Geotech Bores	-	10/7/2016	Mr. Gramke	Letter

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USACE	Kansas City District	Michael Chapman	601 E 12th Street	Kansas City	MO	64106	816-389-3310	Michael.d.chapman@usace.army.mil	Missouri River Recovery Program	6/30/2016			Voicemail
										7/15/2016	7/15/2016	Mr. Chapman	Telephone
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
United States Fish and Wildlife ("USFWS")													
USFWS	Marion County Sub-Office	Matthew Mangan	8588 Route 148	Marion	IL	62959	618-997-3344, ext. 340	matthew_mangan@fws.gov	Federal-listed species	6/3/2016	6/3/2016	Mr. Mangan	Telephone
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
USFWS	Rock Island Field Office	Kristen Lundh	1511 47th Avenue	Moline	IL	61265	309-757-5800	kristen_lundh@fws.gov	Federal-listed species	6/3/2016			Voicemail
										11/2/2016			Voicemail and Email
										11/7/2016	11/7/2016	Ms. Lundh	Telephone and Email
										12/29/2016			Email
USFWS	Rock Island Field Office	Kraig McPeek	1511 47th Avenue	Moline	IL	61265	309-757-5800 ext. 202		Federal-listed species	6/8/2016	6/8/2016	Mr. McPeek	Telephone
										6/8/2016	6/8/2016	Mr. McPeek	Email
										7/8/2016	7/8/2016	Mr. McPeek	Meeting
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
8/12/2016	12/8/2016	Mr. McPeek	Consultation Letter and Letter Response										
1/25/2017			Letter and Plant Survey Report										
USFWS	Rock Island Field Office	Chase Allred	1511 47th Avenue	Moline	IL	61265	309-757-5800, ext. 221	chase_allred@fws.gov	Federal-listed species	7/8/2016	7/8/2016	Mr. Allred	Meeting
										8/2/2016	8/2/2016	Mr. Allred	Telephone and Email
										8/8/2016			Email
										8/5/2016			Open House Invitation Letter
										9/29/2016	9/30/2016	Mr. Allred	Letter and Email
										10/11/2016	10/14/2016	Mr. Allred	Email
										10/14/2016			Email
USFWS	Two Rivers National Wildlife Refuge	Justin Sexton	HC 82, Box 107	Brussels	IL	62013	618-883-2524, ext. 24	justin_sexton@fws.gov	Federal-listed species and migratory birds	6/30/2016			Voicemail and Email
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
USFWS	Columbia Field Office	Trisha Crabill	101 Park De Ville Dr, Suite A	Columbia	MO	65203	573-234-2132	trisha_crabill@fws.gov		9/29/2016			cc on Letter to Chase Allred
National Oceanic and Atmospheric Administration ("NOAA")													
NOAA Fisheries	NOAA NEPA Coordinator		Office of General Counsel, 1315 East-West Highway, Room 15132	Silver Springs	MD	20910	301-713-9668	noaa.nepa@noaa.gov		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
United States Environmental Protection Agency ("USEPA")													
USEPA	Region 5, Acting Regional Administrator	Robert Kaplan	77 W. Jackson Blvd	Chicago	IL	60604	312-353-2000			7/29/2016			Notice of Prefiling Letter
USEPA	Region 5 Environmental Impact Statements Contact	Virginia Laszewski	77 W. Jackson Blvd	Chicago	IL	60604	312-886-7501	Laszewski.virginia@epa.gov		8/5/2016			Open House Invitation Letter
										9/16/2016	9/16/2016	Ms. Laszewski	Telephone
										10/6/2016	10/6/2016	Ms. Laszewski	Telephone
										-	10/6/2016	Ms. Laszewski	Email
										10/12/2016			Email
										11/1/2016			CD and Hardcopy of Draft Environmental Report
										11/4/2016			Voicemail and Email
11/7/2016	11/7/2016	Ms. Laszewski	Telephone										
12/29/2016			Email										
USEPA	Region 5	Elizabeth Poole	77 W. Jackson Blvd	Chicago	IL	60604	312-353-2087	poole.elizabeth.epa.gov		10/6/2016	10/6/2016	Ms. Poole	Telephone
USEPA	Region 7, Regional Administrator	Mark J. Hague	11201 Renner Blvd	Lenexa	KS	66219	913-551-7003			7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
USEPA	Region 7 Environmental Impact Statements Contact	Joe Summerlin	11201 Renner Blvd	Lenexa	KS	66219	913-551-7029	Summerlin.joe@epa.gov		9/16/2016	9/16/2016	Mr. Summerlin	Telephone
										10/6/2016	10/6/2016	Mr. Summerlin	Telephone
										11/1/2016			CD of Draft Environmental Report

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USEPA	Region 7	Althea Moses	11201 Renner Blvd	Lenexa	KS	66219	913-551-7649	Moses.Althea@epa.gov		9/30/2016	9/30/2016	Ms. Moses	Telephone
										10/4/2016	10/6/2016	Ms. Moses	Email
										10/6/2016	10/6/2016	Ms. Moses	Telephone
USEPA	Region 7	Tamara Freeman						Freeman.Tamara@epa.gov		10/6/2016	10/6/2016	Ms. Freeman	Telephone
United States Department of Agriculture ("USDA")													
Natural Resources Conservation Service ("NRCS") Offices													
NRCS	Illinois State Office	Ivan Dozier	2118 W. Park Court	Champaign	IL	61821	217-353-6600			7/29/2016			Notice of Prefiling Letter
										8/5/2016	8/10/2016	Mr. Dozier	Open House Invitation Letter; Letter Response
NRCS	Scott County/ Winchester Field Office	Johanna Fuller	656 North Main	Winchester	IL	62694	217-742-9561, ext. 3	johanna.fuller@il.usda.gov		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										9/30/2016	9/30/2016	Ms. Fuller	Telephone
										1/24/2017			Email
NRCS	Greene County/Carrollton Field Office	Brad Behymer	R.R. 3, Box 129, Route 67 North	Carrollton	IL	62016	217-942-5464, ext. 3	Bradley.Behymer@il.usda.gov		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										10/3/2016	10/3/2016	Mr. Behymer	Telephone
										10/5/2016	10/5/2016	Mr. Behymer	Telephone
										10/5/2016			Email
										10/12/2016	10/13/2016	Mr. Behymer	Email
										1/24/2017			Email
NRCS	Jersey County/ Jerseyville Lincoln Field Office	Brad Behymer	604 East Franklin	Jerseyville	IL	62052	217-942-5464, ext. 3	Bradley.Behymer@il.usda.gov		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
NRCS	Missouri State Office	J.R. Flores	Parkade Center 601 Business Loop 70 West, Suite 250	Columbia	MO	65203	573-876-0901			7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
NRCS	Service Center Office	Connie Gibson	160 Saint Peters Centre Blvd	St. Peters	MO	63376	636-952-2283, ext. 105	Connie.Gibson@mo.usda.gov		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
NRCS	Service Center Office	Renee L. Cook	160 Saint Peters Centre Blvd	St. Peters	MO	63376	636-922-2833, ext. 3	renee.cook@mo.usda.gov		-	9/28/2016	Ms. Cook	Email
										-	10/11/2016	Ms. Cook	Email
Farm Service Agency ("FSA") Offices													
FSA	Scott County	Rebecca D. Walls	656 North Main St	Winchester	IL	62694	217-742-9561, ext. 2	rebecca.walls@il.usda.gov		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
FSA	Carrollton Service Center		Route 267 North	Carrollton	IL	62016				7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
FSA	Jerseyville Service Center		604 E Franklin	Jerseyville	IL	62052				7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
FSA	St Charles County	Connie Gibson	160 Saint Peters Centre Blvd	St. Peters	MO	63376	636-952-2283, ext. 105	Connie.Gibson@mo.usda.gov	CRP	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										9/7/2016			Email
										9/28/2016	9/28/2016	Ms. Gibson	Email
										10/11/2016			Email
										12/2/2016	12/2/2016	Ms. Gibson	Voicemail and Emails
FSA	St Louis County	Connie Gibson	160 Saint Peters Centre Blvd	St. Peters	MO	63376	636-952-2283, ext. 105	Connie.Gibson@mo.usda.gov	CRP	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										9/7/2016			Email
										9/28/2016	9/28/2016	Ms. Gibson	Email
										10/11/2016			Email
										12/2/2016	12/2/2016	Ms. Gibson	Voicemail and Emails
										12/5/2016	12/27/2017	Ms. Gibson	Email
FSA	Illinois State Office	Jamie Diebal	3500 Wabash Ave	Springfield	IL	62711	217-331-6872	jamie.diebal@il.usda.gov	CRP	9/21/2016	9/22/2016	Ms. Diebal	Email
										9/26/2016			Email
										10/12/2016	10/17/2016	Ms. Diebal	Email
										10/19/2016	10/31/2016	Ms. Diebal	Email

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STATE - Illinois													
Illinois Department of Natural Resources ("IDNR")													
IDNR	Endangered- Species	Pat Malone	One Springfield Way	Springfield	IL	62702-1271	217-785-4991	pat.malone@illinois.gov	State Listed Species	6/8/2016	6/8/2016		Telephone and Email
										6/21/2016	6/21/2016	Mr. Malone	Meeting
										6/16/2016	7/6/2016	Mr. Malone	Email
										7/15/2016	7/15/2016	Mr. Malone	Email
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										8/12/2016			Consultation Letter
										8/15/2016	8/15/2016	Mr. Malone	Email
										9/26/2016	9/26/2016	Mr. Malone	Telephone
										9/27/2016	9/27/2016	Mr. Malone	Telephone
										10/5/2016	10/5/2016	Mr. Malone	Telephone
										10/5/2016	10/14/2016	Mr. Malone	Email
										10/14/2016	10/14/2016	Mr. Malone	Email
										-	10/26/2016	Mr. Malone	Email
12/13/2016	12/13/2016	Mr. Malone	Meeting										
IDNR	Impact Assessment Section	Keith Shank						Keith.Shank@illinois.gov	State Listed Species				
IDNR	Water Resources	Mike Diedrichsen	One Springfield Way	Springfield	IL	62702-1271	217-782-4426	mike.diedrichsen@illinois.gov		6/8/2016	6/9/2016	Mr. Diedrichsen	Telephone and Email
										6/14/2016	6/15/2016	Mr. Diedrichsen	Email
										6/21/2016	6/21/2016	Mr. Diedrichsen	Meeting
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										8/12/2016			Consultation Letter
9/28/2016	9/28/2016	Mr. Diedrichsen	Telephone										
IDNR	Conservation Program	Mike Chandler						mike.chandler@illinois.gov		8/4/2016			Voicemail and Email
IDNR	CREP Program Coordinator	Luke Garver	One Natural Resources Way	Springfield	IL	62702-1721	217-524-3200	Luke.Garver@illinois.gov	CREP	-	8/8/2016		Voicemail
										8/9/2016	8/10/2016	Mr. Garver	Telephone and Email
										9/9/2016	9/9/2016	Mr. Garver	Email
										12/2/2016			Voicemail and Email
IDNR	CREP	Robert Bedient	One Natural Resources Way	Springfield	IL	62702	217-557-6525	DNR.CREP@illinois.gov	CREP	-	12/6/2016	Mr. Bedient	Email
IDNR		Nathan Grider					217-524-0501			10/7/2016	10/7/2016	Mr. Grider	Telephone
IDNR	Chief of Staff	Brent Krebs	One Natural Resources Way	Springfield	IL	62702	217-785-7953	brent.krebs@illinois.gov		12/13/2016	12/13/2016	Mr. Krebs	Meeting
										12/19/2016	12/19/2016	Mr. Krebs	Telephone
										6/17/2016	6/20/2016	Ms. Kieninger	Email
IDNR	Heritage Database Program Manager	Tara Kieninger	One Natural Resources Way	Springfield	IL	62702	217-782-2685	tara.kieninger@illinois.gov		6/21/2016	6/21/2016	Ms. Kieninger	Email
										12/23/2016	12/27/2016	Ms. Kieninger	Voicemail and Email
										12/27/2016	12/27/2016	Ms. Kieninger	Telephone
										12/29/2016	1/5/2017	Ms. Kieninger	Email
										12/19/2016	12/19/2016	Ms. Skufca	Telephone
IDNR	Incidental Take Authorization Coordinator	Jenny Skufca	One Natural Resources Way	Springfield	IL	62702	217-557-8243	Jenny.Skufca@illinois.gov		-	12/19/2016	Ms. Skufca	Email
										1/19/2017	1/19/2017	Ms. Skufca	Telephone
IDNR	Endangered Species Program Manager	Joe Kath						Joe.Kath@illinois.gov					
IDNR	Scientific Collection Permits	Nancy Rogers						Nancy.S.Rogers@illinois.gov					

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Illinois Department of Agriculture ("IDOA")													
IDOA	Bureau of Land and Water Resources	Terry Savko	Statefairgrounds P.O. Box 19281	Springfield	IL	62794-9281	217-785-4458	terry.savko@illinois.gov	Agricultural Impact Mitigation Agreement	6/9/2016	6/9/2016	Ms. Savko	Telephone and Email
										6/22/2016	6/22/2016	Ms. Savko	Meeting
										7/29/2016			Notice of Prefiling Letter
										8/15/2016			Consultation Letter
										8/5/2016			Open House Invitation Letter
										9/7/2016	9/7/2016	Ms. Savko	Email
										9/22/2016	9/26/2016	Ms. Savko	Email
										9/26/2016	10/6/2016	Ms. Savko	Email
											11/9/2016	Ms. Savko	Email
											11/22/2016	Ms. Savko	Telephone
											11/29/2016		Email
											12/2/2016		Email
											12/13/2016	Ms. Savko	Meeting
	1/24/2017		Email										
	11/22/2016	11/22/2016	Mr. Chard	Telephone									
IDOA	Bureau of Land and Water Resources	Steve Chard	PO Box 19281	Springfield	IL	62794-9281	217-782-6297	Steve.Chard@illinois.gov	Agricultural Impact Mitigation Agreement	11/29/2016			Email
										12/2/2016			Email
										1/24/2017			Email
IDOA	General Counsel	Craig Sondgeroth					217-558-0014	craig.sondgeroth@illinois.gov		12/13/2016	12/13/2016	Mr. Sondgeroth	Meeting
IDOA	Land and Water Resource Specialist	John Lohse	PO Box 19281	Springfield	IL	62794-9281	217-785-4389	john.lohse@illinois.gov		12/13/2016	12/13/2016	Mr. Lohse	Meeting
IDOA	Deputy Director	Warren Goetsch	PO Box 19281	Springfield	IL	62794-9281	217-785-4747	warren.goetsch@illinois.gov		12/13/2016	12/13/2016	Mr. Goetsch	Meeting
IDOA	COS	Grant Hammer	PO Box 19281	Springfield	IL	62794-9281	217-782-5051	grant.hammer@illinois.gov		12/13/2016	12/13/2016	Mr. Hammer	Meeting
Illinois Historic Preservation Agency ("IHPA")													
IHPA	Division Manager & Deputy SHPO	Rachel Leibowitz	1 Old State Capitol Plaza	Springfield	IL	62701	217-782-7534	rachel.leibowitz@illinois.gov	Section 106	6/21/2016	6/21/2016	Ms. Leibowitz	Meeting
										7/29/2016			Notice of Prefiling Letter
											8/4/2016		Letter
										8/5/2016			Open House Invitation Letter
										8/29/2016			Consultation Letter
										10/28/2016			Letter
										11/1/2016			Hardcopy of Draft RRA
										12/13/2016	12/13/2016	Ms. Leibowitz	Meeting
	1/26/2017		Letter and Phase I Archaeological Survey Report with Architectural/Historical Resources Survey										
IHPA		David Halpin	1 Old State Capitol Plaza	Springfield	IL	62701	217-785-4998		Section 106	11/7/2016	11/7/2016	Mr. Halpin	Telephone
IHPA	Deputy Director	Ryan Prehn	313 S 6th Street	Springfield	IL	62701	217-558-8950	ryan.prehn@illinois.gov		12/13/2016	12/13/2016	Mr. Prehn	Meeting
Illinois Environmental Protection Agency ("IEPA")													
IEPA	Bureau of Water	Alan Keller	1021 North Grand Avenue East P.O. Box 19276	Springfield	IL	62794-9276	217-782-0610	al.keller@illinois.gov		6/9/2016	6/9/2016		Telephone
										8/12/2016			Consultation Letter
IEPA	Industrial Engineer on call	Mark Liska					217-782-0610		Hydrostatic Test Withdrawals and Discharge	7/11/2016	7/11/2016	Mr. Liska	Telephone
IEPA	Bureau of Water - Industrial Unit Manager	Darin LeCrone	1021 North Grand Avenue East	Springfield	IL	62794	217-782-0610	darin.lecrone@illinois.gov		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										12/13/2016	12/13/2016	Mr. LeCrone	Meeting
IEPA	GIS	Joe Konczyk					217-785-2271	Joe.Konczyk@illinois.gov	Illinois Drinking Water Resources	9/21/2016	9/21/2016	Mr. Konczyk	Telephone
										9/22/2016	9/22/2016	Mr. Konczyk	Email
											10/20/2016	Mr. Konczyk	Email
IEPA		Scott Twait	1021 North Grand Avenue East	Springfield	IL	62794	217-558-2012	Scott.Twait@illinois.gov		9/28/2016	9/28/2016	Mr. Twait	Telephone
										10/7/2016	10/17/2016	Mr. Twait	Email
										10/17/2016	10/17/2016	Mr. Twait	Telephone
										12/9/2016	12/9/2016	Mr. Twait	Telephone and Email

**Spire STL Pipeline
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Agency Correspondence - Federal, State, Local Agencies, and Native American Tribes

Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence
IEPA	Public Water Supply	David Cook					217-782-0078			10/17/2016			Voicemail
										10/18/2016	10/18/2016	Mr. Cook	Telephone
IEPA	Bow Permit Section	Darren Gove	1021 North Grand Avenue East	Springfield	IL	62794	217-524-3033	darren.gove@illinois.gov		12/13/2016	12/13/2016	Mr. Gove	Meeting
IEPA	Deputy Director	Ryan McCreery	1021 North Grand Avenue East	Springfield	IL	62794	217-782-1679	ryan.mcCreery@illinois.gov		12/13/2016	12/13/2016	Mr. McCreery	Meeting

STATE - Missouri

Missouri Department of Natural Resources ("MDNR")

MDNR	Water Resources Center - Surface Water, Wetlands and Planning	Steve McIntosh	PO Box 176	Jefferson City	MO	65102	573-751-7823	steve.mcintosh@dnr.mo.gov	Major Water User Registration	6/16/2016	6/16/2016	Mr. McIntosh	Telephone and Email
										8/3/2016	8/3/2016		Meeting
MDNR	Water Resources Center	Scott Kaden	PO Box 176	Jefferson City	MO	65102	573-368-2175			7/8/2016	7/8/2016	Mr. Kaden	Telephone
MDNR	Water Protection Program	Robert Voss	PO Box 176	Jefferson City	MO	65102	573-751-1300			7/8/2016	7/8/2016	Mr. Voss	Telephone
MDNR	Water Protection Program	Chris Wieberg	PO Box 176	Jefferson City	MO	65102	573-526-5781	chris.wieberg@dnr.mo.gov	Hydrostatic Discharge Permit	7/11/2016	7/11/2016	Mr. Wieberg	Telephone
										8/3/2016	8/3/2016	Mr. Wieberg	Meeting
										-	11/29/2016	Mr. Wieberg	Letter - 401 Water Quality Certification
MDNR	Director	Sara Parker Pauley	PO Box 176	Jefferson City	MO	65102	573-522-6221			7/29/2016			Notice of Prefiling Letter
MDNR		Paul Mueller	PO Box 176	Jefferson City	MO	65102	314-416-2960			8/5/2016			Open House Invitation Letter
										7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
MDNR		Mike Irwin	PO Box 176	Jefferson City	MO	65102	573-522-1131	mike.irwin@dnr.mo.gov	401 Water Quality Certification	8/3/2016	8/3/2016	Mr. Irwin	Meeting
										8/4/2016	8/4/2016	Mr. Irwin	Email
										8/4/2016	8/5/2016	Mr. Irwin	Email
										8/5/2016			Open House Invitation Letter
										12/9/2016	12/9/2016	Mr. Irwin	Voicemail and Telephone
										12/9/2016	12/15/2016	Mr. Irwin	Email
			Email										
										8/3/2016	8/3/2016	Ms. Smith	Meeting
MDNR		Lorisa Smith	PO Box 176	Jefferson City	MO	65102	573-751-7370	Lorisa.Smith@dnr.mo.gov	Permitting Contact	8/4/2016			Email
										8/5/2016			Open House Invitation Letter
										9/8/2016			Consultation Letter
MDNR	Katy Trail	Denny Bopp	PO Box 176	Jefferson City	MO	65102	573-751-9392	denny.bopp@dnr.mo.gov	Katy Trail	8/3/2016	8/3/2016	Mr. Bopp	Meeting
										9/28/2016			Voicemail
MDNR		Brad Harris	PO Box 176	Jefferson City	MO	65102	573-644-3226	brad.harris@dnr.mo.gov	Env. Emergency Response Plan	8/3/2016	8/3/2016	Mr. Harris	Meeting
MDNR		Robert Stout	PO Box 176	Jefferson City	MO	65102	573-751-7402	robert.stout@dnr.mo.gov	Policy Contact	8/3/2016	8/3/2016	Mr. Stout	Meeting
MDNR	Geology	Peter Price	PO Box 176	Jefferson City	MO	65102	573-368-2131	peter.price@dnr.mo.gov	Well drilling	8/3/2016	8/3/2016	Mr. Price	Meeting
MDNR	Geology	Peter Bachle	PO Box 176	Jefferson City	MO	65102	573-368-2472	peter.bachle@dnr.mo.gov		8/3/2016	8/3/2016	Mr. Bachle	Meeting
MDNR	Well Heads Department	Justin Davis	PO Box 176	Jefferson City	MO	65102	573-368-2167		Registration of Geotech				
MDNR	GIS	David Erickson					573-368-2332	david.erickson@dnr.mo.gov	Missouri Drinking Water Resources	9/21/2016	9/21/2016	Mr. Erickson	Telephone
MDNR	Cultural Resource Management Section, State Parks	Kim Dillon					573-526-0976	kim.dillon@dnr.mo.gov		10/3/2016	10/3/2016	Ms. Dillon	Email

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Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence						
MDNR	Public Drinking Water Branch	Maher Jaafari					573-751-1127	maher.jaafari@dnr.mo.gov		10/18/2016	10/19/2016	Mr. Jaafari	Email						
MDNR	Public Drinking Water Branch	Everett Baker						Everett.Baker@dnr.mo.gov		-	10/24/2016	Mr. Baker	Email						
										1/17/2017			Email						
MDNR	Public Drinking Water Branch	Ken Tomlin					573-526-0269			12/22/2016			Voicemail						
MDNR	Wellhead Protection Program Chief	Kyle Rollins					573-368-2171			12/21/2016	12/22/2016	Mr. Rollins	Voicemail and Telephone						
MDNR	Wellhead Protection Compliance and Enforcement	Amber Steele					573-368-2115			12/21/2016	12/22/2016	Ms. Steele	Voicemail and Telephone						
MDNR	Geological Survey	Pat Mulvany					573-368-2370			12/14/2016	12/14/2016	Mr. Mulvany	Telephone						
Missouri State Historic Preservation Office (MO SHPO)	Compliance Coordinator	Judith Deel	PO Box 176	Jefferson City	MO	65102	573-751-7862	judith.deel@dnr.mo.gov	Section 106	7/8/2016	7/8/2016	Ms. Deel	Meeting						
														7/29/2016			Notice of Prefiling Letter		
															8/3/2016	8/3/2016	Ms. Deel	Meeting	
															8/5/2016			Open House Invitation Letter	
															8/29/2016			Consultation Letter	
															9/12/2016	9/13/2016	Ms. Deel	Email	
															9/14/2016	9/14/2016	Ms. Deel	Email	
															9/20/2016	9/20/2016	Ms. Deel	Email	
						1101 Riverside Drive				Jefferson City	MO	65101				10/28/2016			Letter
																11/1/2016			Hardcopy of Draft RR4
																11/7/2016			Voicemail
																11/14/2016	11/14/2016	Ms. Deel	Telephone
										1/26/2017			Letter and Phase I Archaeological Survey Report						
										1/26/2017			Letter and Architectural/Historical Resources Survey Report						
MO SHPO		Heather Gibb	PO Box 176	Jefferson City	MO	65102	573-751-4589	heather.gibb@dnr.mo.gov	Section 106	7/8/2016	7/8/2016	Ms. Gibb	Meeting						
														8/3/2016	8/3/2016	Ms. Gibb	Meeting		
															9/28/2016	9/28/2016	Ms. Gibb	Email	
															9/29/2016	9/30/2016	Ms. Gibb	Email	
															11/1/2016			Hardcopy of Draft RR4	
MO SHPO	Director and Deputy SHPO	Toni M. Prawl	1101 Riverside Drive	Jefferson City	MO	65101													
										-	11/17/2016	Dr. Prawl	Letter						
										-	11/17/2016	Dr. Prawl	Letter						
MO SHPO		Amanda Burke	1101 Riverside Drive	Jefferson City	MO	65101	573-751-7862			11/15/2016	11/15/2016	Ms. Burke	Telephone						
Missouri Department of Conservation (MDOC)																			
MDOC	Wildlife	Raenhard Wesselschmidt	2360 Hwy D	St. Charles	MO	63304	636-441-4554 ext. 4132	raenhard.wesselschmidt@mds.mo.gov		7/29/2016			Notice of Prefiling Letter						
										8/5/2016			Open House Invitation Letter						
MDOC	Wildlife	Audrey Beres	2360 Hwy D	St. Charles	MO	63304	573-522-4115, ext. 3346	audrey.beres@mdc.mo.gov	RTE	6/17/2016	6/17/2016	Ms. Beres	Telephone						
										6/27/2016	6/27/2016	Ms. Beres	Meeting						
										6/17/2016	7/6/2016	Ms. Beres	Email						
										8/12/2016			Consultation Letter						
										11/29/2016			Email						
										-	12/5/2016	Ms. Beres	Email						
										1/10/2017	1/10/2017	Ms. Beres	Telephone						
										1/11/2017	1/17/2017	Ms. Beres	Email						
-	1/17/2017	Ms. Beres	Email																
1/20/2017			Email																
MDOC	Pools 24.25 and 26 of Upper Mississippi Conservation Area	Gary Calvert	P.O. Box 201 3333 North Highway 79	Elsberry	MO	63343	573-898-5905, ext. 1890	Gary.Calvert@mdc.mo.gov	Migratory Bird and Setback requirements	7/6/2016	7/6/2016	Mr. Calvert	Telephone						
										7/29/2016			Notice of Prefiling Letter						
										8/5/2016			Open House Invitation Letter						

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Agency Correspondence - Federal, State, Local Agencies, and Native American Tribes

Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence
MDOC	Policy Coordinator	Jennifer Campbell	PO Box 176	Jefferson City	MO	65102	573-522-4115	jennifer.campbell@mdc.mo.gov	Permitting Contact	9/16/2016			Voicemail
										9/22/2016			Voicemail
										10/14/2016	10/17/2016	Ms. Campbell	Voicemail and Email
										10/17/2016	10/17/2016	Ms. Campbell	Email
										-	10/18/2016	Ms. Campbell	Email
										10/28/2016	10/25/2016	Ms. Campbell	Email
										11/4/2016	11/3/2016	Ms. Campbell	Email
11/7/2016	11/4/2016	Ms. Campbell	Email										
MDOC		Nate Muenks					573-751-4115, ext. 3371		Noxious Weeds	9/30/2016	9/30/2016	Mr. Muenks	Telephone
MDOC	Resource Scientist	Janet Haslerig	2901 W. Truman Boulevard	Jefferson City	MO	65109	573-522-4115, ext. 3198	Janet.Haslerig@mdc.mo.gov	Bald Eagles	12/5/2016	12/5/2016	Ms. Haslerig	Telephone and Email
										-	12/12/2016	Ms. Haslerig	Email
Missouri Department of Agriculture ("MDA")													
MDA		Collin Wamsley					412-399-5251		Noxious Weeds	9/30/2016	9/30/2016	Mr. Wamsley	Telephone
MDA	Legal Counsel									6/24/2016	6/24/2016	Legal Counsel	Telephone
LOCAL													
Scott County, Illinois													
Scott County Soil and Water Conservation District ("SWCD")	Resource Conservationist	Lance Mueller	656 North Main	Winchester	IL	62694	217-742-9561	lance.mueller@il.nacdn.net		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										9/7/2016	9/28/2016	Mr. Mueller	Email
										9/28/2016	9/28/2016	Mr. Mueller	Email
Scott County	Chief County Assessment Officer	Lorrie Koch	35 E Market Street	Winchester	IL	62694	217-742-5751	scottcoassessor@frontier.com		10/6/2016	10/6/2016	Ms. Koch	Telephone
Greene County, Illinois													
Greene County SWCD	Administrative Coordinator	Annyce Winters	RR3, Box 129	Carrollton	IL	62016	217-942-5464	annyce.winters@il.nacdn.net		7/29/2016			Notice of Prefiling Letter
Greene County	Floodplain Management	Stan Crusius	519 N. Main St	Carrollton	IL	62016	217-942-5443		Floodplain Permit	8/5/2016			Open House Invitation Letter
										7/29/2016			Notice of Prefiling Letter
Greene County	Clerk	Debbie Banghart					217-942-5443			8/5/2016			Open House Invitation Letter
Roodhouse, Illinois	City Clerk	Patty Plahn					217-589-4351			10/12/2016	10/12/2016	Ms. Plahn	Telephone
White Hall, Illinois	City Clerk	Mona McMillan	116 East Sherman Street	White Hall	IL	62092	217-374-2345			10/12/2016	10/12/2016	Ms. McMillan	Telephone
Carrollton, Illinois	City Clerk	Mike Schneider					217-942-3814			10/12/2016	10/12/2016		Telephone
										10/17/2016	10/17/2016	Mr. Schneider	Telephone
Jersey County, Illinois													
Jersey County SWCD	Resource Conservationist	Jeff Blackorby	604 E. Franklin	Jerseyville	IL	62052	618-498-3712	jeff.blackorby@il.nacdn.net		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										9/7/2016			Email
										9/28/2016	11/3/2016	Mr. Blackorby	Email
Jersey County	Code Administrator	Cindy Craigmiles	200 N. Lafayette, Suite 6	Jerseyville	IL	62052	618-498-5571 x146	codeadmin1@jerseycounty-il.us	Floodplain and Stormwater Development Permits	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
Jersey County							618-498-5571, ext. 442	codeadmin1@jerseycounty-il.us		12/12/2016	12/12/2016	Ms. Craigmiles	Telephone
Jersey County	Planning and Zoning	Craig McGraw								10/6/2016	10/6/2016	Mr. McGraw	Telephone
										10/6/2016	10/6/2016	Mr. McGraw	Email
										12/8/2016	12/9/2016	Mr. McGraw	Email
University of Illinois	Illinois Natural History Survey - Prairie Research Institute	Christopher Phillips	1885 Natural Resources Bldg, 607 E. Peabody Dr	Champaign	IL	61820	217-244-7077	caphill@illinois.edu , lithasia@gmail.com	Timber Rattlesnake Survey Information	8/26/2016	8/26/2016	Mr. Phillips	Telephone
										8/29/2016	8/29/2016	Mr. Phillips	Email
										9/1/2016	9/1/2016	Mr. Phillips	Email
										9/1/2016	9/1/2016	Mr. Phillips	Telephone
										10/17/2016	10/17/2016	Mr. Phillips	Email
St. Charles County, Missouri													
St. Charles County SWCD	District Manager	Frankie Coleman	160 St. Peters Centre Blvd	St. Peters	MO	63376	636-922-2833	frankie.coleman@swcd.mo.gov		9/7/2016	9/16/2016	Mr. Coleman	Email
										9/28/2016			Email
St. Charles County SWCD		Charles Perkins									9/30/2016	Mr. Perkins	Telephone

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Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence
St. Charles County	Community Development Department	Rich Gnecco	201 N Second St	St. Charles	MO	63301	636-949-1814 x7160	development@sccmo.org		7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
St. Charles County	Development Review Department	John Baron	201 N Second St	St. Charles	MO	63301	636-949-1817	jbarron@sccmo.org	Land Disturbance Permits, Natural Watercourse Permits	8/10/2016	8/10/2016	Mr. Baron	Telephone
										-	8/12/2016	Mr. Baron	Email
										-	8/17/2016	Mr. Baron	Email
St. Charles County	Floodplain Vision Board	Ellie Marr	201 N Second St	St. Charles	MO	63301	636-949-7900 x7235	emarr@sccmo.org	Floodplain Permits	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
St. Charles County		Mick Zerr	201 N Second St	St. Charles	MO	63301	636-234-1192	mzerr@sccmo.org	Building Permits (if needed)				
St. Charles County	Highway Department	Charles Kuehler	201 N Second St	St. Charles	MO	63301	636-949-7305	ckuehler@sccmo.org	Special Use Permits				
St. Charles County	Community Development Department	Robert Myers	201 N Second St, Suite 420	St. Charles	MO	63301	636-949-7335, ext. 7225	Rmyers@sccmo.org	Planned Developments	9/13/2016	9/26/2016	Mr. Myers	Email
										9/28/2016	9/28/2016	Mr. Myers	Email
										12/8/2016	12/8/2016	Mr. Meyers	Email
City of West Alton	Planning and Zoning Commissioner	Jason Farley	P.O. Box 42, West Alton City Hall	West Alton	MO	63386	314-306-4695		Land Use Permit	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
										10/6/2016	10/12/2016	Mr. Farley	Voicemail and Telephone
City of West Alton	Floodplain Administrator	Janet Neustadt	P.O. Box 42, West Alton City Hall	West Alton	MO	63386	636-899-0233		Floodplain Permit	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
Consolidated North County Levee District	President	Kevin Machens	135 Payne Road	Portage Des Sioux	MO	63373	314-750-2519	skmachens@live.com	Letter of Endorsement	7/14/2016			Voicemail and Email
										7/29/2016			Notice of Prefiling Letter
										8/3/2016	8/3/2016		Meeting
										8/5/2016			Open House Invitation Letter
										9/15/2016	9/15/2016	Mr. Machens	Telephone and Email
										9/29/2016	9/29/2016	Mr. Machens	Telephone
City of Cottleville	Public Works Engineer	Rich Francis					636-498-6565		Planned Developments	12/12/2016			Voicemail
City of Dardenne Prairie	Public Works Engineer	Luke Kehoe					636-561-1718		Planned Developments	12/12/2016			Voicemail
City of Flint Hill	City Engineer	Tom Rothermich					636-327-4441		Planned Developments	12/12/2016			Voicemail
City of Foristell	City Engineer	Dale Stokes					636-463-2123		Planned Developments	12/12/2016			Voicemail
City of Lake Saint Louis	Community Development Manager	Brenda Qwellen					636-463-1200		Planned Developments	12/12/2016			Voicemail
City of New Melle		TBD					636-828-4807		Planned Developments	12/15/2016			Voicemail
City of Portage des Sioux	Mayor	Mark Warner					636-899-0640		Planned Developments	12/12/2016	12/12/2016	Mr. Warner	Telephone
City of St. Charles	Director of Economic Development	David Leezer					636-949-3200		Planned Developments	12/12/2016	12/12/2016	Mr. Leezer	Voicemail and Telephone
City of St. Paul		TBD					636-980-1063		Planned Developments	12/12/2016			Voicemail
City of St. Peters		Melissa Vullmer					636-477-6600		Planned Developments	12/12/2016			Voicemail
City of O'Fallon	Assistant Planning and Development Director	Shannon Gerard					636-379-5467		Planned Developments	12/15/2016			Voicemail
City of Weldon Spring	City Engineer	Joe Nichols					636-441-2110		Planned Developments	12/12/2016	12/13/2016	Mr. Nichols	Voicemail and Telephone
City of Wentzville	City Marketing Director	Dan Lang					636-332-5101		Planned Developments	12/12/2016	12/12/2016	Mr. Lang	Telephone
Town of Augusta		TBD					636-228-4689		Planned Developments	12/15/2016			Voicemail
Cadre Development, LLC		Rowdy Montgomery					314-608-7915		Planned Developments	12/15/2016	12/15/2016	Mr. Montgomery	Telephone

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St. Louis County, Missouri													
St. Louis County	Department of Highways and Traffic	James M. Knoll	41 South Central Ave	Clayton	MO	63105	314-615-8554	jmknoll@stlouisco.com	Floodplain, Land Disturbance Permits	7/29/2016			Notice of Prefiling Letter
										8/5/2016			Open House Invitation Letter
St. Louis County	Department of Planning	Gail Choate					314-615-2520			10/6/2016	10/6/2016	Ms. Choate	Telephone
Spanish Lake Community Association		TBD	11726 Larimore Rd	St. Louis	MO	63138				8/5/2016			Open House Invitation Letter
Explore St. Louis	Senior Administrative Assistant	Linda Mattus	701 Convention Plaza, Suite 300	St. Louis	MO	63101	314-992-0633	lmattus@explorestlouis.com		12/13/2016	12/13/2016	Ms. Mattus	Telephone and Email
Native American Tribes													
Absentee-Shawnee Tribe of Indians of Oklahoma	Tribal Historic Preservation Officer	Leonard Longhorn	2025 South Gordon Cooper Drive	Shawnee	OK	74801	405-275-4030	leonard.longhorn@astribe.com	Native American Coordination	6/30/2016			Telephone Message
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Delaware Nation		Ms. Nekole Alligood	P.O. Box 825 31064 State Highway 281	Anadarko	OK	73005	405-247-2448	nalligood@delawarenation.com	Native American Coordination	6/30/2016			Telephone Message
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Delaware Tribe of Indians	Historic Preservation Office	Dr. Brice Obermeyer	1200 Commercial Street Roosevelt Hall, Room 212	Emporia	KS	66801	918-335-7026	bobermeyer@delawaretribe.org	Native American Coordination	6/30/2016			Attempted Telephone Call, No Response
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Eastern Shawnee Tribe of Oklahoma	Cultural Preservation Director	Ms. Robin Dushane	P.O. Box 350 127 West Oneida	Seneca	MO	64865	918-666-2435, ext. 247 (Office) 918-801-6677 (Cell)	radushane@gmail.com	Native American Coordination	6/30/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Iowa Tribe of Kansas and Nebraska	Tribal Historic Preservation Officer	Mr. Lance M. Foster	3345 B. Thrasher Road	White Cloud	KS	66094	785-595-3258	lfoster@iowas.org	Native American Coordination	6/30/2016	7/6/2016	Mr. Foster	Telephone
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Iowa Tribe of Oklahoma	Division Director	Patrick Durham	R.R. 1, Box 721	Perkins	OK	74059-9599	405-547-5433, ext. 350	pdurham@iowanation.org	Native American Coordination	6/30/2016	6/30/2016	Mr. Durham	Telephone
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Kaw Indian Nation of Oklahoma	Museum Director	Ms. Crystal Douglas	Drawer 50	Kaw City	OK	74641	580-269-2552	Crystal_douglas@kawnation.com	Native American Coordination	6/30/2016	6/30/2016	Ms. Douglas	Telephone
										8/16/2016			Open House Invitation Letter
										8/30/2016			Voicemail
	Chairman	Ms. Jacqlyn Secondine Hensley	Drawer 50	Kaw City	OK	74641		execsec@kawnation.com	Native American Coordination	7/29/2016, 8/9/16			Notice of Prefiling Letter, courtesy follow up copy by email
										8/16/2016			Open House Invitation Letter
										9/6/2016			Email
Kickapoo Tribe in Kansas	NAGPRA Director	Ms. Nellie Cadue	1107 Gold Finch Road P.O. Box 271	Horton	KS	64439	785-486-2601, ext. 5		Native American Coordination	6/30/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Kickapoo Traditional Tribe of Texas	Director	Mr. Juan Garza, Jr.	HCR 1, Box 9700	Eagle Pass	TX	78852	830-758-1936	juangarza73@yahoo.com	Native American Coordination	6/30/2016	Delivery Refused		Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Kickapoo Tribe of Oklahoma	Attorney/Preservation Rep	Kent Collier	PO Box 70	McCloud	OK	74851	405-964-4227	kcollier@kickapootribeofoklahoma.com	Native American Coordination	6/30/2016			Attempted Telephone Call, No Response
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Miami Tribe of Oklahoma	Acting Tribal Historic Preservation Officer	Ms. Diane Hunter	P.O. Box 1326	Miami	OK	74355	918-541-8966	dhunter@miamination.com	Native American Coordination	6/30/2016	6/30/2016	Ms. Hunter	Telephone
										7/29/2016, 8/9/16			Notice of Prefiling Letter, courtesy follow up copy by email
										-	8/12/2016	Ms. Hunter	Email
										8/16/2016			Open House Invitation Letter

**Spire STL Pipeline
Agency Correspondence Tracking List
Appendix 1-C**

Agency Correspondence - Federal, State, Local Agencies, and Native American Tribes

Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence
Osage Nation	Archaeologist	John Fox	P.O. Box 779 627 Grandview	Pawhuska	OK	74056	918-287-5328	ahunter@osage-tribe.org	Native American Coordination	6/30/2016	6/30/2016	Mr. Fox	Telephone
										7/29/2016	8/16/2016	Mr. Fox	Notice of Prefiling Letter; Email Response
										8/16/2016			Open House Invitation Letter
										8/18/2016	8/18/2016	Mr. Fox	Telephone
										9/6/2016			Email
12/19/2016	12/19/2016	Mr. Fox	Telephone										
Peoria Tribe of Indians of Oklahoma		Logan Davenport	PO Box 1527 118 S. Eight Tribes Trails	Miami	OK	74355	918-540-2535	ldavenport@peoriatribe.com	Native American Coordination	7/1/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Ponca Tribe of Nebraska	Tribal Historic Preservation Officer	Mr. Shannon Wright	P.O. Box 288	Niobrara	NE	68760	402-857-3519		Native American Coordination	7/1/2016	7/1/2016	Mr. Wright	Telephone
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Ponca Tribe of Oklahoma	Tribal Historic Preservation Officer	Ms. Halona Clawson	20 White Eagle Drive	Ponca City	OK	74601	580-762-8104	halona.clawson@ponca.com	Native American Coordination	7/1/2016			Attempted Telephone Call, No Response
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Citizen Potawatomi Nation		Andrew Gourd	1601 S. Gordon Cooper Drive	Shawnee	OK	74801	405-878-5830	andrew.gourd@potawatomi.org	Native American Coordination	7/1/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Forest County Potawatomi	Tribal Historic Preservation Officer	Ms. Melissa Cook	Cultural Center, Library & Museum PO Box 340 8130 Mishkoswen Drive	Crandon	WI	54520	800-960-5479	melissa.cook@fcpotawatomi-nsn.gov	Native American Coordination	7/1/2016			Attempted Telephone Call, No Response
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Potawatomi Nation- Hannahville Indian Community (Hannahville Indian Community of Michigan)	Council/Board	Mr. Kenneth Mechigaud	N14911 Hannahville B-1 Road	Wilson	MI	49896	906-466-9933	kennethmechigaud@hannahville.org	Native American Coordination	7/1/2016			Attempted Telephone Call, No Response
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
										10/19/2016			Voicemail
Pokagon Band of Potawatomi Indians	Tribal Historic Preservation Officer	Mr. Marcus Winchester	PO Box 180 58620 Sink Road,	Dowagiac	MI	49047	269-462-4224	marcus.winchester@pokagonband- nsn.gov	Native American Coordination	7/1/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Prairie Band Potawatomi Nation		Ms. Hattie Mitchell	16281 Q.Road	Mayetta	KS	66509	785-966-4000	hattiem@pbpnation.org	Native American Coordination	7/1/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Quapaw Tribe of Oklahoma	Chairman	Mr. John Berrey	P.O. Box 765	Quapaw	OK	74363	888-641-4724		Native American Coordination	7/1/2016			Attempted Telephone Call, No Response
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Quapaw Tribe of Oklahoma	THPO	Mr. Everett Bandy	P.O. Box 765	Quapaw	OK	74363		ebandy@quapawtribe.com	Native American Coordination	-	8/24/2016	Mr. Bandy	Letter
Sac and Fox Tribe of the Missouri in Kansas and Nebraska	Chair	Mr. Edmore Green	305 North Main	Reserve	KS	66434	785-742-7471	egreen@sacandfoxcasino.com	Native American Coordination	7/1/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Sac and Fox Tribe of the Mississippi in Iowa	Historic Preservation Director	Mr. Johnathan L. Buffalo	349 Meskwaki Road	Tama	IA	52339	641-484-3185	jlbuffalo@meskwaki.org	Native American Coordination	7/1/2016	7/1/2016	Mr. Buffalo	Telephone
										7/29/2016, 8/9/16			Notice of Prefiling Letter, courtesy follow up copy by email
										8/16/2016			Open House Invitation Letter
Sac and Fox Nation of Oklahoma	Cultural Resources	Ms. Sandra Kaye Massey	920883 S. Hwy 99, Building A	Stroud	OK	74079	918-968-3526	smassey@sacandfoxnation-nsn.gov	Native American Coordination	7/1/2016			Voicemail
										7/29/2016			Notice of Prefiling Letter
										8/16/2016			Open House Invitation Letter
Ho-Chunk Nation	THPO	Bill Quackenbush	PO Box 667	Black River Falls	WI	54815	715-284-7181 x1121	bill.quackenbush@ho-chunk.com	Native American Coordination	10/19/2016	10/19/2016	Mr. Quackenbush	Telephone
										10/27/2016			Letter
										10/28/2016			Email
Winnebago Tribe of Nebraska	THPO	John Blackhawk	PO Box 687	Winnebago	NE	68071	402-878-3103	jblackhawk@aol.com	Native American Coordination	10/19/2016			Telephone, Voicemail
										10/27/2016			Letter
										10/19/2016	10/19/2016	Ms. Burlingham	Telephone
Huron Potawatomi Nation	Council/Board	Robyn Burlingham	1484 Mno-Bmadzewen Way	Fulton	MI	49502	269-704-8373	rburlingham@nhbpi.com	Native American Coordination	10/27/2016			Letter
										10/19/2016			Telephone, Voicemail
										10/27/2016	Unable to Forward		Letter
Match-e-be-nash-she-wish Band of Potawatomi Indians of Michigan	THPO	DJ Hoffman	PO Box 218	Dorr	MI	49323	906-632-6896		Native American Coordination	10/19/2016			Telephone, Voicemail
										10/27/2016			Letter
										10/19/2016			Voicemail
Shawnee Tribe	Cultural Resources	Jodi Hayes	PO Box 189	Miami	OK	74355	918-542-2441		Native American Coordination	10/27/2016			Letter
Cherokee Nation	Cultural Resources	Dr. Richard Allen	PO Box 948	Tahlequah	OK	74465	918-456-6485		Native American Coordination	10/19/2016			Voicemail
										10/27/2016			Letter

**Spire STL Pipeline
Agency Correspondence Tracking List
Appendix 1-C**

Agency Correspondence - Federal, State, Local Agencies, and Native American Tribes

Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence
United Keetoowah Band of Cherokee Indians of Oklahoma	THPO	Eric Oosahwee-Voss	PO Box 746	Tahlequah	OK	74465	918-456-8698		Native American Coordination	10/19/2016			Voicemail
										10/27/2016			Letter
Non-Governmental Organizations ("NGOs") and Environmental NGOs													
Alton Fire Department	Chief	Bernie Sebold	333 E 20th Street	Alton	IL	62002	618-463-3565			10/6/2016			Letter
Alton Volunteer Emergency Corps	President	Harold Waggoner	2400 Bloomer Dr	Alton	IL	62002	618-462-2202			10/6/2016			Letter
American Bottomlands Conservancy		TBD	527 Washington Place	East St. Louis	IL	62205				10/6/2016			Letter
Audubon Missouri	VP and Executive Director	Patricia Hagen	301 Riverlands Way	West Alton	MO	63386	636-899-0090	phagen@audubon.org		10/6/2016			Letter
Audubon Society-Illinois	Executive Director	Tom Clay	2315 Clear Lake Ave	Springfield	IL	62706	217-544-2473	tclay@illinoisaudubon.org		10/6/2016			Letter
Audubon Society-Missouri	President	Shari Harden	2101 W Broadway PMB 122	Columbia	MO	65203				10/6/2016			Letter
Center for American Archaeology		TBD	P.O. Box 366	Kampsville	IL	62053	618-653-4316	caa@caa-archeology.org		10/6/2016			Letter
Chicago 350	Executive Director	May Boeve	20 Jay Street Suite 732	Brooklyn	NY	11201		may@350.org		10/6/2016			Letter
City of Jerseyville Economic Development	Director of Building & Zoning and Director of Economic Development	Jeff Soer	115 East Prarie Street	Jerseyville	IL	62052	618-498-3312	jeffsoer@jerseyville-il.us		10/6/2016			Letter
Ducks Unlimited - Illinois	Manager of Conservation	Mark Flaspohler	101 Park De Ville Dr, Suite B	Columbia	MO	65203	573-234-2132 EX: 178	mflasphler@ducks.org		10/6/2016			Letter
Ducks Unlimited -Missouri	Manager of Conservation	Mark Flaspohler	101 Park De Ville Dr, Suite B	Columbia	MO	65203	573-234-2132 EX: 178	mflasphler@ducks.org		10/6/2016			Letter
Earthjustice	President	Trip Van Noppen	50 California Street Suite 500	San Francisco	CA	94111	800-584-6460	headquarters@earthjustice.org		10/6/2016			Letter
Environment Illinois	Energy Program Director	Rob Sargent	328 S. Jefferson St Suite 620	Chicago	IL	60661	617-747-4317			10/6/2016			Letter
Great Rivers Greenway	Executive Director	Susan Trautman	6178 Delmar Boulevard	St. Louis	MO	63112	314-436-7009	trautman@grgstl.org		10/6/2016			Letter
Great Rivers Habitat Alliance	Executive Director	David Stokes	P.O. Box 50014	St. Louis	MO	63150	314-918-1351	info@grha.org		10/6/2016			Letter
Great Rivers Land Trust	President	John Williams	P.O. Box 821	Alton	IL	62002	618-467-2265			10/6/2016			Letter
Greene County Economic Development Group	Director	Jim Mager	314 5th St	Carrollton	IL	62016	618-980-5036	gcedginc@gmail.com		10/6/2016			Letter
Heartwood	Heartwood Coordinator, Illinois	Tabatha Tripp	P.O. Box 1926	Bloomington	IN	47402	740-591-8166	info@heartwood.org		10/6/2016			Letter
Illinois Chamber of Commerce	President and CEO	Todd Maisch	215 E Adams St	Springfield	IL	62701	217-522-5512 EX: 233	tmaisch@ilchamber.org		10/6/2016			Letter
Illinois Energy Council		Katie Stonewater	215 E Adams St	Springfield	IL	62701				10/6/2016			Letter
Jacksonville Regional Economic Development Council	Vice President	Bonni Waters	221 E State St	Jacksonville	IL	62650	217.479.4627	bonni@iredc.org		10/6/2016			Letter
Missouri Caves and Karst Conservancy	President	Alicia Wallace	P.O. Box 190456	St. Louis	MO	63119		president@mocavesandkarst.org		10/6/2016			Letter
Missouri Chamber of Commerce	President and CEO	Daniel Mehan	428 East Capitol Ave	Jefferson City	MO	65101	573-634-3511			10/6/2016			Letter
Missouri Coalition for the Environment	Executive Director	Heather Navarro	3115 S Grand Blvd Suite 650	St. Louis	MO	63118	314-727-0600	hnavarro@moenviron.org		10/6/2016			Letter
Nature Conservancy - Missouri	State Director	Adam McLane	2800 S Brentwood Blvd	St. Louis	MO	63144	314-968-1105	missouri@tnc.org		10/6/2016			Letter
Nature Conservancy - Illinois	State Director	Michelle Carr	8 S Michigan Ave Suite 900	Chicago	IL	60603	312-580-2100	illinois@tnc.org		10/6/2016			Letter
Old Jamestown Association	President	Ellen Lutzow	P.O. Box 2223	Florissant	MO	63032	314-550-0184			10/6/2016			Letter

**Spire STL Pipeline
Agency Correspondence Tracking List
Appendix 1-C**

Agency Correspondence - Federal, State, Local Agencies, and Native American Tribes

Agency	Region/ Division	Contact Name	Address	City	State	Zip	Contact Phone	Contact Email	Permit/Clearance/ Approval	Date Sent	Response Type/ Date	Responding Contact	Correspondence
One Mississippi Campaign	Campaign Coordinator	Brooke Thureau	14 N Peoria St Suite 4F	Chicago	IL	60607	312-754-0402	bthurau@bluestemcommunications.org		10/6/2016			Letter
Rivers Pointe Fire Department	Chief	Richard Pender	100 Firehouse Drive	West Alton	MO	63386	636-899-1122	info@rpfpd.com		10/6/2016			Letter
Scott County Development Corporation	President	Pat Van DeVelde	35 E Market Street	Winchester	IL	62694		pat@peakinsuranceagency.net		10/6/2016			Letter
Sierra Club - Illinois Chapter	Chapter Director	Jack Darin	70 E Lake Street Suite 1500	Chicago	IL	60601	312-251-1680 ext. 112	jack.darin@sierraclub.org		10/6/2016			Letter
Sierra Club - Missouri Chapter	Chapter Director	John Hickey	2818 Sutton Blvd	St. Louis	MO	63143	314-644-1011	missouri.chapter@sierraclub.org		10/6/2016			Letter
St. Charles County Economic Development Center	President and CEO	Greg Prestemon	5988 Mid Rivers Mall Drive	St. Charles	MO	63304	636-441-6880	gprestemon@edcscc.com		10/6/2016			Letter
St. Louis Economic Development Partnership	Staff Contact	Kelly Applegate	7733 Forsyth Blvd Suites 2200 & 2300	St. Louis	MO	63105	314.615.7688	info@stlpartnership.com		10/6/2016			Letter
Trout Unlimited Mid- Missouri	President	Ryan Verkamp	1777 N Kent Street Suite 100	Arlington	VA	22209	573-817-0631	Ryan.Verkamp@gmail.com		10/6/2016			Letter

Note:
Yellow highlighting indicates correspondence that was sent/received after Spire filed its Draft Environmental Report on October 28, 2016.



United States Army Corps of Engineers

Ali Trunzo

From: Jayme Fuller
Sent: Tuesday, November 29, 2016 2:58 PM
To: Rodriguez Robles, Edward C MVS; Allen, Teri C MVS; Meyer, David P MVS; Hoerner, Melissa L MVS; Matthew.J.Hunn@usace.army.mil
Cc: Lori Ferry
Subject: Spire STL Pipeline (email 2 of 2)
Attachments: Spire STL Pipeline - Geotechnical Data Report - Rev. DRAFT (11NOV2016).pdf

Hi Ed,

Please see the second email attachment of the Geotech Data Report for the upland bores.

Thanks

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

Charleston Office | 300 Summers Street, Suite 1100, Charleston WV 25301

Indianapolis Office | 6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 |     

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Ali Trunzo

From: Jayme Fuller
Sent: Tuesday, November 29, 2016 2:55 PM
To: Rodriguez Robles, Edward C MVS; Allen, Teri C MVS; Meyer, David P MVS; Hoerner, Melissa L MVS; audrey.beres@mdc.mo.gov; Matthew.J.Hunn@usace.army.mil
Cc: Lori Ferry
Subject: Spire STL Pipeline draft HDD Plan (email 1 of 2)
Attachments: Spire - STLP - HDD Plan and Profiles_2016_11_23.pdf

Hi Ed,

I have attached the 60% design of the HDD crossings for both the Mississippi and Missouri River crossings. Please forward this email on to Matt/Josh as I am not sure I have copied the correct email address. I will also send the geotech report results of the land based bores in a separate email due to the size of the document.

I will see everyone tomorrow. Thanks!

Jayme L. Fuller, Environmental Manager

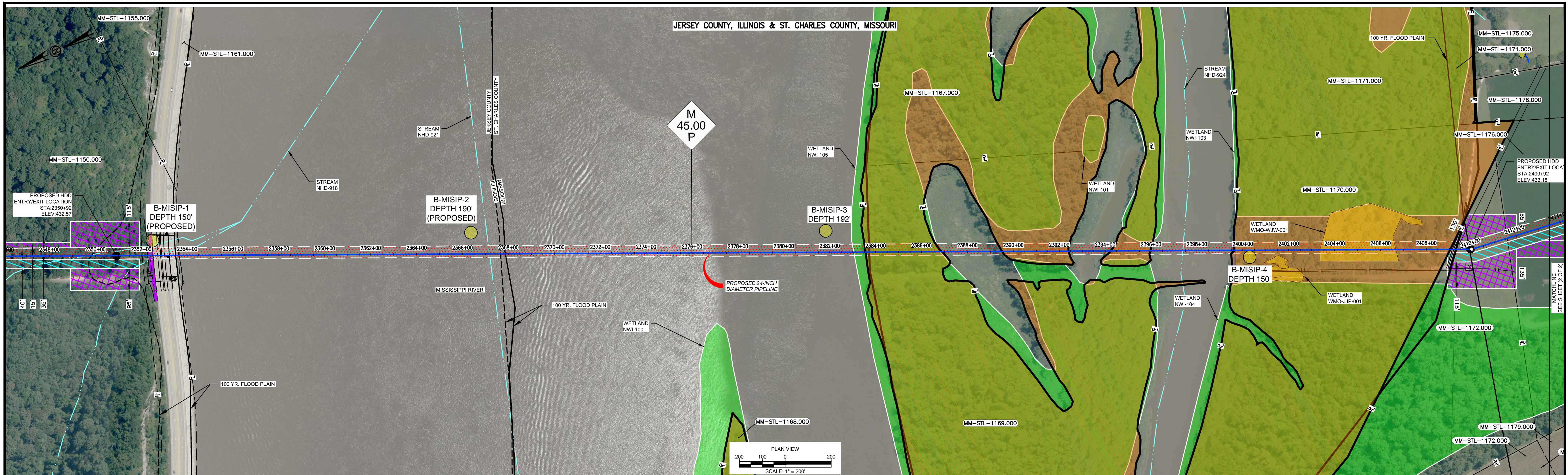
GAI Consultants, Inc.

Charleston Office | 300 Summers Street, Suite 1100, Charleston WV 25301

Indianapolis Office | 6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 | 

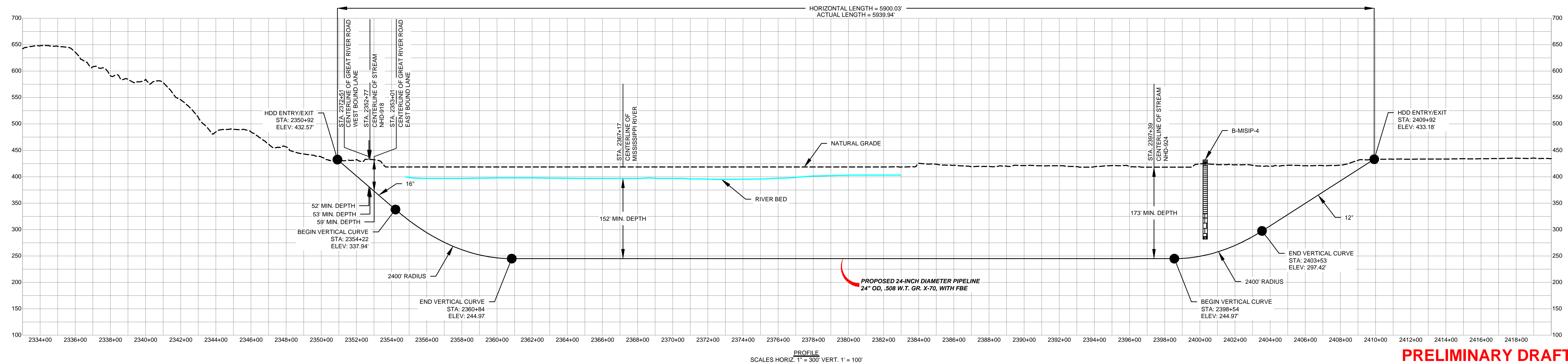
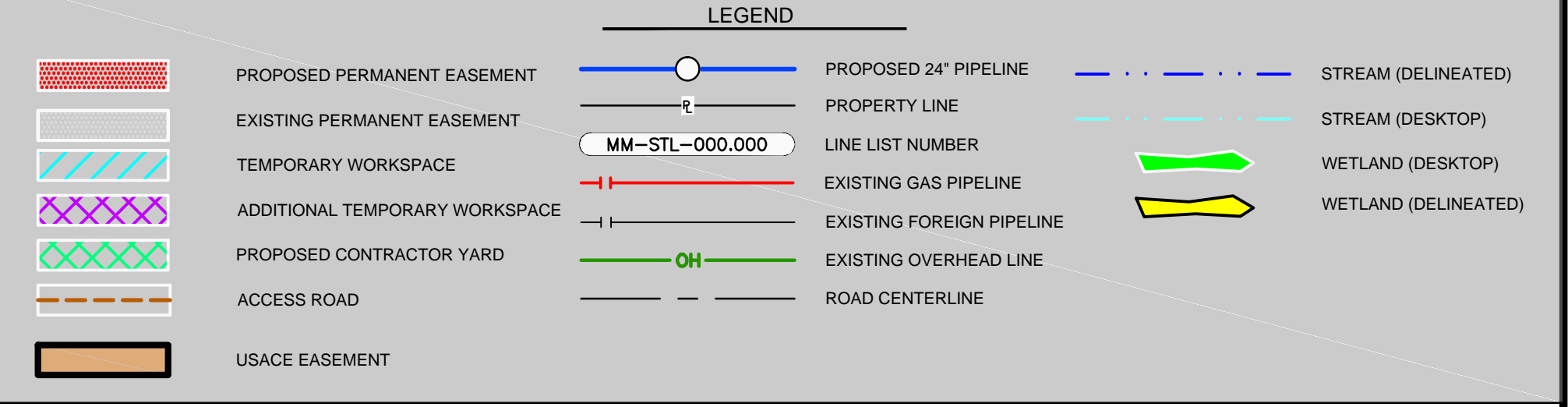
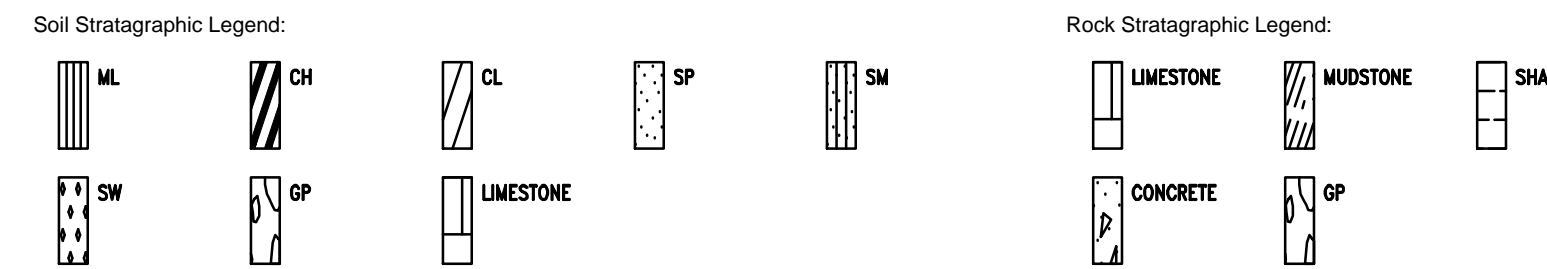
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DRAFT CONCEPTUAL HDD NOTES:

1. THE HDD BORE PATH DEPICTED ON THIS DRAWING IS CONSIDERED "DRAFT CONCEPTUAL" AND IS SUBJECT TO CHANGE BASED ON GEOTECHNICAL DATA, TOPOGRAPHICAL SURVEY, AND/OR ADDITIONAL INFORMATION REGARDING BIOLOGICAL FEATURE DELINEATIONS. THE HDD BORE PATH WILL BE ISSUED AS "FINAL CONCEPTUAL" AFTER COLLECTION AND EVALUATION OF BOTH TOPOGRAPHICAL SURVEY AND GEOTECHNICAL DATA AND AFTER BIOLOGICAL FEATURE DELINEATIONS ARE FINAL.
2. THIS DRAWING HAS BEEN PREPARED WITHOUT THE BENEFIT OF A COMPLETED GEOTECHNICAL INVESTIGATION PROGRAM. THE PRELIMINARY/CONCEPTUAL ALIGNMENTS WERE DETERMINED BASED UPON CURRENTLY AVAILABLE INFORMATION REGARDING THE CROSSING. IT IS POSSIBLE THAT ADDITIONAL CONSTRAINTS ASSOCIATED WITH THIS CROSSING WILL BE DISCOVERED AFTER A GEOTECHNICAL INVESTIGATION IS COMPLETED, RESULTING IN ALIGNMENT AND OTHER DESIGN CHANGES. ELEVATION DATA IS BASED ON PUBLICLY AVAILABLE DATASETS.
3. UPPER 200' OF HDD ANNULAR SPACE SHALL BE GROUTED WITH A BENTONITE/CEMENT MIXTURE.
4. THE PILOT BORE WILL BE EITHER 10.625" OR 12.25" IN DIAMETER. THE FINAL REAMED HOLE DIAMETER IS ANTICIPATED TO BE 36". THE NUMBER OF REAMING PASSES WILL BE DETERMINED BY THE CONTRACTOR SELECTED FOR THE WORK.

MISSISSIPPI HDD PLAN VIEW



- NOTES:
1. THE IMAGERY SHOWN WAS PROVIDED BY AERIAL DATA SERVICES, 2016. ADDITIONAL IMAGERY SUPPLEMENTED FROM USFWS-NWI AND USGS.
 2. EXISTING FEATURES SHOWN WERE SURVEYED BY MOTT MACDONALD AND DIGITIZED FROM IMAGERY. ALL LOCATIONS ARE APPROXIMATE AND SHALL BE VERIFIED BY CONTRACTOR.
 3. PROPERTY LINES DEPICTED ON THIS PLAN ARE BASED ON GIS TAX MAP DATA.

**PRELIMINARY DRAFT
FOR REVIEW AND COMMENT ONLY
11/23/2016**

REFERENCE DRAWINGS		REFERENCE DRAWINGS		REVISIONS				REVISIONS				APPROVALS										
DWG. NO.	TITLE	DWG. NO.	TITLE	NO.	REVISIONS	DATE	DRAWN	CK	APPR	NO.	REVISIONS	DATE	DRAWN	CK	APPR	DRAWN BY	DATE	ENG. APPROVAL	DATE	CLIENT APPROVAL	DATE	

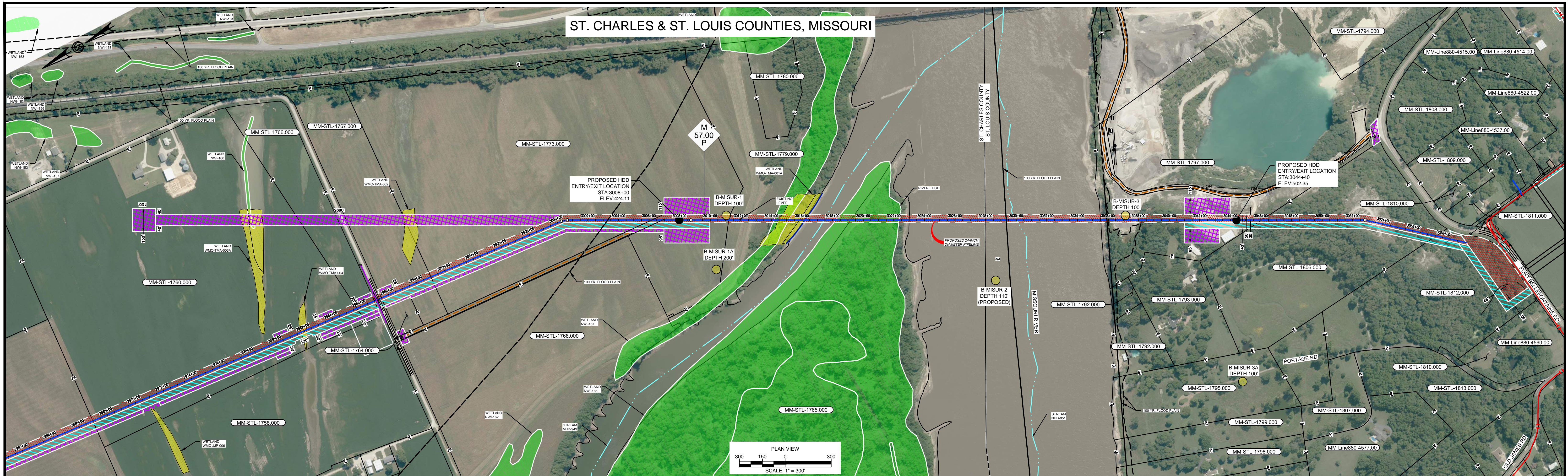
PREPARED FOR
Spire STL Pipeline

PREPARED BY
MOTT MACDONALD

SPIRE STL PIPELINE PROJECT
HDD PROFILE OVERVIEW
MISSISSIPPI RIVER MAINLINE
JERSEY COUNTY, ILLINOIS & ST. CHARLES COUNTY, MISSOURI

STLP-HDD-001

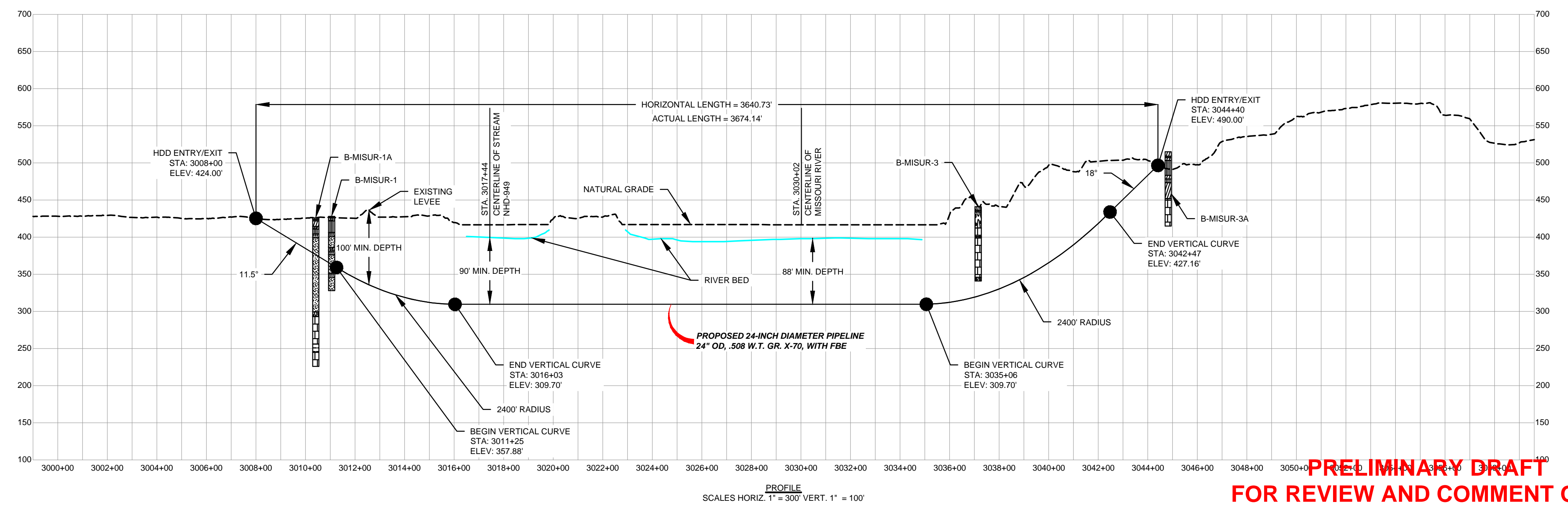
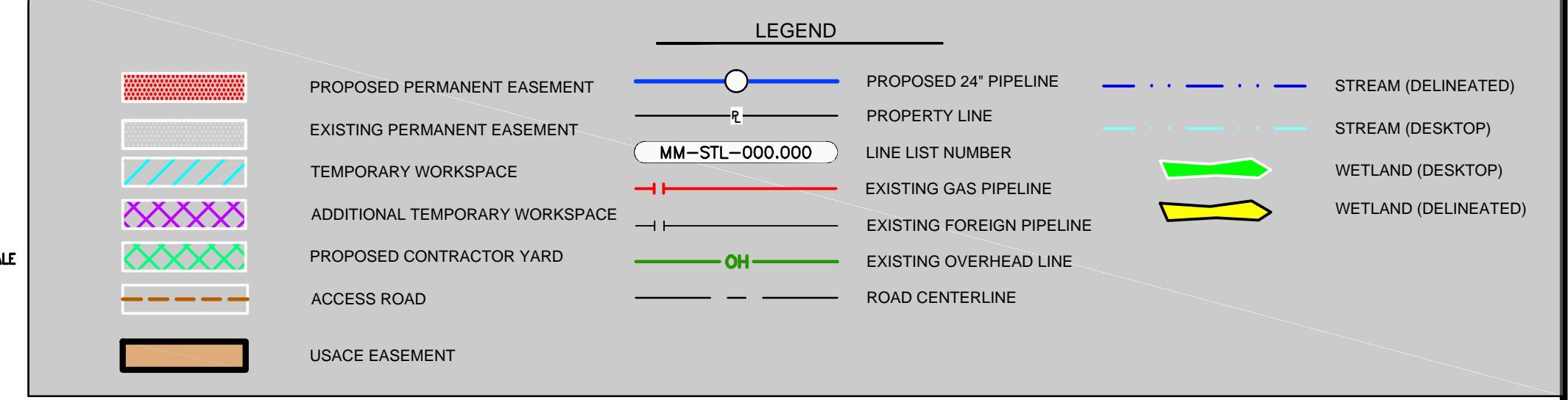
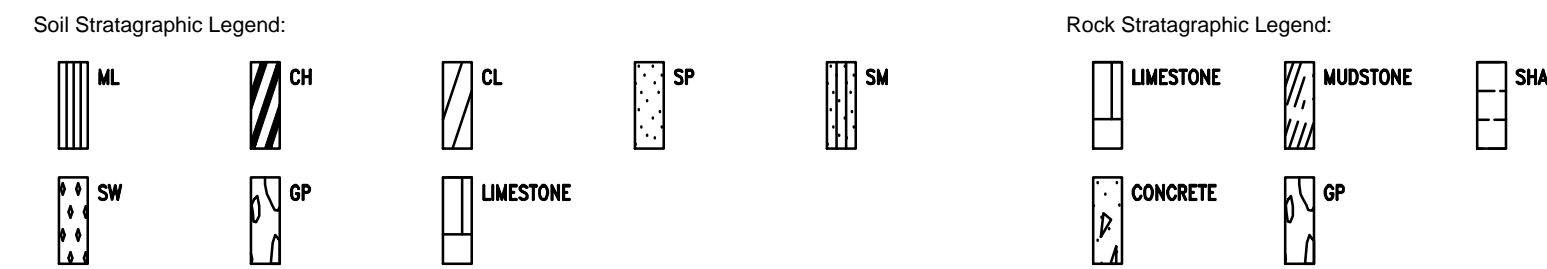
ST. CHARLES & ST. LOUIS COUNTIES, MISSOURI



DRAFT CONCEPTUAL HDD NOTES:

1. THE HDD BORE PATH DEPICTED ON THIS DRAWING IS CONSIDERED "DRAFT CONCEPTUAL" AND IS SUBJECT TO CHANGE BASED ON GEOTECHNICAL DATA, TOPOGRAPHICAL SURVEY, AND/OR ADDITIONAL INFORMATION REGARDING BIOLOGICAL FEATURE DELINEATIONS. THE HDD BORE PATH WILL BE ISSUED AS "FINAL CONCEPTUAL" AFTER COLLECTION AND EVALUATION OF BOTH TOPOGRAPHICAL SURVEY AND GEOTECHNICAL DATA AND AFTER BIOLOGICAL FEATURE DELINEATIONS ARE FINAL.
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3. UPPER 200' OF HDD ANNUAL SPACE SHALL BE GROUTED WITH A BENTONITE/CEMENT MIXTURE.
4. THE PILOT BORE WILL BE EITHER 10.625" OR 12.25" IN DIAMETER. THE FINAL REAMED HOLE DIAMETER IS ANTICIPATED TO BE 36". THE NUMBER OF REAMING PASSES WILL BE DETERMINED BY THE CONTRACTOR SELECTED FOR THE WORK.

MISSOURI RIVER HDD PLAN VIEW



**PRELIMINARY DRAFT
FOR REVIEW AND COMMENT ONLY
11/23/2016**

- NOTES:
1. THE IMAGERY SHOWN WAS PROVIDED BY AERIAL DATA SERVICES, 2016. ADDITIONAL IMAGERY SUPPLEMENTED FROM USFWS-NWI AND USGS.
 2. EXISTING FEATURES SHOWN WERE SURVEYED BY MOTT MACDONALD AND DIGITIZED FROM IMAGERY. ALL LOCATIONS ARE APPROXIMATE AND SHALL BE VERIFIED BY CONTRACTOR.
 3. PROPERTY LINES DEPICTED ON THIS PLAN ARE BASED ON GIS TAX MAP DATA.

REFERENCE DRAWINGS		REFERENCE DRAWINGS		REVISIONS				REVISIONS				APPROVALS				PREPARED FOR		PREPARED BY		SPIRE STL PIPELINE PROJECT							
DWG. NO.	TITLE	DWG. NO.	TITLE	NO.	REVISIONS	DATE	DRAWN	CK	APPR	NO.	REVISIONS	DATE	DRAWN	CK	APPR	DRAWN BY	DATE	ENG. APPROVAL	DATE	CLIENT APPROVAL	DATE	Spire STL Pipeline		MOTT MACDONALD		HDD PROFILE OVERVIEW MISSOURI RIVER MAINLINE ST. CHARLES & ST. LOUIS COUNTIES, MISSOURI	

Ali Trunzo

From: Lori Ferry
Sent: Thursday, November 10, 2016 5:16 PM
To: Ali Trunzo
Subject: FW: Army Corp Cost Reimbursement Agreement
Attachments: Spire Pipeline Section 408 MOA 214 Agreement - Spire Pipe comments 11.8.2016.docx; 2352_Funding_to_process_permits.pdf

From: Jayme Fuller
Sent: Thursday, November 10, 2016 3:30 PM
To: Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>
Cc: Douglas Sipe (dsipe@mdmcorp.com) <dsipe@mdmcorp.com>; Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: FW: Army Corp Cost Reimbursement Agreement

Hi Ed,

Please see the attached comments/edits to the MOA 214 Agreement provided by Spire's General Council.

Please let us know if you have questions, or we can plan to discuss at our November 30th meeting.

Thanks

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

Charleston Office | 300 Summers Street, Suite 1100, Charleston WV 25301

Indianapolis Office | 6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 |     

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GAI Consultants, Inc.

Chicago Office
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 Aurora, IL 60505
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Letter of Transmittal

TRANSMITTAL NO.	T008
DATE:	11/1/2016
PROJECT NO.	E160438.00, Task 003

United States Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, Missouri 63103-2833
Attention: Dr. Teri Allen

PROJECT TITLE:
Spire STL Pipeline Project
Spire STL Pipeline LLC
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

SUBJECT:
PF16-9-000
Federal Energy Regulatory Commission
Draft Environmental Report

WE ARE SENDING YOU: Electronic Files
VIA: Next Day Delivery
PURPOSE: For Your Use

COMMENTS:

ATTACHMENTS:

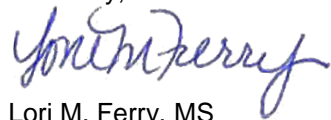
Quantity	Document No.	Rev.	Document Date	Document Description/Title	Status*
1 CD	-	-	October 2016	Draft Environmental Report	-

*Status Codes for Submittal Package Reviews: NE=No Exceptions; EN=Exceptions Noted; RR=Revise & Resubmit; RJ=Rejected

DISTRIBUTION:

Name	Company	Transmittal (Y/N)	Attachments (Y/N)
Mr. Scott Jaskowiak	Spire Inc.	Y	N
Mr. David Yonce	Spire Inc.	Y	N
Mr. Russell English	Spire Inc.	Y	N

Sincerely,



Lori M. Ferry, MS
 Environmental Manager

Ali Trunzo

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

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 | 300 Summers Street, Suite 1100, Charleston WV 25301

Indianapolis Office | 6420 Castleway West, Indianapolis, IN 46250

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Ali Trunzo

From: Prebianca, Jacob MVS <Jacob.A.Prebianca@usace.army.mil>
Sent: Wednesday, October 12, 2016 12:22 PM
To: Jayme Fuller
Cc: Lori Ferry; Ali Trunzo; Rankins, Jonathan E MVS
Subject: RE: Spire STL Pipeline

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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

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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

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Please let me know when your team may be able to sample this location, if is needed at all.

Thanks!

Jayne L. Fuller, Environmental Manager

GAI Consultants, Inc.

Charleston Office | 300 Summers Street, Suite 1100, Charleston WV 25301

Indianapolis Office | 6420 Castleway West, Indianapolis, IN 46250

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Ali Trunzo

From: Lori Ferry
Sent: Friday, October 14, 2016 4:41 PM
To: Ali Trunzo
Subject: FW: MVS-2016-582 NW_ 6+33 SPIRE STL Pipeline Geotechnical Borings

-----Original Message-----

From: Meyer, David P MVS [mailto:David.P.Meyer@usace.army.mil]
Sent: Friday, October 07, 2016 1:07 PM
To: Allen, Teri C MVS <Teri.C.Allen@usace.army.mil>; Hoerner, Melissa L MVS <Melissa.L.Hoerner@usace.army.mil>; Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>; Deutsch, Charles W (Charlie) MVS <Charlie.Deutsch@usace.army.mil>; Irwin, Mike <mike.irwin@dnr.mo.gov>; Daniels, Jason <Daniels.Jason@epa.gov>; Deel, Judith MVS External Stakeholder <Judith.Deel@dnr.mo.gov>; Simmons, Bryan <bryan_simmons@fws.gov>; Beres, Audrey <Audrey.Beres@mdc.mo.gov>; Diedrichsen, Mike IDNR, OWR: <mike.diedrichsen@illinois.gov>; Epa.401.bow@illinois.gov; S. Xiah Kragie <Sheila.Kragie@ferc.gov>; kevin.bowman@ferc.gov; Jen Ward <JLWard@edge-es.com>; HTLoveday@edge-es.com; Russell.English@spireenergy.com; Lori Ferry <L.Ferry@gaiconsultants.com>; Jayme Fuller <J.Fuller@gaiconsultants.com>; dsipe@mdmcorp.com; llocher@mmdcopr.com; summerlin.joe@epa.gov; Laszewski.Virginia@epa.gov; chase_allred@fws.gov; trisha_crabill@fws.gov; kristen_lundh@fws.gov; terry.savko@illinois.gov; Malone, Pat <pat.malone@illinois.gov>; joe.phillippe@illinois.gov
Subject: MVS-2016-582 NW_ 6+33 SPIRE STL Pipeline Geotechnical Borings

All,

Since you are all involved in the Spire STL bi-weekly pipeline coordination effort, please retain this information for your records. Attached is the permit verification letter for the proposed geotechnical borings that will be performed within the confluence region of the Mississippi and Missouri Rivers. Also, the permit conditions and Corps Section 408 authorization has been attached as well.

If you have any further questions please let me know, Thank you.

David Meyer
U.S. Army Corps of Engineers
St. Louis District, Regulatory Branch
1222 Spruce St.
St. Louis, Missouri 63103
314.331.8810



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
ST. LOUIS DISTRICT CORPS OF ENGINEERS
1222 SPRUCE STREET
ST. LOUIS, MISSOURI 63103-2833

October 7, 2016

Regulatory Branch
File Number: MVS-2016-582

Spire
700 Market Street
St. Louis, Missouri 63101

To Whom It May Concern:

We have reviewed your submittal dated August 19, 2016, in regard to the utilization of a temporary work barge and drilling rig to complete exploratory borings, as part of a geotechnical survey workplan for the proposed Spire STL Pipeline in Scott, Green and Jersey County, Illinois, as well as St. Charles and St. Louis County, Missouri. Several geotechnical soil test borings are proposed to collect location-specific information to evaluate the feasibility, design, and constructability of horizontal directional drill (HDD) methods of pipeline installation under the Mississippi and Missouri Rivers, as well as on land and along the river bottoms. In addition, several borings will be conducted between the Missouri and Mississippi River to determine if buoyancy controls are necessary along locations where the pipe is installed using conventional trenching and installation.

The following numbers of borings are anticipated for evaluation of each proposed crossing alternative:

- Missouri River HDD Crossing -- Mainline Evaluation:
 - Two (2) land borings each to 100 feet below existing ground surface.
 - One (1) river boring to 150 feet below top of water (100 feet below mudline)
- Missouri River HDD Crossing – Alternative Evaluation:
 - One (1) land boring to 100 feet below existing ground surface
 - One (1) land boring to 200 feet below existing ground surface
- Mississippi River HDD Crossing -- Mainline Evaluation:
 - Two (2) land borings, each 150 feet below existing ground surface.
 - Two (2) river borings, each 190 feet below top of water (150 feet below mudline)
- Shallow Borings to Evaluate Buoyancy Controls:

- o Four (4) land borings, each 15 feet below existing ground surface

The following table represents boring locations for river crossings:

Spire Pipeline Boring Locations			
Crossing	Boring	Latitude (°N)	Longitude (°W)
Missouri Mainline	B-MISUR-1	38.849394	90.237683
	B-MISUR-2	38.845706	90.242744
	B-MISUR-3	38.843142	90.242344
Missouri Alternative	B-MISUR-1	38.849875	90.238294
	B-MISUR-2	<i>Same as Mainline</i>	<i>Same as Mainline</i>
	B-MISUR-3	38.842989	90.247136
Mississippi Mainline	B-MISIP-1	38.956783	90.374006
	B-MISIP-2	38.952886	90.375911
	B-MISIP-3	38.949100	90.378367
	B-MISIP-4	38.944725	90.382308

Note: The location of land borings to support buoyancy evaluation are not included in the table as the location may change due to landowner access during the time of the investigation. However, the borings are anticipated to be conducted approximately equi-distant along the land area bounded between both Missouri and Mississippi River crossings along the pipeline alignment.

The project may result in minor wetland impacts and any test sites located near a levee system will be backfilled with grout. The project will not require any vegetation clearing and will not require fill to be placed within streams or wetlands associated with temporary construction access. It is anticipated that the work barge will be launched from Hideaway Harbor Park, Portage Des, Sioux, Missouri to complete the water-based bores within the Mississippi and Missouri Rivers.

Section 10 of the Rivers and Harbors Act assigns responsibility to the Secretary of the Army to regulate virtually any construction, excavation, or deposition of materials in, over, or under navigable waters of the United States, or any work that could affect the course, location, condition, or capacity of those waters. This ensures that no activity shall impede or interrupt commercial navigation. This office has jurisdiction to investigate and enforce Section 10 waters within the St. Louis District boundaries. The Mississippi and Missouri Rivers possess an ordinary high water elevation at the locations and are considered navigable waters of the United States. Therefore, the temporary mooring of a barge and survey activities requires authorization under Section 10 of the Rivers and Harbors Act from this office.

The Corps of Engineers has determined that this activity is authorized under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act by two existing Department of the Army nationwide permits for Temporary Construction, Access and Dewatering and Survey Activities, as described in the February 21, 2012, Federal Register, Reissuance of Nationwide Permits; Notice (72 FR 10278), Appendix A (B)(33) and Notice (72 FR 10271)

Appendix A (B)(6). These NWP verifications are valid until March 18, 2017, which is the expiration date for the NWP. Should your project plans change, or if your activity is not complete by March 18, 2017, you must contact this office in writing for another permit determination. We will issue a public notice when the NWPs are reissued. Furthermore, if you commence or are under contract to commence the authorized activity before March 18, 2017, you will have twelve (12) months from that date to complete the activity under the present terms and conditions of this NWP. If you need more than one additional year to complete the authorized activity, or if work has not commenced and is not under contract to commence, you will need to get a new verification under the 2017 NWPs or have the remaining work authorized by another type of DA Permit. **The District Engineer has further conditioned the permit to include the following special conditions:**

- 1. The permittee understands and agrees that, if future operation by the United States require the removal, relocation, or other alteration, of the barge structure or work herein authorized, or if, in the opinion of the Secretary of the Army or his authorized representative, said structures of work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the Corps of Engineers, to remove, relocate, or alter the structural work obstructions caused thereby, without expense to the United States. No claim shall be made against the United States on account of any such removal or alteration.**
- 2. The permitted activities shall not prohibit or interfere with future work, construction of weirs, or dikes, undertaken by the United States Government for navigation purposes, nor shall the United States Government be held liable for any changed conditions resulting from the installation of weirs, dikes, revetment, etc.**
- 3. The permittee shall comply with all lightings or other conditions required by the United States Coast Guard to mark the permitted structures. The United States Coast Guard, Marine Safety Office, can be contacted at 1222 Spruce Street, St. Louis, Missouri 63103-2832 for further information.**
- 4. During the mooring of the barge, you shall comply with all U.S. Coast Guard and Corps of Engineers regulations concerning the prevention of navigation obstructions in navigable "Waters of the United States". You shall conduct operations in the river such that there will be no unreasonable interference with navigation.**
- 5. The approved temporary barge shall be removed, at no cost to the United States Government, when deemed necessary for actions required by the United States Government (bankline repairs, construction of new structures, dredging, etc.).**

The Missouri Department of Natural Resources Water Protection Program (MDNR/WPP) has conditionally issued general Section 401 Water Quality Certification for this nationwide permit, subject to special conditions (see enclosure). These conditions are part of the Corps permit. If

you have any questions regarding the water quality certification conditions, you may call Mr. Mike Irwin, MDNR/WPP, at (573) 522-1131.

The Illinois Environmental Protection Agency Division of Water Pollution Control (IEPA/WPC) has conditionally issued general Section 401 Water Quality Certification for this nationwide permit, subject to the special conditions and three general conditions (see enclosure). These conditions are part of the Corps permit. If you have any questions regarding the water quality certification conditions, you may call Mr. Dan Heacock, IEPA/WPC, at 217-782-3362.

In accordance with General Condition number 30 of the Nationwide Permit, a compliance certification (Attachment A of this package) must be completed within 30 days of project completion or the permit issuance may be revoked and considered null and void.

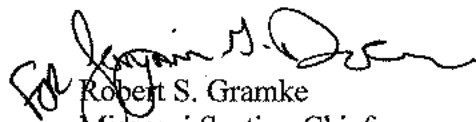
This determination is applicable only to the permit program administered by the Corps of Engineers. It does not eliminate the need to obtain other federal, state or local approvals before beginning work. This permit verification does not convey property rights, nor authorize any injury to property or invasion of other rights.

You are reminded that the permit is based on submitted plans. Variations from these plans shall constitute a violation of Federal law and may result in the revocation of the permit. If this nationwide permit is modified, reissued, or revoked during this period, the provisions described at 33 CFR 330.6(b) will apply.

The jurisdictional determination for this project is considered a preliminary jurisdictional determination (PJD) in accordance with Corps regulations at 33 CFR Part 331. A PJD is an expedited determination that does not require interagency coordination, but is also not appealable. If you consent to the findings of this PJD, please sign and date the enclosed *Preliminary Jurisdictional Determination Form* and return it to this office at the letterhead address. If you do not agree with the PJD, you may request an Approved Jurisdictional Determination, which may be appealed, by contacting our office for further instruction.

If you have any questions, please contact David Meyer at (314) 331-8810. Please refer to file number **MVS-2016-582**. The St. Louis District Regulatory Branch is committed to providing quality and timely service to our customers. In an effort to improve customer service, please take a moment to go to our Customer Service Survey found on our web site at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey.

Sincerely,


Robert S. Gramke
Missouri Section Chief
Regulatory Branch

Copy Furnished: (electronically)

Ms. Teri Allen, U.S. Army Corps of Engineers
Ms. Lynn Hoerner, U.S. Army Corps of Engineers
Mr. Ed Rodriguez Robles, U.S. Army Corps of Engineers
Mr. Charles Deutsch, U.S. Army Corps of Engineers
Mr. Mike Irwin, MDNR-Water Protection Program
Mr. Jason Daniels, U.S. Environmental Protection Agency
Ms. Judith Deel, MDNR-State Historic Preservation Office
Mr. Bryan Simmons U.S. Fish & Wildlife Service
Ms. Audrey Beres, Missouri Department of Conservation
Mr. Mike Diedrichsen, IDNR-OWR
Mr. Dan Heacock, IEPA
Ms. Xiah Kragie, Federal Energy Regulatory Commission
Mr. Kevin Bowman, Federal Regulatory Commission
Ms. Jennifer Ward, Edge Engineering and Science
Mr. Trevor Loveday, Edge Engineering and Science
Mr. Russ English, Spire STL Pipeline LLC
Ms. Lori, Ferry, GAI Consultants
Ms. Jayme Fuller, GAI Consultants
Mr. Doug Sipe, MDM Corp.
Mr. Loren Locher, MDM Corp.
Mr. Joe Summerlin, U.S. Environmental Protection Agency
Ms. Virginia Laszewski, U.S. Environmental Protection Agency
Mr. Chase Allred, U.S Fish & Wildlife Service
Ms. Trisha Crabill, U.S. Fish & Wildlife Service
Ms. Kristen Lundh, U.S. Fish & Wildlife Service
Ms. Terry Savko, Illinois Department of Agriculture
Ms. Pat Malone, Illinois Department of Natural Resources
Mr. Joe Phillipe, Illinois Historic Preservation Office

ATTACHMENT A

COMPLETED WORK CERTIFICATION

Date of Issuance: October 7, 2016

File Number: MVS-2016-582

Name of Permittee: Spire

River Basin/County/State: Mississippi and Missouri/Scott Co., Greene Co., Jersey Co. & St. Charles Co., St. Louis Co./ Illinois, Missouri

Project Manager: David Meyer

Upon completion of this activity authorized by this permit and any mitigation required by the permit, sign this certification and return it to the following address:

**U.S. Army Corps of Engineers
Attn: Regulatory Branch (OD-F)
1222 Spruce Street
St. Louis, Missouri 63103-2833**

(Please note that your permitted activity is subject to a compliance inspection by a U.S. Army Corps of Engineers representative. If you fail to comply with this permit, you are subject to permit suspension, modification or revocation.)

I hereby certify that the work authorized by the above referenced permit has been completed in accordance with the terms and conditions of the said permit, and required mitigation was completed in accordance with the permit conditions.

Signature of Permittee

Date

Nationwide Permit Summary

U.S Army Corps
Of Engineers
St. Louis District

No. 33, TEMPORARY CONSTRUCTION, ACCESS AND DEWATERING

(NWP Final Notice: 77 FR 10278)

Temporary structures, work, and discharges, including cofferdams, necessary for construction activities or access fills or dewatering of construction sites, provided that the associated primary activity is authorized by the Corps of Engineers or the U.S. Coast Guard. This NWP also authorizes temporary structures, work, and discharges, including cofferdams, necessary for construction activities not otherwise subject to the Corps or U.S. Coast Guard permit requirements. Appropriate measures must be taken to maintain near normal downstream flows and to minimize flooding. Fill must consist of materials, and be placed in a manner, that will not be eroded by expected high flows. The use of dredged material may be allowed if the district engineer determines that it will not cause more than minimal adverse effects on aquatic resources. Following completion of construction, temporary fill must be entirely removed to an area that has no waters of the United States, dredged material must be returned to its original location, and the affected areas must be restored to pre-construction elevations. The affected areas must also be revegetated, as appropriate. This permit does not authorize the use of cofferdams to dewater wetlands or other aquatic areas to change their use. Structures left in place after construction is completed require a separate section 10 permit if located in navigable waters of the United States. (See 33 CFR part 322.)

Notification: The permittee must submit a pre-construction notification to the district engineer prior to commencing the activity (see general condition 31). The pre-construction notification must include a restoration plan showing how all temporary fills and structures will be removed and the area restored to pre-project conditions. (Sections 10 and 404)

NATIONWIDE PERMIT CONDITIONS

Note: To qualify for NWP authorization, the prospective permittee must comply with the following general conditions, as applicable, in addition to any regional or case-specific conditions imposed by the division engineer or district engineer. Prospective permittees should contact the appropriate Corps district office to determine if regional conditions have been imposed on an NWP. Prospective permittees should also contact the appropriate Corps district office to determine the status of Clean Water Act Section 401 water quality certification and/ or Coastal Zone Management Act consistency for an NWP. Every person who may wish to obtain permit authorization under one or more NWPs, or who is currently relying on an existing or prior permit authorization under one or more NWPs, has been and is on notice that all of the provisions of 33 CFR 330.1 through 330.6 apply to every NWP authorization. Note especially 33 CFR 330.5 relating to the modification, suspension, or revocation of any NWP authorization.

1. Navigation. (a) No activity may cause more than a minimal adverse effect on navigation.

(b) Any safety lights and signals prescribed by the U.S. Coast Guard, through regulations or otherwise, must be installed and maintained at the permittee's expense on authorized facilities in navigable waters of the United States.

(c) The permittee understands and agrees that, if future operations by the United States require the removal, relocation, or other alteration, of the structure or work herein authorized, or if, in the opinion of the Secretary of the Army or his authorized representative, said structure or work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the Corps of Engineers, to remove, relocate, or alter the structural work or obstructions caused thereby, without expense to the United States. No claim shall be made against the United States on account of any such removal or alteration.

2. Aquatic Life Movements. No activity may substantially disrupt the necessary life cycle movements of those species of aquatic life indigenous to the waterbody, including those species that normally migrate through the area, unless the activity's primary purpose is to impound water. All permanent and temporary crossings of waterbodies shall be suitably culverted, bridged, or otherwise designed and constructed to maintain low flows to sustain the movement of those aquatic species.

3. Spawning Areas. Activities in spawning areas during spawning seasons must be avoided to the maximum extent practicable. Activities that result in the physical destruction (e.g., through excavation, fill, or downstream smothering by substantial turbidity) of an important spawning area are not authorized.

4. Migratory Bird Breeding Areas. Activities in waters of the United States that serve as breeding areas for migratory birds must be avoided to the maximum extent practicable.

5. Shellfish Beds. No activity may occur in areas of concentrated shellfish populations, unless the activity is directly related to a shellfish harvesting activity authorized by NWPs 4 and 48, or is a shellfish seeding or habitat restoration activity authorized by NWP 27.

6. Suitable Material. No activity may use unsuitable material (e.g., trash, debris, car bodies, asphalt, etc.). Material used for construction or discharged must be free from toxic pollutants in toxic amounts (see Section 307 of the Clean Water Act).

7. Water Supply Intakes. No activity may occur in the proximity of a public water supply intake, except where the activity is for the repair or improvement of public water supply intake structures or adjacent bank stabilization.

8. Adverse Effects From Impoundments. If the activity creates an impoundment of water, adverse effects to the aquatic system due to accelerating the passage of water, and/or restricting its flow must be minimized to the maximum extent practicable.

9. Management of Water Flows. To the maximum extent practicable, the pre-construction course, condition, capacity, and location of open waters must be maintained for each activity, including stream channelization and storm water management activities, except as provided below. The activity must be constructed to withstand expected high flows. The activity must not restrict or impede the passage of normal or high flows, unless the primary purpose of the activity is to impound water or manage high flows. The activity may alter the pre-construction course, condition, capacity, and location of

open waters if it benefits the aquatic environment (e.g., stream restoration or relocation activities).

10. Fills Within 100-Year Floodplains. The activity must comply with applicable FEMA-approved state or local floodplain management requirements.

11. Equipment. Heavy equipment working in wetlands or mudflats must be placed on mats, or other measures must be taken to minimize soil disturbance.

12. Soil Erosion and Sediment Controls. Appropriate soil erosion and sediment controls must be used and maintained in effective operating condition during construction, and all exposed soil and other fills, as well as any work below the ordinary high water mark or high tide line, must be permanently stabilized at the earliest practicable date. Permittees are encouraged to perform work within waters of the United States during periods of low-flow or no-flow.

13. Removal of Temporary Fills. Temporary fills must be removed in their entirety and the affected areas returned to pre-construction elevations. The affected areas must be revegetated, as appropriate.

14. Proper Maintenance. Any authorized structure or fill shall be properly maintained, including maintenance to ensure public safety, and compliance with applicable NWP general conditions, as well as any activity-specific conditions added by the district engineer to an NWP authorization.

15. Single and Complete Project. The activity must be a single and complete project. The same NWP cannot be used more than once for the same single and complete project.

16. Wild and Scenic Rivers. No activity may occur in a component of the National Wild and Scenic River System, or in a river officially designated by Congress as a "study river" for possible inclusion in the system while the river is in an official study status, unless the appropriate Federal agency with direct management responsibility for such river, has determined in writing that the proposed activity will not adversely affect the Wild and Scenic River designation or study status. Information on Wild and Scenic Rivers may be obtained from the appropriate Federal land management agency responsible for the designated Wild and Scenic River or study river (e.g., National Park Service, U.S. Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service).

17. Tribal Rights. No activity or its operation may impair reserved tribal rights, including, but not limited to, reserved water rights and treaty fishing and hunting rights.

18. Endangered Species. (a) No activity is authorized under any NWP which is likely to directly or indirectly jeopardize the continued existence of a threatened or endangered species or a species proposed for such designation, as identified under the Federal Endangered Species Act (ESA), or which will directly or indirectly destroy or adversely modify the critical habitat of such species. No activity is authorized under any NWP which "may affect" a listed species or critical habitat, unless Section 7 consultation addressing the effects of the proposed activity has been completed.

(b) Federal agencies should follow their own procedures for complying with the requirements of the ESA. Federal permittees must provide the district engineer with the appropriate documentation to demonstrate compliance with those requirements. The district engineer will review the documentation and determine whether it is sufficient to address ESA compliance for the NWP activity, or whether additional ESA consultation is necessary.

(c) Non-federal permittees must submit a pre-construction notification to the district engineer if any listed species or designated

critical habitat might be affected or is in the vicinity of the project, or if the project is located in designated critical habitat, and shall not begin work on the activity until notified by the district engineer that the requirements of the ESA have been satisfied and that the activity is authorized. For activities that might affect Federally-listed endangered or threatened species or designated critical habitat, the pre-construction notification must include the name(s) of the endangered or threatened species that might be affected by the proposed work or that utilize the designated critical habitat that might be affected by the proposed work. The district engineer will determine whether the proposed activity "may affect" or will have "no effect" to listed species and designated critical habitat and will notify the non-Federal applicant of the Corps' determination within 45 days of receipt of a complete pre-construction notification. In cases where the non-Federal applicant has identified listed species or critical habitat that might be affected or is in the vicinity of the project, and has so notified the Corps, the applicant shall not begin work until the Corps has provided notification the proposed activities will have "no effect" on listed species or critical habitat, or until Section 7 consultation has been completed. If the non-Federal applicant has not heard back from the Corps within 45 days, the applicant must still wait for notification from the Corps.

(d) As a result of formal or informal consultation with the FWS or NMFS the district engineer may add species-specific regional endangered species conditions to the NWPs.

(e) Authorization of an activity by a NWP does not authorize the "take" of a threatened or endangered species as defined under the ESA. In the absence of separate authorization (e.g., an ESA Section 10 Permit, a Biological Opinion with "incidental take" provisions, etc.) from the U.S. FWS or the NMFS, The Endangered Species Act prohibits any person subject to the jurisdiction of the United States to take a listed species, where "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. The word "harm" in the definition of "take" means an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.

(f) Information on the location of threatened and endangered species and their critical habitat can be obtained directly from the offices of the U.S. FWS and NMFS or their world web pages at <http://www.fws.gov/> or <http://www.fws.gov/ipac> and <http://www.noaa.gov/fisheries.html> respectively.

19. Migratory Birds and Bald and Golden Eagles. The permittee is responsible for obtaining any "take" permits required under the U.S. Fish and Wildlife Service's regulations governing compliance with the Migratory Bird Treaty Act or the Bald and Golden Eagle Protection Act. The permittee should contact the appropriate local office of the U.S. Fish and Wildlife Service to determine if such "take" permits are required for a particular activity.

20. Historic Properties. (a) In cases where the district engineer determines that the activity may affect properties listed, or eligible for listing, in the National Register of Historic Places, the activity is not authorized, until the requirements of Section 106 of the National Historic Preservation Act (NHPA) have been satisfied.

(b) Federal permittees should follow their own procedures for complying with the requirements of Section 106 of the National Historic Preservation Act. Federal permittees must provide the district engineer with the appropriate documentation to demonstrate compliance with those requirements. The district engineer will review the documentation and determine whether it is sufficient to address section 106 compliance for the NWP activity, or whether additional section 106 consultation is necessary.

(c) Non-federal permittees must submit a pre-construction notification to the district engineer if the authorized activity may have the potential to cause effects to any historic properties listed on, determined to be eligible for listing on, or potentially eligible for listing on the National Register of Historic Places, including previously

unidentified properties. For such activities, the pre-construction notification must state which historic properties may be affected by the proposed work or include a vicinity map indicating the location of the historic properties or the potential for the presence of historic properties. Assistance regarding information on the location of or potential for the presence of historic resources can be sought from the State Historic Preservation Officer or Tribal Historic Preservation Officer, as appropriate, and the National Register of Historic Places (see 33 CFR 330.4(g)). When reviewing pre-construction notifications, district engineers will comply with the current procedures for addressing the requirements of Section 106 of the National Historic Preservation Act. The district engineer shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey. Based on the information submitted and these efforts, the district engineer shall determine whether the proposed activity has the potential to cause an effect on the historic properties. Where the non-Federal applicant has identified historic properties on which the activity may have the potential to cause effects and so notified the Corps, the non-Federal applicant shall not begin the activity until notified by the district engineer either that the activity has no potential to cause effects or that consultation under Section 106 of the NHPA has been completed.

(d) The district engineer will notify the prospective permittee within 45 days of receipt of a complete pre-construction notification whether NHPA Section 106 consultation is required. Section 106 consultation is not required when the Corps determines that the activity does not have the potential to cause effects on historic properties (see 36 CFR 800.3(a)). If NHPA section 106 consultation is required and will occur, the district engineer will notify the non-Federal applicant that he or she cannot begin work until Section 106 consultation is completed. If the non-Federal applicant has not heard back from the Corps within 45 days, the applicant must still wait for notification from the Corps.

(e) Prospective permittees should be aware that section 110k of the NHPA (16 U.S.C. 470h–2(k)) prevents the Corps from granting a permit or other assistance to an applicant who, with intent to avoid the requirements of Section 106 of the NHPA, has intentionally significantly adversely affected a historic property to which the permit would relate, or having legal power to prevent it, allowed such significant adverse effect to occur, unless the Corps, after consultation with the Advisory Council on Historic Preservation (ACHP), determines that circumstances justify granting such assistance despite the adverse effect created or permitted by the applicant. If circumstances justify granting the assistance, the Corps is required to notify the ACHP and provide documentation specifying the circumstances, the degree of damage to the integrity of any historic properties affected, and proposed mitigation. This documentation must include any views obtained from the applicant, SHPO/THPO, appropriate Indian tribes if the undertaking occurs on or affects historic properties on tribal lands or affects properties of interest to those tribes, and other parties known to have a legitimate interest in the impacts to the permitted activity on historic properties.

21. Discovery of Previously Unknown Remains and Artifacts. If you discover any previously unknown historic, cultural or archeological remains and artifacts while accomplishing the activity authorized by this permit, you must immediately notify the district engineer of what you have found, and to the maximum extent practicable, avoid construction activities that may affect the remains and artifacts until the required coordination has been completed. The district engineer will initiate the Federal, Tribal and state coordination required to determine if the items or remains warrant a recovery effort or if the site is eligible for listing in the National Register of Historic Places.

22. Designated Critical Resource Waters. Critical resource waters include, NOAA-managed marine sanctuaries and marine monuments, and National Estuarine Research Reserves. The district engineer may designate, after notice and opportunity for public comment, additional

waters officially designated by a state as having particular environmental or ecological significance, such as outstanding national resource waters or state natural heritage sites. The district engineer may also designate additional critical resource waters after notice and opportunity for public comment.

(a) Discharges of dredged or fill material into waters of the United States are not authorized by NWP 7, 12, 14, 16, 17, 21, 29, 31, 35, 39, 40, 42, 43, 44, 49, 50, 51, and 52 for any activity within, or directly affecting, critical resource waters, including wetlands adjacent to such waters.

(b) For NWPs 3, 8, 10, 13, 15, 18, 19, 22, 23, 25, 27, 28, 30, 33, 34, 36, 37, and 38, notification is required in accordance with general condition 31, for any activity proposed in the designated critical resource waters including wetlands adjacent to those waters. The district engineer may authorize activities under these NWPs only after it is determined that the impacts to the critical resource waters will be no more than minimal.

23. Mitigation. The district engineer will consider the following factors when determining appropriate and practicable mitigation necessary to ensure that adverse effects on the aquatic environment are minimal:

(a) The activity must be designed and constructed to avoid and minimize adverse effects, both temporary and permanent, to waters of the United States to the maximum extent practicable at the project site (i.e., on site).

(b) Mitigation in all its forms (avoiding, minimizing, rectifying, reducing, or compensating for resource losses) will be required to the extent necessary to ensure that the adverse effects to the aquatic environment are minimal.

(c) Compensatory mitigation at a minimum one-for-one ratio will be required for all wetland losses that exceed 1/10 acre and require pre-construction notification, unless the district engineer determines in writing that either some other form of mitigation would be more environmentally appropriate or the adverse effects of the proposed activity are minimal, and provides a project-specific waiver of this requirement. For wetland losses of 1/10 acre or less that require pre-construction notification, the district engineer may determine on a case-by-case basis that compensatory mitigation is required to ensure that the activity results in minimal adverse effects on the aquatic environment. Compensatory mitigation projects provided to offset losses of aquatic resources must comply with the applicable provisions of 33 CFR part 332.

(1) The prospective permittee is responsible for proposing an appropriate compensatory mitigation option if compensatory mitigation is necessary to ensure that the activity results in minimal adverse effects on the aquatic environment.

(2) Since the likelihood of success is greater and the impacts to potentially valuable uplands are reduced, wetland restoration should be the first compensatory mitigation option considered.

(3) If permittee-responsible mitigation is the proposed option, the prospective permittee is responsible for submitting a mitigation plan. A conceptual or detailed mitigation plan may be used by the district engineer to make the decision on the NWP verification request, but a final mitigation plan that addresses the applicable requirements of 33 CFR 332.4(c)(2)–(14) must be approved by the district engineer before the permittee begins work in waters of the United States, unless the district engineer determines that prior approval of the final mitigation plan is not practicable or not necessary to ensure timely completion of the required compensatory mitigation (see 33 CFR 332.3(k)(3)).

(4) If mitigation bank or in-lieu fee program credits are the proposed option, the mitigation plan only needs to address the baseline conditions at the impact site and the number of credits to be provided.

(5) Compensatory mitigation requirements (e.g., resource type and amount to be provided as compensatory mitigation, site protection, ecological performance standards, monitoring requirements) may be addressed through conditions added to the

NWP authorization, instead of components of a compensatory mitigation plan.

(d) For losses of streams or other open waters that require pre-construction notification, the district engineer may require compensatory mitigation, such as stream rehabilitation, enhancement, or preservation, to ensure that the activity results in minimal adverse effects on the aquatic environment.

(e) Compensatory mitigation will not be used to increase the acreage losses allowed by the acreage limits of the NWPs. For example, if an NWP has an acreage limit of 1/2 acre, it cannot be used to authorize any project resulting in the loss of greater than 1/2 acre of waters of the United States, even if compensatory mitigation is provided that replaces or restores some of the lost waters. However, compensatory mitigation can and should be used, as necessary, to ensure that a project already meeting the established acreage limits also satisfies the minimal impact requirement associated with the NWPs.

(f) Compensatory mitigation plans for projects in or near streams or other open waters will normally include a requirement for the restoration or establishment, maintenance, and legal protection (e.g., conservation easements) of riparian areas next to open waters. In some cases, riparian areas may be the only compensatory mitigation required. Riparian areas should consist of native species. The width of the required riparian area will address documented water quality or aquatic habitat loss concerns. Normally, the riparian area will be 25 to 50 feet wide on each side of the stream, but the district engineer may require slightly wider riparian areas to address documented water quality or habitat loss concerns. If it is not possible to establish a riparian area on both sides of a stream, or if the waterbody is a lake or coastal waters, then restoring or establishing a riparian area along a single bank or shoreline may be sufficient. Where both wetlands and open waters exist on the project site, the district engineer will determine the appropriate compensatory mitigation (e.g., riparian areas and/or wetlands compensation) based on what is best for the aquatic environment on a watershed basis. In cases where riparian areas are determined to be the most appropriate form of compensatory mitigation, the district engineer may waive or reduce the requirement to provide wetland compensatory mitigation for wetland losses.

(g) Permittees may propose the use of mitigation banks, in-lieu fee programs, or separate permittee-responsible mitigation. For activities resulting in the loss of marine or estuarine resources, permittee-responsible compensatory mitigation may be environmentally preferable if there are no mitigation banks or in-lieu fee programs in the area that have marine or estuarine credits available for sale or transfer to the permittee. For permittee-responsible mitigation, the special conditions of the NWP verification must clearly indicate the party or parties responsible for the implementation and performance of the compensatory mitigation project, and, if required, its long-term management.

(h) Where certain functions and services of waters of the United States are permanently adversely affected, such as the conversion of a forested or scrub-shrub wetland to a herbaceous wetland in a permanently maintained utility line right-of-way, mitigation may be required to reduce the adverse effects of the project to the minimal level.

24. Safety of Impoundment Structures. To ensure that all impoundment structures are safely designed, the district engineer may require non-Federal applicants to demonstrate that the structures comply with established state dam safety criteria or have been designed by qualified persons. The district engineer may also require documentation that the design has been independently reviewed by similarly qualified persons, and appropriate modifications made to ensure safety.

25. Water Quality. Where States and authorized Tribes, or EPA where applicable, have not previously certified compliance of an NWP with CWA Section 401, individual 401 Water Quality Certification must be obtained or waived (see 33 CFR 330.4(c)). The district engineer or State or Tribe may require additional water quality management measures to ensure that the authorized activity does not result in more than minimal degradation of water quality.

26. Coastal Zone Management. In coastal states where an NWP has not previously received a state coastal zone management consistency concurrence, an individual state coastal zone management consistency concurrence must be obtained, or a presumption of concurrence must occur (see 33 CFR 330.4(d)). The district engineer or a State may require additional measures to ensure that the authorized activity is consistent with state coastal zone management requirements.

27. Regional and Case-By-Case Conditions. The activity must comply with any regional conditions that may have been added by the Division Engineer (see 33 CFR 330.4(e)) and with any case specific conditions added by the Corps or by the state, Indian Tribe, or U.S. EPA in its section 401 Water Quality Certification, or by the state in its Coastal Zone Management Act consistency determination.

28. Use of Multiple Nationwide Permits. The use of more than one NWP for a single and complete project is prohibited, except when the acreage loss of waters of the United States authorized by the NWPs does not exceed the acreage limit of the NWP with the highest specified acreage limit. For example, if a road crossing over tidal waters is constructed under NWP 14, with associated bank stabilization authorized by NWP 13, the maximum acreage loss of waters of the United States for the total project cannot exceed 1/3-acre.

29. Transfer of Nationwide Permit Verifications. If the permittee sells the property associated with a nationwide permit verification, the permittee may transfer the nationwide permit verification to the new owner by submitting a letter to the appropriate Corps district office to validate the transfer. A copy of the nationwide permit verification must be attached to the letter, and the letter must contain the following statement and signature: "When the structures or work authorized by this nationwide permit are still in existence at the time the property is transferred, the terms and conditions of this nationwide permit, including any special conditions, will continue to be binding on the new owner(s) of the property. To validate the transfer of this nationwide permit and the associated liabilities associated with compliance with its terms and conditions, have the transferee sign and date below."

(Transferee)

(Date)

30. Compliance Certification. Each permittee who receives an NWP verification letter from the Corps must provide a signed certification documenting completion of the authorized activity and any required compensatory mitigation. The success of any required permittee-responsible mitigation, including the achievement of ecological performance standards, will be addressed separately by the district engineer. The Corps will provide the permittee the certification document with the NWP verification letter. The certification document will include:

(a) A statement that the authorized work was done in accordance with the NWP authorization, including any general, regional, or activity-specific conditions;

(b) A statement that the implementation of any required compensatory mitigation was completed in accordance with the permit

conditions. If credits from a mitigation bank or in-lieu fee program are used to satisfy the compensatory mitigation requirements, the certification must include the documentation required by 33 CFR 332.3(l)(3) to confirm that the permittee secured the appropriate number and resource type of credits; and

(c) The signature of the permittee certifying the completion of the work and mitigation..

31. Pre-Construction Notification. (a) Timing. Where required by the terms of the NWP, the prospective permittee must notify the district engineer by submitting a pre-construction notification (PCN) as early as possible. The district engineer must determine if the PCN is complete within 30 calendar days of the date of receipt and, if the PCN is determined to be incomplete, notify the prospective permittee within that 30 day period to request the additional information necessary to make the PCN complete. The request must specify the information needed to make the PCN complete. As a general rule, district engineers will request additional information necessary to make the PCN complete only once. However, if the prospective permittee does not provide all of the requested information, then the district engineer will notify the prospective permittee that the PCN is still incomplete and the PCN review process will not commence until all of the requested information has been received by the district engineer. The prospective permittee shall not begin the activity until either:

(1) He or she is notified in writing by the district engineer that the activity may proceed under the NWP with any special conditions imposed by the district or division engineer; or

(2) 45 calendar days have passed from the district engineer's receipt of the complete PCN and the prospective permittee has not received written notice from the district or division engineer. However, if the permittee was required to notify the Corps pursuant to general condition 18 that listed species or critical habitat might be affected or in the vicinity of the project, or to notify the Corps pursuant to general condition 20 that the activity may have the potential to cause effects to historic properties, the permittee cannot begin the activity until receiving written notification from the Corps that there is "no effect" on listed species or "no potential to cause effects" on historic properties, or that any consultation required under Section 7 of the Endangered Species Act (see 33 CFR 330.4(f)) and/or Section 106 of the National Historic Preservation (see 33 CFR 330.4(g)) has been completed. Also, work cannot begin under NWPs 21, 49, or 50 until the permittee has received written approval from the Corps. If the proposed activity requires a written waiver to exceed specified limits of an NWP, the permittee may not begin the activity until the district engineer issues the waiver. If the district or division engineer notifies the permittee in writing that an individual permit is required within 45 calendar days of receipt of a complete PCN, the permittee cannot begin the activity until an individual permit has been obtained. Subsequently, the permittee's right to proceed under the NWP may be modified, suspended, or revoked only in accordance with the procedure set forth in 33 CFR 330.5(d)(2).

(b) Contents of Pre-Construction Notification: The PCN must be in writing and include the following information:

(1) Name, address and telephone numbers of the prospective permittee;

(2) Location of the proposed project;

(3) A description of the proposed project; the project's purpose; direct and indirect adverse environmental effects the project would cause, including the anticipated amount of loss of water of the United States expected to result from the NWP activity, in acres, linear feet, or other appropriate unit of measure; any other NWP(s), regional general permit(s), or individual permit(s) used or intended to be used to authorize any part of the proposed project or any related activity. The description should be sufficiently detailed to allow the district engineer to determine that the adverse effects of the project will be minimal and to determine the need for compensatory mitigation. Sketches should be provided when necessary to show that the activity complies with the terms of the NWP. (Sketches usually clarify the project and when provided results in a quicker decision. Sketches

should contain sufficient detail to provide an illustrative description of the proposed activity (e.g., a conceptual plan), but do not need to be detailed engineering plans);

(4) The PCN must include a delineation of wetlands, other special aquatic sites, and other waters, such as lakes and ponds, and perennial, intermittent, and ephemeral streams, on the project site. Wetland delineations must be prepared in accordance with the current method required by the Corps. The permittee may ask the Corps to delineate the special aquatic sites and other waters on the project site, but there may be a delay if the Corps does the delineation, especially if the project site is large or contains many waters of the United States. Furthermore, the 45 day period will not start until the delineation has been submitted to or completed by the Corps, as appropriate;

(5) If the proposed activity will result in the loss of greater than 1/10-acre of wetlands and a PCN is required, the prospective permittee must submit a statement describing how the mitigation requirement will be satisfied, or explaining why the adverse effects are minimal and why compensatory mitigation should not be required. As an alternative, the prospective permittee may submit a conceptual or detailed mitigation plan.

(6) If any listed species or designated critical habitat might be affected or is in the vicinity of the project, or if the project is located in designated critical habitat, for non-Federal applicants the PCN must include the name(s) of those endangered or threatened species that might be affected by the proposed work or utilize the designated critical habitat that may be affected by the proposed work. Federal applicants must provide documentation demonstrating compliance with the Endangered Species Act; and

(7) For an activity that may affect a historic property listed on, determined to be eligible for listing on, or potentially eligible for listing on, the National Register of Historic Places, for non-Federal applicants the PCN must state which historic property may be affected by the proposed work or include a vicinity map indicating the location of the historic property. Federal applicants must provide documentation demonstrating compliance with Section 106 of the National Historic Preservation Act.

(c) Form of Pre-Construction Notification: The standard individual permit application form (Form ENG 4345) may be used, but the completed application form must clearly indicate that it is a PCN and must include all of the information required in paragraphs (b)(1) through (7) of this general condition. A letter containing the required information may also be used.

(d) Agency Coordination: (1) The district engineer will consider any comments from Federal and state agencies concerning the proposed activity's compliance with the terms and conditions of the NWPs and the need for mitigation to reduce the project's adverse environmental effects to a minimal level.

(2) For all NWP activities that require pre-construction notification and result in the loss of greater than 1/2-acre of waters of the United States, for NWP 21, 29, 39, 40, 42, 43, 44, 50, 51, and 52 activities that require pre-construction notification and will result in the loss of greater than 300 linear feet of stream bed, and for all NWP 48 activities that require pre-construction notification, the district engineer will immediately provide (e.g., via email, facsimile transmission, overnight mail, or other expeditious manner) a copy of the complete PCN to the appropriate Federal or state offices (U.S. FWS, state natural resource or water quality agency, EPA, State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Office (THPO), and, if appropriate, the NMFS). With the exception of NWP 37, these agencies will have 10 calendar days from the date the material is transmitted to telephone or fax the district engineer notice that they intend to provide substantive, site-specific comments. The comments must explain why the agency believes the adverse effects will be more than minimal. If so contacted by an agency, the district engineer will wait an additional 15 calendar days before making a decision on the preconstruction notification. The district engineer will fully consider agency comments received within the specified time frame, concerning the proposed activity's compliance with the terms

and conditions of the NWP, including the need for mitigation to ensure the net adverse environmental effects to the aquatic environment of the proposed activity are minimal. The district engineer will provide no response to the resource agency, except as provided below. The district engineer will indicate in the administrative record associated with each pre-construction notification that the resource agencies' concerns were considered. For NWP 37, the emergency watershed protection and rehabilitation activity may proceed immediately in cases where there is an unacceptable hazard to life or a significant loss of property or economic hardship will occur. The district engineer will consider any comments received to decide whether the NWP 37 authorization should be modified, suspended, or revoked in accordance with the procedures at 33 CFR 330.5.

(3) In cases of where the prospective permittee is not a Federal agency, the district engineer will provide a response to NMFS within 30 calendar days of receipt of any Essential Fish Habitat conservation recommendations, as required by Section 305(b)(4)(B) of the Magnuson-Stevens Fishery Conservation and Management Act.

(4) Applicants are encouraged to provide the Corps with either electronic files or multiple copies of pre-construction notifications to expedite agency coordination.

D. District Engineer's Decision:

1. In reviewing the PCN for the proposed activity, the district engineer will determine whether the activity authorized by the NWP will result in more than minimal individual or cumulative adverse environmental effects or may be contrary to the public interest. For a linear project, this determination will include an evaluation of the individual crossings to determine whether they individually satisfy the terms and conditions of the NWP(s), as well as the cumulative effects caused by all of the crossings authorized by NWP. If an applicant requests a waiver of the 300 linear foot limit on impacts to streams or of an otherwise applicable limit, as provided for in NWPs 13, 21, 29, 36, 39, 40, 42, 43, 44, 50, 51 or 52, the district engineer will only grant the waiver upon a written determination that the NWP activity will result in minimal adverse effects. When making minimal effects determinations the district engineer will consider the direct and indirect effects caused by the NWP activity. The district engineer will also consider site specific factors, such as the environmental setting in the vicinity of the NWP activity, the type of resource that will be affected by the NWP activity, the functions provided by the aquatic resources that will be affected by the NWP activity, the degree or magnitude to which the aquatic resources perform those functions, the extent that aquatic resource functions will be lost as a result of the NWP activity (e.g., partial or complete loss), the duration of the adverse effects (temporary or permanent), the importance of the aquatic resource functions to the region (e.g., watershed or ecoregion), and mitigation required by the district engineer. If an appropriate functional assessment method is available and practicable to use, that assessment method may be used by the district engineer to assist in the minimal adverse effects determination. The district engineer may add case-specific special conditions to the NWP authorization to address site-specific environmental concerns.

2. If the proposed activity requires a PCN and will result in a loss of greater than 1/10 acre of wetlands, the prospective permittee should submit a mitigation proposal with the PCN. Applicants may also propose compensatory mitigation for projects with smaller impacts. The district engineer will consider any proposed compensatory mitigation the applicant has included in the proposal in determining whether the net adverse environmental effects to the aquatic environment of the proposed activity are minimal. The compensatory mitigation proposal may be either conceptual or detailed. If the district engineer determines that the activity complies with the terms and conditions of the NWP and that the adverse effects on the aquatic environment are minimal, after considering mitigation, the district engineer will notify the permittee and include any activity-specific conditions in the NWP verification the district engineer deems necessary. Conditions for compensatory mitigation requirements must

comply with the appropriate provisions at 33 CFR 332.3(k). The district engineer must approve the final mitigation plan before the permittee commences work in waters of the United States, unless the district engineer determines that prior approval of the final mitigation plan is not practicable or not necessary to ensure timely completion of the required compensatory mitigation. If the prospective permittee elects to submit a compensatory mitigation plan with the PCN, the district engineer will expeditiously review the proposed compensatory mitigation plan. The district engineer must review the proposed compensatory mitigation plan within 45 calendar days of receiving a complete PCN and determine whether the proposed mitigation would ensure no more than minimal adverse effects on the aquatic environment. If the net adverse effects of the project on the aquatic environment (after consideration of the compensatory mitigation proposal) are determined by the district engineer to be minimal, the district engineer will provide a timely written response to the applicant. The response will state that the project can proceed under the terms and conditions of the NWP, including any activity specific conditions added to the NWP authorization by the district engineer.

3. If the district engineer determines that the adverse effects of the proposed work are more than minimal, then the district engineer will notify the applicant either: (a) That the project does not qualify for authorization under the NWP and instruct the applicant on the procedures to seek authorization under an individual permit; (b) that the project is authorized under the NWP subject to the applicant's submission of a mitigation plan that would reduce the adverse effects on the aquatic environment to the minimal level; or (c) that the project is authorized under the NWP with specific modifications or conditions. Where the district engineer determines that mitigation is required to ensure no more than minimal adverse effects occur to the aquatic environment, the activity will be authorized within the 45-day PCN period, with activity-specific conditions that state the mitigation requirements. The authorization will include the necessary conceptual or detailed mitigation or a requirement that the applicant submit a mitigation plan that would reduce the adverse effects on the aquatic environment to the minimal level. When mitigation is required, no work in waters of the United States may occur until the district engineer has approved a specific mitigation plan or has determined that prior approval of a final mitigation plan is not practicable or not necessary to ensure timely completion of the required compensatory mitigation..

E. Further Information

1. District Engineers have authority to determine if an activity complies with the terms and conditions of an NWP.
2. NWPs do not obviate the need to obtain other federal, state, or local permits, approvals, or authorizations required by law.
3. NWPs do not grant any property rights or exclusive privileges.
4. NWPs do not authorize any injury to the property or rights of others.
5. NWPs do not authorize interference with any existing or proposed Federal project.

F. Definitions

Best management practices (BMPs): Policies, practices, procedures, or structures implemented to mitigate the adverse environmental effects on surface water quality resulting from development. BMPs are categorized as structural or non-structural.

Compensatory mitigation: The restoration (re-establishment or rehabilitation), establishment (creation), enhancement, and/or in certain circumstances preservation of aquatic resources for the purposes of offsetting unavoidable adverse impacts which remain after all appropriate and practicable avoidance and minimization has been achieved.

Currently serviceable: Useable as is or with some maintenance, but not so degraded as to essentially require reconstruction.

Direct effects: Effects that are caused by the activity and occur at the same time and place.

Discharge: The term “discharge” means any discharge of dredged or fill material.

Enhancement: The manipulation of the physical, chemical, or biological characteristics of an aquatic resource to heighten, intensify, or improve a specific aquatic resource function(s). Enhancement results in the gain of selected aquatic resource function(s), but may also lead to a decline in other aquatic resource function(s). Enhancement does not result in a gain in aquatic resource area.

Ephemeral stream: An ephemeral stream has flowing water only during, and for a short duration after, precipitation events in a typical year. Ephemeral stream beds are located above the water table year-round. Groundwater is not a source of water for the stream. Runoff from rainfall is the primary source of water for stream flow.

Establishment (creation): The manipulation of the physical, chemical, or biological characteristics present to develop an aquatic resource that did not previously exist at an upland site. Establishment results in a gain in aquatic resource area.

High Tide Line: The line of intersection of the land with the water’s surface at the maximum height reached by a rising tide. The high tide line may be determined, in the absence of actual data, by a line of oil or scum along shore objects, a more or less continuous deposit of fine shell or debris on the foreshore or berm, other physical markings or characteristics, vegetation lines, tidal gages, or other suitable means that delineate the general height reached by a rising tide. The line encompasses spring high tides and other high tides that occur with periodic frequency but does not include storm surges in which there is a departure from the normal or predicted reach of the tide due to the piling up of water against a coast by strong winds such as those accompanying a hurricane or other intense storm.

Historic Property: Any prehistoric or historic district, site (including archaeological site), building, structure, or other object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria (36 CFR part 60).

Independent utility: A test to determine what constitutes a single and complete non-linear project in the Corps regulatory program. A project is considered to have independent utility if it would be constructed absent the construction of other projects in the project area. Portions of a multi-phase project that depend upon other phases of the project do not have independent utility. Phases of a project that would be constructed even if the other phases were not built can be considered as separate single and complete projects with independent utility.

Indirect effects: Effects that are caused by the activity and are later in time or farther removed in distance, but are still reasonably foreseeable.

Intermittent stream: An intermittent stream has flowing water during certain times of the year, when groundwater provides water for stream flow. During dry periods, intermittent streams may not have flowing water. Runoff from rainfall is a supplemental source of water for stream flow.

Loss of waters of the United States: Waters of the United States that are permanently adversely affected by filling, flooding, excavation, or drainage because of the regulated activity. Permanent adverse effects include permanent discharges of dredged or fill material that change an aquatic area to dry land, increase the bottom elevation of a waterbody, or change the use of a waterbody. The acreage of loss of waters of the United States is a threshold measurement of the impact to jurisdictional waters for determining whether a project may qualify for an NWP; it is not a net threshold that is calculated after considering compensatory mitigation that may be used to offset losses of aquatic functions and services. The loss of stream bed includes the linear feet

of stream bed that is filled or excavated. Waters of the United States temporarily filled, flooded, excavated, or drained, but restored to pre-construction contours and elevations after construction, are not included in the measurement of loss of waters of the United States. Impacts resulting from activities eligible for exemptions under Section 404(f) of the Clean Water Act are not considered when calculating the loss of waters of the United States.

Non-tidal wetland: A non-tidal wetland is a wetland that is not subject to the ebb and flow of tidal waters. The definition of a wetland can be found at 33 CFR 328.3(b). Non-tidal wetlands contiguous to tidal waters are located landward of the high tide line (i.e., spring high tide line).

Open water: For purposes of the NWPs, an open water is any area that in a year with normal patterns of precipitation has water flowing or standing above ground to the extent that an ordinary high water mark can be determined. Aquatic vegetation within the area of standing or flowing water is either non-emergent, sparse, or absent. Vegetated shallows are considered to be open waters. Examples of “open waters” include rivers, streams, lakes, and ponds.

Ordinary High Water Mark: An ordinary high water mark is a line on the shore established by the fluctuations of water and indicated by physical characteristics, or by other appropriate means that consider the characteristics of the surrounding areas (see 33 CFR 328.3(e)).

Perennial stream: A perennial stream has flowing water year-round during a typical year. The water table is located above the stream bed for most of the year. Groundwater is the primary source of water for stream flow. Runoff from rainfall is a supplemental source of water for stream flow.

Practicable: Available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.

Pre-construction notification: A request submitted by the project proponent to the Corps for confirmation that a particular activity is authorized by nationwide permit. The request may be a permit application, letter, or similar document that includes information about the proposed work and its anticipated environmental effects. Pre-construction notification may be required by the terms and conditions of a nationwide permit, or by regional conditions. A pre-construction notification may be voluntarily submitted in cases where pre-construction notification is not required and the project proponent wants confirmation that the activity is authorized by nationwide permit.

Preservation: The removal of a threat to, or preventing the decline of, aquatic resources by an action in or near those aquatic resources. This term includes activities commonly associated with the protection and maintenance of aquatic resources through the implementation of appropriate legal and physical mechanisms. Preservation does not result in a gain of aquatic resource area or functions.

Re-establishment: The manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/historic functions to a former aquatic resource. Re-establishment results in rebuilding a former aquatic resource and results in a gain in aquatic resource area and functions.

Rehabilitation: The manipulation of the physical, chemical, or biological characteristics of a site with the goal of repairing natural/historic functions to a degraded aquatic resource. Rehabilitation results in a gain in aquatic resource function, but does not result in a gain in aquatic resource area.

Restoration: The manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/historic functions to a former or degraded aquatic resource. For the purpose of tracking net gains in aquatic resource area, restoration is divided into two categories: re-establishment and rehabilitation.

Riffle and pool complex: Riffle and pool complexes are special aquatic sites under the 404(b)(1) Guidelines. Riffle and pool complexes sometimes characterize steep gradient sections of streams. Such stream sections are recognizable by their hydraulic characteristics. The rapid movement of water over a coarse substrate in riffles results in a rough flow, a turbulent surface, and high dissolved oxygen levels in the water. Pools are deeper areas associated with

riffles. A slower stream velocity, a streaming flow, a smooth surface, and a finer substrate characterize pools.

Riparian areas: Riparian areas are lands adjacent to streams, lakes, and estuarine-marine shorelines. Riparian areas are transitional between terrestrial and aquatic ecosystems, through which surface and subsurface hydrology connects riverine, lacustrine, estuarine, and marine waters with their adjacent wetlands, non-wetland waters, or uplands. Riparian areas provide a variety of ecological functions and services and help improve or maintain local water quality. (See general condition 23.)

Shellfish seeding: The placement of shellfish seed and/or suitable substrate to increase shellfish production. Shellfish seed consists of immature individual shellfish or individual shellfish attached to shells or shell fragments (i.e., spat on shell). Suitable substrate may consist of shellfish shells, shell fragments, or other appropriate materials placed into waters for shellfish habitat.

Single and complete linear project: A linear project is a project constructed for the purpose of getting people, goods, or services from a point of origin to a terminal point, which often involves multiple crossings of one or more waterbodies at separate and distant locations. The term "single and complete project" is defined as that portion of the total linear project proposed or accomplished by one owner/developer or partnership or other association of owners/developers that includes all crossings of a single water of the United States (i.e., a single waterbody) at a specific location. For linear projects crossing a single or multiple waterbodies several times at separate and distant locations, each crossing is considered a single and complete project for purposes of NWP authorization. However, individual channels in a braided stream or river, or individual arms of a large, irregularly shaped wetland or lake, etc., are not separate waterbodies, and crossings of such features cannot be considered separately.

Single and complete non-linear project: For non-linear projects, the term "single and complete project" is defined at 33 CFR 330.2(i) as the total project proposed or accomplished by one owner/developer or partnership or other association of owners/developers. A single and complete non-linear project must have independent utility (see definition of "independent utility"). Single and complete non-linear projects may not be "piecemealed" to avoid the limits in an NWP authorization.

Stormwater management: Stormwater management is the mechanism for controlling stormwater runoff for the purposes of reducing downstream erosion, water quality degradation, and flooding and mitigating the adverse effects of changes in land use on the aquatic environment.

Stormwater management facilities: Stormwater management facilities are those facilities, including but not limited to, stormwater retention and detention ponds and best management practices, which retain water for a period of time to control runoff and/or improve the quality (i.e., by reducing the concentration of nutrients, sediments, hazardous substances and other pollutants) of stormwater runoff.

Stream bed: The substrate of the stream channel between the ordinary high water marks. The substrate may be bedrock or inorganic particles that range in size from clay to boulders. Wetlands contiguous to the stream bed, but outside of the ordinary high water marks, are not considered part of the stream bed.

Stream channelization: The manipulation of a stream's course, condition, capacity, or location that causes more than minimal interruption of normal stream processes. A channelized stream remains a water of the United States.

Structure: An object that is arranged in a definite pattern of organization. Examples of structures include, without limitation, any pier, boat dock, boat ramp, wharf, dolphin, weir, boom, breakwater, bulkhead, revetment, riprap, jetty, artificial island, artificial reef, permanent mooring structure, power transmission line, permanently moored floating vessel, piling, aid to navigation, or any other manmade obstacle or obstruction.

Tidal wetland: A tidal wetland is a wetland (i.e., water of the United States) that is inundated by tidal waters. The definitions of a wetland

and tidal waters can be found at 33 CFR 328.3(b) and 33 CFR 328.3(f), respectively. Tidal waters rise and fall in a predictable and measurable rhythm or cycle due to the gravitational pulls of the moon and sun. Tidal waters end where the rise and fall of the water surface can no longer be practically measured in a predictable rhythm due to masking by other waters, wind, or other effects. Tidal wetlands are located channelward of the high tide line, which is defined at 33 CFR 328.3(d).

Vegetated shallows: Vegetated shallows are special aquatic sites under the 404(b)(1) Guidelines. They are areas that are permanently inundated and under normal circumstances have rooted aquatic vegetation, such as seagrasses in marine and estuarine systems and a variety of vascular rooted plants in freshwater systems.

Waterbody: For purposes of the NWPs, a waterbody is a jurisdictional water of the United States. If a jurisdictional wetland is adjacent—meaning bordering, contiguous, or neighboring—to a waterbody determined to be a water of the United States under 33 CFR 328.3(a)(1)–(6), that waterbody and its adjacent wetlands are considered together as a single aquatic unit (see 33 CFR 328.4(c)(2)). Examples of "waterbodies" include streams, rivers, lakes, ponds, and wetlands.



U.S Army Corps
Of Engineers
St. Louis District

Nationwide Permit

No. 6, Survey Activities (NWP Final Notice, 77 FR 10271)

Survey activities, such as core sampling, seismic exploratory operations, plugging of seismic shot holes and other exploratory-type bore holes, exploratory trenching, soil surveys, sampling, sample plots or transects for wetland delineations, and historic resources surveys. For the purposes of this NWP, the term "exploratory trenching" means mechanical land clearing of the upper soil profile to expose bedrock or substrate, for the purpose of mapping or sampling the exposed material. The area in which the exploratory trench is dug must be restored to its pre-construction elevation upon completion of the work and must not drain a water of the United States. In wetlands, the top 6 to 12 inches of the trench should normally be backfilled with topsoil from the trench. This NWP authorizes the construction of temporary pads, provided the discharge does not exceed 1/10-acre in waters of the U.S. Discharges and structures associated with the recovery of historic resources are not authorized by this NWP. Drilling and the discharge of excavated material from test wells for oil and gas exploration are not authorized by this NWP; the plugging of such wells is authorized. Fill placed for roads and other similar activities is not authorized by this NWP. The NWP does not authorize any permanent structures. The discharge of drilling mud and cuttings may require a permit under Section 402 of the Clean Water Act. (Sections 10 and 404)

NATIONWIDE PERMIT CONDITIONS

Note: To qualify for NWP authorization, the prospective permittee must comply with the following general conditions, as applicable, in addition to any regional or case-specific conditions imposed by the division engineer or district engineer. Prospective permittees should contact the appropriate Corps district office to determine if regional conditions have been imposed on an NWP. Prospective permittees should also contact the appropriate Corps district office to determine the status of Clean Water Act Section 401 water quality certification and/ or Coastal Zone Management Act consistency for an NWP. Every person who may wish to obtain permit authorization under one or more NWPs, or who is currently relying on an existing or prior permit authorization under one or more NWPs, has been and is on notice that all of the provisions of 33 CFR 330.1 through 330.6 apply to every NWP authorization. Note especially 33 CFR 330.5 relating to the modification, suspension, or revocation of any NWP authorization.

1. Navigation. (a) No activity may cause more than a minimal adverse effect on navigation.

(b) Any safety lights and signals prescribed by the U.S. Coast Guard, through regulations or otherwise, must be installed and maintained at the permittee's expense on authorized facilities in navigable waters of the United States.

(c) The permittee understands and agrees that, if future operations by the United States require the removal, relocation, or other alteration, of the structure or work herein authorized, or if, in the opinion of the Secretary of the Army or his authorized representative, said structure or work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the Corps of Engineers, to remove, relocate, or alter

the structural work or obstructions caused thereby, without expense to the United States. No claim shall be made against the United States on account of any such removal or alteration.

2. Aquatic Life Movements. No activity may substantially disrupt the necessary life cycle movements of those species of aquatic life indigenous to the waterbody, including those species that normally migrate through the area, unless the activity's primary purpose is to impound water. All permanent and temporary crossings of waterbodies shall be suitably culverted, bridged, or otherwise designed and constructed to maintain low flows to sustain the movement of those aquatic species.

3. Spawning Areas. Activities in spawning areas during spawning seasons must be avoided to the maximum extent practicable. Activities that result in the physical destruction (e.g., through excavation, fill, or downstream smothering by substantial turbidity) of an important spawning area are not authorized.

4. Migratory Bird Breeding Areas. Activities in waters of the United States that serve as breeding areas for migratory birds must be avoided to the maximum extent practicable.

5. Shellfish Beds. No activity may occur in areas of concentrated shellfish populations, unless the activity is directly related to a shellfish harvesting activity authorized by NWPs 4 and 48, or is a shellfish seeding or habitat restoration activity authorized by NWP 27.

6. Suitable Material. No activity may use unsuitable material (e.g., trash, debris, car bodies, asphalt, etc.). Material used for construction or discharged must be free from toxic pollutants in toxic amounts (see Section 307 of the Clean Water Act).

7. Water Supply Intakes. No activity may occur in the proximity of a public water supply intake, except where the activity is for the repair or improvement of public water supply intake structures or adjacent bank stabilization.

8. Adverse Effects From Impoundments. If the activity creates an impoundment of water, adverse effects to the aquatic system due to accelerating the passage of water, and/or restricting its flow must be minimized to the maximum extent practicable.

9. Management of Water Flows. To the maximum extent practicable, the pre-construction course, condition, capacity, and location of open waters must be maintained for each activity, including stream channelization and storm water management activities, except as provided below. The activity must be constructed to withstand expected high flows. The activity must not restrict or impede the passage of normal or high flows, unless the primary purpose of the activity is to impound water or manage high flows. The activity may alter the pre-construction course, condition, capacity, and location of open waters if it benefits the aquatic environment (e.g., stream restoration or relocation activities).

10. Fills Within 100-Year Floodplains. The activity must comply with applicable FEMA-approved state or local floodplain management requirements.

11. Equipment. Heavy equipment working in wetlands or mudflats must be placed on mats, or other measures must be taken to minimize soil disturbance.

12. Soil Erosion and Sediment Controls. Appropriate soil erosion and sediment controls must be used and maintained in effective operating condition during construction, and all exposed soil and other fills, as well as any work below the ordinary high water mark or high tide line, must be permanently stabilized at the earliest practicable date. Permittees are encouraged to perform work within waters of the United States during periods of low-flow or no-flow.

13. Removal of Temporary Fills. Temporary fills must be removed in their entirety and the affected areas returned to pre-construction elevations. The affected areas must be revegetated, as appropriate.

14. Proper Maintenance. Any authorized structure or fill shall be properly maintained, including maintenance to ensure public safety, and compliance with applicable NWP general conditions, as well as any activity-specific conditions added by the district engineer to an NWP authorization.

15. Single and Complete Project. The activity must be a single and complete project. The same NWP cannot be used more than once for the same single and complete project.

16. Wild and Scenic Rivers. No activity may occur in a component of the National Wild and Scenic River System, or in a river officially designated by Congress as a "study river" for possible inclusion in the system while the river is in an official study status, unless the appropriate Federal agency with direct management responsibility for such river, has determined in writing that the proposed activity will not adversely affect the Wild and Scenic River designation or study status. Information on Wild and Scenic Rivers may be obtained from the appropriate Federal land management agency responsible for the designated Wild and Scenic River or study river (e.g., National Park Service, U.S. Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service).

17. Tribal Rights. No activity or its operation may impair reserved tribal rights, including, but not limited to, reserved water rights and treaty fishing and hunting rights.

18. Endangered Species. (a) No activity is authorized under any NWP which is likely to directly or indirectly jeopardize the continued existence of a threatened or endangered species or a species proposed for such designation, as identified under the Federal Endangered Species Act (ESA), or which will directly or indirectly destroy or adversely modify the critical habitat of such species. No activity is authorized under any NWP which "may affect" a listed species or critical habitat, unless Section 7 consultation addressing the effects of the proposed activity has been completed.

(b) Federal agencies should follow their own procedures for complying with the requirements of the ESA. Federal permittees must provide the district engineer with the appropriate documentation to demonstrate compliance with those requirements. The district engineer will review the documentation and determine whether it is sufficient to address ESA compliance for the NWP activity, or whether additional ESA consultation is necessary.

(c) Non-federal permittees must submit a pre-construction notification to the district engineer if any listed species or designated critical habitat might be affected or is in the vicinity of the project, or if the project is located in designated critical habitat, and shall not begin work on the activity until notified by the district engineer that the requirements of the ESA have been satisfied and that the activity is

authorized. For activities that might affect Federally-listed endangered or threatened species or designated critical habitat, the pre-construction notification must include the name(s) of the endangered or threatened species that might be affected by the proposed work or that utilize the designated critical habitat that might be affected by the proposed work. The district engineer will determine whether the proposed activity "may affect" or will have "no effect" to listed species and designated critical habitat and will notify the non-Federal applicant of the Corps' determination within 45 days of receipt of a complete pre-construction notification. In cases where the non-Federal applicant has identified listed species or critical habitat that might be affected or is in the vicinity of the project, and has so notified the Corps, the applicant shall not begin work until the Corps has provided notification the proposed activities will have "no effect" on listed species or critical habitat, or until Section 7 consultation has been completed. If the non-Federal applicant has not heard back from the Corps within 45 days, the applicant must still wait for notification from the Corps.

(d) As a result of formal or informal consultation with the FWS or NMFS the district engineer may add species-specific regional endangered species conditions to the NWPs.

(e) Authorization of an activity by a NWP does not authorize the "take" of a threatened or endangered species as defined under the ESA. In the absence of separate authorization (e.g., an ESA Section 10 Permit, a Biological Opinion with "incidental take" provisions, etc.) from the U.S. FWS or the NMFS, The Endangered Species Act prohibits any person subject to the jurisdiction of the United States to take a listed species, where "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. The word "harm" in the definition of "take" means an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.

(f) Information on the location of threatened and endangered species and their critical habitat can be obtained directly from the offices of the U.S. FWS and NMFS or their world web pages at <http://www.fws.gov/> or <http://www.fws.gov/ipac> and <http://www.noaa.gov/fisheries.html> respectively.

19. Migratory Birds and Bald and Golden Eagles. The permittee is responsible for obtaining any "take" permits required under the U.S. Fish and Wildlife Service's regulations governing compliance with the Migratory Bird Treaty Act or the Bald and Golden Eagle Protection Act. The permittee should contact the appropriate local office of the U.S. Fish and Wildlife Service to determine if such "take" permits are required for a particular activity.

20. Historic Properties. (a) In cases where the district engineer determines that the activity may affect properties listed, or eligible for listing, in the National Register of Historic Places, the activity is not authorized, until the requirements of Section 106 of the National Historic Preservation Act (NHPA) have been satisfied.

(b) Federal permittees should follow their own procedures for complying with the requirements of Section 106 of the National Historic Preservation Act. Federal permittees must provide the district engineer with the appropriate documentation to demonstrate compliance with those requirements. The district engineer will review the documentation and determine whether it is sufficient to address section 106 compliance for the NWP activity, or whether additional section 106 consultation is necessary.

(c) Non-federal permittees must submit a pre-construction notification to the district engineer if the authorized activity may have the potential to cause effects to any historic properties listed on, determined to be eligible for listing on, or potentially eligible for listing on the National Register of Historic Places, including previously unidentified properties. For such activities, the pre-construction notification must state which historic properties may be affected by the proposed work or include a vicinity map indicating the location of the historic properties or the potential for the presence of historic

properties. Assistance regarding information on the location of or potential for the presence of historic resources can be sought from the State Historic Preservation Officer or Tribal Historic Preservation Officer, as appropriate, and the National Register of Historic Places (see 33 CFR 330.4(g)). When reviewing pre-construction notifications, district engineers will comply with the current procedures for addressing the requirements of Section 106 of the National Historic Preservation Act. The district engineer shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey. Based on the information submitted and these efforts, the district engineer shall determine whether the proposed activity has the potential to cause an effect on the historic properties. Where the non-Federal applicant has identified historic properties on which the activity may have the potential to cause effects and so notified the Corps, the non-Federal applicant shall not begin the activity until notified by the district engineer either that the activity has no potential to cause effects or that consultation under Section 106 of the NHPA has been completed.

(d) The district engineer will notify the prospective permittee within 45 days of receipt of a complete pre-construction notification whether NHPA Section 106 consultation is required. Section 106 consultation is not required when the Corps determines that the activity does not have the potential to cause effects on historic properties (see 36 CFR 800.3(a)). If NHPA section 106 consultation is required and will occur, the district engineer will notify the non-Federal applicant that he or she cannot begin work until Section 106 consultation is completed. If the non-Federal applicant has not heard back from the Corps within 45 days, the applicant must still wait for notification from the Corps.

(e) Prospective permittees should be aware that section 110k of the NHPA (16 U.S.C. 470h-2(k)) prevents the Corps from granting a permit or other assistance to an applicant who, with intent to avoid the requirements of Section 106 of the NHPA, has intentionally significantly adversely affected a historic property to which the permit would relate, or having legal power to prevent it, allowed such significant adverse effect to occur, unless the Corps, after consultation with the Advisory Council on Historic Preservation (ACHP), determines that circumstances justify granting such assistance despite the adverse effect created or permitted by the applicant. If circumstances justify granting the assistance, the Corps is required to notify the ACHP and provide documentation specifying the circumstances, the degree of damage to the integrity of any historic properties affected, and proposed mitigation. This documentation must include any views obtained from the applicant, SHPO/THPO, appropriate Indian tribes if the undertaking occurs on or affects historic properties on tribal lands or affects properties of interest to those tribes, and other parties known to have a legitimate interest in the impacts to the permitted activity on historic properties.

21. Discovery of Previously Unknown Remains and Artifacts. If you discover any previously unknown historic, cultural or archeological remains and artifacts while accomplishing the activity authorized by this permit, you must immediately notify the district engineer of what you have found, and to the maximum extent practicable, avoid construction activities that may affect the remains and artifacts until the required coordination has been completed. The district engineer will initiate the Federal, Tribal and state coordination required to determine if the items or remains warrant a recovery effort or if the site is eligible for listing in the National Register of Historic Places.

22. Designated Critical Resource Waters. Critical resource waters include, NOAA-managed marine sanctuaries and marine monuments, and National Estuarine Research Reserves. The district engineer may designate, after notice and opportunity for public comment, additional waters officially designated by a state as having particular environmental or ecological significance, such as outstanding

national resource waters or state natural heritage sites. The district engineer may also designate additional critical resource waters after notice and opportunity for public comment.

(a) Discharges of dredged or fill material into waters of the United States are not authorized by NWP's 7, 12, 14, 16, 17, 21, 29, 31, 35, 39, 40, 42, 43, 44, 49, 50, 51, and 52 for any activity within, or directly affecting, critical resource waters, including wetlands adjacent to such waters.

(b) For NWP's 3, 8, 10, 13, 15, 18, 19, 22, 23, 25, 27, 28, 30, 33, 34, 36, 37, and 38, notification is required in accordance with general condition 31, for any activity proposed in the designated critical resource waters including wetlands adjacent to those waters. The district engineer may authorize activities under these NWP's only after it is determined that the impacts to the critical resource waters will be no more than minimal.

23. Mitigation. The district engineer will consider the following factors when determining appropriate and practicable mitigation necessary to ensure that adverse effects on the aquatic environment are minimal:

(a) The activity must be designed and constructed to avoid and minimize adverse effects, both temporary and permanent, to waters of the United States to the maximum extent practicable at the project site (i.e., on site).

(b) Mitigation in all its forms (avoiding, minimizing, rectifying, reducing, or compensating for resource losses) will be required to the extent necessary to ensure that the adverse effects to the aquatic environment are minimal.

(c) Compensatory mitigation at a minimum one-for-one ratio will be required for all wetland losses that exceed 1/10 acre and require pre-construction notification, unless the district engineer determines in writing that either some other form of mitigation would be more environmentally appropriate or the adverse effects of the proposed activity are minimal, and provides a project-specific waiver of this requirement. For wetland losses of 1/10 acre or less that require pre-construction notification, the district engineer may determine on a case-by-case basis that compensatory mitigation is required to ensure that the activity results in minimal adverse effects on the aquatic environment. Compensatory mitigation projects provided to offset losses of aquatic resources must comply with the applicable provisions of 33 CFR part 332.

(1) The prospective permittee is responsible for proposing an appropriate compensatory mitigation option if compensatory mitigation is necessary to ensure that the activity results in minimal adverse effects on the aquatic environment.

(2) Since the likelihood of success is greater and the impacts to potentially valuable uplands are reduced, wetland restoration should be the first compensatory mitigation option considered.

(3) If permittee-responsible mitigation is the proposed option, the prospective permittee is responsible for submitting a mitigation plan. A conceptual or detailed mitigation plan may be used by the district engineer to make the decision on the NWP verification request, but a final mitigation plan that addresses the applicable requirements of 33 CFR 332.4(c)(2)-(14) must be approved by the district engineer before the permittee begins work in waters of the United States, unless the district engineer determines that prior approval of the final mitigation plan is not practicable or not necessary to ensure timely completion of the required compensatory mitigation (see 33 CFR 332.3(k)(3)).

(4) If mitigation bank or in-lieu fee program credits are the proposed option, the mitigation plan only needs to address the baseline conditions at the impact site and the number of credits to be provided.

(5) Compensatory mitigation requirements (e.g., resource type and amount to be provided as compensatory mitigation, site protection, ecological performance standards, monitoring requirements) may be addressed through conditions added to the NWP authorization, instead of components of a compensatory mitigation plan.

(d) For losses of streams or other open waters that require pre-construction notification, the district engineer may require compensatory mitigation, such as stream rehabilitation, enhancement, or preservation, to ensure that the activity results in minimal adverse effects on the aquatic environment.

(e) Compensatory mitigation will not be used to increase the acreage losses allowed by the acreage limits of the NWP. For example, if an NWP has an acreage limit of 1/2 acre, it cannot be used to authorize any project resulting in the loss of greater than 1/2 acre of waters of the United States, even if compensatory mitigation is provided that replaces or restores some of the lost waters. However, compensatory mitigation can and should be used, as necessary, to ensure that a project already meeting the established acreage limits also satisfies the minimal impact requirement associated with the NWPs.

(f) Compensatory mitigation plans for projects in or near streams or other open waters will normally include a requirement for the restoration or establishment, maintenance, and legal protection (e.g., conservation easements) of riparian areas next to open waters. In some cases, riparian areas may be the only compensatory mitigation required. Riparian areas should consist of native species. The width of the required riparian area will address documented water quality or aquatic habitat loss concerns. Normally, the riparian area will be 25 to 50 feet wide on each side of the stream, but the district engineer may require slightly wider riparian areas to address documented water quality or habitat loss concerns. If it is not possible to establish a riparian area on both sides of a stream, or if the waterbody is a lake or coastal waters, then restoring or establishing a riparian area along a single bank or shoreline may be sufficient. Where both wetlands and open waters exist on the project site, the district engineer will determine the appropriate compensatory mitigation (e.g., riparian areas and/or wetlands compensation) based on what is best for the aquatic environment on a watershed basis. In cases where riparian areas are determined to be the most appropriate form of compensatory mitigation, the district engineer may waive or reduce the requirement to provide wetland compensatory mitigation for wetland losses.

(g) Permittees may propose the use of mitigation banks, in-lieu fee programs, or separate permittee-responsible mitigation. For activities resulting in the loss of marine or estuarine resources, permittee-responsible compensatory mitigation may be environmentally preferable if there are no mitigation banks or in-lieu fee programs in the area that have marine or estuarine credits available for sale or transfer to the permittee. For permittee-responsible mitigation, the special conditions of the NWP verification must clearly indicate the party or parties responsible for the implementation and performance of the compensatory mitigation project, and, if required, its long-term management.

(h) Where certain functions and services of waters of the United States are permanently adversely affected, such as the conversion of a forested or scrub-shrub wetland to a herbaceous wetland in a permanently maintained utility line right-of-way, mitigation may be required to reduce the adverse effects of the project to the minimal level.

24. Safety of Impoundment Structures. To ensure that all impoundment structures are safely designed, the district engineer may require non-Federal applicants to demonstrate that the structures comply with established state dam safety criteria or have been designed by qualified persons. The district engineer may also require documentation that the design has been independently reviewed by similarly qualified persons, and appropriate modifications made to ensure safety.

25. Water Quality. Where States and authorized Tribes, or EPA where applicable, have not previously certified compliance of an NWP with CWA Section 401, individual 401 Water Quality Certification must be obtained or waived (see 33 CFR 330.4(c)). The district engineer or

State or Tribe may require additional water quality management measures to ensure that the authorized activity does not result in more than minimal degradation of water quality.

26. Coastal Zone Management. In coastal states where an NWP has not previously received a state coastal zone management consistency concurrence, an individual state coastal zone management consistency concurrence must be obtained, or a presumption of concurrence must occur (see 33 CFR 330.4(d)). The district engineer or a State may require additional measures to ensure that the authorized activity is consistent with state coastal zone management requirements.

27. Regional and Case-By-Case Conditions. The activity must comply with any regional conditions that may have been added by the Division Engineer (see 33 CFR 330.4(e)) and with any case specific conditions added by the Corps or by the state, Indian Tribe, or U.S. EPA in its section 401 Water Quality Certification, or by the state in its Coastal Zone Management Act consistency determination.

28. Use of Multiple Nationwide Permits. The use of more than one NWP for a single and complete project is prohibited, except when the acreage loss of waters of the United States authorized by the NWPs does not exceed the acreage limit of the NWP with the highest specified acreage limit. For example, if a road crossing over tidal waters is constructed under NWP 14, with associated bank stabilization authorized by NWP 13, the maximum acreage loss of waters of the United States for the total project cannot exceed 1/3-acre.

29. Transfer of Nationwide Permit Verifications. If the permittee sells the property associated with a nationwide permit verification, the permittee may transfer the nationwide permit verification to the new owner by submitting a letter to the appropriate Corps district office to validate the transfer. A copy of the nationwide permit verification must be attached to the letter, and the letter must contain the following statement and signature: "When the structures or work authorized by this nationwide permit are still in existence at the time the property is transferred, the terms and conditions of this nationwide permit, including any special conditions, will continue to be binding on the new owner(s) of the property. To validate the transfer of this nationwide permit and the associated liabilities associated with compliance with its terms and conditions, have the transferee sign and date below."

(Transferee)

(Date)

30. Compliance Certification. Each permittee who receives an NWP verification letter from the Corps must provide a signed certification documenting completion of the authorized activity and any required compensatory mitigation. The success of any required permittee-responsible mitigation, including the achievement of ecological performance standards, will be addressed separately by the district engineer. The Corps will provide the permittee the certification document with the NWP verification letter. The certification document will include:

(a) A statement that the authorized work was done in accordance with the NWP authorization, including any general, regional, or activity-specific conditions;

(b) A statement that the implementation of any required compensatory mitigation was completed in accordance with the permit conditions. If credits from a mitigation bank or in-lieu fee program are used to satisfy the compensatory mitigation requirements, the certification must include the documentation required by 33 CFR 332.3(l)(3) to confirm that the permittee secured the appropriate number and resource type of credits; and

(c) The signature of the permittee certifying the completion of the work and mitigation..

31. Pre-Construction Notification. (a) Timing. Where required by the terms of the NWP, the prospective permittee must notify the district engineer by submitting a pre-construction notification (PCN) as early as possible. The district engineer must determine if the PCN is complete within 30 calendar days of the date of receipt and, if the PCN is determined to be incomplete, notify the prospective permittee within that 30 day period to request the additional information necessary to make the PCN complete. The request must specify the information needed to make the PCN complete. As a general rule, district engineers will request additional information necessary to make the PCN complete only once. However, if the prospective permittee does not provide all of the requested information, then the district engineer will notify the prospective permittee that the PCN is still incomplete and the PCN review process will not commence until all of the requested information has been received by the district engineer. The prospective permittee shall not begin the activity until either:

(1) He or she is notified in writing by the district engineer that the activity may proceed under the NWP with any special conditions imposed by the district or division engineer; or

(2) 45 calendar days have passed from the district engineer's receipt of the complete PCN and the prospective permittee has not received written notice from the district or division engineer. However, if the permittee was required to notify the Corps pursuant to general condition 18 that listed species or critical habitat might be affected or in the vicinity of the project, or to notify the Corps pursuant to general condition 20 that the activity may have the potential to cause effects to historic properties, the permittee cannot begin the activity until receiving written notification from the Corps that there is "no effect" on listed species or "no potential to cause effects" on historic properties, or that any consultation required under Section 7 of the Endangered Species Act (see 33 CFR 330.4(f)) and/or Section 106 of the National Historic Preservation (see 33 CFR 330.4(g)) has been completed. Also, work cannot begin under NWPs 21, 49, or 50 until the permittee has received written approval from the Corps. If the proposed activity requires a written waiver to exceed specified limits of an NWP, the permittee may not begin the activity until the district engineer issues the waiver. If the district or division engineer notifies the permittee in writing that an individual permit is required within 45 calendar days of receipt of a complete PCN, the permittee cannot begin the activity until an individual permit has been obtained. Subsequently, the permittee's right to proceed under the NWP may be modified, suspended, or revoked only in accordance with the procedure set forth in 33 CFR 330.5(d)(2).

(b) Contents of Pre-Construction Notification: The PCN must be in writing and include the following information:

(1) Name, address and telephone numbers of the prospective permittee;

(2) Location of the proposed project;

(3) A description of the proposed project; the project's purpose; direct and indirect adverse environmental effects the project would cause, including the anticipated amount of loss of water of the United States expected to result from the NWP activity, in acres, linear feet, or other appropriate unit of measure; any other NWP(s), regional general permit(s), or individual permit(s) used or intended to be used to authorize any part of the proposed project or any related activity. The description should be sufficiently detailed to allow the district engineer to determine that the adverse effects of the project will be minimal and to determine the need for compensatory mitigation. Sketches should be provided when necessary to show that the activity complies with the terms of the NWP. (Sketches usually clarify the project and when provided results in a quicker decision. Sketches should contain sufficient detail to provide an illustrative description of the proposed activity (e.g., a conceptual plan), but do not need to be detailed engineering plans);

(4) The PCN must include a delineation of wetlands, other special

aquatic sites, and other waters, such as lakes and ponds, and perennial, intermittent, and ephemeral streams, on the project site. Wetland delineations must be prepared in accordance with the current method required by the Corps. The permittee may ask the Corps to delineate the special aquatic sites and other waters on the project site, but there may be a delay if the Corps does the delineation, especially if the project site is large or contains many waters of the United States. Furthermore, the 45 day period will not start until the delineation has been submitted to or completed by the Corps, as appropriate;

(5) If the proposed activity will result in the loss of greater than 1/10-acre of wetlands and a PCN is required, the prospective permittee must submit a statement describing how the mitigation requirement will be satisfied, or explaining why the adverse effects are minimal and why compensatory mitigation should not be required. As an alternative, the prospective permittee may submit a conceptual or detailed mitigation plan.

(6) If any listed species or designated critical habitat might be affected or is in the vicinity of the project, or if the project is located in designated critical habitat, for non-Federal applicants the PCN must include the name(s) of those endangered or threatened species that might be affected by the proposed work or utilize the designated critical habitat that may be affected by the proposed work. Federal applicants must provide documentation demonstrating compliance with the Endangered Species Act; and

(7) For an activity that may affect a historic property listed on, determined to be eligible for listing on, or potentially eligible for listing on, the National Register of Historic Places, for non-Federal applicants the PCN must state which historic property may be affected by the proposed work or include a vicinity map indicating the location of the historic property. Federal applicants must provide documentation demonstrating compliance with Section 106 of the National Historic Preservation Act.

(c) Form of Pre-Construction Notification: The standard individual permit application form (Form ENG 4345) may be used, but the completed application form must clearly indicate that it is a PCN and must include all of the information required in paragraphs (b)(1) through (7) of this general condition. A letter containing the required information may also be used.

(d) Agency Coordination: (1) The district engineer will consider any comments from Federal and state agencies concerning the proposed activity's compliance with the terms and conditions of the NWPs and the need for mitigation to reduce the project's adverse environmental effects to a minimal level.

(2) For all NWP activities that require pre-construction notification and result in the loss of greater than 1/2-acre of waters of the United States, for NWP 21, 29, 39, 40, 42, 43, 44, 50, 51, and 52 activities that require pre-construction notification and will result in the loss of greater than 300 linear feet of stream bed, and for all NWP 48 activities that require pre-construction notification, the district engineer will immediately provide (e.g., via email, facsimile transmission, overnight mail, or other expeditious manner) a copy of the complete PCN to the appropriate Federal or state offices (U.S. FWS, state natural resource or water quality agency, EPA, State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Office (THPO), and, if appropriate, the NMFS). With the exception of NWP 37, these agencies will have 10 calendar days from the date the material is transmitted to telephone or fax the district engineer notice that they intend to provide substantive, site-specific comments. The comments must explain why the agency believes the adverse effects will be more than minimal. If so contacted by an agency, the district engineer will wait an additional 15 calendar days before making a decision on the preconstruction notification. The district engineer will fully consider agency comments received within the specified time frame, concerning the proposed activity's compliance with the terms and conditions of the NWPs, including the need for mitigation to ensure the net adverse environmental effects to the aquatic environment of the proposed activity are minimal. The district engineer will provide no response to the resource agency, except as provided

below. The district engineer will indicate in the administrative record associated with each pre-construction notification that the resource agencies' concerns were considered. For NWP 37, the emergency watershed protection and rehabilitation activity may proceed immediately in cases where there is an unacceptable hazard to life or a significant loss of property or economic hardship will occur. The district engineer will consider any comments received to decide whether the NWP 37 authorization should be modified, suspended, or revoked in accordance with the procedures at 33 CFR 330.5.

(3) In cases of where the prospective permittee is not a Federal agency, the district engineer will provide a response to NMFS within 30 calendar days of receipt of any Essential Fish Habitat conservation recommendations, as required by Section 305(b)(4)(B) of the Magnuson-Stevens Fishery Conservation and Management Act.

(4) Applicants are encouraged to provide the Corps with either electronic files or multiple copies of pre-construction notifications to expedite agency coordination.

D. District Engineer's Decision:

1. In reviewing the PCN for the proposed activity, the district engineer will determine whether the activity authorized by the NWP will result in more than minimal individual or cumulative adverse environmental effects or may be contrary to the public interest. For a linear project, this determination will include an evaluation of the individual crossings to determine whether they individually satisfy the terms and conditions of the NWP(s), as well as the cumulative effects caused by all of the crossings authorized by NWP. If an applicant requests a waiver of the 300 linear foot limit on impacts to streams or of an otherwise applicable limit, as provided for in NWPs 13, 21, 29, 36, 39, 40, 42, 43, 44, 50, 51 or 52, the district engineer will only grant the waiver upon a written determination that the NWP activity will result in minimal adverse effects. When making minimal effects determinations the district engineer will consider the direct and indirect effects caused by the NWP activity. The district engineer will also consider site specific factors, such as the environmental setting in the vicinity of the NWP activity, the type of resource that will be affected by the NWP activity, the functions provided by the aquatic resources that will be affected by the NWP activity, the degree or magnitude to which the aquatic resources perform those functions, the extent that aquatic resource functions will be lost as a result of the NWP activity (e.g., partial or complete loss), the duration of the adverse effects (temporary or permanent), the importance of the aquatic resource functions to the region (e.g., watershed or ecoregion), and mitigation required by the district engineer. If an appropriate functional assessment method is available and practicable to use, that assessment method may be used by the district engineer to assist in the minimal adverse effects determination. The district engineer may add case-specific special conditions to the NWP authorization to address site-specific environmental concerns.

2. If the proposed activity requires a PCN and will result in a loss of greater than 1/10 acre of wetlands, the prospective permittee should submit a mitigation proposal with the PCN. Applicants may also propose compensatory mitigation for projects with smaller impacts. The district engineer will consider any proposed compensatory mitigation the applicant has included in the proposal in determining whether the net adverse environmental effects to the aquatic environment of the proposed activity are minimal. The compensatory mitigation proposal may be either conceptual or detailed. If the district engineer determines that the activity complies with the terms and conditions of the NWP and that the adverse effects on the aquatic environment are minimal, after considering mitigation, the district engineer will notify the permittee and include any activity-specific conditions in the NWP verification the district engineer deems necessary. Conditions for compensatory mitigation requirements must comply with the appropriate provisions at 33 CFR 332.3(k). The district engineer must approve the final mitigation plan before the permittee commences work in waters of the United States, unless the district engineer determines that prior approval of the final mitigation plan is

not practicable or not necessary to ensure timely completion of the required compensatory mitigation. If the prospective permittee elects to submit a compensatory mitigation plan with the PCN, the district engineer will expeditiously review the proposed compensatory mitigation plan. The district engineer must review the proposed compensatory mitigation plan within 45 calendar days of receiving a complete PCN and determine whether the proposed mitigation would ensure no more than minimal adverse effects on the aquatic environment. If the net adverse effects of the project on the aquatic environment (after consideration of the compensatory mitigation proposal) are determined by the district engineer to be minimal, the district engineer will provide a timely written response to the applicant. The response will state that the project can proceed under the terms and conditions of the NWP, including any activity specific conditions added to the NWP authorization by the district engineer.

3. If the district engineer determines that the adverse effects of the proposed work are more than minimal, then the district engineer will notify the applicant either: (a) That the project does not qualify for authorization under the NWP and instruct the applicant on the procedures to seek authorization under an individual permit; (b) that the project is authorized under the NWP subject to the applicant's submission of a mitigation plan that would reduce the adverse effects on the aquatic environment to the minimal level; or (c) that the project is authorized under the NWP with specific modifications or conditions. Where the district engineer determines that mitigation is required to ensure no more than minimal adverse effects occur to the aquatic environment, the activity will be authorized within the 45-day PCN period, with activity-specific conditions that state the mitigation requirements. The authorization will include the necessary conceptual or detailed mitigation or a requirement that the applicant submit a mitigation plan that would reduce the adverse effects on the aquatic environment to the minimal level. When mitigation is required, no work in waters of the United States may occur until the district engineer has approved a specific mitigation plan or has determined that prior approval of a final mitigation plan is not practicable or not necessary to ensure timely completion of the required compensatory mitigation..

E. Further Information

1. District Engineers have authority to determine if an activity complies with the terms and conditions of an NWP.
2. NWPs do not obviate the need to obtain other federal, state, or local permits, approvals, or authorizations required by law.
3. NWPs do not grant any property rights or exclusive privileges.
4. NWPs do not authorize any injury to the property or rights of others.
5. NWPs do not authorize interference with any existing or proposed Federal project.

F. Definitions

Best management practices (BMPs): Policies, practices, procedures, or structures implemented to mitigate the adverse environmental effects on surface water quality resulting from development. BMPs are categorized as structural or non-structural.

Compensatory mitigation: The restoration (re-establishment or rehabilitation), establishment (creation), enhancement, and/or in certain circumstances preservation of aquatic resources for the purposes of offsetting unavoidable adverse impacts which remain after all appropriate and practicable avoidance and minimization has been achieved.

Currently serviceable: Useable as is or with some maintenance, but not so degraded as to essentially require reconstruction.

Direct effects: Effects that are caused by the activity and occur at the same time and place.

Discharge: The term "discharge" means any discharge of dredged or fill material.

Enhancement: The manipulation of the physical, chemical, or biological characteristics of an aquatic resource to heighten, intensify, or improve a specific aquatic resource function(s). Enhancement results in the gain of selected aquatic resource function(s), but may also lead to a decline in other aquatic resource function(s). Enhancement does not result in a gain in aquatic resource area.

Ephemeral stream: An ephemeral stream has flowing water only during, and for a short duration after, precipitation events in a typical year. Ephemeral stream beds are located above the water table year-round. Groundwater is not a source of water for the stream. Runoff from rainfall is the primary source of water for stream flow.

Establishment (creation): The manipulation of the physical, chemical, or biological characteristics present to develop an aquatic resource that did not previously exist at an upland site. Establishment results in a gain in aquatic resource area.

High Tide Line: The line of intersection of the land with the water's surface at the maximum height reached by a rising tide. The high tide line may be determined, in the absence of actual data, by a line of oil or scum along shore objects, a more or less continuous deposit of fine shell or debris on the foreshore or berm, other physical markings or characteristics, vegetation lines, tidal gages, or other suitable means that delineate the general height reached by a rising tide. The line encompasses spring high tides and other high tides that occur with periodic frequency but does not include storm surges in which there is a departure from the normal or predicted reach of the tide due to the piling up of water against a coast by strong winds such as those accompanying a hurricane or other intense storm.

Historic Property: Any prehistoric or historic district, site (including archaeological site), building, structure, or other object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria (36 CFR part 60).

Independent utility: A test to determine what constitutes a single and complete non-linear project in the Corps regulatory program. A project is considered to have independent utility if it would be constructed absent the construction of other projects in the project area. Portions of a multi-phase project that depend upon other phases of the project do not have independent utility. Phases of a project that would be constructed even if the other phases were not built can be considered as separate single and complete projects with independent utility.

Indirect effects: Effects that are caused by the activity and are later in time or farther removed in distance, but are still reasonably foreseeable.

Intermittent stream: An intermittent stream has flowing water during certain times of the year, when groundwater provides water for stream flow. During dry periods, intermittent streams may not have flowing water. Runoff from rainfall is a supplemental source of water for stream flow.

Loss of waters of the United States: Waters of the United States that are permanently adversely affected by filling, flooding, excavation, or drainage because of the regulated activity. Permanent adverse effects include permanent discharges of dredged or fill material that change an aquatic area to dry land, increase the bottom elevation of a waterbody, or change the use of a waterbody. The acreage of loss of waters of the United States is a threshold measurement of the impact to jurisdictional waters for determining whether a project may qualify for an NWP; it is not a net threshold that is calculated after considering compensatory mitigation that may be used to offset losses of aquatic functions and services. The loss of stream bed includes the linear feet of stream bed that is filled or excavated. Waters of the United States temporarily filled, flooded, excavated, or drained, but restored to pre-construction contours and elevations after construction, are not included in the measurement of loss of waters of the United States. Impacts resulting from activities eligible for exemptions under Section

404(f) of the Clean Water Act are not considered when calculating the loss of waters of the United States.

Non-tidal wetland: A non-tidal wetland is a wetland that is not subject to the ebb and flow of tidal waters. The definition of a wetland can be found at 33 CFR 328.3(b). Non-tidal wetlands contiguous to tidal waters are located landward of the high tide line (i.e., spring high tide line).

Open water: For purposes of the NWPs, an open water is any area that in a year with normal patterns of precipitation has water flowing or standing above ground to the extent that an ordinary high water mark can be determined. Aquatic vegetation within the area of standing or flowing water is either non-emergent, sparse, or absent. Vegetated shallows are considered to be open waters. Examples of "open waters" include rivers, streams, lakes, and ponds.

Ordinary High Water Mark: An ordinary high water mark is a line on the shore established by the fluctuations of water and indicated by physical characteristics, or by other appropriate means that consider the characteristics of the surrounding areas (see 33 CFR 328.3(e)).

Perennial stream: A perennial stream has flowing water year-round during a typical year. The water table is located above the stream bed for most of the year. Groundwater is the primary source of water for stream flow. Runoff from rainfall is a supplemental source of water for stream flow.

Practicable: Available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.

Pre-construction notification: A request submitted by the project proponent to the Corps for confirmation that a particular activity is authorized by nationwide permit. The request may be a permit application, letter, or similar document that includes information about the proposed work and its anticipated environmental effects. Pre-construction notification may be required by the terms and conditions of a nationwide permit, or by regional conditions. A pre-construction notification may be voluntarily submitted in cases where pre-construction notification is not required and the project proponent wants confirmation that the activity is authorized by nationwide permit.

Preservation: The removal of a threat to, or preventing the decline of, aquatic resources by an action in or near those aquatic resources. This term includes activities commonly associated with the protection and maintenance of aquatic resources through the implementation of appropriate legal and physical mechanisms. Preservation does not result in a gain of aquatic resource area or functions.

Re-establishment: The manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/historic functions to a former aquatic resource. Re-establishment results in rebuilding a former aquatic resource and results in a gain in aquatic resource area and functions.

Rehabilitation: The manipulation of the physical, chemical, or biological characteristics of a site with the goal of repairing natural/historic functions to a degraded aquatic resource. Rehabilitation results in a gain in aquatic resource function, but does not result in a gain in aquatic resource area.

Restoration: The manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/historic functions to a former or degraded aquatic resource. For the purpose of tracking net gains in aquatic resource area, restoration is divided into two categories: re-establishment and rehabilitation.

Riffle and pool complex: Riffle and pool complexes are special aquatic sites under the 404(b)(1) Guidelines. Riffle and pool complexes sometimes characterize steep gradient sections of streams. Such stream sections are recognizable by their hydraulic characteristics. The rapid movement of water over a coarse substrate in riffles results in a rough flow, a turbulent surface, and high dissolved oxygen levels in the water. Pools are deeper areas associated with riffles. A slower stream velocity, a streaming flow, a smooth surface, and a finer substrate characterize pools.

Riparian areas: Riparian areas are lands adjacent to streams, lakes, and estuarine-marine shorelines. Riparian areas are transitional

between terrestrial and aquatic ecosystems, through which surface and subsurface hydrology connects riverine, lacustrine, estuarine, and marine waters with their adjacent wetlands, non-wetland waters, or uplands. Riparian areas provide a variety of ecological functions and services and help improve or maintain local water quality. (See general condition 23.)

Shellfish seeding: The placement of shellfish seed and/or suitable substrate to increase shellfish production. Shellfish seed consists of immature individual shellfish or individual shellfish attached to shells or shell fragments (i.e., spat on shell). Suitable substrate may consist of shellfish shells, shell fragments, or other appropriate materials placed into waters for shellfish habitat.

Single and complete linear project: A linear project is a project constructed for the purpose of getting people, goods, or services from a point of origin to a terminal point, which often involves multiple crossings of one or more waterbodies at separate and distant locations. The term "single and complete project" is defined as that portion of the total linear project proposed or accomplished by one owner/developer or partnership or other association of owners/developers that includes all crossings of a single water of the United States (i.e., a single waterbody) at a specific location. For linear projects crossing a single or multiple waterbodies several times at separate and distant locations, each crossing is considered a single and complete project for purposes of NWP authorization. However, individual channels in a braided stream or river, or individual arms of a large, irregularly shaped wetland or lake, etc., are not separate waterbodies, and crossings of such features cannot be considered separately.

Single and complete non-linear project: For non-linear projects, the term "single and complete project" is defined at 33 CFR 330.2(i) as the total project proposed or accomplished by one owner/developer or partnership or other association of owners/developers. A single and complete non-linear project must have independent utility (see definition of "independent utility"). Single and complete non-linear projects may not be "piecemealed" to avoid the limits in an NWP authorization.

Stormwater management: Stormwater management is the mechanism for controlling stormwater runoff for the purposes of reducing downstream erosion, water quality degradation, and flooding and mitigating the adverse effects of changes in land use on the aquatic environment.

Stormwater management facilities: Stormwater management facilities are those facilities, including but not limited to, stormwater retention and detention ponds and best management practices, which retain water for a period of time to control runoff and/or improve the quality (i.e., by reducing the concentration of nutrients, sediments, hazardous substances and other pollutants) of stormwater runoff.

Stream bed: The substrate of the stream channel between the ordinary high water marks. The substrate may be bedrock or inorganic particles that range in size from clay to boulders. Wetlands contiguous to the stream bed, but outside of the ordinary high water marks, are not considered part of the stream bed.

Stream channelization: The manipulation of a stream's course, condition, capacity, or location that causes more than minimal interruption of normal stream processes. A channelized stream remains a water of the United States.

Structure: An object that is arranged in a definite pattern of organization. Examples of structures include, without limitation, any pier, boat dock, boat ramp, wharf, dolphin, weir, boom, breakwater, bulkhead, revetment, riprap, jetty, artificial island, artificial reef, permanent mooring structure, power transmission line, permanently moored floating vessel, piling, aid to navigation, or any other manmade obstacle or obstruction.

Tidal wetland: A tidal wetland is a wetland (i.e., water of the United States) that is inundated by tidal waters. The definitions of a wetland and tidal waters can be found at 33 CFR 328.3(b) and 33 CFR 328.3(f), respectively. Tidal waters rise and fall in a predictable and measurable rhythm or cycle due to the gravitational pulls of the moon and sun. Tidal waters end where the rise and fall of the water surface

can no longer be practically measured in a predictable rhythm due to masking by other waters, wind, or other effects. Tidal wetlands are located channelward of the high tide line, which is defined at 33 CFR 328.3(d).

Vegetated shallows: Vegetated shallows are special aquatic sites under the 404(b)(1) Guidelines. They are areas that are permanently inundated and under normal circumstances have rooted aquatic vegetation, such as seagrasses in marine and estuarine systems and a variety of vascular rooted plants in freshwater systems.

Waterbody: For purposes of the NWPs, a waterbody is a jurisdictional water of the United States. If a jurisdictional wetland is adjacent—meaning bordering, contiguous, or neighboring—to a waterbody determined to be a water of the United States under 33 CFR 328.3(a)(1)–(6), that waterbody and its adjacent wetlands are considered together as a single aquatic unit (see 33 CFR 328.4(c)(2)). Examples of "waterbodies" include streams, rivers, lakes, ponds, and wetlands.

STATE OF ILLINOIS
CLEAN WATER ACT SECTION 401 WATER QUALITY CERTIFICATION
2012 GENERAL AND SPECIFIC CONDITIONS
NWP 6 - SURVEY ACTIVITIES

These conditions ensure that the activities carried out under Nationwide Permits (NWP) do not violate the Water Quality Standards of the State of Illinois resulting in permanent damage to habitat, increased turbidity, reduced bank and channel stability, and/or impacts to the biological and chemical integrity of the waters. These conditions are in addition to, not a replacement for, those conditions included by the federal authorities. Proposed projects authorized by the NWP listed above that cannot be conducted within the conditions listed below must apply for individual Clean Water Act Section 401 Water Quality Certification.

Applications for certification should be sent to the Illinois Environmental Protection Agency, Division of Water Pollution Control, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois, 62794-9276. An issued certification becomes part of the Clean Water Act Section 404 Permit. Therefore, it expires with the 404 Permit unless explicitly stated otherwise.

GENERAL CONDITIONS FOR ALL NWPs

1. An individual 401 water quality certification will be required for any activities permitted under these Nationwide Permits for discharges to waters designated by the State of Illinois as Outstanding Resource Waters under 35 Ill. Adm. Code 302.105(b).
2. Projects requiring authorization under Section 404 of the Clean Water Act must implement Best Management Practices (BMPs) to protect water quality, preserve natural hydrology and minimize the overall impacts to aquatic resources during and after construction. If the project involves a water with an approved Total Maximum Daily Load (TMDL) allocation for any parameter, measures which ensure consistency with the assumption and requirements of the TMDL shall be included. TMDL program information and water listings are available at www.epa.state.il.us/water/tmdl/. If the project involves an impaired water listed on the Illinois Environmental Protection Agency's Section 303(d) list for suspended solids, turbidity, or siltation, measures designed for at least a 25-year, 24-hour rainfall event shall be incorporated. Impaired waters are identified at www.epa.state.il.us/water/tmdl/303d-list.html.
3. Prior to proceeding with any work in accordance with any Nationwide Permit, potential impacts to threatened or endangered species shall be identified through use of the State's Ecological Compliance Assessment Tool (EcoCAT) at <http://dnrecocat.state.il.us/ecopublic/>. If potential impacts to State threatened or endangered species are identified, the Illinois Department of Natural Resources shall be consulted with.

SPECIFIC CONDITIONS FOR NWP 6 – Survey Activities

1. The applicant shall not cause:
 - A. violation of applicable provisions of the Illinois Environmental Protection Act;
 - B. water pollution defined and prohibited by the Illinois Environmental Protection Act;
 - C. violation of applicable water quality standards of the Illinois Pollution Control Board, Title 35, Subtitle C: Water Pollution Rules and Regulation; or
 - D. interference with water use practices near public recreation areas or water supply intakes.

2. The applicant for Nationwide Permit 6 shall provide adequate planning and supervision during the project construction period for implementing construction methods, processes and cleanup procedures necessary to prevent water pollution and control erosion.
3. Material resulting from trench excavation within surface waters of the State may be temporarily sidecast adjacent to the trench excavation provided that:
 - A. Sidecast material is not placed within a creek, stream, river or other flowing water body such that material dispersion could occur;
 - B. Side cast material is not placed within ponds or other water bodies other than wetlands; and
 - C. Sidecast material is not placed within a wetland for a period longer than twenty (20) calendar days. Such sidecast material shall either be removed from the site, or used as backfill (refer to Condition 4 and 5).
4. Backfill used within trenches passing through surface water of the State, except wetland areas, shall be clean course aggregate, gravel or other material which will not cause siltation. Excavated material may be used only if:
 - A. Particle size analysis is conducted and demonstrates the material to be at least 80% sand or larger size material, using a #230 U.S. sieve; or
 - B. Excavation and backfilling are done under dry conditions.
5. Backfill used within trenches passing through wetland areas shall consist of clean material which will not cause siltation. Excavated material shall be used to the extent practicable, with the upper six (6) to twelve (12) inches backfilled with the topsoil obtained during trench excavation.
6. Temporary work pads shall be constructed of clean coarse aggregate or non-erodible non-earthen fill material that will not cause siltation. Sandbags, pre-fabricated rigid materials, sheet piling, inflatable bladders and fabric lined basins may be used for temporary facilities.
7. The applicant for Nationwide 6 that uses temporary work pads in order to perform work in creeks, streams, or rivers shall maintain flow in the these waters by utilizing dam and pumping, fluming, culverts or other such techniques

STATE OF MISSOURI
 CLEAN WATER ACT SECTION 401 WATER QUALITY CERTIFICATION
 2012 GENERAL AND SPECIFIC CONDITIONS
 NWP 33 – TEMPORARY CONSTRUCTION, ACCESS AND DEWATERING

These conditions ensure that activities carried out under Nationwide Permits (NWPs) do not violate the Water Quality Standards of the State of Missouri resulting in permanent damage to habitat, increased turbidity, reduced bank and channel stability, and/or impacts to the biological and chemical integrity of the waters. These conditions are in addition to, not a replacement for, those conditions included by the federal authorities. Proposed projects authorized by the NWPs listed above that cannot be conducted within the conditions listed below must apply for individual Clean Water Act Section 401 Water Quality Certification (certification).

Applications for certification should be sent to the Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176, or electronically to wpsc401cert@dnr.mo.gov. A complete application consists of the application submitted to the U.S. Army Corps of Engineers (Corps) as well as additional information necessary for a complete review of the project. This may include but is not limited to topographical maps, locational maps, engineering plans, project diagrams and where applicable mitigation plans (10 CSR 20-6.060(5)).

An issued certification becomes part of the 404 Permit and; therefore, expires with the 404 Permit unless explicitly stated in the certification. Not all permit modifications require the certification to be modified and/or reissued. An example would be when a permit expiration date is extended or the permit is reissued and there are no changes to the original project, the certification may remain valid for that project.

The Department encourages, but does not require, the permittee to consider environmentally-friendly design techniques to include stormwater management strategies that maintain or restore the original site hydrology through infiltration, evaporation or reuse of stormwater. Designs might include creating vegetated swales or rain gardens, or using porous pavement. More information can be found at these websites: <http://www.epa.gov/owow/NPS/lid/> and www.lid-stormwater.net/lid_techniques.htm.

GENERAL CONDITIONS for ALL NWPs

1. NWPs shall not allow the filling of jurisdictional springs.
2. Acquisition of a NWP(s) and the attendant certification(s) shall not be construed or interpreted to imply the requirements for other permits are replaced or superseded, including Clean Water Act Section 402 National Pollutant Discharge Elimination System (NPDES) Permits for land disturbance or return water from material deposition. Permits or any other requirements shall remain in effect. Applicants with questions are encouraged to contact the Missouri Department of Natural Resources' Regional Office in the project area. A regional office map with contact information can be located at www.dnr.mo.gov/regions/regions.htm.
3. Care shall be taken to keep machinery out of the waterway as much as possible. Fuel, oil and other petroleum products, equipment, construction materials and any solid waste shall not be stored below the ordinary high water mark at any time or in the adjacent floodway beyond normal working hours. All precautions shall be taken to avoid the release of wastes or fuel to streams and other adjacent waters as a result of this operation.
4. Petroleum products spilled into any water or on the banks where the material may enter waters of the state shall be immediately cleaned up and disposed of properly. Any such spills of petroleum shall be reported as soon as possible, but no later than 24 hours after discovery to the Missouri Department of Natural Resources' Environmental Emergency Response number at (573) 634-2436.
5. Only clean, nonpolluting fill shall be used. The following materials are not suitable for bank stabilization and shall not be used due to their potential to cause violations of the general criteria of the Water Quality Standards (10 CSR 20-7.031 (3)(A)-(H)):
 - a. Earthen fill, gravel, broken concrete where the material does not meet the specifications stated in the Missouri NWP Regional Conditions (http://www.nwk.usace.army.mil/regulatory/NWP_2012/nwp.htm) and fragmented asphalt, since these materials are usually not substantial enough to withstand erosive flows;
 - b. Concrete with exposed rebar;
 - c. Tires, vehicles or vehicle bodies, construction or demolition debris are solid waste and are excluded from placement in the waters of the state;
 - d. Liquid concrete, including grouted riprap, if not placed as part of an engineered structure; and
 - e. Any material containing chemical pollutants (including but not limited to creosote or pentachlorophenol).
6. Clearing of vegetation/trees shall be the minimum necessary to accomplish the activity. A vegetated corridor shall be maintained from the high bank on either side of the jurisdictional channel to protect water quality and to provide for long-term stability of the stream channel, unless physical barriers prevent such a corridor. For purposes of this NWP, lack of ownership or control of any portion of this corridor may be considered a legitimate and discretionary cause to waive this requirement on that portion.

7. This certification is not valid for any Section 404 Permit issued on a water that is:
 - a. Listed as impaired by inorganic sediment, aquatic habitat alteration or unknown impairment as listed in the most current Water Quality Report (Section 305(b) Report). For convenience a table of these impaired waters is provided at the following website: www.nwk.usace.army.mil/regulatory/NWP_2012/MO/MOWQC_Con7.pdf;
 - b. Located in or occur within two miles upstream of a designated outstanding state or national resource water; or
 - c. Located in a designated metropolitan no-discharge stream.

The most current Water Quality Report can be found at <http://www.dnr.mo.gov/env/wpp/waterquality/305b/>. A listing of *Outstanding National and State Resource Waters* and *Metropolitan No-Discharge Streams* can be found in 10 CSR 20-7.031, Tables D, E and F or at <http://www.sos.mo.gov/adrules/csr/current/10csr/10c20-7.pdf>.

The Department's geospatial data is available upon request, and all published data is available on the Missouri Spatial Data Information Services website at <http://msdis.missouri.edu/>.

Additional information to identify the project location may be obtained from the program at (573) 751-1300.

8. Streambed gradient shall not be permanently altered during project construction.
9. NWP's issued by the Corps for which the 300 linear foot threshold for stream impacts is waived by the district engineer shall require individual certification by the state. This is applicable to all NWP's where the permit has a 300 linear foot threshold including NWP's 21, 29, 39, 40, 42, 43, 44, 50, 51 and 52.
10. No project under a NWP shall accelerate bed or bank erosion.
11. Representatives from the Department shall be allowed on the project property to inspect the authorized activity at any time deemed necessary to ensure compliance with permit conditions.
12. You must submit a copy of the signed "Compliance Certification" referenced in NWP General Condition No. 30 as proof of project completion when the original is submitted to the Corps. This document is to be sent to the Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176 or electronically to wpsc401cert@dnr.mo.gov.
13. After avoidance and minimization for the project, unavoidable stream impacts shall be mitigated appropriately. Mitigation for loss of aquatic resources shall be in conformance with the currently approved "Missouri Stream Mitigation Method" and the "State of Missouri Wetland Assessment Method" as well as other mitigation guidance located on-line at <http://www.nwk.usace.army.mil/regulatory/CompMit/compmit.htm>.
14. Best Management Practices shall be used during all phases of the project to limit the amount of discharge of water contaminants to waters of the state. The project shall not involve more than normal stormwater or incidental loading of sediment caused by construction disturbances.
15. Pursuant to Chapter 644.038, RSMo, the Department certifies all NWP's for impacts in all waters of the state without the above-stated or any other conditions for the construction of highways and bridges approved by the Missouri Highway and Transportation Commission. The Memorandum of Understanding of 2009 and any subsequent modifications between the two agencies outline the requirements by which the Missouri Department of Transportation will design and construct projects in order to protect the water quality of waters of the state.

SPECIFIC CONDITIONS for NWP 33 – Temporary Construction, Access and Dewatering

1. The use of this NWP shall be limited to impacts of six months or less in duration.
2. Any removal of accumulated gravel upstream of a bridge or crossing shall be limited to the quantity necessary to relieve any obstruction or to protect downstream habitat.

STATE OF MISSOURI
 CLEAN WATER ACT SECTION 401 WATER QUALITY CERTIFICATION
 2012 GENERAL AND SPECIFIC CONDITIONS
 NWP 6 – SURVEY ACTIVITIES

These conditions ensure that activities carried out under Nationwide Permits (NWPs) do not violate the Water Quality Standards of the State of Missouri resulting in permanent damage to habitat, increased turbidity, reduced bank and channel stability, and/or impacts to the biological and chemical integrity of the waters. These conditions are in addition to, not a replacement for, those conditions included by the federal authorities. Proposed projects authorized by the NWPs listed above that cannot be conducted within the conditions listed below must apply for individual Clean Water Act Section 401 Water Quality Certification (certification).

Applications for certification should be sent to the Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176, or electronically to wpsc401cert@dnr.mo.gov. A complete application consists of the application submitted to the U.S. Army Corps of Engineers (Corps) as well as additional information necessary for a complete review of the project. This may include but is not limited to topographical maps, locational maps, engineering plans, project diagrams and where applicable mitigation plans (10 CSR 20-6.060(5)).

An issued certification becomes part of the 404 Permit and; therefore, expires with the 404 Permit unless explicitly stated in the certification. Not all permit modifications require the certification to be modified and/or reissued. An example would be when a permit expiration date is extended or the permit is reissued and there are no changes to the original project, the certification may remain valid for that project.

The Department encourages, but does not require, the permittee to consider environmentally-friendly design techniques to include stormwater management strategies that maintain or restore the original site hydrology through infiltration, evaporation or reuse of stormwater. Designs might include creating vegetated swales or rain gardens, or using porous pavement. More information can be found at these websites: <http://www.epa.gov/owow/NPS/lid/> and www.lid-stormwater.net/lid_techniques.htm.

GENERAL CONDITIONS for ALL NWPs

1. NWPs shall not allow the filling of jurisdictional springs.
2. Acquisition of a NWP(s) and the attendant certification(s) shall not be construed or interpreted to imply the requirements for other permits are replaced or superseded, including Clean Water Act Section 402 National Pollutant Discharge Elimination System (NPDES) Permits for land disturbance or return water from material deposition. Permits or any other requirements shall remain in effect. Applicants with questions are encouraged to contact the Missouri Department of Natural Resources' Regional Office in the project area. A regional office map with contact information can be located at www.dnr.mo.gov/regions/regions.htm.
3. Care shall be taken to keep machinery out of the waterway as much as possible. Fuel, oil and other petroleum products, equipment, construction materials and any solid waste shall not be stored below the ordinary high water mark at any time or in the adjacent floodway beyond normal working hours. All precautions shall be taken to avoid the release of wastes or fuel to streams and other adjacent waters as a result of this operation.
4. Petroleum products spilled into any water or on the banks where the material may enter waters of the state shall be immediately cleaned up and disposed of properly. Any such spills of petroleum shall be reported as soon as possible, but no later than 24 hours after discovery to the Missouri Department of Natural Resources' Environmental Emergency Response number at (573) 634-2436.
5. Only clean, nonpolluting fill shall be used. The following materials are not suitable for bank stabilization and shall not be used due to their potential to cause violations of the general criteria of the Water Quality Standards (10 CSR 20-7.031 (3)(A)-(H)):
 - a. Earthen fill, gravel, broken concrete where the material does not meet the specifications stated in the Missouri NWP Regional Conditions (http://www.nwk.usace.army.mil/regulatory/NWP_2012/nwp.htm) and fragmented asphalt, since these materials are usually not substantial enough to withstand erosive flows;
 - b. Concrete with exposed rebar;
 - c. Tires, vehicles or vehicle bodies, construction or demolition debris are solid waste and are excluded from placement in the waters of the state;
 - d. Liquid concrete, including grouted riprap, if not placed as part of an engineered structure; and
 - e. Any material containing chemical pollutants (including but not limited to creosote or pentachlorophenol).
6. Clearing of vegetation/trees shall be the minimum necessary to accomplish the activity. A vegetated corridor shall be maintained from the high bank on either side of the jurisdictional channel to protect water quality and to provide for long-term stability of the stream channel, unless physical barriers prevent such a corridor. For purposes of this NWP, lack of ownership or control of any portion of this corridor may be considered a legitimate and discretionary cause to waive this requirement on that portion.

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 - a. Listed as impaired by inorganic sediment, aquatic habitat alteration or unknown impairment as listed in the most current Water Quality Report (Section 305(b) Report). For convenience a table of these impaired waters is provided at the following website: www.nwk.usace.army.mil/regulatory/NWP_2012/MO/MOWQC_Con7.pdf;
 - b. Located in or occur within two miles upstream of a designated outstanding state or national resource water; or
 - c. Located in a designated metropolitan no-discharge stream.

The most current Water Quality Report can be found at <http://www.dnr.mo.gov/env/wpp/waterquality/305b/>. A listing of *Outstanding National and State Resource Waters* and *Metropolitan No-Discharge Streams* can be found in 10 CSR 20-7.031, Tables D, E and F or at <http://www.sos.mo.gov/adrules/csr/current/10csr/10c20-7.pdf>.

The Department's geospatial data is available upon request, and all published data is available on the Missouri Spatial Data Information Services website at <http://msdis.missouri.edu/>.

Additional information to identify the project location may be obtained from the program at (573) 751-1300.

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9. NWP's issued by the Corps for which the 300 linear foot threshold for stream impacts is waived by the district engineer shall require individual certification by the state. This is applicable to all NWP's where the permit has a 300 linear foot threshold including NWP's 21, 29, 39, 40, 42, 43, 44, 50, 51 and 52.
10. No project under a NWP shall accelerate bed or bank erosion.
11. Representatives from the Department shall be allowed on the project property to inspect the authorized activity at any time deemed necessary to ensure compliance with permit conditions.
12. You must submit a copy of the signed "Compliance Certification" referenced in NWP General Condition No. 30 as proof of project completion when the original is submitted to the Corps. This document is to be sent to the Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176 or electronically to wpsc401cert@dnr.mo.gov.
13. After avoidance and minimization for the project, unavoidable stream impacts shall be mitigated appropriately. Mitigation for loss of aquatic resources shall be in conformance with the currently approved "Missouri Stream Mitigation Method" and the "State of Missouri Wetland Assessment Method" as well as other mitigation guidance located on-line at <http://www.nwk.usace.army.mil/regulatory/CompMit/compmit.htm>.
14. Best Management Practices shall be used during all phases of the project to limit the amount of discharge of water contaminants to waters of the state. The project shall not involve more than normal stormwater or incidental loading of sediment caused by construction disturbances.
15. Pursuant to Chapter 644.038, RSMo, the Department certifies all NWP's for impacts in all waters of the state without the above-stated or any other conditions for the construction of highways and bridges approved by the Missouri Highway and Transportation Commission. The Memorandum of Understanding of 2009 and any subsequent modifications between the two agencies outline the requirements by which the Missouri Department of Transportation will design and construct projects in order to protect the water quality of waters of the state.

SPECIFIC CONDITIONS for NWP 6 – Survey Activities

1. Water, fines and excavated materials displaced by activities such as borings, shall not be returned directly to the waterway, but shall be pumped upland and filtered through an appropriate treatment device as prescribed in any existing separate permit authorizing the discharge of return water.

Ali Trunzo

From: Prebianca, Jacob MVS <Jacob.A.Prebianca@usace.army.mil>
Sent: Thursday, October 06, 2016 2:30 PM
To: Jayme Fuller
Cc: Lori Ferry; Ali Trunzo
Subject: RE: Spire STL Pipeline

Jayme,

I have forwarded this information to our Radiation Safety Officer for review. He will let me know how many samples are needed and the level of effort required. I will get back with you on this.

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

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 | 300 Summers Street, Suite 1100, Charleston WV 25301

Indianapolis Office | 6420 Castleway West, Indianapolis, IN 46250

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Ali Trunzo

From: Jayme Fuller
Sent: Thursday, September 29, 2016 4:31 PM
To: jacob.a.prebianca@usace.army.mil
Cc: Lori Ferry; Ali Trunzo
Subject: Spire STL Pipeline
Attachments: Clearwater_Creek_Area_Crossing_2016_09_29.pdf; 1209_001.pdf

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.

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telephone log



gai consultants

Date: 9/28/2016

Project / Admin. No.: E160438.00

Call From: Jayme Fuller

Company: GAI Consultants

Phone No.: 234-203-0763

Call To: Jacob Prebianca

Company: USACE

Phone No.: 314-731-7661

Subject: Coldwater Creek

cc:

Summary of Discussion, Decisions, and Commitments:

Spoke with Mr. Prebianca today about the possibility of open cutting Coldwater Creek instead of boring under it. Mr. Prebianca indicated that he would need a figure showing the proposed soil disturbance areas and based on that, he would make recommendations on soil sampling that might be needed. He did indicate that all sources of contaminants have been removed upstream and their current sampling efforts are revealing that the contamination is extremely diluted at this point. There is no possibility for contaminants to move further to re-contaminate an area at this point. It is really a matter of contaminants present or not at the proposed creek crossing. He indicated that they would not require Spire to deploy a special geotech crew to sample the soils for the USACE if they (engineers) were not planning to do geotech already. The USACE is responsible for the soil sampling effort on this stream and they will let us know what needs to be done. If there are contaminants, then the USACE would also be responsible to hauling any excavated material during construction off site. Spire would not be responsible for handling any contaminated material. At this point he is waiting on a Figure and he will talk to his Utility Support Team and see what the next recommended steps will be.

Ali Trunzo

From: Lori Ferry
Sent: Friday, September 23, 2016 9:38 AM
To: Ali Trunzo
Subject: FW: Spire Pipeline Soil Exploration | Consolidated North County Levee District

-----Original Message-----

From: Rodriguez Robles, Edward C MVS [mailto:Edward.C.RodriguezRobles@usace.army.mil]
Sent: Wednesday, September 21, 2016 4:23 PM
To: Douglas Sipe <dsipe@mdmcorp.com>; Lori Ferry <L.Ferry@gaiconsultants.com>; Jayme Fuller <J.Fuller@gaiconsultants.com>
Subject: Spire Pipeline Soil Exploration | Consolidated North County Levee District

All,

Concerning the proposed soil exploration adjacent to the subject levee, I have sent them a letter stating our recommendation for approval this afternoon. Please follow up with the levee district for final approval.

Please give us a heads up 72 hours in advance of when commencing to begin borings in this area.

The letter for the Mississippi River Crossing boring is expected to be sent to our District Commander by the end of the week for signature/approval. More to follow.

If you have any questions, please don't hesitate to contact me.

Respectfully,

Ed Rodriguez Robles
ICW Program Manager
US Army Corps of Engineers
St. Louis District Office
1222 Spruce St.
St. Louis, MO 63103
Office: 314-331-8568
Mobile (BB): 314-379-9065

Ali Trunzo

From: Lori Ferry
Sent: Tuesday, September 20, 2016 1:23 PM
To: Ali Trunzo
Subject: FW: Spire Temporary License Agreement (UNCLASSIFIED)
Attachments: RE: Temporary License Contract No. DACW43-3-16-101 - RE: Temporary License - Spire STL Pipeline

From: Hoerner, Melissa L MVS [mailto:Melissa.L.Hoerner@usace.army.mil]
Sent: Tuesday, September 20, 2016 11:34 AM
To: Lori Ferry <L.Ferry@gaiconsultants.com>
Cc: Jayme Fuller <J.Fuller@gaiconsultants.com>
Subject: RE: Spire Temporary License Agreement (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Hi, Lori:

I'm not in the office, but I'm told a fed ex package did arrive from GAI. Thank you.

Attached is the executed agreement. Please don't hesitate to let me know if you have questions.

Thanks!!
Lynn

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]
Sent: Tuesday, September 20, 2016 11:01 AM
To: Hoerner, Melissa L MVS <Melissa.L.Hoerner@usace.army.mil>
Cc: Jayme Fuller <J.Fuller@gaiconsultants.com>
Subject: [EXTERNAL] Spire Temporary License Agreement

Hi Lynn

Just wanted to check in with you and make sure you received our check for the USACE's work on the Temporary License agreement? You should be receiving it today (if it hasn't come already).

Please forward the executed agreement when you get the chance!

Thanks for your assistance with this!

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 |     

l.ferry@gaiconsultants.com

Ali Trunzo

From: Lori Ferry
Sent: Thursday, September 15, 2016 4:19 PM
To: KWIBBENMEYER@WIBBENMEYERLAW.COM
Cc: Rodriguez Robles, Edward C MVS; Jayme Fuller; Douglas Sipe; Ali Trunzo; skmachens@live.com; Loren Locher
Subject: Spire STL Pipeline-North County Levee

Hi Kevin,

Thank you for taking the time to speak with us this afternoon, we appreciate it.





Below is a summary of our call:

- Spire was informed from St. Louis that a letter of endorsement from the levee district be included with our federal permit package. We wanted to touch base with you to discuss what would be required in order to obtain this letter, so that we can plan to provide you the necessary materials in sufficient time.
- We understand from the call that generally the levee district will defer to the USACE review and determination that the crossing is being conducted without impacting the integrity of the levee.
- North Consolidated Levee District is not familiar with providing a letter of endorsement but would want to have a discussion with the St. Louis District to understand what would be needed and could provide a letter as necessary.
- Spire can provide draft design details/drawings this fall if required.

Ed-if there is further information you can provide us regarding the USACE requirement to have a letter from the levee district, it would be greatly helpful.

Thanks all!
Lori

Lori Ferry
Environmental Manager-Energy Business Unit

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l.ferry@gaiconsultants.com

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Ali Trunzo

From: Prebianca, Jacob MVS <Jacob.A.Prebianca@usace.army.mil>
Sent: Tuesday, September 13, 2016 3:51 PM
To: Jayme Fuller
Cc: Lori Ferry; Ali Trunzo
Subject: RE: Spire STL Pipeline proposed Geotech bore sample points Cold Water Creek

Jayme,

Upon review of the attached figure, no utility support is required. Please contact me if the soil within the floodplain and a depth of 6ft or less is disturbed during this project.

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 08, 2016 3:53 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 proposed Geotech bore sample points Cold Water Creek

Hi Jacob,

Per our conversation yesterday, I am sending you the attached figure referencing the proposed geotechnical bore sample pit locations on each side of Coldwater Creek. As you can see, the proposed pits appear to be outside of the mapped 100 year floodplain. The geotech drillers will plan to bore a pit on each side approximately 100 ft in depth either the last week of September or first week of October. If you prefer to have someone from your Utility Support Team be present during the survey to scan soils for potential contamination, please let me know and I will try to get a date pinned down for when they plan to be out there.

Thanks!

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

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Ali Trunzo

From: Lori Ferry
Sent: Thursday, September 01, 2016 10:11 AM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline- Update

From: Jayme Fuller
Sent: Thursday, September 01, 2016 9:01 AM
To: Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>; Lori Ferry <L.Ferry@gaiconsultants.com>
Cc: Hoerner, Melissa L MVS <Melissa.L.Hoerner@usace.army.mil>
Subject: Spire STL Pipeline- Update

Hi Ed and Lynn,

I just wanted to follow up on the geotech Section 408 permit and temporary license agreement. Geotech is tentatively scheduled for the week of September 12th pending your approval. I know you have been super busy but I wanted to check to see if you thought we would have approval and temporary access by that week.

Also Ed, is there anything else you need from us to draft the cost agreement? We would like to sit down with you to go over a draft of the cost agreement on September 14th if your schedule allowed.

Let me know thanks!

Jayme L. Fuller, Environmental Manager

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6420 Castleway West, Indianapolis, IN 46250

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6420 Castleway West Drive
Indianapolis, IN 46250

T 317.570.6800

August 19, 2016
Project E160438.00

Mr. Ed Rodriguez Robles
US Army Corps of Engineers
St. Louis District Office
1222 Spruce St.
St. Louis, MO 63103

Ms. Lynn Hoerner
US Army Corps of Engineers
St. Louis District Office
1222 Spruce St.
St. Louis, MO 63103

**Section 408 Request for Authorization
Temporary License Agreement
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL and St. Charles and St. Louis Counties, Missouri**

Dear Mr. Rodriguez Robles and Ms. Lynn Hoerner:

GAI Consultants, Inc. ("GAI") is requesting authorization under Section 14 of the Rivers and Harbors Act of 1899 as codified in 33 USC 408 ("Section 408") on behalf of Spire STL Pipeline LLC ("Spire"), for the proposed Geotechnical Survey Workplan for the Spire STL Pipeline ("Project") in Scott, Green, and Jersey Counties, IL and St. Charles and St. Louis Counties, Missouri. GAI is submitting this Section 408 package in reference to our meeting with your office on August 3, 2016 to discuss the proposed Geotechnical Survey Workplan ("Workplan") in the Mississippi and Missouri Rivers. Based upon our discussions with United States Army Corps of Engineers ("USACE") St. Louis District and Kansas City District, Kansas City District will not require authorization under Section 408 for the proposed river boring in the Missouri River. Therefore, GAI requests review of the land and water Mississippi River borings only.

General Project Description

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). As part of the proposed Project and subject to LGC's receipt of approval from the Missouri Public Service Commission ("MPSC"), Spire is proposing to purchase Line 880 from LGC and modify the pipeline for interstate service. Line 880 consists of approximately 7.6 miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi River in St. Louis County, Missouri. The total length of pipelines subject to the Project will be approximately 65.0 miles. The overall design capacity of the pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project as proposed will include pipeline interconnects with

REX in Illinois and LGC and MRT in Missouri. The Project will also include the construction of minor aboveground facilities.

Geotechnical Survey Workplan Description

In order to evaluate the feasibility, design, and constructability of the horizontal directional drill ("HDD") methods of pipeline installation under the Mississippi and Missouri Rivers, several geotechnical soil test borings are proposed to be collected on land and along the river bottoms. A total of 4 borings are anticipated for evaluation of the Mississippi River crossing (2 land and 2 water) as shown in Figures 6- 8 of the Workplan attached as Attachment A. It is anticipated that a barge will be launched from Hideaway Harbor Park to complete the water-based bores within the Mississippi River. Proposed land bore site B-MISIP-4 is located on property owned by the USACE as shown in the Workplan as a detailed figure attached in Appendix B.3- Mississippi Mainline Crossing- BMISIP-4.

Temporary License Agreement

GAI is requesting a Temporary License Agreement on behalf of Spire, for access to the property owned by the USACE for 120 days. It is anticipated that several surveys will need to be conducted on the property including the proposed land bore site B-MISIP-4, stream and wetland delineations, civil surveys and habitat surveys within a 400 foot survey corridor along the proposed centerline (Figure A, Attachment B). No tree clearing or cutting of brush will be needed to perform these surveys. Stream and wetland delineations, civil surveys, and habitat surveys will all be conducted by pedestrian reconnaissance with no vehicle access. To minimize the concern associated with rutting or damage to existing ground cover for the land bore site, a low-contact, rubber-tired ATV drill rig will be used. If rain or other precipitation has occurred several days before the proposed boring date, the drilling contractor will send out a crew member to assess if soft ground conditions exist. Should soft ground exist and the possibility for disturbance such as deep rutting be present, the boring will be rescheduled until the area dries and is re-inspected for work. Further details of the proposed land bore site can be found in the attached Workplan (Attachment A).

Nationwide Permit 6 and 33

During our meeting with your office on August 3, 2016, we discussed the applicability of Nationwide Permit ("NWP") 6 - Survey Activities and NWP 33 - Temporary Construction Access and Dewatering for geotechnical borings within the Mississippi River and wetlands within the location of the land based bores. A pre-construction notification is not required under NWP 6 for impacts under 0.10 acre. Additionally, no fill will be placed in streams or wetlands associated with temporary construction access. GAI will provide Spire with an internal documentation package that includes a Wetland and Stream Identification Report ("WDSIR") and review of proposed impacts (if any) associated with the Workplan.

Categorical Exclusions

It is our understanding that in order for the USACE to grant permission under Section 408, the USACE must determine that the proposed alteration does not impair the usefulness of the USACE project. Because a decision on a Section 408 request is a federal action, and therefore subject to the National Environmental Policy Act ("NEPA") review, the district will work with the applicant under a categorical exclusion for the proposed Workplan. The proposed work is minor and would not have a significant impact on the environment.

GAI would appreciate your issuance of a Temporary License Agreement for the access to the USACE-owned property and your expedited review under a Categorical Exclusion for borings proposed within the Mississippi and Missouri Rivers in accordance with this Workplan to address the requests described above.

Mr. Ed Rodriguez Robles
August 19, 2016
Project E160438.00

Page 3

If you have any questions regarding this submission, please feel free to contact me at 234.203.0763, or by e-mail at J.Fuller@gaiconsultants.com.

Sincerely,
GAI Consultants, Inc.



Jayne Fuller
Environmental Manager

AMT/jbm

Attachment A: Proposed Spire Pipeline Geotechnical Workplan

Attachment B: Figure A- Temporary License Agreement Study Area Map

Ali Trunzo

From: Jayme Fuller
Sent: Wednesday, August 24, 2016 2:34 PM
To: Deutsch, Charles W (Charlie) MVS; david.p.meyer@usace.army.mil
Cc: Lori Ferry; Ali Trunzo
Subject: RE: Spire STL Pipeline FERC and USACE River Crossing Review

Hi Charlie
Thank you for following up.

We had a nice site visit and toured the north and south sides of both the Mississippi and Missouri proposed crossings. We also looked at the area proposed for a geotech investigation on the USACE property.

While we are on site, there was mention of on going bat mist net surveys along the Mississippi and on the islands close to our proposed crossing area. We would like to review the findings and areas studied so that we may modify our mist net survey locations for next year if necessary.

Thanks

Jayme Fuller

Sent via the Samsung Galaxy Note® 4, an AT&T 4G LTE smartphone

----- Original message -----

From: "Deutsch, Charles W (Charlie) MVS" <Charlie.Deutsch@usace.army.mil>
Date: 8/23/2016 5:06 PM (GMT-06:00)
To: Jayme Fuller <J.Fuller@gaiconsultants.com>
Subject: RE: Spire STL Pipeline FERC and USACE River Crossing Review

Jayme,

Hope the site visit went well today. Sorry I wasn't able to attend. I had a meeting previously planned for that same time and didn't have anyone available that could represent our office.

Will you be putting together notes or a trip report from today's visit? If so, can you please copy me when you send them out?

Thank you

Charlie Deutsch
Supv. Wildlife Biologist
Environmental Stewardship Manager
US Army Corps of Engineers
Rivers Project Office
301 Riverlands Way
West Alton, MO 63386
636-899-0082 direct line
636-899-2600 main operator

-----Original Appointment-----

From: Jayme Fuller [<mailto:J.Fuller@gaiconsultants.com>]

Sent: Friday, August 19, 2016 1:38 PM

To: Jayme Fuller; Deutsch, Charles W (Charlie) MVS

Subject: [EXTERNAL] FW: Spire STL Pipeline FERC and USACE River Crossing Review

When: Tuesday, August 23, 2016 9:00 AM-2:00 PM (UTC-06:00) Central Time (US & Canada).

Where: Rivers Project Office

-----Original Appointment-----

From: Jayme Fuller

Sent: Thursday, August 11, 2016 4:41 PM

To: Jayme Fuller; Lori Ferry; Allred, Chase; Frerker, Charles F MVS; Rodriguez Robles, Edward C MVS; David.p.meyer@usace.army.mil; melissa.l.hoerner@usace.army.mil

Cc: trisha_crabill@fws.gov

Subject: Spire STL Pipeline FERC and USACE River Crossing Review

When: Tuesday, August 23, 2016 9:00 AM-2:00 PM (UTC-06:00) Central Time (US & Canada).

Where: Rivers Project Office

Hi Everyone,

Please join us for the review of the Mississippi and Missouri River Crossings for the Spire STL Pipeline Project with FERC.

We will meet at 9am at the USACE Rivers Project Office. We will combine cars there.

Rivers Project Office
301 Riverlands Way
West Alton, MO 63386

Thanks,
Jayme Fuller
614-499-6258

Ali Trunzo

From: Lori Ferry
Sent: Friday, August 19, 2016 5:38 PM
To: Ali Trunzo
Subject: FW: Quick Question

From: Hoerner, Melissa L MVS [mailto:Melissa.L.Hoerner@usace.army.mil]
Sent: Friday, August 19, 2016 9:09 AM
To: Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: RE: Quick Question

Hi, Lori:

The process to obtain permission to cross USACE flowage easement lands is much less time consuming than that for crossing fee title lands. Where USACE has only obtained a flowage easement over property Spire proposes to cross, we simply need a request to cross flowage easement lands along with an accurate map depicting the proposed route. We would then provide Spire with a "Consent to Cross U.S. Government Easement", which basically says that the construction, operation and maintenance of the pipeline will not conflict with the rights the government acquired (so, it won't impede our ability to flood the property). Both parties would execute the agreement and that's that.

Please remember that the consent (just as the easement) is a separate and distinct process from the 408 permission process. The consent would also contain a condition requiring that all necessary permits and/or clearances are obtained prior to construction, including but not limited to regulatory & 408

Don't hesitate to let me know if you have questions.
Thanks!

Lynn Hoerner

Real Estate Division
U.S. Army Corps of Engineers
St. Louis District
314-331-8157
melissa.l.hoerner@usace.army.mil

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]
Sent: Thursday, August 11, 2016 1:17 PM
To: Hoerner, Melissa L MVS <Melissa.L.Hoerner@usace.army.mil>
Subject: [EXTERNAL] Quick Question

Hi Lynn

We didn't get a chance at the meeting but can you direct us through the process for crossing one of the USACE Flowage Easements? We are still evaluating the route and want to make sure we understand the implications for these.





Thank you,
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 |     

l.ferry@gaiconsultants.com



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Ali Trunzo

From: Meyer, David P MVS <David.P.Meyer@usace.army.mil>
Sent: Monday, August 08, 2016 10:15 AM
To: Jayme Fuller; Rodriguez Robles, Edward C MVS
Cc: Lori Ferry; Ali Trunzo
Subject: RE: Spire STL Pipeline

Jayme,

Thank you for the supplemental info. I will let Ed speak on the 408 issues, but we do not issue our Section 10 & 404 permit until the 408 permit is completed. Also, we will await FERC's review process before moving forward with permitting. Any real estate easement issues may be need to be cleared before 408 and/or FERC can complete their review, which would delay the 404/10 permitting.

We look forward to meeting everyone on August 23rd, meeting at the USACE Rivers office should be just fine.

We can address any more questions on the day of the site visits.

Thanks

David Meyer
U.S. Army Corps of Engineers
St. Louis District, Regulatory Branch
1222 Spruce St.
St. Louis, Missouri 63103
314.331.8810

-----Original Message-----

From: Jayme Fuller [mailto:J.Fuller@gaiconsultants.com]
Sent: Thursday, August 04, 2016 3:25 PM
To: Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>; Meyer, David P MVS <David.P.Meyer@usace.army.mil>
Cc: Lori Ferry <L.Ferry@gaiconsultants.com>; Ali Trunzo <A.Trunzo@gaiconsultants.com>
Subject: [EXTERNAL] Spire STL Pipeline

Hi Ed and Dave,

Thanks again for taking the time to meet with us yesterday. I wanted to follow up on a few items:

1. I have attached a kmz of the proposed centerline. You can utilize this line to develop your cost estimate for the Memorandum of Agreement.
2. Yesterday we were discussing the timing of the permits as they relate to FERC issuing an EA and FONSI. Chuck had indicated that they cannot issue the Section 10 and 404 permits before Section 408 is issued. Am I correct in understanding that you will issue 3 separate 408 permits- 408 for the Corps Fee Title crossing, 408 for the HDD on the Mississippi River, and 408 for the HDD under the levee? If that is the case, I assume you will issue the Section 408 for

the HDD on the Mississippi River and the levee district and wait until the easement is complete on the Corps Fee Title land before you issue that 408. It would not be the intent to hold the entire Section 10 and NWP approval up because of the easement process correct?

3. FERC meeting- we are still planning to meet on the morning of August 23rd for the project tour. Can we plan to meet at the USACE Rivers office? Also we will be providing one bus to drive everyone around assuming you guys are allowed to ride with us.

I think that is it for now thanks!

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 | <Blocked<http://www.facebook.com/gaiconsultants>>
<Blocked<https://twitter.com/GAIConsultants>> <Blocked<https://www.youtube.com/user/gaiconsultants>>
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Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Lynn Hoerner
Real Estate Division United States Army Corps of Engineers - St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. To Whom It May Concern Hoerner,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

Included with this letter, for your information, is a general overview map of the proposed pipeline route and a diagram illustrating the FERC process.

We believe that we can create a better project by hearing from you and listening to your feedback. That's why we are hosting open houses this month so you can learn more about the project and we can learn more about you.

At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

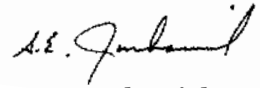
Spire STL Pipeline open house schedule

Tuesday August 16, 2016 5 p.m. – 7:30 p.m.	Wednesday August 17, 2016 5 p.m. – 7:30 p.m.	Thursday August 18, 2016 5 p.m.– 7:30 p.m.	Tuesday August 23, 2016 5 p.m.– 7:30 p.m.	Wednesday August 24, 2016 5 p.m. – 7:30 p.m.
Scott County, Illinois	Jersey County, Illinois	St. Louis County, Missouri	St. Charles County, Missouri	Greene County, Illinois
Scott County Fairgrounds 401 North Walnut Winchester, IL 62694	Jerseyville Recreation Center 401 Mound Street Jerseyville, IL 62052	Hazelwood Civic Center East 8969 Dunn Road Hazelwood, MO 63042	American Legion Post 312 2500 Raymond Drive St Charles, MO 63301	Knights of Columbus Hall U.S. HWY 67 Carrollton, IL 62016

Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,

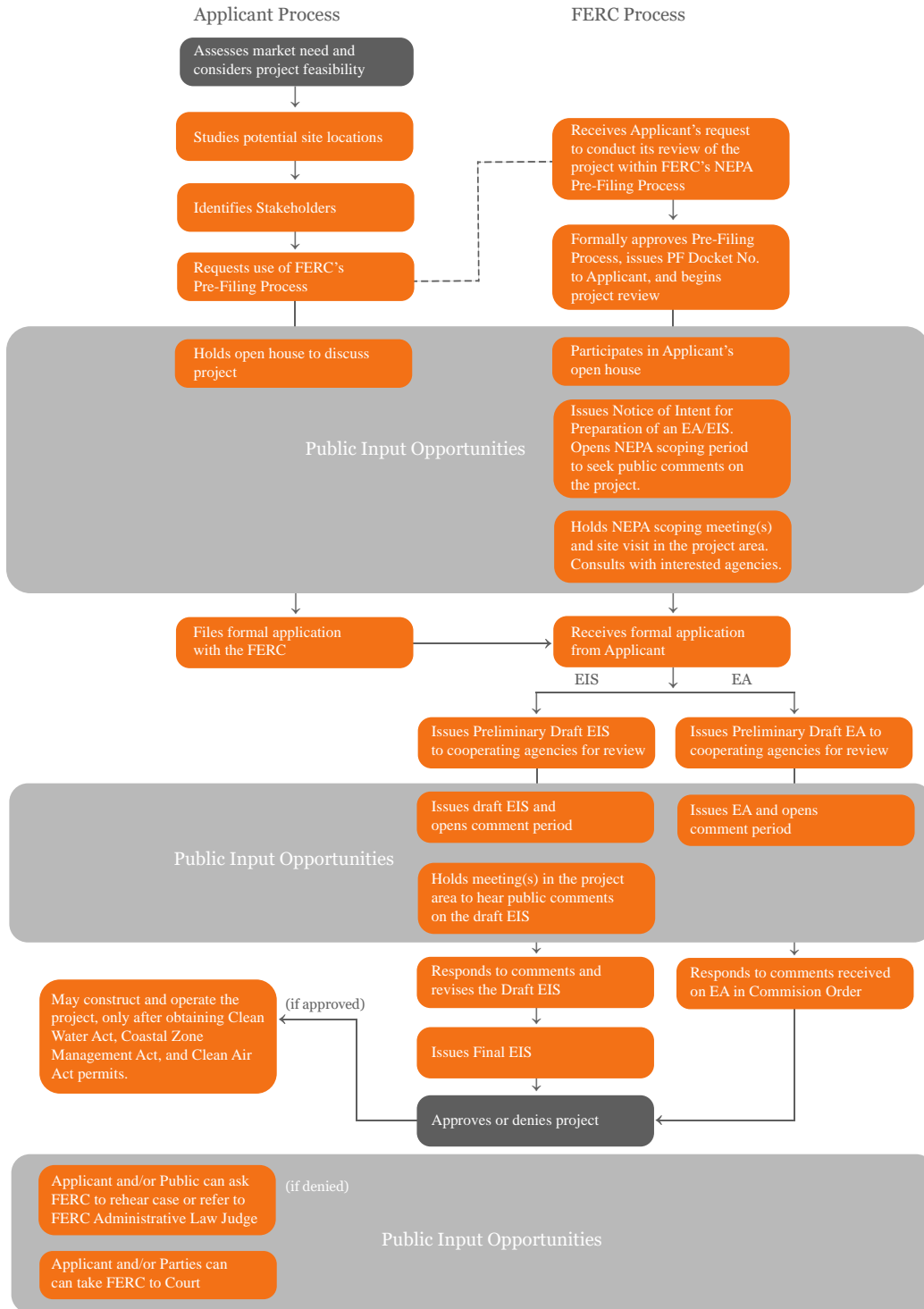


Scott Jaskowiak
Vice President
Spire STL Pipeline LLC

Project Map



FERC Pre-Filing Process





Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Ms. Susan Adams
Formerly Utilized Sites Remedial Action Program
United States Army Corps of Engineers - St.
Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Ms. To Whom It May Concern Adams,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

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At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

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Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Michael Chapman
Implementation Manager - Missouri River Recovery Program
United States Army Corps of Engineers - Kansas City District
601 E. 12th Street
Kansas City, MO 64106

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. To Whom It May Concern Chapman,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

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We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Keith McMullen
Illinois Section Chief United States Army Corps of Engineers - St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. To Whom It May Concern McMullen,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

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We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. David Meyer
United States Army Corps of Engineers - St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Meyer,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

Included with this letter, for your information, is a general overview map of the proposed pipeline route and a diagram illustrating the FERC process.

We believe that we can create a better project by hearing from you and listening to your feedback. That's why we are hosting open houses this month so you can learn more about the project and we can learn more about you.

At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

Spire STL Pipeline open house schedule

Tuesday August 16, 2016 5 p.m. – 7:30 p.m.	Wednesday August 17, 2016 5 p.m. – 7:30 p.m.	Thursday August 18, 2016 5 p.m.– 7:30 p.m.	Tuesday August 23, 2016 5 p.m.– 7:30 p.m.	Wednesday August 24, 2016 5 p.m. – 7:30 p.m.
Scott County, Illinois	Jersey County, Illinois	St. Louis County, Missouri	St. Charles County, Missouri	Greene County, Illinois
Scott County Fairgrounds 401 North Walnut Winchester, IL 62694	Jerseyville Recreation Center 401 Mound Street Jerseyville, IL 62052	Hazelwood Civic Center East 8969 Dunn Road Hazelwood, MO 63042	American Legion Post 312 2500 Raymond Drive St Charles, MO 63301	Knights of Columbus Hall U.S. HWY 67 Carrollton, IL 62016

Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Edward Rodriguez Robles
ICW Program Manager United States Army Corps of Engineers - St. Louis District
1222 Spruce Street
St. Louis, MO 63103

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Rodriguez Robles,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

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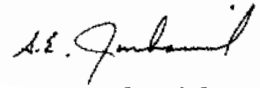
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Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC

Ali Trunzo

From: Jayme Fuller
Sent: Thursday, August 04, 2016 4:25 PM
To: Rodriguez Robles, Edward C MVS; David.p.meyer@usace.army.mil
Cc: Lori Ferry; Ali Trunzo
Subject: Spire STL Pipeline
Attachments: MM_Spire_STL_Proposed_Centerline_KMZ.KMZ

Hi Ed and Dave,

Thanks again for taking the time to meet with us yesterday. I wanted to follow up on a few items:

1. I have attached a kmz of the proposed centerline. You can utilize this line to develop your cost estimate for the Memorandum of Agreement.
2. Yesterday we were discussing the timing of the permits as they relate to FERC issuing an EA and FONSI. Chuck had indicated that they cannot issue the Section 10 and 404 permits before Section 408 is issued. Am I correct in understanding that you will issue 3 separate 408 permits- 408 for the Corps Fee Title crossing, 408 for the HDD on the Mississippi River, and 408 for the HDD under the levee? If that is the case, I assume you will issue the Section 408 for the HDD on the Mississippi River and the levee district and wait until the easement is complete on the Corps Fee Title land before you issue that 408. It would not be the intent to hold the entire Section 10 and NWP approval up because of the easement process correct?
3. FERC meeting- we are still planning to meet on the morning of August 23rd for the project tour. Can we plan to meet at the USACE Rivers office? Also we will be providing one bus to drive everyone around assuming you guys are allowed to ride with us.

I think that is it for now thanks!

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 | 

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Ali Trunzo

From: Jayme Fuller
Sent: Tuesday, August 02, 2016 3:42 PM
To: Rodriguez Robles, Edward C MVS
Cc: Lori Ferry; Ali Trunzo
Subject: Spire Energy STL Pipeline Geotech Workplan
Attachments: Spire Pipeline - Geotechnical Work Plan.pdf

Hi Ed,

As promised please see the attached proposed workplan for the Geotech bore locations. I plan to bring hard copies to the meeting with me tomorrow.

Thanks!

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 | 

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July 29, 2016

Mr. Keith McMullen
Illinois Section Chief
United States Army Corps of
Engineers, St. Louis District
1222 Spruce Street
St. Louis, MO 63103-2833

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. McMullen:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Army Corps of Engineers - St. Louis District to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

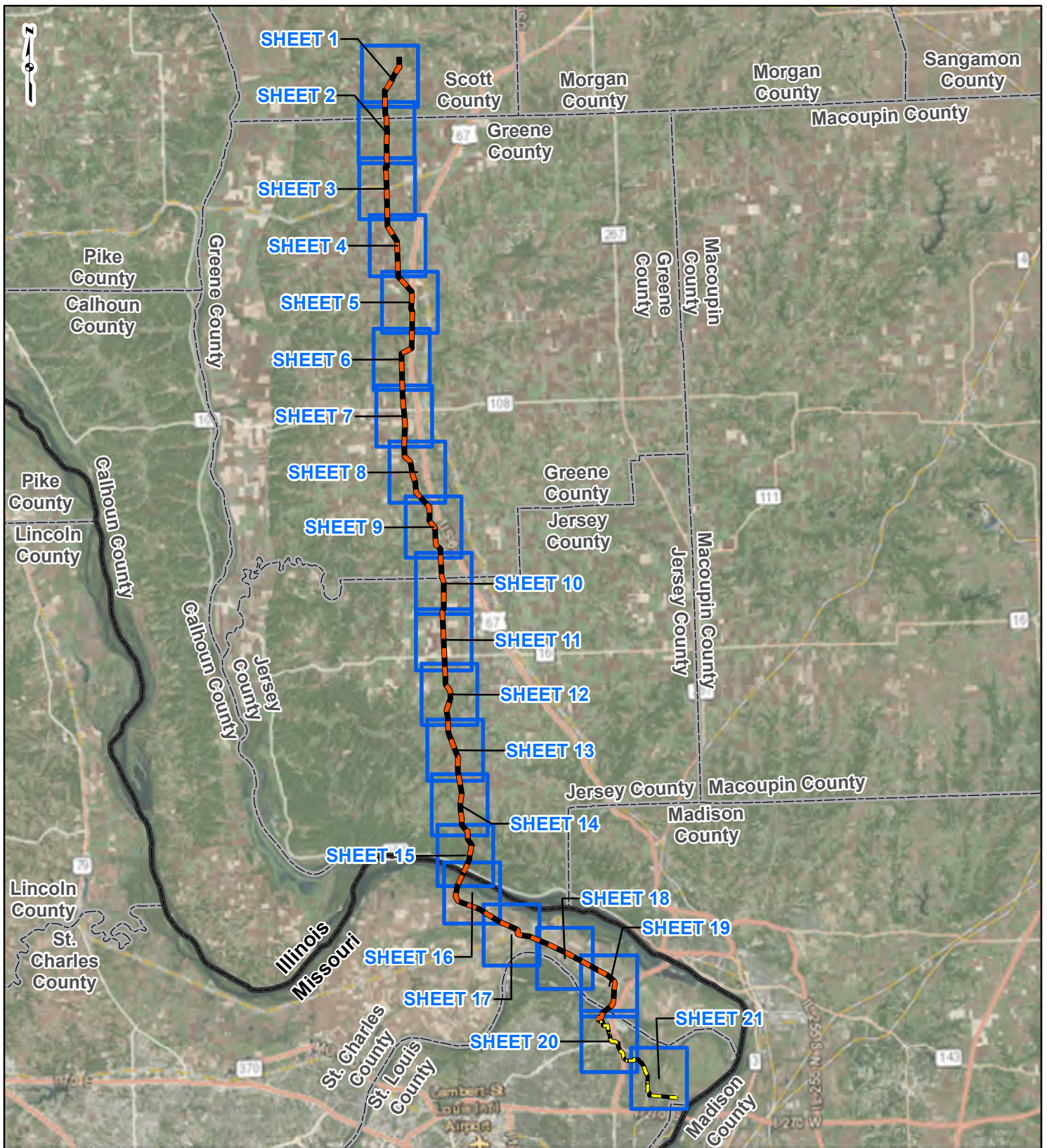
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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

ATTACHMENT
USGS TOPOGRAPHIC MAP (FIGURE 1)



PROJECT LOCATION



SCOTT, GREENE
AND JERSEY
COUNTIES, ILLINOIS
AND ST. CHARLES AND
ST. LOUIS COUNTIES, MISSOURI

LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY
- SHEET INDEX



**FIGURE 1
LOCATION MAP
SHEET INDEX**



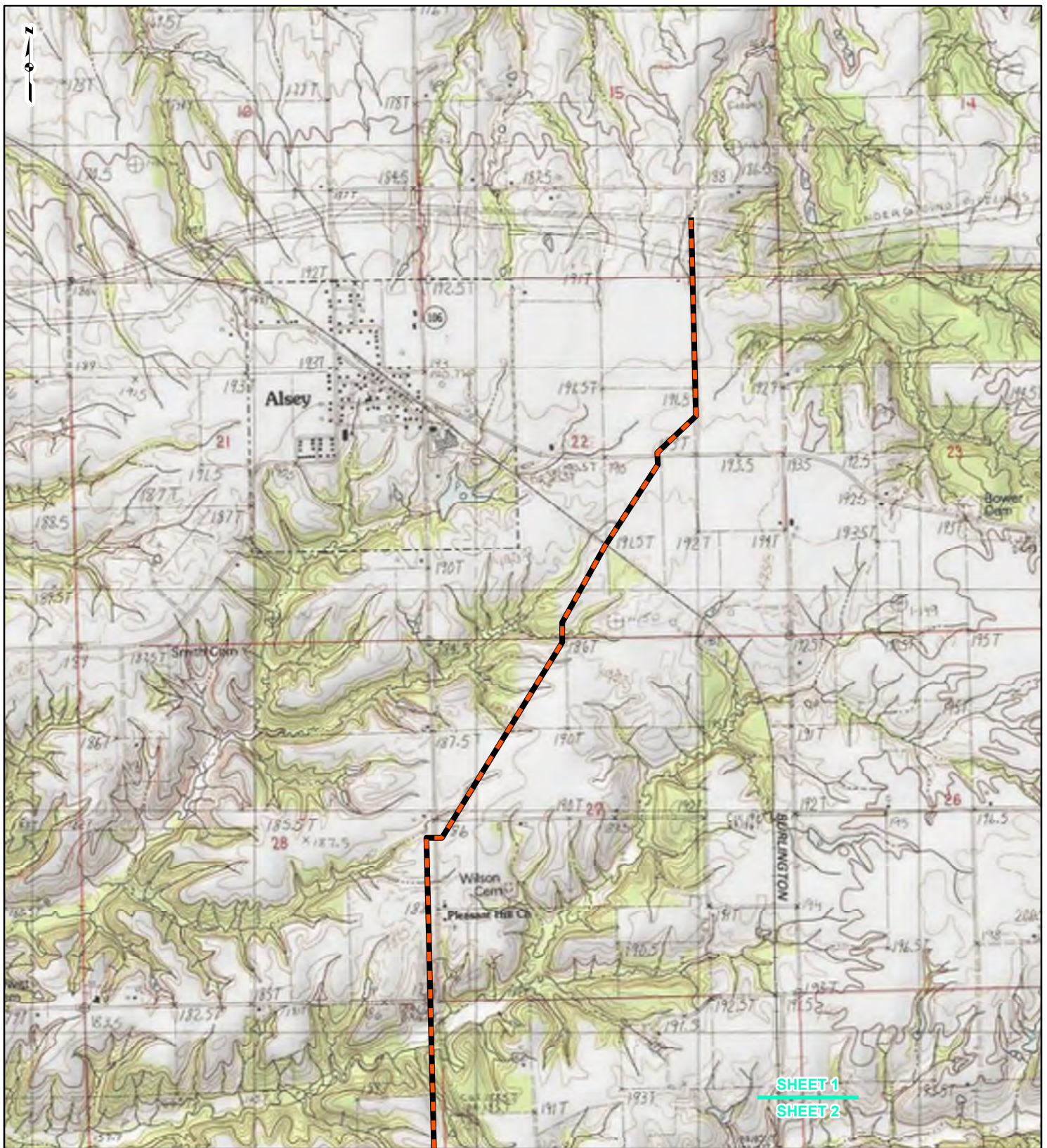
**Spire STL
Pipeline**



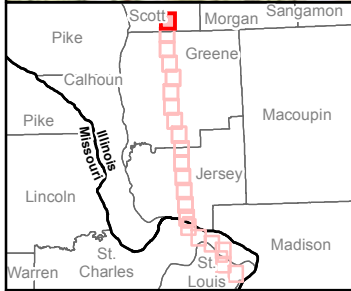
DRAWN BY: PMH
CHECKED: SWW

DATE: 7/28/2016
APPROVED: LMF

REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2015, ACCESSED 07/2016.



SHEET 1
SHEET 2



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

**FIGURE 1
LOCATION MAP
SHEET 1 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.





SHEET 1
SHEET 2

Scott
County
Greene
County

SHEET 2
SHEET 3



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

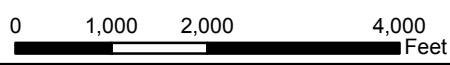


FIGURE 1
LOCATION MAP
SHEET 2 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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SHEET 2





SHEET 3

SHEET 3

SHEET 4



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

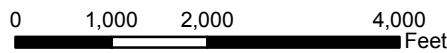
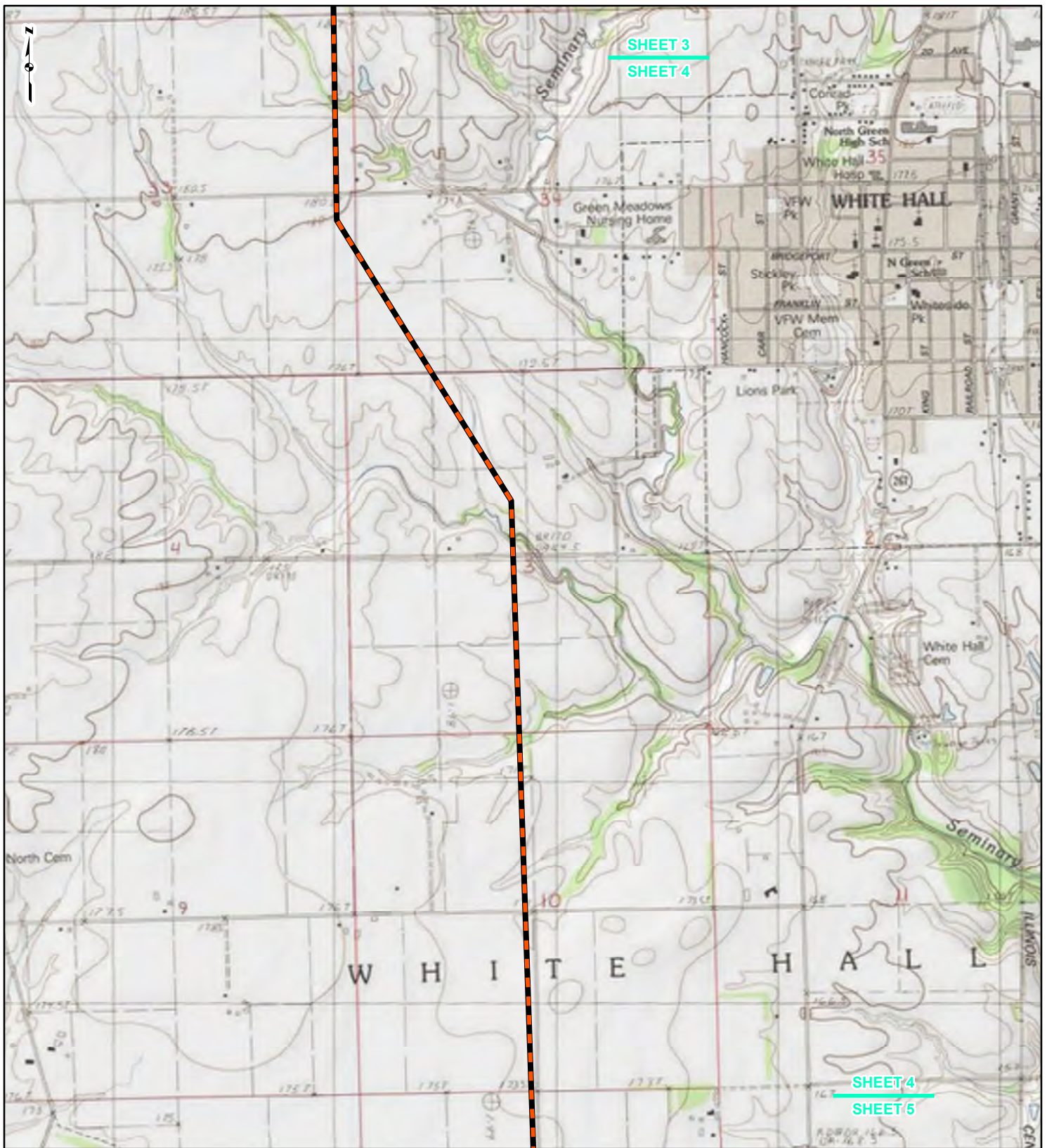


FIGURE 1
LOCATION MAP
SHEET 3 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

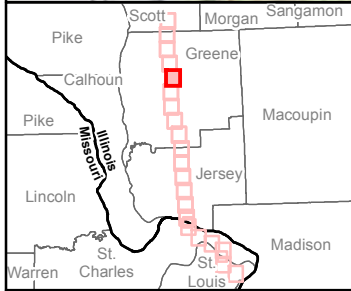
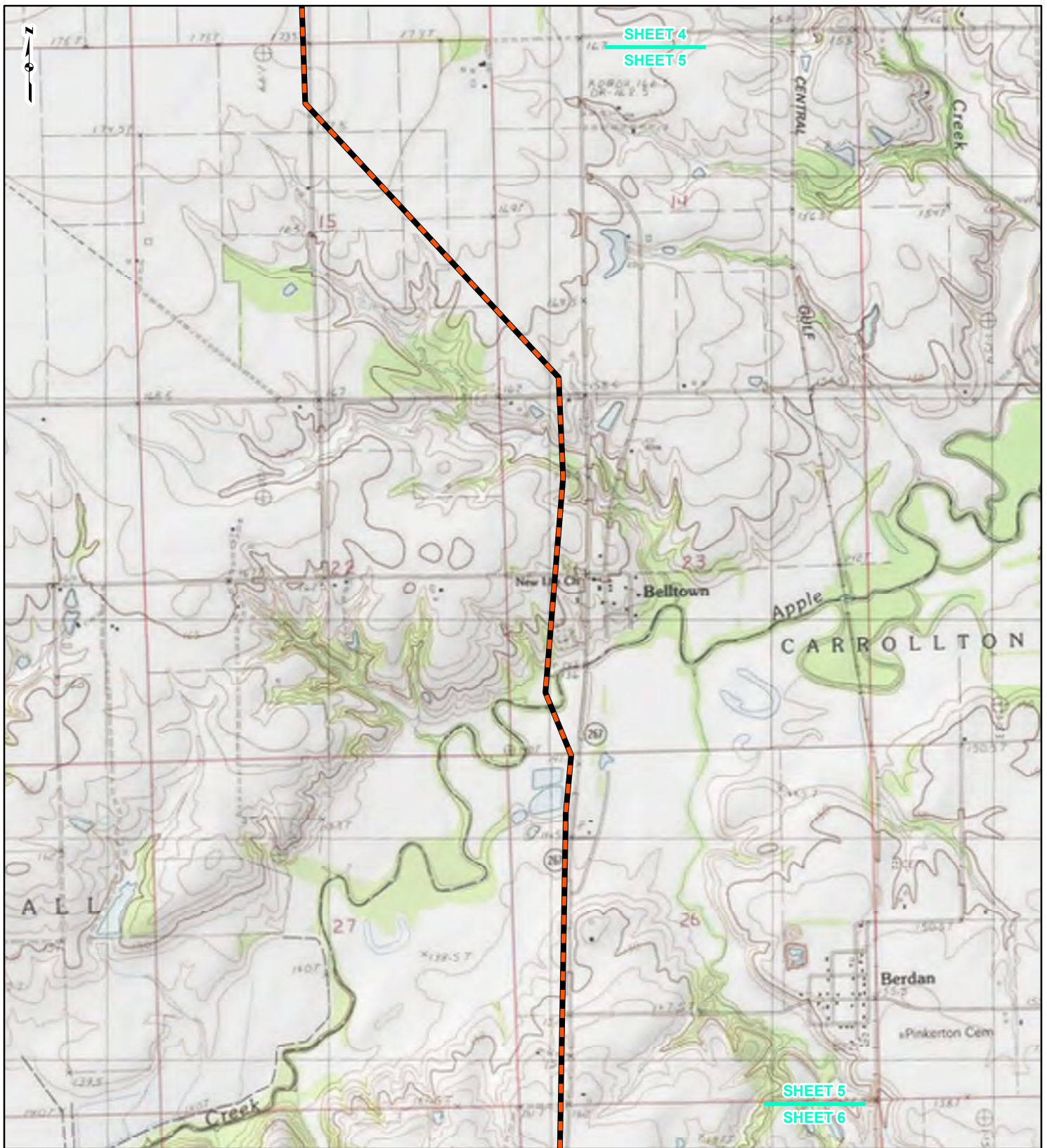
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FIGURE 1
LOCATION MAP
SHEET 4 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

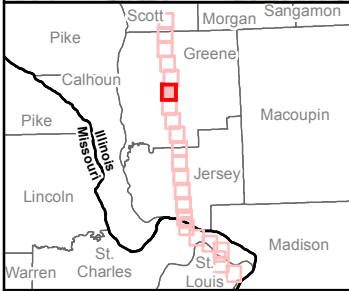
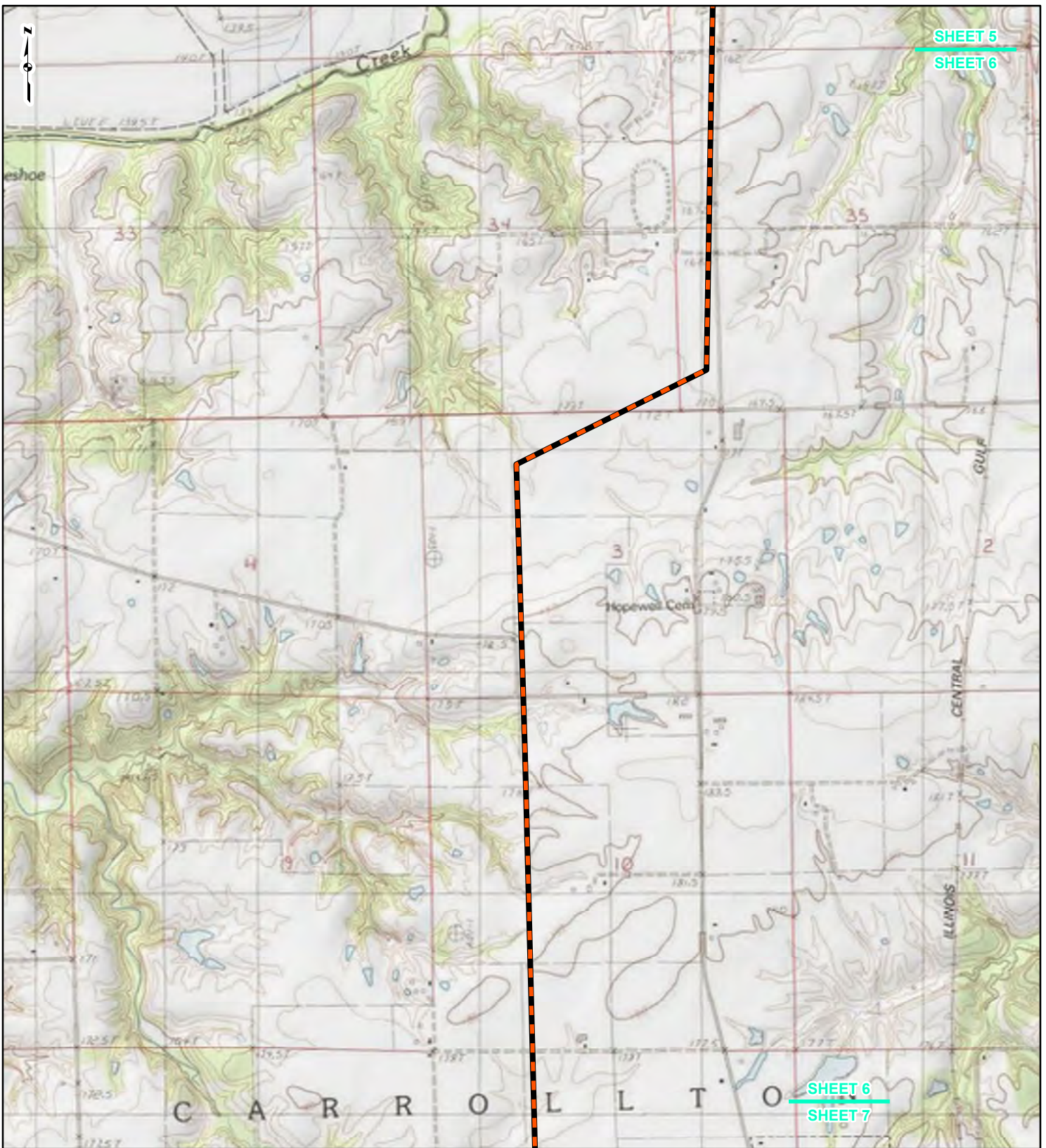
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FIGURE 1
LOCATION MAP
SHEET 5 OF 21







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LEGEND

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-  COUNTY BOUNDARY

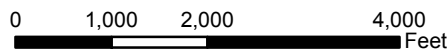
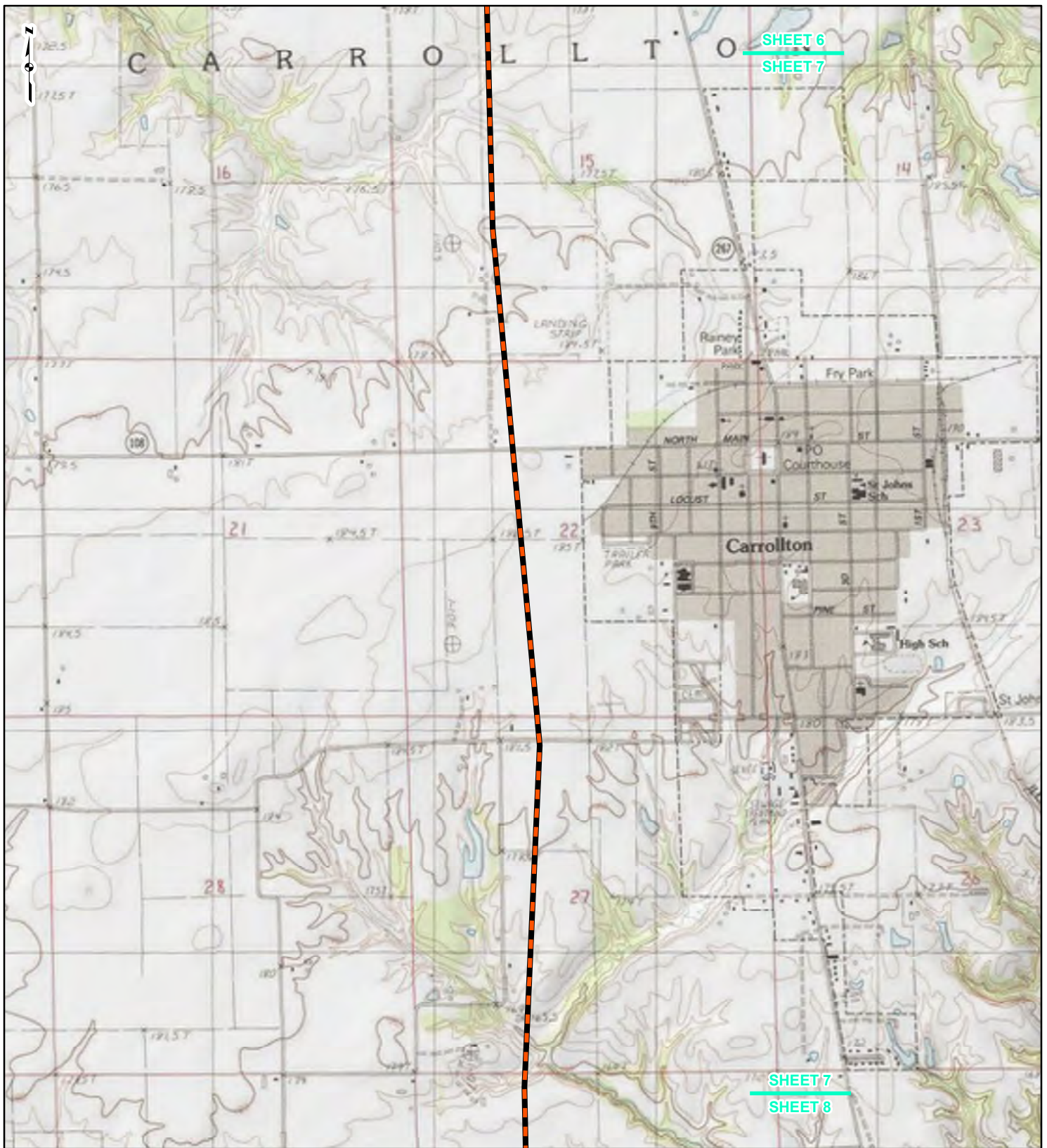


FIGURE 1
LOCATION MAP
SHEET 6 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

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**FIGURE 1
LOCATION MAP
SHEET 7 OF 21**

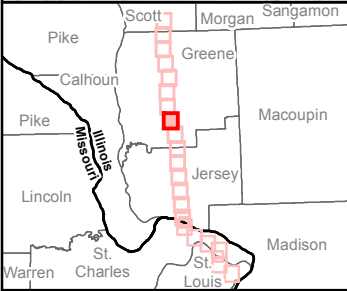
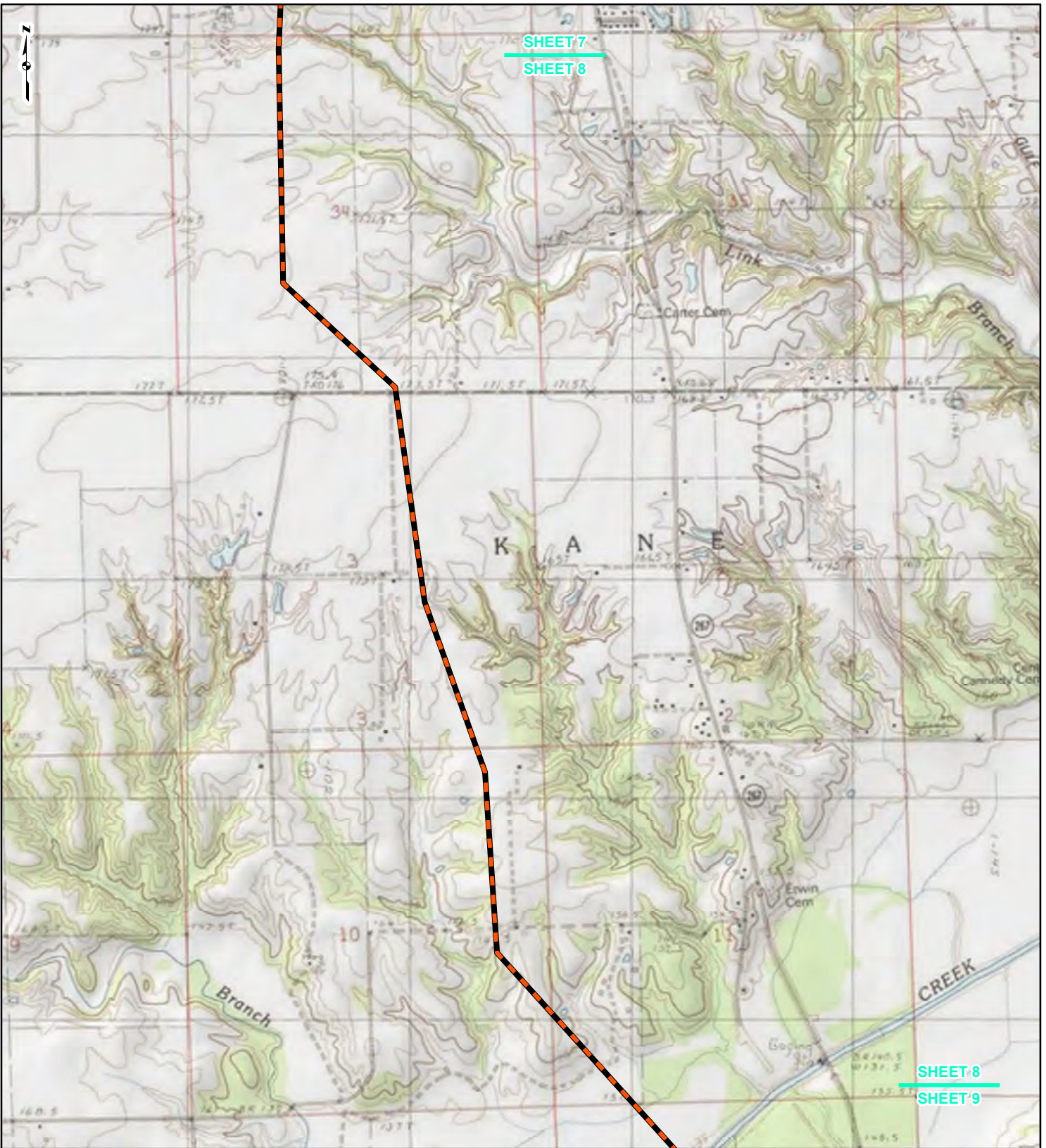
Spire STL Pipeline

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SHEET 7
SHEET 8

SHEET 8
SHEET 9



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

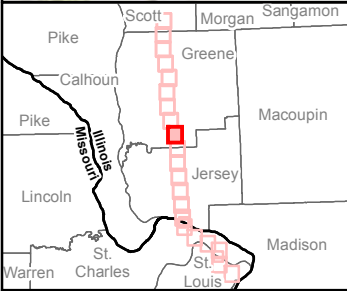
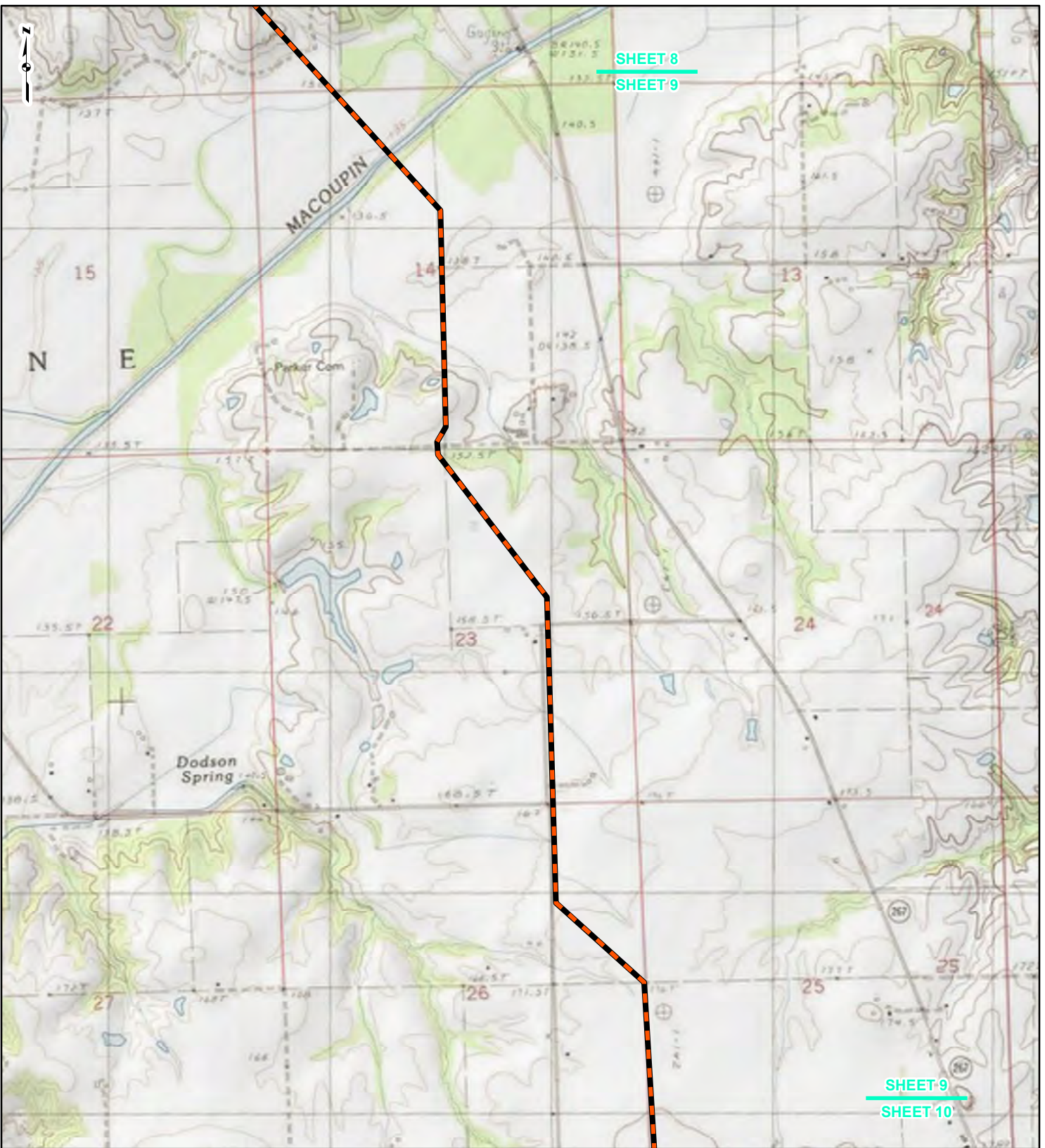
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FIGURE 1
LOCATION MAP
SHEET 8 OF 21

Spire STL Pipeline

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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
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- COUNTY BOUNDARY

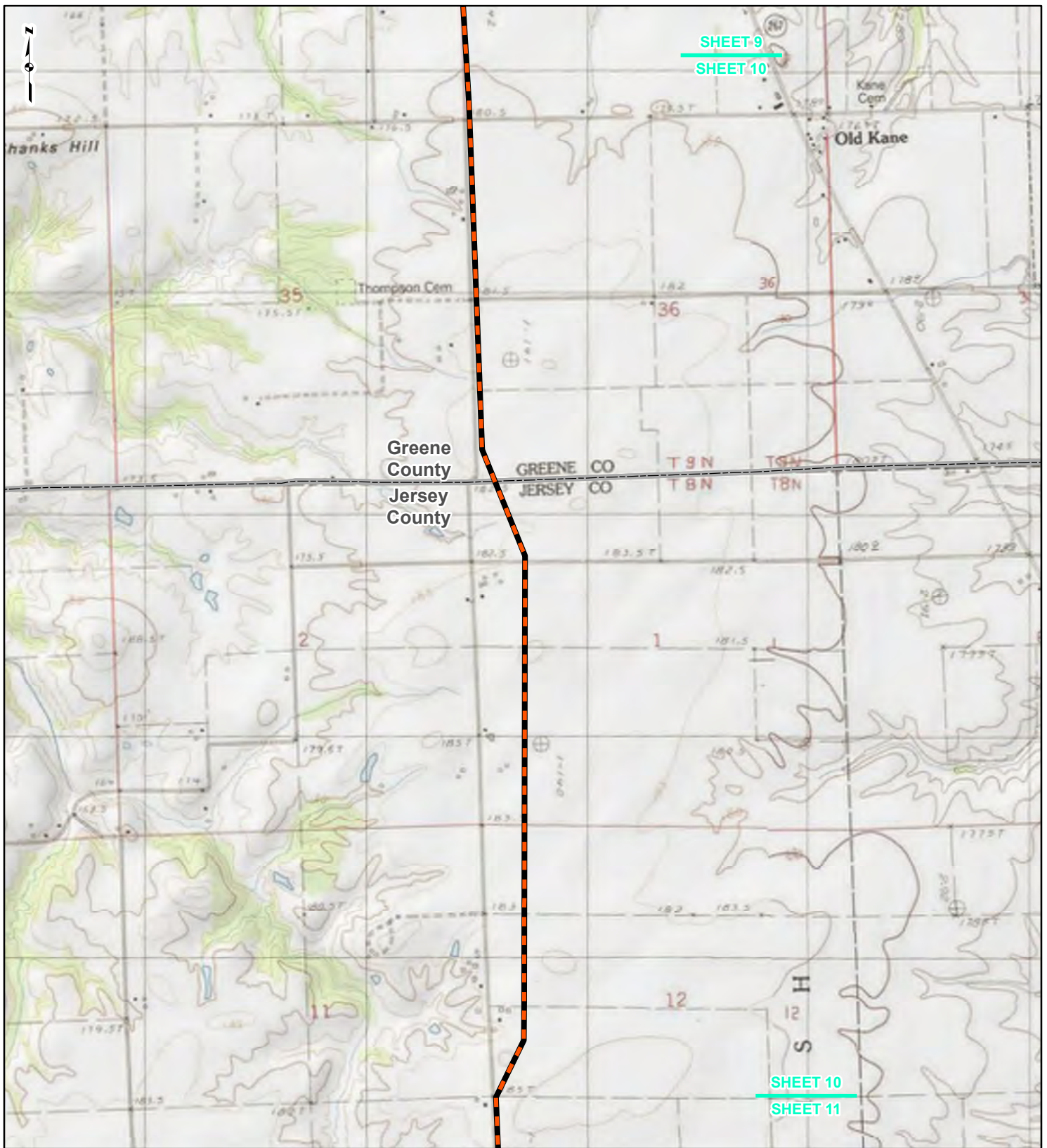
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FIGURE 1
LOCATION MAP
SHEET 9 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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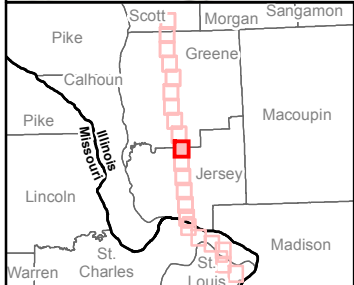


SHEET 9
SHEET 10

SHEET 10
SHEET 11

Greene
County
Jersey
County

GREENE CO T9N T8N
JERSEY CO T8N T7N



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

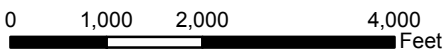
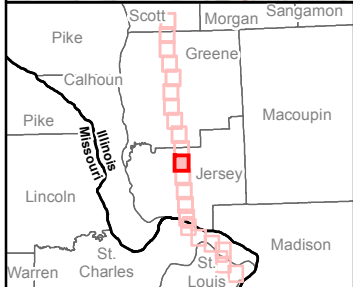
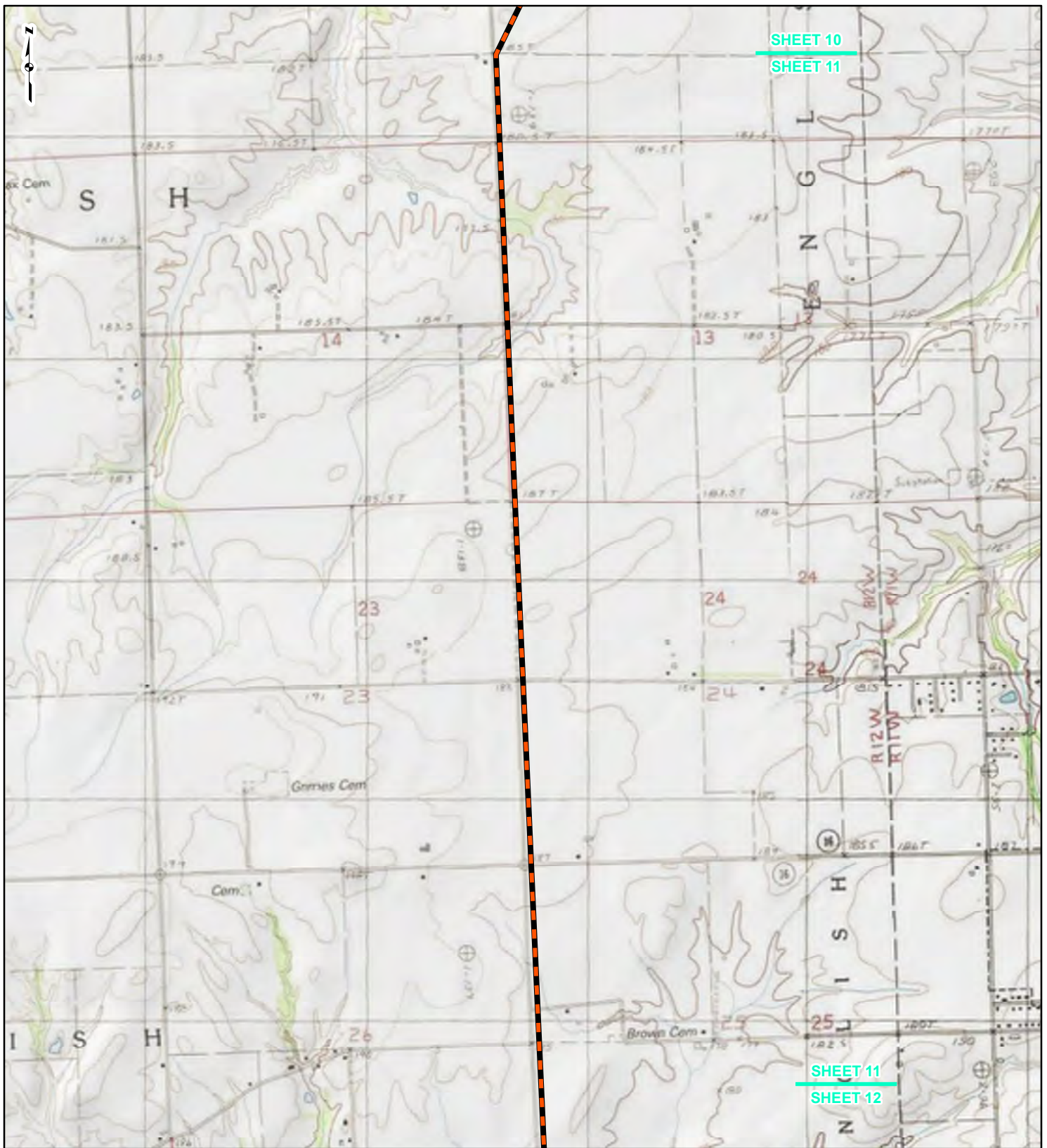


FIGURE 1
LOCATION MAP
SHEET 10 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

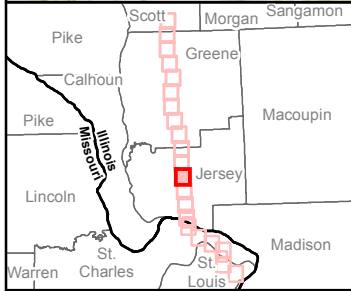
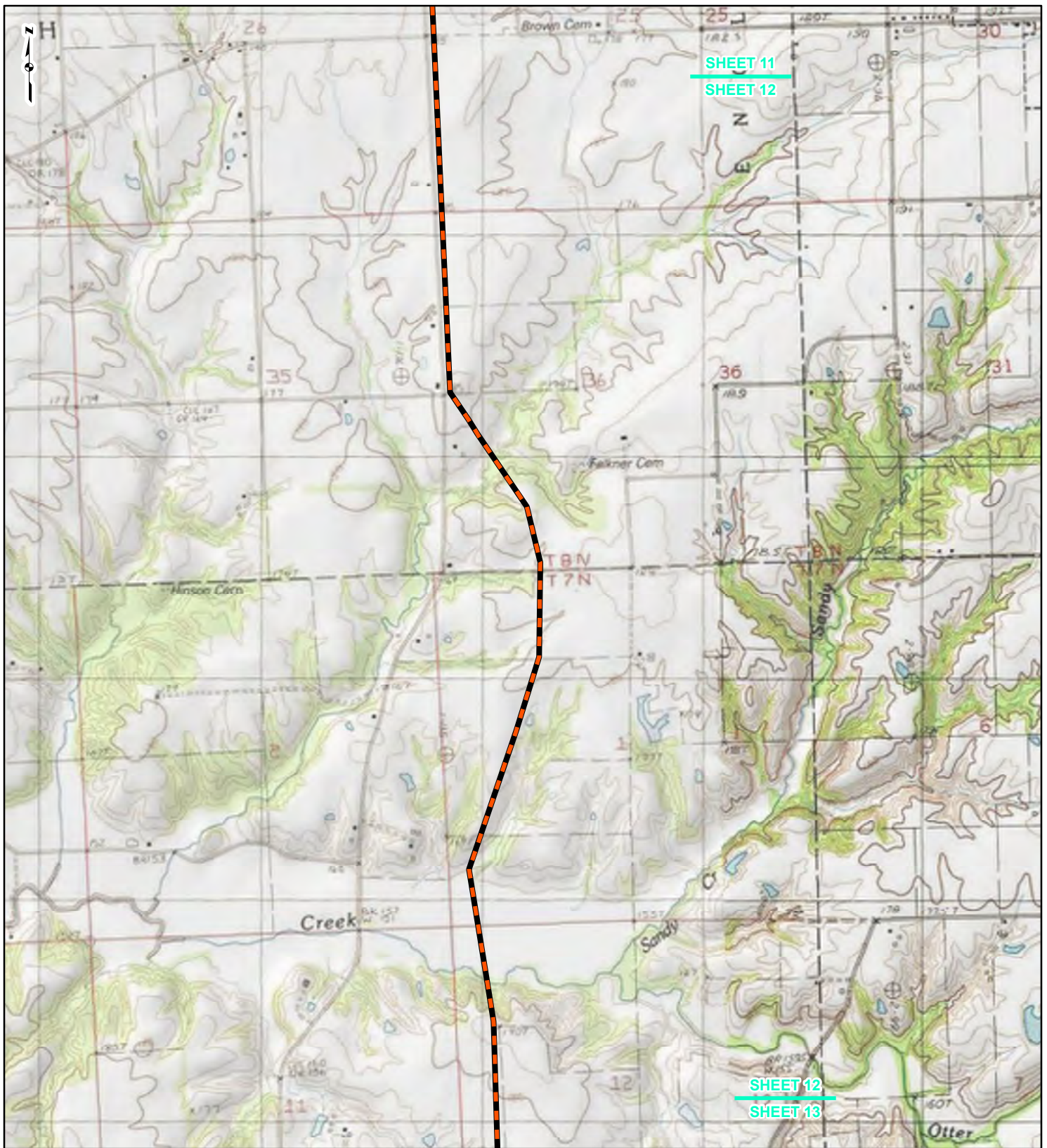
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 11 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

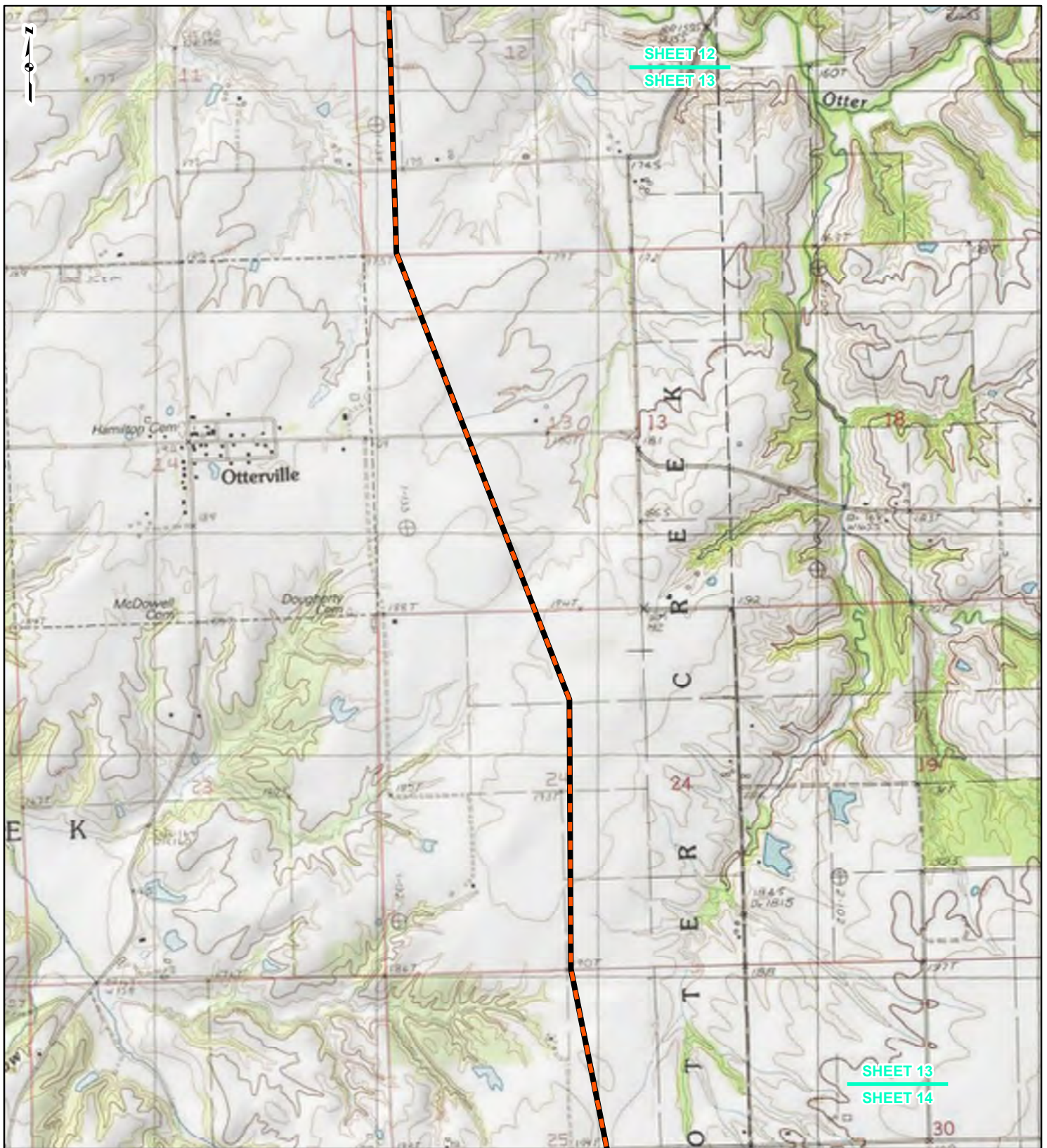
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 12 OF 21

Spire STL Pipeline

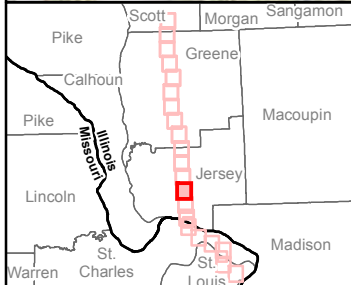
DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.







SHEET 12
SHEET 13

SHEET 13
SHEET 14



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

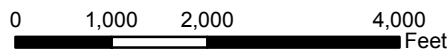
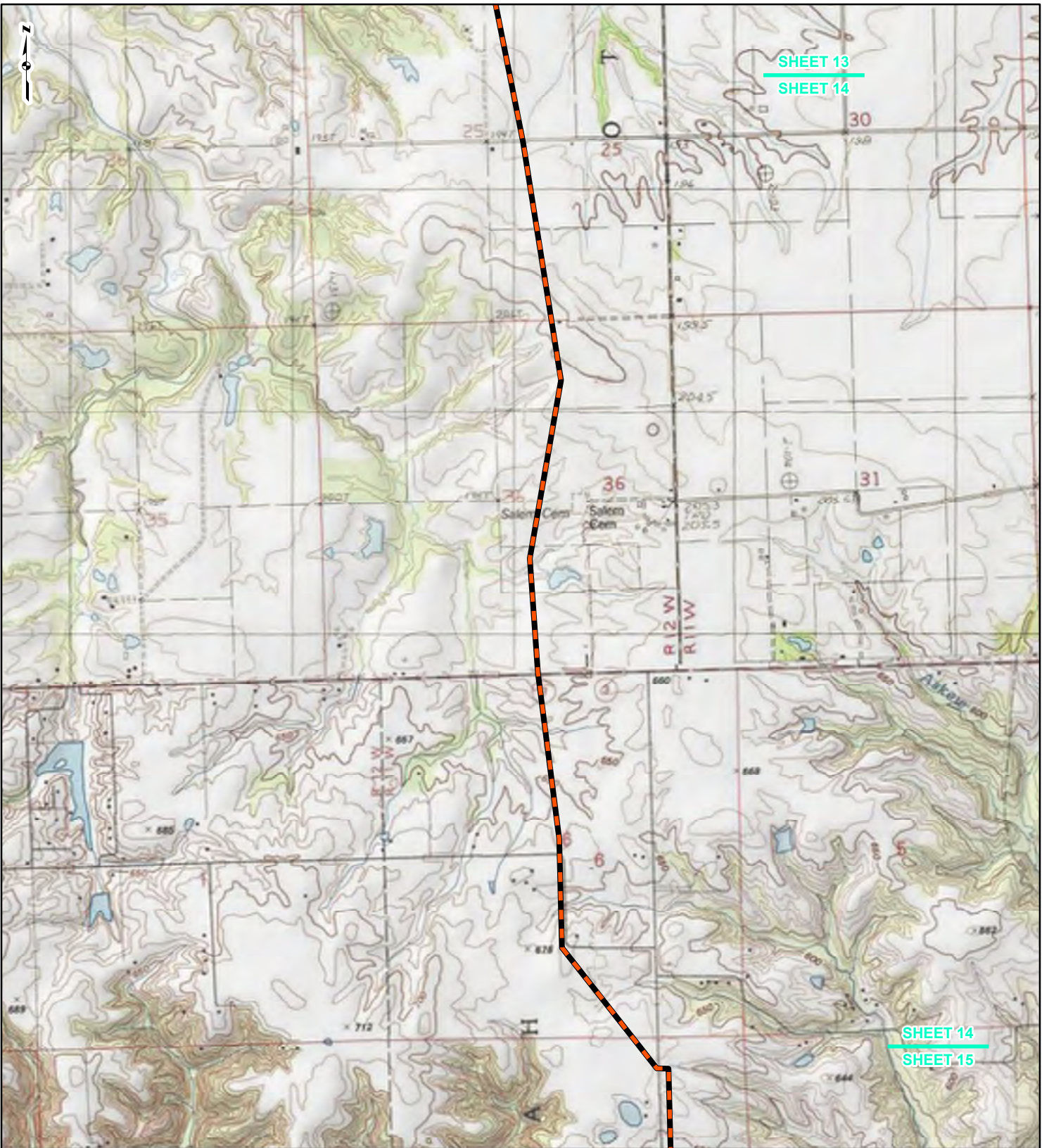


FIGURE 1
LOCATION MAP
SHEET 13 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

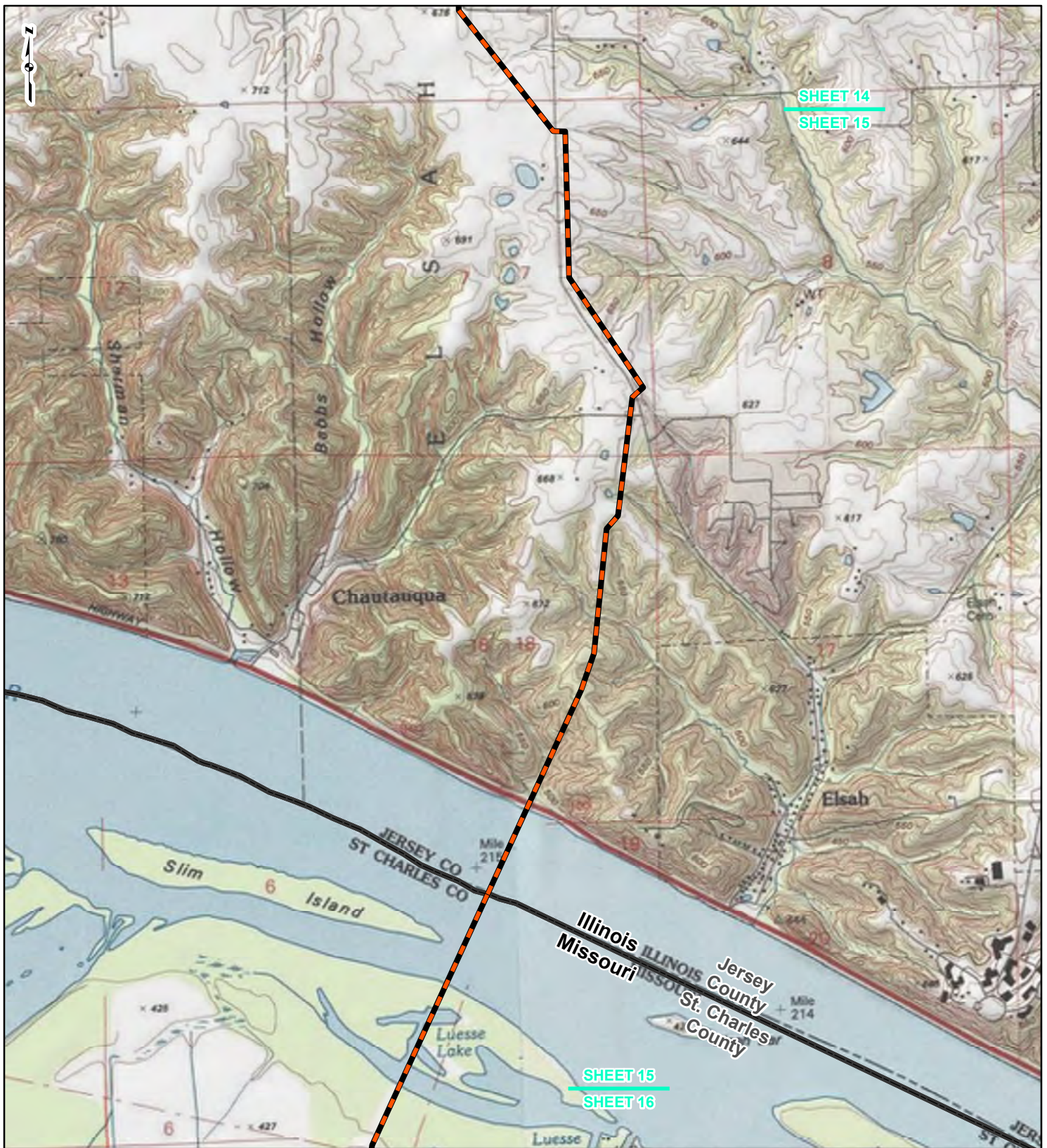
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 14 OF 21



DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 14
SHEET 15

SHEET 15
SHEET 16



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

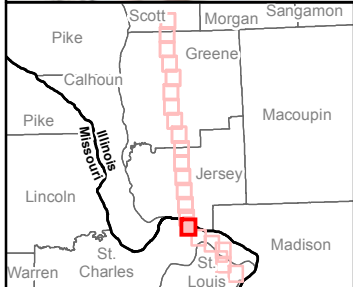
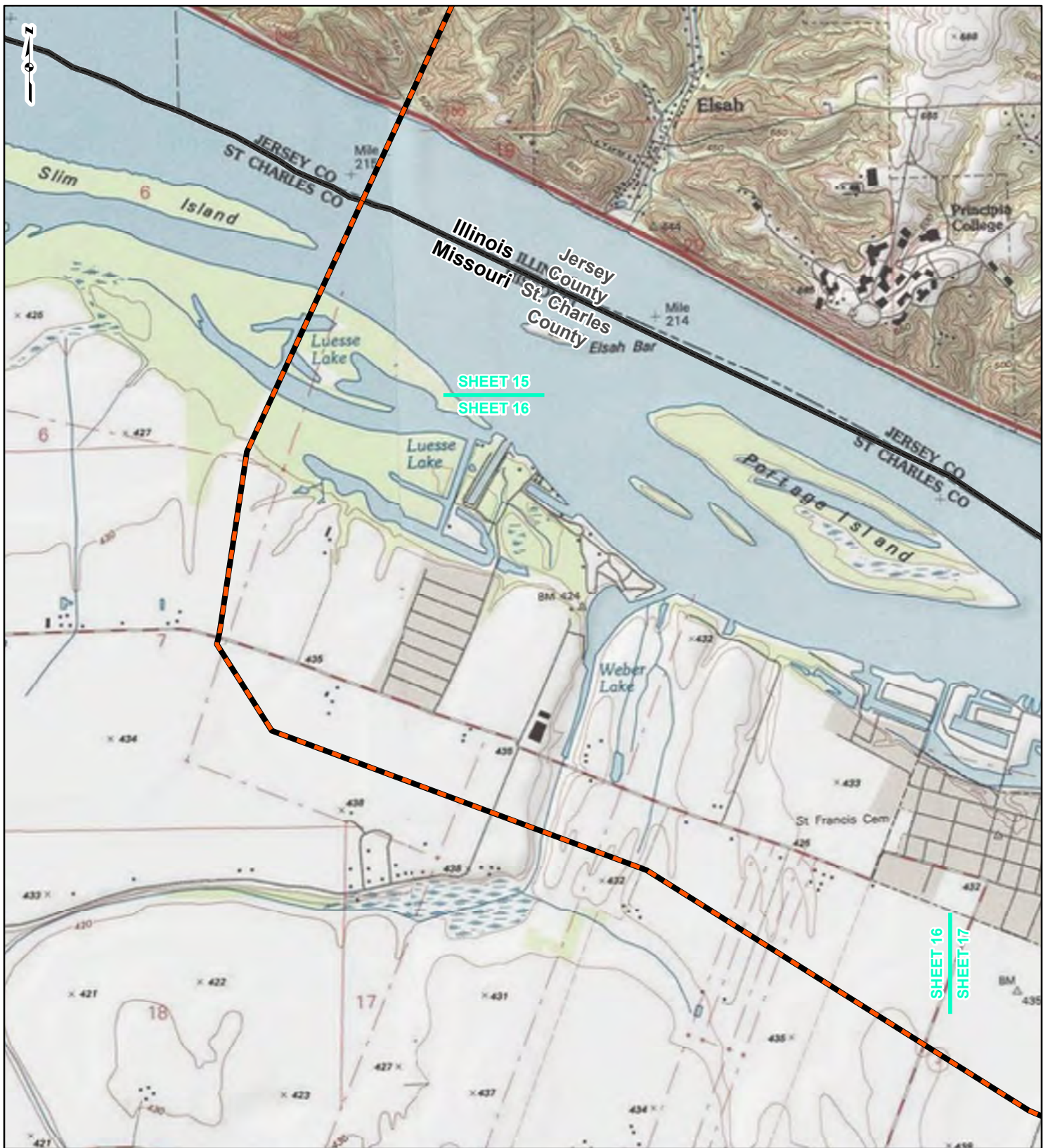
0 1,000 2,000 4,000
Feet

**FIGURE 1
LOCATION MAP
SHEET 15 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983), AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

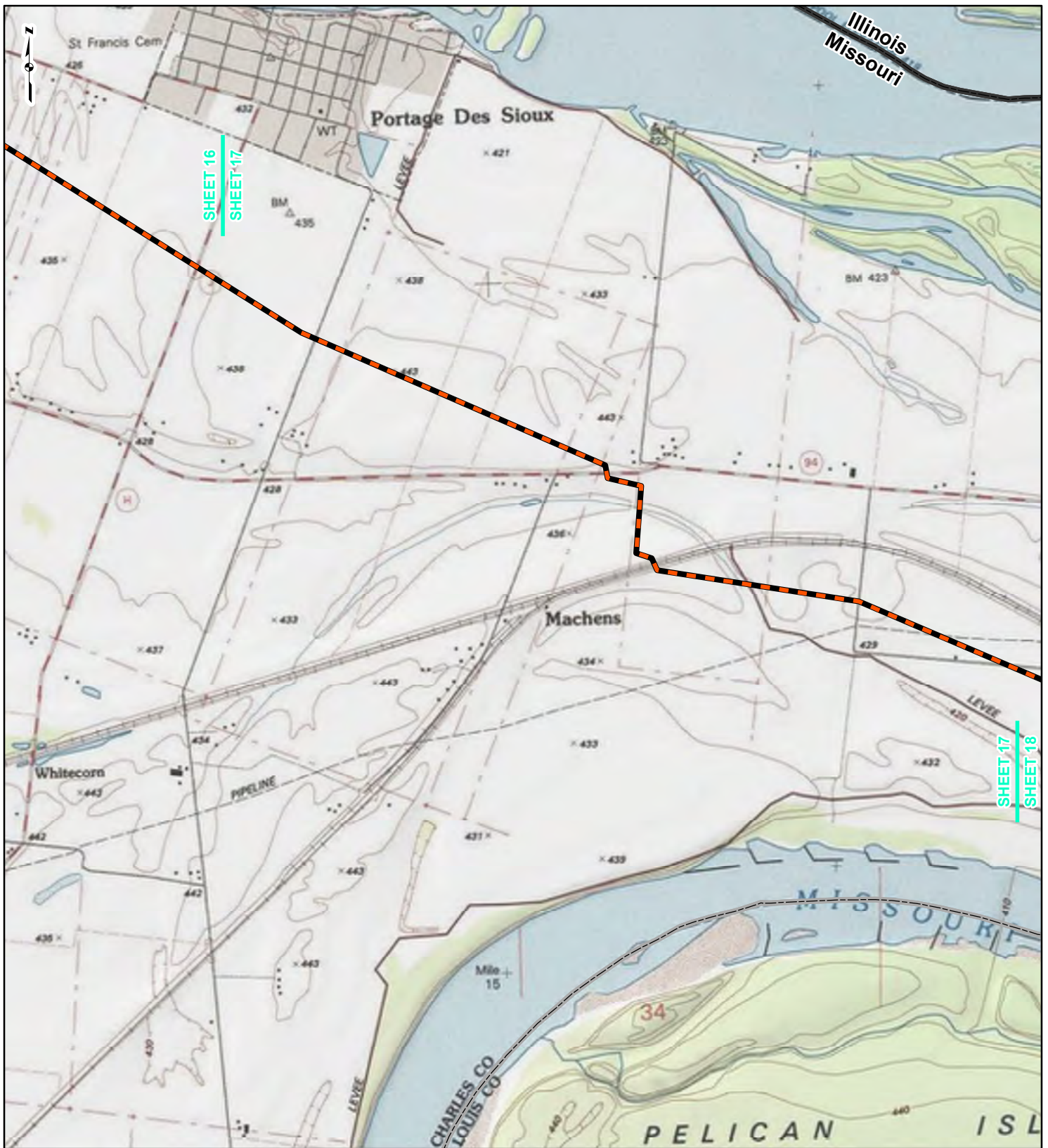
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 16 OF 21

Spire STL Pipeline

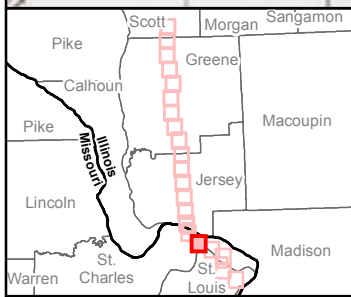
DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

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SHEET 16
SHEET 17

SHEET 17
SHEET 18



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

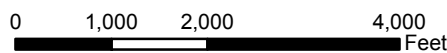


FIGURE 1
LOCATION MAP
SHEET 17 OF 21



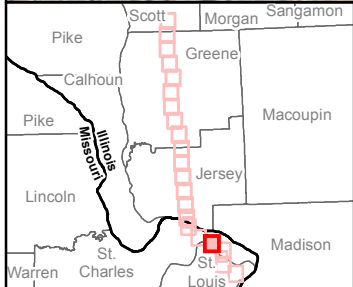
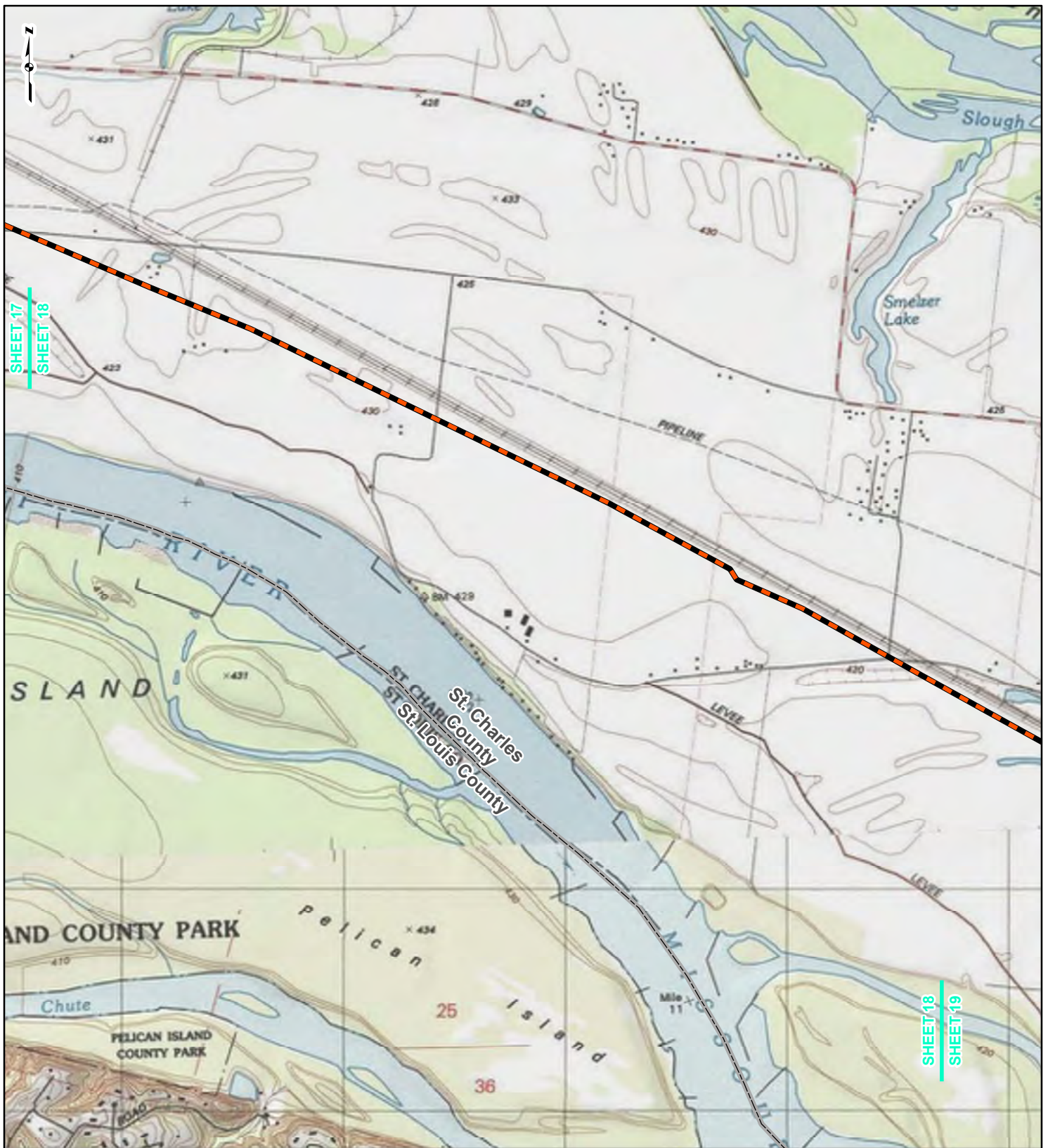
Spire STL Pipeline



DRAWN BY: PMH
CHECKED: SWW

DATE: 7/28/2016
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

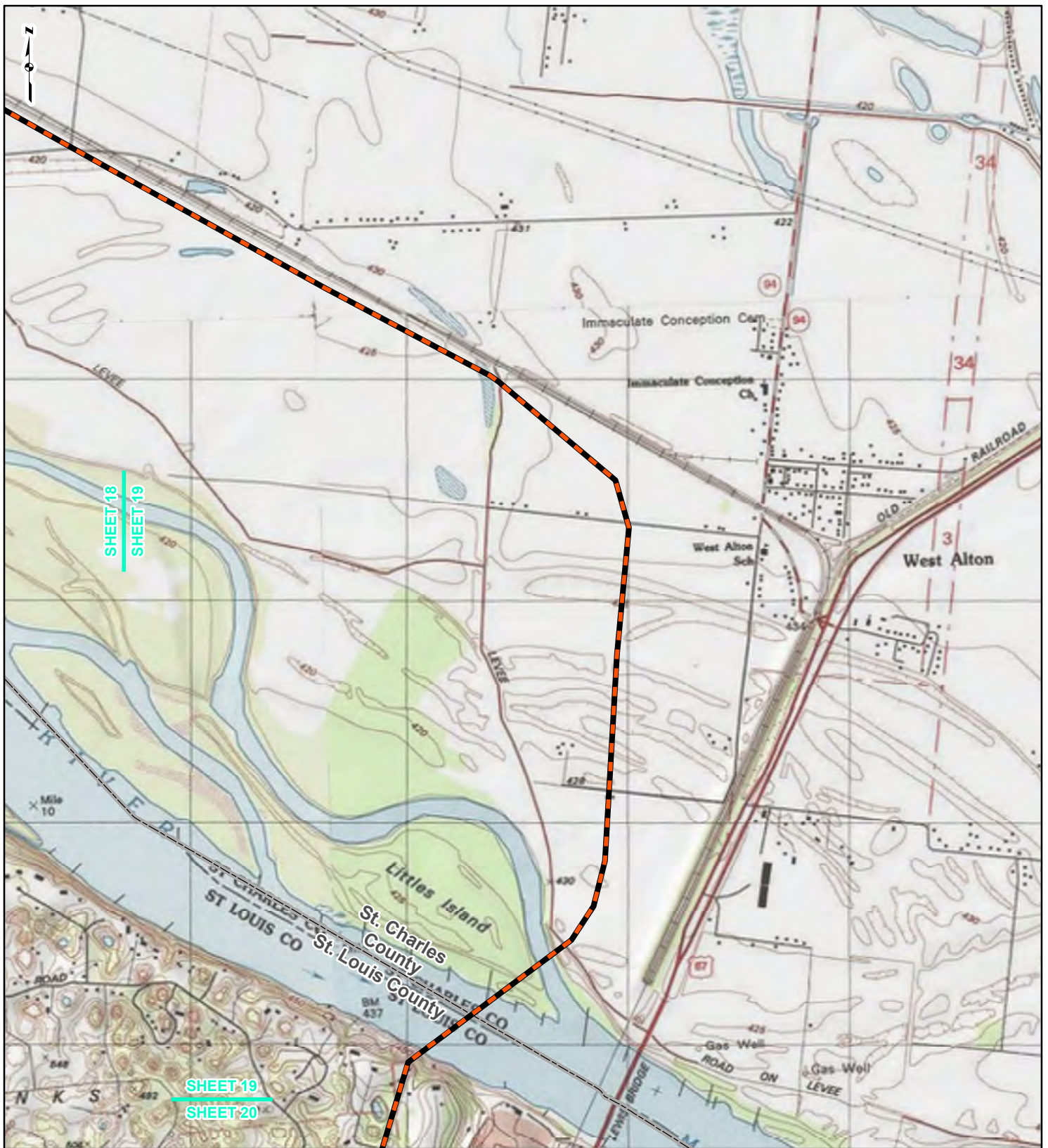
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 18 OF 21

Spire STL Pipeline

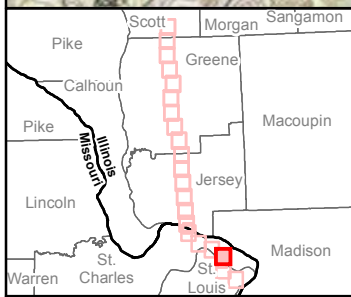
DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

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SHEET 18
SHEET 19

SHEET 19
SHEET 20



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

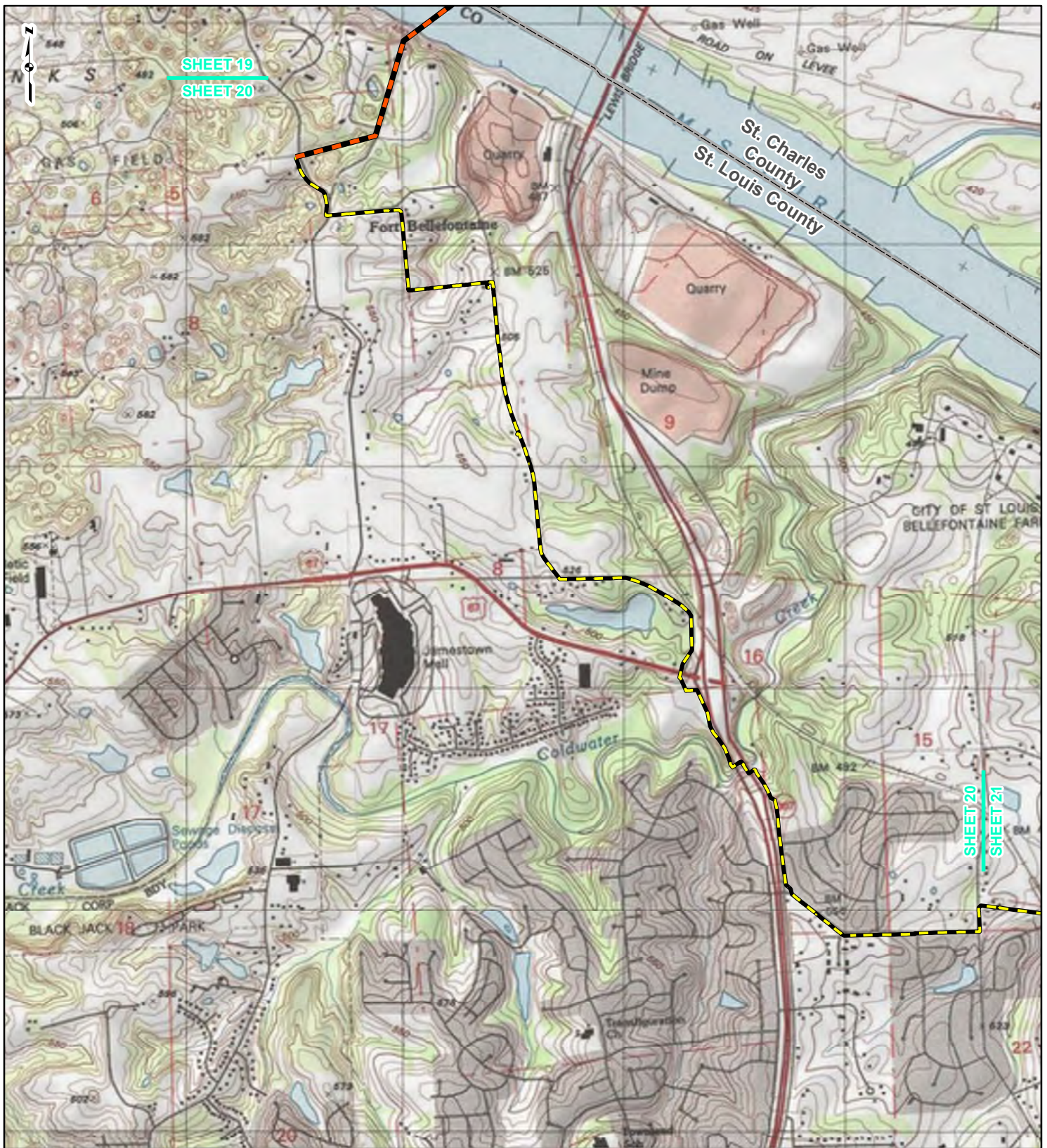
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 19 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

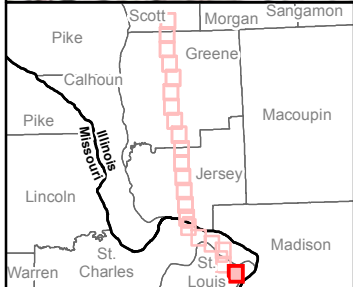
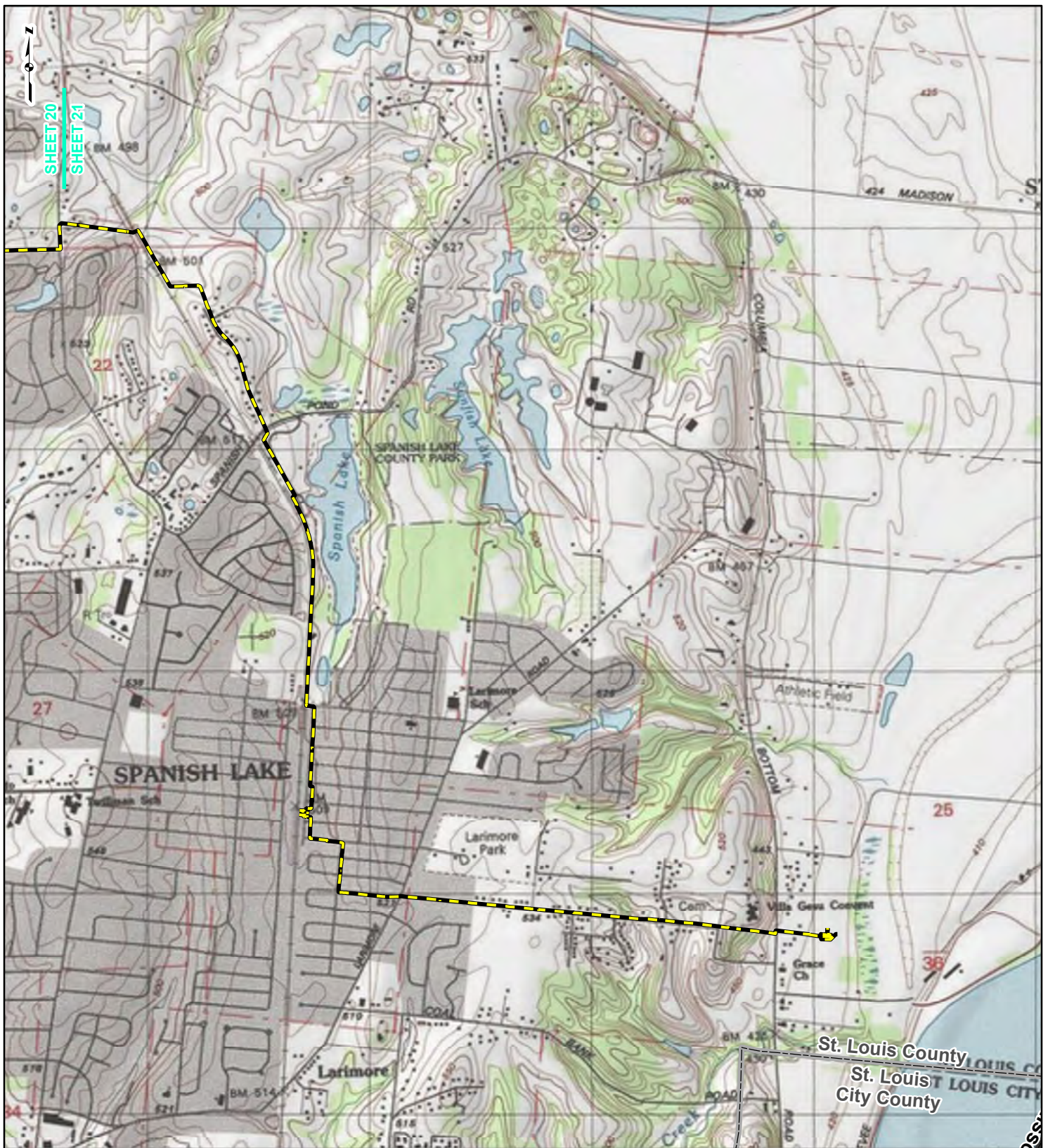
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 20 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- - - NEW BUILD 24-INCH DIAMETER PIPELINE
- - - LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 21 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



July 29, 2016

Ms. Susan Adams
Formerly Utilized Sites Remedial Action Program
United States Army Corps of
Engineers, St. Louis District
1222 Spruce Street
St. Louis, MO 63103-2833

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Ms. Adams:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Army Corps of Engineers - St. Louis District to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Mr. Michael Chapman
Implementation Manager - Missouri River Recovery Program
United States Army Corps of
Engineers - Kansas City District
601 East 12th Street
Kansas City, MO 64106

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Chapman:

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On behalf of Spire, GAI would like to take this opportunity to invite the United States Army Corps of Engineers - Kansas City District to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

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Sincerely,

GAI Consultants, Inc.

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Lori M. Ferry
Environmental Project Manager

LMF/gmg

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

Ali Trunzo

From: Lori Ferry
Sent: Friday, July 29, 2016 3:13 PM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline-Aug. 3rd Meeting

-----Original Message-----

From: Hoerner, Melissa L MVS [mailto:Melissa.L.Hoerner@usace.army.mil]
Sent: Friday, July 29, 2016 12:52 PM
To: Lori Ferry <L.Ferry@gaiconsultants.com>; Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>
Cc: Jayme Fuller <J.Fuller@gaiconsultants.com>
Subject: RE: Spire STL Pipeline-Aug. 3rd Meeting

Absolutely.

Ed: Please send me the particulars on location and time once finalized.

Thanks!

Lynn Hoerner
Real Estate Division
U.S. Army Corps of Engineers
St. Louis District
314-331-8157
melissa.l.hoerner@usace.army.mil

-----Original Message-----

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]
Sent: Friday, July 29, 2016 12:35 PM
To: Hoerner, Melissa L MVS <Melissa.L.Hoerner@usace.army.mil>; Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>
Cc: Jayme Fuller <J.Fuller@gaiconsultants.com>
Subject: [EXTERNAL] Spire STL Pipeline-Aug. 3rd Meeting

Hi Lynn

As I indicated in my email to you earlier this week, we have been trying to schedule a follow up meeting with the District to review the Project's geotech borings, route, and crossing of the federal property. We've spoken with Ed and have a tentative meeting set up for August 3 at 10:00am.

If you have just a few minutes to step into this meeting to discuss the real estate portion again with us again on August 3rd that would be great. We do appreciate your time on this.

Thank you,

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](http://www.gaiconsultants.com/) <Blocked<http://www.gaiconsultants.com/>> |
<Blocked<http://www.facebook.com/gaiconsultants>> <Blocked<https://twitter.com/GAIConsultants>>
<Blocked<https://www.youtube.com/user/gaiconsultants>> <Blocked<https://www.linkedin.com/company/gai-consultants-inc->> <Blocked<http://gaiconsultants.com/news-and-insights/our-thinking/>>

l.ferry@gaiconsultants.com <<mailto:l.ferry@gaiconsultants.com>>

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telephone log



gai consultants

Date: 7-28-2016

Project / Admin. No.: E160438.00

Call From: Jayme L. Fuller

Company: GAI Consultants

Phone No.: 234-203-0763

Call To: Ed Rodriguez Robles

Company: USACE

Phone No.: 314-331-8568

Subject: Section 408

cc:

Summary of Discussion, Decisions, and Commitments:

I spoke with Ed today in regards to the questions I sent him by email. Responses are italicized below.

1. Spire has confirmed that they would like to engage in the memorandum of agreement for acceptance of review funds. So please begin this process. I do have a few questions about the process:
 - a. Does this agreement of funds have to be in place for you to complete the 408 for the geotechnical investigations or are you able to use existing funds for the expedited review?

No, they can use their existing funds to review the 408 for the Geotech permit.
 - b. Do you have an example of what the memorandum of agreement would look like so that Spire may understand the process?

Yes, they do have an example from a neighboring district. They have not completed one themselves, and he has to check to see that he is allowed to share the agreement from the other district. He doesn't think it will be an issue. He will need the proposed pipeline route (does not have to be final) to help them provide the cost estimate for us.
 2. We have been working with the engineers to get a geotech plan together so that we can sit down and meet with you for review and go over requirements for the permit.
 - a. Do you have time to meet on August 3rd at 10:30 or 11:00 am?

Yes, he will make time for us and would like to bring in his Environmental Compliance Officer and his Geotechnical Engineer. I told him we would want to discuss the NEPA process for the 408 and crossing USACE owned property and he indicated his Environmental Compliance Officer will be the one to talk to about that. He would also like a copy of the Geotech workplan prepared by M&M prior to the meeting so they can review. Also he needs to meet a little earlier so he is going to see if everyone is available to meet at 10:00 am.
-

Ali Trunzo

From: Lori Ferry
Sent: Friday, July 22, 2016 11:49 AM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline-Survey Permission

From: Hoerner, Melissa L MVS [mailto:Melissa.L.Hoerner@usace.army.mil]
Sent: Thursday, July 21, 2016 4:19 PM
To: Lori Ferry <L.Ferry@gaiconsultants.com>
Cc: Barnes, James E MVS <James.E.Barnes@usace.army.mil>; Anderson, Lara MVS <Lara.Anderson@usace.army.mil>; Deutsch, Charles W (Charlie) MVS <Charlie.Deutsch@usace.army.mil>
Subject: RE: Spire STL Pipeline-Survey Permission

Hi, Lori:

Per our conversation, for “visual” surveys such as environmental and wetland delineation, you do not need a real estate permit to enter public lands. However, I do ask that you contact Charlie Deutsch from the Rivers Project Office for operational and safety reasons.

Regarding the cultural surveys, the POC on our end is not in the office today. However, it’s my understanding that we typically ensure that you have met all State requirements.

Because there will be ground disturbance with both the cultural and geotechnical surveys, please provide me with information regarding what type of equipment you’ll be using (trucks, augers, shovels, etc.), if you need special access, how you will backfill boring holes or repair associated property damage and the length of time you anticipate needing access.

Please don’t hesitate to call with any questions. E-mail is usually the best way to reach me.

Thanks!

Lynn Hoerner

Real Estate Division
U.S. Army Corps of Engineers
St. Louis District
314-331-8157
melissa.l.hoerner@usace.army.mil

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]
Sent: Wednesday, July 20, 2016 4:01 PM
To: Hoerner, Melissa L MVS <Melissa.L.Hoerner@usace.army.mil>
Subject: [EXTERNAL] Spire STL Pipeline-Survey Permission

Hi Lynn,

I wanted to follow-up via email to the voicemails I’ve left.

We are looking to work with you to gain survey access to the federal property on the south side of the Mississippi River. Can you please give me a call to discuss this and the information you may need?





Thanks so much,
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 |     

l.ferry@gaiconsultants.com



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telephone log



gai consultants

Date: 7/21/2016

Project / Admin. No.: E160438.00

Call From: Lynn Hoerner

Company: USACE St. Louis District, Real Estate Division

Phone No.: 314-331-8157

Call To: Lori Ferry

Company: GAI Consultants

Phone No.: 331-301-2002

Subject: Temporary License for survey access on federal property

cc:

Summary of Discussion, Decisions, and Commitments:

Spoke with Lynn Hoerner (returning my voicemails and emails) regarding survey access on the federal property.

Lynn can issue a Temporary License agreement for access to the federal property south of the Mississippi River for geotechnical borings. She will check to see if cultural survey can also be included in this temporary license.

Wetland and waterbody surveys can proceed on the property since no earth disturbance is occurring. Surveyors should contact the USACE Operations folks who will give us survey access to the property. Charlie Deustch 636-899-0082

She will need geotech boring locations, vehicles, earth disturbance area, backfill procedures etc for the license agreement. I indicated I should have this information next week. Lynn stated license should not take very long at all for approval once she had the information and depending on the group's availability to process it.

telephone log



gai consultants

Date: 07/15/2016

Project / Admin. No.: E160438.00

Call From: Jayme Fuller

Company: GAI Consultants

Phone No.: 234-203-0763

Call To: Mike Chapman

Company: USACE Kansas City District

Phone No.: 816-389-3310

Subject: Section 10 and Section 408

cc:

Summary of Discussion, Decisions, and Commitments:

Mike explained that Kansas City District maintains jurisdiction of high bank to high bank of the Missouri River all the way to the mouth of the Mississippi River and maintains Section 10 authority up to river mile 60 on the Missouri River. I explained to Mike that our project is currently proposed to cross the Missouri between river miles 9 and 8 but downstream of Route 67. Mike confirmed that St. Louis District will handle the Section 10 permit, however, they will send to Mike for his review and comment for the crossing. Mike indicated that the Section 10 process works fine for Kansas City District and if there are no impacts proposed to rock structures or other river training structures, then they would not require a separate 408 Permit. Mike said they will comment to St. Louis that under Section 10 review, they do not feel a Section 408 is needed. Mike indicated he will be checking for minimum depth and will recommend an elevation of 370 which is 40 feet below the normal navigation line. Their main concern will be the prevention of flood scour. He also stated that they Corps owns land around river mile 6.3 but that is currently outside of our proposed crossing. Mike did not feel further coordination was needed at this time but we are welcome to follow up with an email and include Ed Rodriquez for further discussion if necessary.

telephone log



gai consultants

Date: 7/14/2016

Project / Admin. No.: E160438.00

Call From:

Company: GAI Consultants

Phone No.:

Call To: Ed Rodriguez

Company: USACE-St. Louis District

Phone No.: 314-331-8568

Subject: Section 408 Permitting

cc:

Summary of Discussion, Decisions, and Commitments:

Attendees on the call: Lori Ferry, Jayme Fuller, Brandon Kish, Doug Sipe, Ed Rodriguez

The purpose of the call was to discuss the Section 408 permits that would be required, the need for the NEPA reviews and to understand what the USACE would be looking for in the applications.

Because the Mississippi River and Missouri River are Section 10 waterways, and they part of federally authorized navigation channels, both river crossings would require a Section 408 permit (the 408 permit on the Missouri River would be reviewed by the Kansas City District USACE). Although the rivers will be crossed via HDD, the 408 process still requires a NEPA review but it should be minimal considering the impacts to the rivers will be avoided via the drill.

Additionally, the USACE would require a Section 408 permit for the crossing of the federal fee land south of the Mississippi River and for crossing the Consolidated North Levee District. Ed recommended we talk with the North Levee District and discuss the Project plans with them. They will also be required to sponsor the project and GAI will need to submit a written endorsement from the Levee District with our permit applications.

If geotechnical bores are required in the rivers, another Section 408 permit would be required. These should be issued fairly quickly. Geotechnical bores located outside the footprint of the levee would not require a Section 408 permit.

GAI asked the USACE if we can submit an environmental document which discusses project impacts and

construction impacts on the USACE property and at the river crossings ahead of the FERC NEPA document. The USACE indicated that they cannot prepare a NEPA document or utilize any other NEPA document other than what FERC prepares. They do want to talk to FERC about this process. USACE indicated that it would be helpful for us to coordinate with them this fall prior to GAI submitting its final applications in January 2017. They could review a document for USACE properties and work with FERC as a cooperating agency to confirm that their concerns are addressed in the NEPA document. If this was all presented to the USACE, and the final applications were submitted by January 2017, Ed indicated that he thought the USACE could approve the permits within 90 days of the final NEPA document (approximately November 2017).

Funding for the Section 408 permits is still very questionable. USACE fiscal year ends September 30. They do not know how much money they will be allocated next year for review of Section 408. USACE recommends that Spire enter into the reimbursement agreement so that it will guarantee funding will be available. At this point, Ed assumes it may take \$100,000-\$200,000 to complete their review of the Spire project permits.

-----Original Message-----

From: Jayme Fuller

Sent: Friday, July 22, 2016 3:16 PM

To: 'Rodriguez Robles, Edward C MVS' <Edward.C.RodriguezRobles@usace.army.mil>

Subject: RE: USACE St. Louis District Section 408 - NEPA

Hi Ed,

After we have had some conversations with Spire, I have some answers/questions for you:

1. Spire has confirmed that they would like to engage in the memorandum of agreement for acceptance of review funds. So please begin this process. I do have a few questions about the process:

a. Does this agreement of funds have to be in place for you to complete the 408 for the geotechnical investigations or are you able to use existing funds for the expedited review?

b. Do you have an example of what the memorandum of agreement would look like so that Spire may understand the process?

2. We have been working with the engineers to get a geotech plan together so that we can sit down and meet with you for review and go over requirements for the permit.

a. Do you have time to meet on August 3rd at 10:30 or 11:00 am?

Thanks and have a great weekend. Talk to you soon.

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 |

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-----Original Message-----

From: Rodriguez Robles, Edward C MVS [mailto:Edward.C.RodriguezRobles@usace.army.mil]

Sent: Wednesday, July 13, 2016 5:42 PM

To: Jayme Fuller <J.Fuller@gaiconsultants.com>

Cc: Frerker, Charles F MVS <Charles.F.Frerker@usace.army.mil>

Subject: USACE St. Louis District Section 408 - NEPA

Jayme,

I just wanted to follow-up with a recap of our conversation. Due to FERC being the lead federal agency to review this project, an abbreviated EA document specific to the USACE Section 408 action areas cannot be developed. We are not allowed to divide a single action for separate NEPA review (segmentation) if each action does not have an independent utility. However, we can still coordinate

with each other concerning the potential impacts within our action areas prior and during the FERC process.

Also, we would like clarification if FERC is definitely including the borings within their review. This would mean that any Section 408 permitting cannot be issued until FERC process is completed. It could also potentially impact the Corps of Engineers review timeline on both permits (borings & pipeline crossings).

I'd like to touch base with the FERC point of contact at some point. If you can provide the contact information, that would be great.

Lastly, our office of counsel has allowed us to begin coordinating a memorandum of agreement for acceptance of review funds. This could be somewhat of a lengthy process in itself. If Spire wishes to engage in this type of agreement, please let us know to commence the process.

Looking forward in hearing back.

Respectfully,

Ed Rodriguez Robles
ICW Program Manager
US Army Corps of Engineers
St. Louis District Office
1222 Spruce St.
St. Louis, MO 63103
Office: 314-331-8568
Mobile (BB): 314-379-9065

Ali Trunzo

From: Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>
Sent: Thursday, July 07, 2016 11:33 AM
To: Jayme Fuller
Cc: Lori Ferry; Ali Trunzo
Subject: RE: Spire STL Pipeline
Attachments: General Guidelines for HDD Permit Requests Mar 2011.pdf; HDD Guidance from ERDC 2004.pdf; FUSRAP Utility Policy REV 2.pdf; 20151008_EC 1165-2-216_Section 408_Final_Combined-Signed.pdf; MVS Section 408 Fact Sheet.pdf

Jayme,

I'm sorry for the delay, I just got back from vacation. It was a very productive meeting and definitely looking forward in working with you.

Before I start going down the list, I want to clarify a point regarding the Consolidated North County Levee District. In the meeting, I had said that the levee was mostly "non-federal". I was wrong and in fact it's the other way around and I apologize for that. All of the boundaries are "federal" except the boundary that faces the Mississippi River. Therefore, the proposed route will cross a federal section (Section 408 required) of the Consolidated North County Levee right before it crosses the Missouri River. The technical review remains the same while the only changes are added NEPA Analysis and a letter from the sponsor (levee district) endorsing the proposed project.

Also I wanted to point out that currently our funding that is available to conduct Section 408's is in a precarious state. Therefore, I'd like to get ahead and make sure that we have secured funding at all times to conduct the review when the package is submitted. There is an existing mechanism under the authority of Section 214 of WRDA 2000 that allows the Corps of Engineers to accept funds contributed by a non-federal public entity (natural gas company). If I am correct, Spire is Laclede Gas which id be leaning towards that you are eligible to potentially enter into an agreement to expedite the process and remove any chances of the review being unfunded. See link for more information:
http://www.usace.army.mil/Portals/2/docs/civilworks/regulatory/section214/section214_attach_a.pdf

I've also attached a copy of the EC 1165-2-216 (Section 408 Policy) and a Draft Fact Sheet for St. Louis District 408's.

1. See attached for a copy of our HDD Guidelines. I also attach guidelines for "at grade crossings".

2. The levee district commissioner is Kevin Machens and his information is the following:

Mr. Kevin Machens
President, Consolidated North County Levee District
135 Payne Road
Portage Des Sioux, MO 63373
314-750-2519
skmachens@live.com

3. Mike Chapman is the Chief of River Engineering for the KC District Office. He will most likely point you to the Section 408 coordinator. However, Mike will be knowledgeable on potential impacts to existing USACE river training structures along that MO River corridor. There has been some changes in that district recently.

4. See number 3, Mike will be able to provide you with more information.

5. See attached for a copy of the FUSRAP utility policy. FUSRAP point of contact is the following:

Susan Adams
FUSRAP
314-422-7205
Susan.L.Adams@usace.army.mil

If you have any questions or concerns, please don't hesitate to contact me.

Very respectfully,
Ed

Ed Rodriguez Robles
ICW Program Manager
US Army Corps of Engineers
St. Louis District Office
1222 Spruce St.
St. Louis, MO 63103
Office: 314-331-8568
Mobile (BB): 314-379-9065

-----Original Message-----

From: Jayme Fuller [mailto:J.Fuller@gaiconsultants.com]
Sent: Thursday, June 30, 2016 1:42 PM
To: Rodriguez Robles, Edward C MVS <Edward.C.RodriguezRobles@usace.army.mil>
Cc: Lori Ferry <L.Ferry@gaiconsultants.com>; Ali Trunzo <A.Trunzo@gaiconsultants.com>
Subject: [EXTERNAL] Spire STL Pipeline

Hi Ed,

It was great meeting with you yesterday about the Spire STL Pipeline project. I wanted to follow up with you on some action items from the meeting.

1. You had mentioned that the Corps has HDD guidelines for levee crossings and access restriction guidelines. Can you please send me a copy of those?
2. You indicated it would be good to contact the Consolidated North County Levee District Commissioner, however I am unable to find their contact information. Can you please pass that along to me?

3. I wanted to confirm with you that Mike Chapman was the person to talk to about Section 408 for Kansas City District

4. Also we briefly discussed the dike structures in the Mississippi and Missouri Rivers, is there a way to get shapefiles of the dike locations near our proposed crossings?

5. And last but not least, you indicated you have the contact information on who we should deal with under FUSRAP. We would like to get in contact with them on their safety requirements and any other approvals we may need for the Cold Water Creek crossing.

Thanks for all your help!

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 | <Blocked<http://www.facebook.com/gaiconsultants>>
<Blocked<https://twitter.com/GAIConsultants>> <Blocked<https://www.youtube.com/user/gaiconsultants>>
<Blocked<https://www.linkedin.com/company/gai-consultants-inc.>>
<Blockedhttp://gaiconsultants.com/corporate_blog/index.php>

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Ali Trunzo

Subject: 0900 Meeting 6-29-2016, 24-inch pipeline, Scott Co to St. Louis Co
Attachments: Spire MS River crossing RM215.jpg; Spire CNCLD MS RM 215 MO RM8.5 River crossings.jpg

-----Original Message-----

From: Frerker, Charles F MVS [mailto:Charles.F.Frerker@usace.army.mil]
Sent: Friday, June 24, 2016 11:35 AM
To: Jayme Fuller <J.Fuller@gaiconsultants.com>
Cc: Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: 0900 Meeting 6-29-2016, 24-inch pipeline, Scott Co to St. Louis Co

Jayme,

I'm working outside the office today. I don't know if our Section 408 PM and our GIS contact is working today to provide shapefiles of specific levee districts.

Attached are images I created with various data layers from GIS yesterday. I may be incorrect, but it appears the pipeline would only cross the Consolidated North County Levee District. The levee is depicted as the orange colored line bordering the MO River and Mississippi River where it makes a "U-shaped" path within the river floodplains. I don't issue the Section 408 permits to know all of the specifics, but going under or over the levee will likely trigger review requirements to ensure any disturbance doesn't result in under seepage or other structural integrity problems. Our Section 408 manager will be at the meeting to discuss all of the geotechnical plans and review requirement documents that would need to be submitted. I pointed out the levee crossing in one of the aerials.

The Kansas City District Corps' maintains authority over river structures, federal bank stabilization and other similar activities in the Missouri River. The St. Louis District retains Regulatory permitting authority over the lower 50 river miles of the Missouri River and would coordinate any crossing of the Missouri River with the KC District. I don't know KC District's policy will require a Section 408 review for the MO River crossing. I will have to ask the same question about the Mississippi River crossing with our Section 408 PM.

The pipeline will cross Corps of Engineers public land on the south side of the Mississippi River crossing. Corps land is shown as the marsh/wetland symbol in the aerial. An easement from our Real Estate Branch must be obtained to cross through or under Corps land. There is a heightened level of review when crossing Federal property (cultural, HTRW, habitat assessments, etc). Someone from our Real Estate Branch will be attending the meeting. If the pipeline company requires clearing and maintaining low growth vegetation on Federal land, they will likely be required to compensate for waters of the US impacts and also the diminished loss of public/recreational opportunities on Federal land. Crossing Federal land may also trigger Section 408 review. Our Section 408 PM will discuss the applicant's environmental document preparation and cost requirements.

As you're aware, the proposed pipeline crosses numerous small to large tributaries, creeks, wetlands and other waters. There is also a high potential for cultural sites, especially in the Illinois River valley. Each crossing impact, construction road and HDD staging area access impact and permanent ROW vegetation maintenance clearing impact would have to be quantified for the type of wetland, waterway and acreage each area would temporarily and permanently impact for my consideration of the type of Section 10 Rivers and Harbors Act and Section 404 Clean Water Act permit, along with mitigation requirements/location, that would be triggered in the future.

The attached aerial showing the pipeline connecting to the Laclede Gas line shows numerous other red lines running east/west through the Missouri and Mississippi River floodplain. Those pipelines continue to extend westward, but their paths are not shown on the aerial. Identifying each line potentially crossed by the proposed pipeline would be required

for your documentation describing how the activity would be completed without impacting other existing lines now and possibly in the future if other existing companies need to conduct routine or emergency repairs involving excavation.

We can talk about these matters in greater detail next week. Hopefully the attached aerials provide some of the baseline information you requested.

Thanks
Chuck

-----Original Message-----

From: Jayme Fuller [mailto:J.Fuller@gaiconsultants.com]

Sent: Friday, June 24, 2016 9:55 AM

To: Frerker, Charles F MVS <Charles.F.Frerker@usace.army.mil>

Cc: Lori Ferry <L.Ferry@gaiconsultants.com>

Subject: [EXTERNAL] RE: Meeting 6-29-2016 24-inch pipeline Scott Co to St. Louis Co

Hi Chuck,

We are going over the route with the client next week prior to meeting with you on Wednesday, is it possible to send us the 408 Levee shape files? We would like to inform Spire asap if there are route changes that need to be considered early on. Thanks for your help! See you next week.

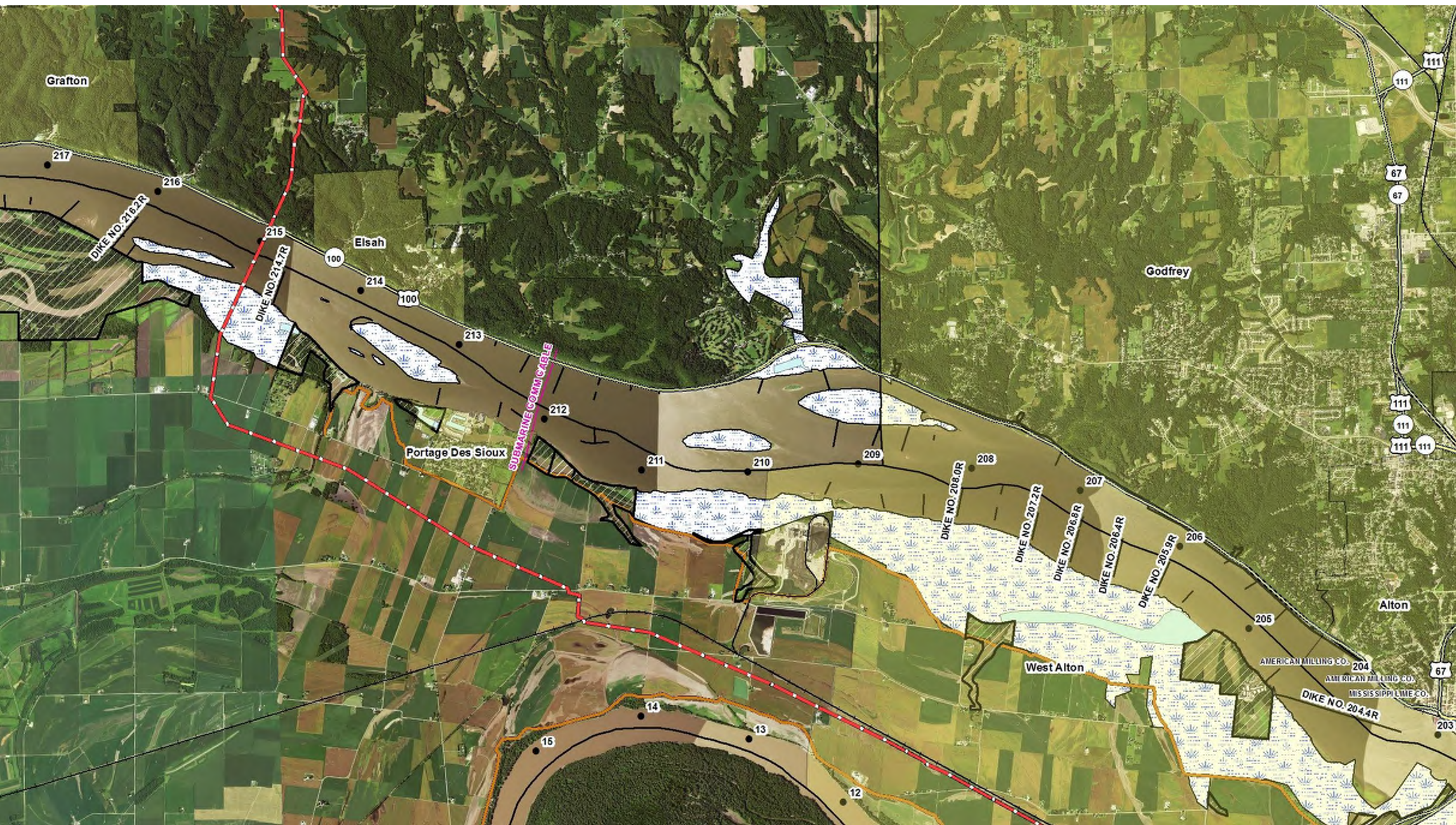
Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 |

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Ali Trunzo

-----Original Message-----

From: Frerker, Charles F MVS [mailto:Charles.F.Frerker@usace.army.mil]
Sent: Monday, June 20, 2016 9:15 AM
To: Jayme Fuller <J.Fuller@gaiconsultants.com>
Cc: Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: RE: Meeting 6-29-2016 24-inch pipeline Scott Co to St. Louis Co

Jayme,

Meeting at 9 AM works well for me.

My office is located in the Regulatory Branch on the 4th Floor of the Robert A. Young Federal Building.

The address is 1222 Spruce Street, St. Louis, Missouri 63103-2833. You'll go through a metal detector after entering the building. Mention to the guards you have a meeting with me/Corps. They can point you to the elevators. After reaching the 4th floor, take the long hallway South and through the wooded door. You'll see windows by continuing to walk straight ahead until you reach my office next to the windows. Anyone you meet can direct you to the Regulatory Branch if you have trouble locating my office.

Thank you,
Chuck

-----Original Message-----

From: Jayme Fuller [mailto:J.Fuller@gaiconsultants.com]
Sent: Monday, June 20, 2016 8:51 AM
To: Frerker, Charles F MVS <Charles.F.Frerker@usace.army.mil>
Cc: Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: [EXTERNAL] RE: Meeting 6-29-2016

Great thanks Chuck. If you are available anytime between 9-12 on Wednesday that would be great. If you can carve out an hour it would be beneficial to go over some of the ag levee information we were discussing.

Thanks again.

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.
6420 Castleway West, Indianapolis, IN 46250
1-234-203-0763 | C 614.499.6258 |

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-----Original Message-----

From: Frerker, Charles F MVS [mailto:Charles.F.Frerker@usace.army.mil]

Sent: Monday, June 20, 2016 9:47 AM

To: Jayme Fuller <J.Fuller@gaiconsultants.com>

Subject: Meeting 6-29-2016

Jayme,

I am available to meet next Wednesday, June 29, 2016.

Let me know what time works best for you and I will be available.

Thanks,
Chuck

Lori Ferry

From: Jayme Fuller
Sent: Wednesday, June 08, 2016 1:57 PM
To: Frerker, Charles F MVS
Cc: Lori Ferry
Subject: RE: Additional Information
Attachments: Line_880_2016_06_07.dbf; Line_880_2016_06_07.prj; Line_880_2016_06_07.sbn; Line_880_2016_06_07.sbx; Line_880_2016_06_07.shp; Line_880_2016_06_07.shp.xml; Line_880_2016_06_07.shx; PPRO_Route_3_2016_0_07.dbf; PPRO_Route_3_2016_0_07.prj; PPRO_Route_3_2016_0_07.sbn; PPRO_Route_3_2016_0_07.sbx; PPRO_Route_3_2016_0_07.shp; PPRO_Route_3_2016_0_07.shp.xml; PPRO_Route_3_2016_0_07.shx

Hi Chuck,

I wanted to follow up with you and provide you with a project description below and the attached shapefiles. It's looking like we can meet the week of the 20th or the 27th. Please let me know a date that best fits your schedule and we will modify our schedule as needed. In the meantime, please feel free to ask additional questions if needed.

Thanks!

Project Description:

Spire STL Pipeline LLC (Spire) is proposing to build, operate, and maintain the Spire STL Pipeline Project (Project). The Project consists of approximately 60-miles of new 24-inch-diameter natural gas pipeline commencing in Scott County, Illinois at an interconnect with the existing Rockies Express Pipeline and traversing south through Greene and Jersey counties, Illinois and into St. Charles and St. Louis counties, Missouri. Spire plans to install three metering and regulating stations, one odorization station and one standalone regulating station as part of the new build section of the project. The Project also includes an upgrade of an existing 9-mile 20-inch natural gas pipeline in St. Louis County, Missouri which would include the addition of two additional measuring and regulating stations. No compressor stations are currently proposed for the Project. The proposed pipeline will be designed and built to carry up to 400,000 dekatherms per day (Dth/d) and is proposed to provide an additional source of natural gas to the local distribution company (LDC) in the St. Louis metropolitan area.

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.
6420 Castleway West, Indianapolis, IN 46250
1-234-203-0763 | C 614.499.6258 |

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-----Original Message-----

From: Frerker, Charles F MVS [mailto:Charles.F.Frerker@usace.army.mil]
Sent: Friday, June 03, 2016 1:23 PM

To: Jayme Fuller <J.Fuller@gaiconsultants.com>

Subject: Additional Information

Jayme,

Here's some information related to a few topics we discussed: (The word "blocked" may appear in front of the weblink with our server security, in which case you can cut and paste just the web address into your browser)

FUSRAP Program:

<http://www.mvs.usace.army.mil/Missions/CentersofExpertise/FormerlyUtilizedSitesRemedialActionProgram.aspx>

Coldwater Creek FAQs: <http://www.mvs.usace.army.mil/Portals/54/docs/fusrap/Coldwater%20Creek/FUSRAPfaqs.pdf>

Levees: <http://www.mvs.usace.army.mil/Missions/LeveeSafety.aspx>

Section 408 Levee review: <http://www.mvs.usace.army.mil/Missions/EmergencyOperations.aspx>

St. Louis District Boundary: (IL) http://www.mvs.usace.army.mil/Portals/54/docs/regulatory/Illinois_Corps_Districts.pdf
(MO) http://www.mvs.usace.army.mil/Portals/54/docs/regulatory/Missouri_Corps_Districts.pdf

Regulatory Program Information: <http://www.mvs.usace.army.mil/Missions/Regulatory.aspx>

Thank you and have a good weekend,

Chuck Frerker, PM
U.S. Army Corps of Engineers
Regulatory Branch (OD-F)
1222 Spruce Street
St. Louis, Missouri 63103-2833
314-331-8583

-----Original Message-----

From: Jayme Fuller [mailto:J.Fuller@gaiconsultants.com]

Sent: Friday, June 03, 2016 11:27 AM

To: Frerker, Charles F MVS <Charles.F.Frerker@usace.army.mil>

Subject: [EXTERNAL] RE: Contact Information

Great thanks Chuck. I hope to follow up with additional information shortly.

Jayme L. Fuller, Environmental Manager
GAI Consultants, Inc.
| C 614.499.6258 |

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-----Original Message-----

From: Frerker, Charles F MVS [mailto:Charles.F.Frerker@usace.army.mil]

Sent: Friday, June 03, 2016 12:03 PM

To: Jayme Fuller <J.Fuller@gaiconsultants.com>

Subject: Contact Information

Jaimie,

Thank you for sharing some of the information about a proposed pipeline coming through areas within the St. Louis District.

As I mentioned, we keep project information confidential. If you're able to send read-ahead information about the proposal and the approximate route, I'll be able to better determine which individuals within different branches of the Corps to invite to the meeting on June 17th or the week of June 20th.

Feel free to send information by replying to this e-mail.

Thank you,

Chuck Frerker, PM
U.S. Army Corps of Engineers
Regulatory Branch (OD-F)
1222 Spruce Street
St. Louis, Missouri 63103-2833
314-331-8583



United States Fish and Wildlife Service



January 25, 2017

Project E160438.00, Task 002.001

Mr. Kraig McPeek
Field Supervisor
United States Fish and Wildlife Service
Rock Island Field Office
1511 47th Avenue
Moline, Illinois 61265

**Re: Rare, Threatened, and Endangered Species Consultation
Spire STL Pipeline LLC
Spire STL Pipeline
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri**

Dear Mr. McPeek:

GAI Consultants, Inc. ("GAI") is performing environmental services on behalf of Spire STL Pipeline LLC ("Spire"), for the Spire STL Pipeline ("Project") in Scott, Jersey, and Greene Counties, Illinois, and St. Charles and St. Louis Counties, Missouri. A letter was submitted to the United States Fish and Wildlife Service ("USFWS") Rock Island Field Office ("RIFO") on September 29, 2016, requesting review of initial effects determinations and proposed survey protocol for federally threatened and endangered species that may be impacted by the proposed Project. The USFWS RIFO responded in a letter dated December 8, 2016; GAI's responses to those comments are provided herein.

Threatened and Endangered Species

Least Tern, Piping Plover, Red Knot, Higgins eye pearlymussel, and pallid sturgeon

In GAI's September 29, 2016, letter to the USFWS RIFO, preliminary determinations were made that the following species are not likely to be adversely affected based on avoiding direct impacts by horizontal directional drilling ("HDD"): Least Tern, Piping Plover, Red Knot, Higgins eye pearlymussel, and pallid sturgeon. The USFWS RIFO recommended that additional information be included detailing how the geological features or drilling methods will prevent the possibility of frackouts ("inadvertent returns") during drilling and any hydrological testing to support these determinations.

Geotechnical borings were completed at both the Mississippi River and Missouri River crossings. Two main aspects of the HDD design indicate that the approach for completing the river crossings via HDD is deemed highly feasible based on the following factors:

Geological Features and Construction Methods

Mississippi River

Spire conducted four geotechnical borings at the Mississippi River; land-based bores and bores conducted within the river. Soil conditions on the north side drill site (the HDD will be advanced from the north side of the crossing towards the south side) was composed of a 23.5-foot-thick layer of soils consisting of soft to medium stiff clayey silt with fine gravel, loose rock fragments and silts. When borings drilled straight down, bedrock was encountered at approximate elevation of 423.5 feet. Bedrock consisted of predominately limestone and shale with layers of mudstone, siltstone and sandstone.

When soils are present in a soft or loose state, it presents difficulty in providing sufficient strength to resist the required fluid pressures necessary to complete an HDD installation. These conditions are present at the beginning and end of the HDD. When these materials are present, the required drilling fluid pressures can

exceed the strength of the soil resulting in the formation of hydraulic fracturing. To mitigate this potential issue, Spire has incorporated temporary conductor casings on the entry and exit locations due to the presence of loose soils near the ground surface. Casings will be installed a minimum length of 85 feet on the north side of the river and 275 feet on the south side of the river. The temporary conductor casings will terminate in favorable soils at depth and will provide an open pathway for drilling fluid flow back to the HDD entry/exit locations. Once the HDD installation is completed, the temporary conductor casings will be removed from the bore. These casings will be removed and grouted upon the completion of pullback operations.

Bedrock materials are also important for a successful drill. Rock quality designations (RQD) is a technique for determining the quality of rock that is recovered when taking core samples. Heavily weathered, jointed, fractured bedrock with RQDs less than 60 percent present challenges in terms of constructability of an HDD installation. The bedrock recovered from the bores along the HDD alignment presented at RQDs of over 60 percent which indicates that the bedrock along the alignment of the pipeline is well suited for HDD installation providing decreased installation risks associated with bore instability, raveling, and loss of drilling fluids to the overlying geotechnical materials.

Missouri River

Spire conducted five geotechnical borings at the Missouri River; land-based bores and bores conducted within the river. Soil conditions on the north side drill site (the HDD will be advanced from the north side of the crossing towards the south side) was composed of a 45-foot-thick layer of soils consisting of very loose to medium dense sand or silt and very soft to medium stiff silts before transitioning to medium dense to very dense sand. When borings drilled straight down, bedrock was encountered at approximate elevation of 293 feet. Bedrock consisted of mudstone and limestone.

When soils are present in a soft or loose state, it presents difficulty in providing sufficient strength to resist the required fluid pressures necessary to complete an HDD installation. These conditions are present at the beginning and end of the HDD. When these materials are present, the required drilling fluid pressures can exceed the strength of the soil resulting in the formation of hydraulic fracturing. To mitigate this potential issue, Spire has incorporated temporary conductor casings on the entry and exit locations due to the presence of loose soils near the ground surface. Casings will be installed a minimum length of 200 feet on the north side of the river and while not anticipated, a small length of temporary casing on the south side of the river may be required. The temporary conductor casings will terminate in favorable soils at depth and will provide an open pathway for drilling fluid flow back to the HDD entry/exit locations. Once the HDD installation is completed, the temporary conductor casings will be removed from the bore. These casings will be removed and grouted upon the completion of pullback operations.

Bedrock materials are also important for a successful drill. RQDs are a technique for determining the quality of rock that is recovered when taking core samples. Heavily weathered, jointed, fractured bedrock with RQDs less than 60 percent present challenges in terms of constructability of an HDD installation. The bedrock recovered from the bores along the HDD alignment presented at RQDs of over 60 percent for the majority of the crossing, which indicates that the bedrock along the alignment of the pipeline is well suited for HDD installation providing decreased installation risks associated with bore instability, raveling, and loss of drilling fluids to the overlying geotechnical materials.

Drilling Fluid Pressure

Spire evaluated the potential for hydraulic fracturing along the proposed HDD crossings of the Mississippi and Missouri Rivers by completing drilling fluid pressure calculations. Spire applied a factor of safety of 2.0 to the cavity expansion calculation, per the recommendations of the United States Army Corps of Engineers. Based on those calculations Spire has determined that the required drilling fluid pressure for the installation is below the recommended allowable pressure for installation. For both the Mississippi and Missouri River crossings, the allowable drilling fluid pressure was found to be significantly higher than the required drilling fluid pressure for the installation. This indicates that the risk for hydraulic fracturing is greatly reduced because the rock type that the drill will be conducted in is able to support the HDD and associated mud pressures. As part of standard construction practice, Spire has developed an HDD Contingency Plan in the event of an inadvertent release of drilling mud. As part of the plan, drilling pressures would be monitored at all times. In the event of

an inadvertent release, Spire would implement the procedures in its plan and coordinate with the USFWS as appropriate.

HDD Summary

No fatal deterrents have been identified with the alignment or the proposed HDD at the Mississippi and Missouri Rivers. Based on the required installation length and diameter, there are nine successfully completed HDD installations of similar lengths within North America for the Mississippi River crossing and 29 for the Missouri River crossing. The proposed HDD installation has been designed based on the use of the drill and intersect method of construction, where drill rig spreads are established on both sides of the crossing to drill individual pilot bores that meet within a target intersect zone beneath the Mississippi and Missouri Rivers.

While not anticipated, if an attempted HDD installation is unsuccessful, the proposed HDD alignment could be modified beneath the Mississippi and/or Missouri Rivers using the same general location to accommodate an additional HDD attempt, depending on the condition/cause contributing to the original HDD failure. Prior to attempting a second HDD crossing, a risk mitigation workshop should be held with all parties to determine the cause of the initial failure and any mitigation measures that could be adopted to reduce the risk(s) during the second HDD attempt.

Plants

In their letter dated December 8, 2016, the USFWS RIFO agreed that plant species are listed within the counties along the alignment and that surveys should be conducted to identify whether any of the species occur within the alignment where suitable habitat exists for decurrent false aster (*Boltonia decurrens*), eastern prairie fringed orchid (*Platanthera leucophaea*), Mead's milkweed (*Asclepias meadii*), and running buffalo clover (*Trifolium stoloniferum*).

Decurrent false aster

Based on prior consultation with the USFWS, decurrent false aster surveys were limited to Jersey County, Illinois in locations of forested floodplains that are frequently flooded and disturbed. Only one location was identified that matches that criteria, Otter Creek. Surveys for decurrent false aster were completed in October 2016 and no individuals were located. A copy of the survey report is provided as Attachment 1. Although, decurrent false aster is listed in the counties crossed by the Project in Missouri, no suitable habitat was identified in Missouri, with the exception of the area south of the Mississippi River, which will be crossed via HDD, therefore, surveys for the decurrent false aster in this location are not warranted.

Eastern prairie fringed orchid, Mead's milkweed, and running buffalo clover

Biological field surveys for wetlands and waterbodies within a 300-foot survey corridor over the proposed Project alignment was completed in 2016. During these surveys, GAI biologists identified areas of potential high-quality habitat for Eastern prairie fringed orchid, Mead's milkweed, and running buffalo clover. Based on those results, potential habitat for Eastern prairie fringed orchid and Mead's milkweed were identified in select locations in Illinois. Surveys for these two species will be completed in June 2017, in accordance with the flowering period of these species. Results of these surveys will be provided to the USFWS for review and concurrence in July 2017. Spire has not been granted landowner permission in the location where surveys for Mead's milkweed are proposed. Once survey permission has been granted, Spire will complete a habitat assessment to determine if suitable habitat for Mead's milkweed is present in the Project area and update the USFWS. One potential area was identified as suitable habitat for the running buffalo clover in Missouri. Surveys will be conducted in May 2017. Results of these surveys will be provided to the USFWS in July 2017. If individuals are located during the surveys, Spire will coordinate with the USFWS to determine the appropriate avoidance and/or minimization measures.

Bats

In their letter dated December 8, 2016, the USFWS RIFO indicated that the Project is within the range of three federally listed bat species: Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), and gray bat (*Myotis grisescens*). According to the USFWS RIFO, the Indiana bat and northern long-eared bat are known to occur within the counties where the proposed Project will occur. Mist net surveys will be completed in May 2017 to determine the presence or absence of listed bats within the proposed alignment following the

latest USFWS Range-wide Indiana bat Survey Guidance (April 2016). A mist-net study plan will be prepared and submitted to the USFWS RIFO for approval prior to commencement of any mist net surveys. Prior to the mist net surveys being completed Spire will proactively work with the USFWS to develop a Biological Assessment in the event that Indiana bats are captured during mist net surveys and tree clearing needs to be conducted after April 1, 2018. Based on the results of the mist net survey Spire will work with USFWS to determine if submission of the Biological Assessment is necessary. Results of the mist net surveys will be submitted in July 2017. If listed bat species are not captured during mist net surveys, Spire has assumed the USFWS would not require tree clearing restrictions for bat species. If listed-bat species are captured, further coordination with the USFWS RIFO will be required. If northern long-eared bats are captured during the surveys, Spire will request concurrence from USFWS that the Project may affect the northern long-eared bat, but that any resulting incidental take of the northern long-eared bat is not prohibited by the final 4(d) rule. If caught during mist nest surveys, northern long-eared bats are not proposed to be tracked via a telemetry survey to identify occupied maternity roosts.

As indicated in our letter dated September 29, 2016, the Project is within known karst resource areas and numerous sinkholes could be detected via aerial photograph analyses. Portal assessments were completed in the winter 2016/2017 and no portals were located. Because no caves or abandoned mine portals were found during the biological field surveys, it is unlikely that the Project will affect any roosting or hibernating habitat for the gray bat. In addition, because the Project will not affect the other types of habitat utilized by the gray bat, such as for foraging and traveling (i.e., rivers, streams, lakes, and reservoirs), the overall Project effects to gray bats are expected to be insignificant and/or discountable, and therefore, would not rise to the level of take. Regardless, gray bats could still utilize the Project area and be captured during mist net surveys. Generally, when gray bats are captured during mist net surveys, they are not radio-tracked to diurnal roosts because, unlike forest-roosting species, it is improbable that a radio-tagged gray bat would be located in an underground roost (where the radio signal cannot be detected from the surface).

Bald Eagles

In their letter dated December 8, 2016, the USFWS RIFO recommended that surveys for active Bald Eagle nests be conducted throughout the proposed Project corridor. A desktop review of the Project area using aerial imagery was completed to identify appropriate proposed locations for Bald Eagle nest searches. Areas selected for searches were where the Project crosses large bodies of water or is in close proximity to a large body of water and where trees are located. Due to the limited amount of work proposed to occur along Line 880 in the vicinity of Spanish Lake in St. Louis County, Missouri, no Bald Eagle nest searches are proposed to occur in the vicinity of the workspace areas around Spanish Lake. To correspond with when Bald Eagles are active in constructing or repairing nests for the upcoming breeding season, nest surveys are anticipated to be completed in early February 2017. Nest searches during this time of year are also favorable as the searcher's view is not obstructed by leaves. The selected areas for Bald Eagle nest searches will be traversed on foot by a qualified biologist using binoculars and a spotting scope as needed by scanning tree canopies for nests. Where needed (i.e., river islands) a spotting scope will be set-up and used to review areas outside the search area or where access is limited. Due to property access restrictions, surveyor's foot traffic will be limited to the 300-foot environmental study corridor centered on the pipeline and the limits of the access roads. Eighteen areas along the Project have been identified for Bald Eagle nest searches to be completed. A copy of the Bald Eagle nest search report will be provided to the USFWS RIFO upon completion of the fieldwork.

Migratory Birds

In their letter dated December 8, 2016, the USFWS RIFO recommended that timing restrictions be included in the construction plan to avoid direct impacts to migratory birds. In addition to avoiding forested areas to the maximum extent practicable, Spire anticipates that tree clearing would be completed prior to May 1, 2018 and, if necessary, after August 1, 2018, to avoid the nesting season for the majority of the Birds of Conservation Concern that may occupy trees in the Project area.

Although Line 880 modifications are proposed to commence in June 2018, Project activities are primarily located within existing easement or maintained residential areas. Construction activities are not anticipated to impact migratory bird species to the degree to which the regional breeding success of these species would be compromised if nests were to be disturbed.

Tree-nesting Species

The USFWS RIFO also recommended that a migratory bird habitat impact analysis be developed to evaluate the overall impacts of habitat loss associated with this Project and possibly provide mitigation to comply with Executive Order 13186. Displacement of individuals and the loss or conversion of habitat from operation activities poses the greatest risk of impact to migratory birds. In December 2016, the USFWS indicated that loss of habitat associated with right-of-way clearing and habitat fragmentation are detrimental to migratory birds in landscapes heavily dominated by agriculture, urban sprawl, or other land use practices that restrict and fragment habitat. In order to minimize these risks, Spire implemented the following avoidance and minimization measures:

- Spire has routed its pipeline such that it avoids trees to the extent practicable by routing the majority of the 24-inch pipeline through agricultural fields.
- Spire has limited its construction right-of-way to the minimal width needed within wooded areas to safely construct and operate the proposed facilities.
- Other than tree clearing for the right-of-way on the north side of the Mississippi River, no interior forests are crossed by the Project. However, the proposed location of the 24-inch pipeline across the Mississippi River will parallel an existing pipeline right-of-way, therefore, minimizing new fragmentation to an otherwise undisturbed tract of interior forest habitat.
- Spire has maximized the use of existing rights-of-way by collocating the route (approximately one-third of the 24-inch pipeline is collocated) with an existing linear easement as to further reduce impacts to the forest or other land uses in the Mississippi River Valley.
- Line 880 modifications are primarily located within existing easement or maintained residential areas and construction activities are not anticipated to impact migratory bird species.
- The majority of the 24-inch pipeline route traverses agricultural lands that will be disturbed by spring agricultural prepping activities.

The majority of the migratory birds identified in the USFWS's Information, Planning and Consultation System ("IPaC") Reports are known to breed in the Project area; the Fox Sparrow, Rusty Blackbird, and Short-eared Owl are non-breeding species of concern for the region. Excluding the non-breeding species, eight species are known to be ground nesting species and 13 species are tree and/or shrub nesting species in the Project area. Additionally, three of the species that were identified in the IPaC Report are associated with large expansive aquatic habitat systems. The nesting seasons associated with the migratory bird species potentially present within the Project areas is generally May 1 through July 31. Based on the review of the species potentially present in the Project areas, nesting seasons associated with the species likely present in the Project areas, nesting typically occurs between May 1 and August 1.

Based on a review of the tree and/or shrub nesting species, the majority of these species have a nesting time period (i.e., eggs or young in the nest) from May through July. In order to protect nesting migratory birds, Spire would not clear trees for construction between May 1 and August 1, 2018. Spire anticipates commencing construction in January 2018 provided that federal authorizations and state permits have been received. Tree clearing activities are currently proposed to be conducted between February 1 and May 1, 2018 (assuming these clearing dates also meet the allowable timeframes for listed bat species pending ongoing agency consultations). Some bird species, such as the Loggerhead Shrike, begin their nesting season earlier in the year, whereas some species may have active nests into August or September, such as Black-billed Cuckoo, Red-headed Woodpecker, Willow Flycatcher, and Wood Thrush. Should impacts to Loggerhead Shrike occur through the removal of shrubs and/or trees prior to May 1, those individuals are likely to re-nest in suitable undisturbed adjacent habitat with sufficient time remaining in the breeding season to not only raise one brood, but multiple broods. For those species that may have active nests into August and September, impacts to those nesting species are not anticipated as tree clearing activities for the Project are anticipated to be completed prior to the start of their nesting season in May.

Bird-related habitat loss for the Project overall will primarily be confined to where wooded areas will be cleared for construction and operation. Approximately five percent of the total area required for construction is considered forested. Impacts to forest are scattered throughout the proposed 59 miles of the 24-inch pipeline,

which equates to less than one-acre per mile of tree clearing for the Project. Furthermore, 50 percent of the proposed 40 acres of proposed forested impacts will be allowed to revert back to forest after construction. Permanent forested impacts have been limited to approximately five percent of the total acreage required for operation of the Project overall.

Ground-nesting Species

The Kentucky Warbler and Worm-eating Warbler are ground nesting species in wooded habitat, and therefore, are not anticipated to be impacted by the Project as the principle habitat they occupy (trees and shrubs) is proposed to be disturbed through the removal of vegetation prior to May 1, which is the beginning of their active nesting time period. Other ground nesting species, such as the Blue-winged Warbler, Dickcissel, Field Sparrow, and Henslow's Sparrow nest in areas dominated by grasses, with the exception of Blue-winged Warbler which nests in herbaceous vegetation within edge and scrub-shrub habitat. Habitat for the Blue-winged Warbler can be assumed to be present over a majority of the Project where edges between wooded and open areas exist; therefore, it can be anticipated that most areas where Blue-winged Warbler would nest would be disturbed during tree clearing activities proposed to be completed prior to May 1, which would coincide with the beginning of their nesting season in May. As for the other ground nesting species that occupy open herbaceous land (i.e., Dickcissel, Field Sparrow, and Henslow's Sparrow), this nesting habitat is anticipated to be disturbed prior to their breeding season commencing in May through a) spring agricultural field preparation by private landowners, and b) the use of the construction right-of-way by contractor vehicles and construction equipment. As a result of tree clearing activities occurring prior to nests being occupied with eggs and/or young, these species may already be displaced from the Project during or prior to territory establishment and pair bonding, and therefore, would find suitable nesting sites in adjacent undisturbed habitat. Nonetheless, should impacts to these ground nesting species occur during Project construction activities the amount of open, non-cultivated land crossed by the Project is minimal and scattered throughout the Project. Therefore, should nesting Dickcissel, Field Sparrow, and Henslow's Sparrow be impacted during construction, the number of nesting individuals impacted is likely to be minimal and not concentrated to a single location to have a significant negative impact to the regional reproductive output for that species during the year of Project construction.

Aquatic Habitat Species

Lastly, species that primarily occupy aquatic habitat, such as Black-crowned Night-heron, Least Bittern, and Pied-billed Grebe are not anticipated to be impacted by the Project as large expansive wetland and/or aquatic habitats are not anticipated to be impacted by the Project. Although the Project crosses the Upper Mississippi Conservation Area on the south side of the Mississippi River, no tree clearing or surface disturbance within that area is proposed.

From a habitat perspective, the proposed Project is not anticipated to significantly increase habitat fragmentation. The largest tract of forest crossed by the Project is located on the northern side of the Mississippi River. This area is fragmented by the presence of an existing pipeline right-of-way which the 24-inch pipeline lies adjacent. Collocating the proposed 24-inch pipeline with an existing pipeline right-of-way minimizes impacts to this natural resource while still meeting the purpose and need of the Project.

Non-local Breeding Species

Impacts to habitats used by the three non-breeding species of concern for the region (Fox Sparrow, Rusty Blackbird, and Short-eared Owl) are not anticipated following completion of the Project as large or concentrated areas of grassland habitat are not proposed to be converted to other land uses and large expanses of aquatic habitat will not be impacted. Habitat loss for the other grassland species of conservation concern that may breed in the Project area is also not anticipated as almost all of the impacted grassland and/or agricultural-related habitat will be allowed to revert back to prior land use following construction.

Spire will minimize operational impacts to nesting birds of conservation concern (for all habitat types) by completing routine vegetation mowing or clearing over the full width of the operational right-of-way in uplands outside of the migratory bird nesting season of April 15 through August 1 as prescribed in the Federal Energy Regulatory Commission's Plan.

In summary, the implementation of the avoidance and minimization measures described herein as well as the abundance of suitable and similar habitat adjacent to the Project are anticipated to alleviate the potential for direct impacts to nesting adults and their young, regional population-level impacts, and the habitat of birds of conservation concern. Significantly measureable negative impacts on migratory birds and their habitats are not anticipated as a result of construction and operation of the Project; therefore, mitigation for the potential impacts to migratory birds is not proposed.

Conclusion

Should the Project design change, Spire will coordinate with the USFWS to discuss changes to species determinations and/or proposed surveys as appropriate. Spire understands that the RIFO will continue to handle coordination with the Columbia Field Office.

At this time, Spire is requesting concurrence on the information provided herein, or as appropriate, additional guidance on the species determinations and survey protocols provided on the rare, threatened, and endangered species that may exist within the Project area. GAI and Spire thank you in advance for your assistance.

If you have any questions regarding this submission, please feel free to contact me at 331.301.2002 or by e-mail at l.ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.



Lori M. Ferry, MS
Environmental Manager

LMF/djz

Attachment: Attachment 1 (Decurrent False Aster Survey Report)

cc: Ms. Kristen Lundh, USFWS, Rock Island Field Office
Ms. Trisha Crabill, USFWS, Columbia Field Office

Ali Trunzo

From: Lori Ferry
Sent: Friday, January 20, 2017 9:21 PM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline-Draft BA Schedule
Attachments: Draft Listed Bat Species Work Plan_012017.pdf

From: Lori Ferry
Sent: Friday, January 20, 2017 8:20 PM
To: 'Lundh, Kristen' <kristen_lundh@fws.gov>
Subject: Spire STL Pipeline-Draft BA Schedule

Hi Kristen,

As discussed on our call at the beginning of January, I have provided our draft schedule for the development of a Biological Assessment should one be required upon the completion of our mist net surveys. A draft BA is scheduled to be provided March 20 for your initial review. Should you have any questions or comments on this schedule, please do not hesitate to contact me.

Have a great weekend,
Lori

Lori Ferry
Environmental Manager-Energy Business Unit

GAI Consultants

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SPIRE STL PIPELINE USFWS/IDNR LISTED BAT SPECIES SCHEDULE PLAN

Activity	Duration (days)	Start Date	End Date	Notes
Mist Net Study Plan				
Conduct Preliminary Mist Net Site Survey	5 Business Days	23-Jan-17	27-Jan-17	
Complete Study Plan	5 Business Days	23-Jan-17	27-Jan-17	
Spire Review	2 Business Days	30-Jan-17	31-Jan-17	
Submit to USFWS and IDNR for Review	1 Milestone	1-Feb-17	1-Feb-17	
Development of the Biological Assessment (BA)				
Spire develops Draft Biological Assessment (BA)	30 Calendar Days	1-Feb-17	3-Mar-17	
Spire submits Draft BA to the USFWS for informal review	30 Calendar Days	20-Mar-17	20-Apr-17	
Spire address comments from USFWS	5 Business Days	21-Apr-17	28-Apr-17	
Spire incorporate Mist Net Results into BA (if needed)	30 Calendar Days	15-May-17	16-Jun-17	
Submit BA to FERC (if needed)	1 Milestone	1-Jul-17	1-Jul-17	
FERC proposed submittal date of the BA to USFWS (if needed)	1 Calendar Days	1-Aug-17	1-Aug-17	
USFWS review for completeness	30 Calendar Days	1-Aug-17	30-Aug-17	
If complete, USFWS consults with FERC	60 Calendar Days	1-Sep-17	31-Oct-17	
USFWS writes BO	45 Calendar Days	1-Nov-17	16-Dec-17	
USFWS issues Final BO	1 Milestone	16-Dec-17	16-Dec-17	
Incidental Take Authorization (ITA)				
Ongoing informal discussions with IDNR	30 Calendar Days	1-Feb-17	1-Mar-17	
Spire develops Draft Habitat Conservation Plan for IDNR	30 Calendar Days	1-Mar-17	31-Mar-17	
IDNR conducts informal review	30 Calendar Days	17-Apr-17	17-May-17	
Spire incorporate Mist Net Results into Habitat Conservation Plan	30 Calendar Days	18-May-17	16-Jun-17	
Submit Habitat Conservation Plan to IDNR	1 Milestone	1-Jul-17	1-Jul-17	
IDNR review for completeness	30 Calendar Days	1-Aug-17	31-Aug-17	
Spire issues Public Notices	14 Calendar Days	1-Sep-17	14-Sep-17	3 notices with 14 days between first and last
Public Comment Period	30 Calendar Days	14-Sep-17	30-Aug-17	
IDNR Final Review	120 Calendar Days	1-Sep-17	29-Dec-17	
Spire evaluates and responds to any received comments from the public	10 Calendar Days	31-Aug-17	13-Sep-17	
IDNR issues ITA	1 Milestone	29-Dec-17	29-Dec-17	
Mist Net Survey				
Conduct mist net surveys	14 Calendar Days	15-May-17	28-May-17	
Spire Drafts Mist Net Survey Report	10 Business Days	30-May-17	12-Jun-17	
Spire submits Mist Net Survey Report and incorporates information into the Final BA and ITA (if needed)	1 Milestone	19-Jun-17	19-Jun-17	

Ali Trunzo





From: Lori Ferry
Sent: Thursday, December 29, 2016 10:34 AM
To: Lundh, Kristen
Subject: Spire STL Pipeline-IL Agency Meeting Notes
Attachments: 12-13-16 IL Interagency Meeting Minutes Combined.pdf

Hello Kristen,
Hope you had a nice holiday.
I have attached the meeting notes from the Illinois interagency meeting as requested.

Thank you and happy new year!

Lori

Lori Ferry
Environmental Manager-Energy Business Unit

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United States Department of the Interior



FISH AND WILDLIFE SERVICE
Rock Island Field Office
1511 47th Avenue
Moline, Illinois 61265
Phone: (309) 757-5800 Fax: (309) 757-5807

IN REPLY REFER
TO:
FWS/RIFO

December 8, 2016

Ms. Loir Ferry
GAI Consultants Inc.
1444 Farnsworth Avenue, Suite 303
Aurora, Illinois 60505

Dear Ms Ferry:

Thank you for your letter of September 29, 2016, requesting review of initial effects determinations and proposed survey protocol for federally threatened and endangered species that may be impacted by the proposed Spire STL Pipeline. The proposed project will consist of approximately 57.4 miles of new 24-inch diameter steel natural gas pipeline extending from Scott County, Illinois through Greene and Jersey counties, crossing under the Mississippi River and east into St. Claire County Missouri, then crossing the Missouri River and tying into an existing 20-inch pipe in St. Louis County, Missouri. Spire is anticipating a 90-foot temporary construction right-of-way with a 50-foot permanent easement. An additional 25 feet of temporary workspace will be required in agricultural areas and additional workspaces may be added in certain areas as the alignment is finalized. The construction right-of-way will be reduced to 75 feet within streams and wetlands.

Threatened and Endangered Species

Your letter includes assessments and proposed survey methodology for species that may be impacted by the proposed project. Several species are included that are located within the Mississippi and Missouri Rivers where the line will be installed through horizontal directional drilling (HDD) under the river bottom. You have made preliminary determinations that the following species are not likely to be adversely affected based on avoiding direct impacts by HDD; least tern, piping plover, red knot, Higgins eye pearl mussel, and pallid sturgeon. We recommend that additional information be included detailing how the geological features or drilling methods will prevent the possibility of frackouts during drilling and any hydrological testing to support these determinations.

The following plant species are listed within the counties along the alignment; the decurrent false aster (*Boltonia decurrens*), eastern prairie fringed orchid (*Platanthera leucophaea*), Mead's milkweed (*Asclepias meadii*), and running buffalo clover (*Trifolium stoloniferum*). We agree surveys should be conducted to identify whether any of the species occur within the alignment where suitable habitat exists for these species.

The project is also within the range of three federally listed bat species: the Indiana bat (*Myotis sodalis*), the northern long-eared bat (*Myotis septentrionalis*), and the gray bat (*Myotis grisescens*). Suitable roosting and foraging habitat for these species is likely present within the proposed alignment, and Indiana and northern long-eared bats are known to occur within the counties where the project will occur. Spire has proposed that mist netting surveys be conducted in the summer of 2017 to determine the presence or probable absence of listed bats within the proposed alignment following the latest U.S. Fish and Wildlife Service (Service) Range-wide Indiana Bat Survey Guidance. Spire has indicated radio-telemetry will be utilized in order to locate important maternity roosts and document habitat use of Indiana bats within the proposed alignment. You indicate that northern long-eared bats will not be tracked due to incidental take of this species being exempted by the final 4(d) rule which was published for this species. While we do not require this species to be tracked, we encourage you to consider a telemetry survey of northern long-eared bats in addition to Indiana bats to identify occupied maternity roosts and avoid incidental take of this species when possible. We appreciate your efforts to survey portals for evidence of bats within the proposed construction corridor. We recommend that you coordinate these efforts with our office to be sure your methods are the least disruptive to hibernating bats.

Bald Eagles

We have reviewed our data for any known bald eagle nests within the proximity of the proposed right-of-way and the closest known nest is 4 miles from the alignment. We agree that field surveys should be conducted to determine if there are other active bald eagle nests that could be impacted by the construction of the pipeline. Although eagle nests are concentrated along river corridors, they are found in other wooded locations and we recommend surveys for active nests are conducted throughout the proposed corridor.

Migratory Birds

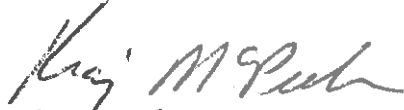
Bird species protected under the Migratory Bird Treaty Act may be negatively impacted by loss of habitat associated with right of way clearing. Clearing of habitat when it is occupied by migratory birds can lead to direct take. Loss of habitat and habitat fragmentation is also detrimental to migratory birds in landscapes heavily dominated by agriculture, urban sprawl, or other land use practices that restrict and fragment habitat. We recommend that timing restrictions be included in the construction plan to avoid direct impacts to migratory birds. The Service also recommends that Spire (as they have been designated by FERC as the non-federal representative to consult with the Service) develop a migratory bird habitat impact analysis to evaluate the overall impacts of habitat loss associated with this project and possibly provide mitigation to comply with Executive Order 13186.

The Service appreciates your willingness to coordinate on this project and looks forward to future discussions to avoid any impacts to trust resources.

These comments are provided as technical assistance in accordance with the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq).

If you have any questions regarding our comments, please contact Kristen Lundh of my staff at (309) 757-5800, extension. 215.

Sincerely,

A handwritten signature in black ink, appearing to read "Kraig McPeck". The signature is written in a cursive style with a large initial "K".

Kraig McPeck
Field Supervisor

Ali Trunzo

From: Lori Ferry
Sent: Monday, November 07, 2016 12:13 PM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline Project
Attachments: Current_Route_UTM15N.ZIP

From: Lori Ferry
Sent: Monday, November 07, 2016 11:13 AM
To: 'Lundh, Kristen' <kristen_lundh@fws.gov>
Subject: Spire STL Pipeline Project

Hi Kristen

As discussed this morning, I've attached the current project facility shapefiles for your review. This includes what was filed with FERC as of October 28, 2016.

Please let me know if you have any issues opening these files.

Thanks,
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 |     

l.ferry@gaiconsultants.com



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Ali Trunzo

From: Lori Ferry
Sent: Wednesday, November 02, 2016 5:47 PM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline-

From: Lori Ferry
Sent: Wednesday, November 02, 2016 2:57 PM
To: 'kristen_lundh@fws.gov' <kristen_lundh@fws.gov>
Cc: Douglas Sipe <dsipe@mdmcorp.com>
Subject: Spire STL Pipeline-

Hi Kristen

I left you a message on your voicemail today. Just wanted to follow up with you since I was told you were now taking over as the point of contact for the Spire STL Pipeline Project.






We sent a letter to Chase Allred back in September regarding our current review of the species within the vicinity of the Project. In my last communication with Chase he indicated he was sending us a response letter before he left, however, we have not received that letter as of yet.


We've also recently made our filing of the initial draft Resource Reports with FERC (docket no. PF16-9) on October 28, 2016. I sent over the electronic files of this filing to you yesterday and wanted to make sure you had been able to download the information.

If your schedule allows, we'd like to see if you might be available for an in-person meeting next week to discuss these items and the Project. Please let me know and we'd be happy to accommodate a meeting at your convenience.

Thank you!
Lori

Lori Ferry
Environmental Manager-Energy Business Unit

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Ali Trunzo

From: Lori Ferry
Sent: Friday, October 14, 2016 4:44 PM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline

From: Lori Ferry
Sent: Friday, October 14, 2016 3:43 PM
To: 'Allred, Chase' <chase_allred@fws.gov>
Subject: RE: Spire STL Pipeline

Hi Chase,

No problem, thanks for the email! Please let me know if there is a good time for us to have a conference call before you leave to discuss the Project details with Kristen or an in-person meeting.

Talk soon!

Lori

From: Allred, Chase [mailto:chase_allred@fws.gov]
Sent: Friday, October 14, 2016 10:09 AM
To: Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: Re: Spire STL Pipeline

Hi Lori,

I apologize for my delayed response; I was in Utah visiting family. However, I have had an opportunity to review Spire's most recent letter. I am in process of drafting a response to your letter, which I will most likely finalize sometime next week. Also, it appears that my replacement will most likely be my supervisor, Kristen Lundh.

Chase Allred
U.S. Fish & Wildlife Service
Rock Island Ecological Services Field Office
1511 47th Ave
Moline, IL 61265
309-757-5800, ext. 221
chase_allred@fws.gov

On Tue, Oct 11, 2016 at 12:23 PM, Lori Ferry <L.Ferry@gaiconsultants.com> wrote:

Hi Chase,

I wanted to check with you all to see if you had a chance to review the most recent letter sent to the USFWS and if you all had identified a contact to replace you on this Project with your impending move.

Please let know when you are able.

Thanks much,

Lori Ferry

From: Allred, Chase [mailto:chase_allred@fws.gov]

Sent: Friday, September 30, 2016 9:22 AM

To: Lori Ferry <L.Ferry@gaiconsultants.com>

Subject: Re: Spire STL Pipeline

Hi Lori,

Thanks for letting me know that Spire's most recent consultation letter will be arriving at my office today. I would also like to inform you that I accepted another job with the FWS in Elkins, West Virginia. My last day at Rock Island is Tuesday, October 25. I will continue to be the POC for this project until 10/25. If I hear who the new POC is for this project, I will let you know.

Thanks,

Chase

Chase Allred

U.S. Fish & Wildlife Service

Rock Island Ecological Services Field Office

1511 47th Ave

Moline, IL 61265

309-757-5800, ext. 221

chase_allred@fws.gov

On Fri, Sep 30, 2016 at 8:14 AM, Lori Ferry <L.Ferry@gaiconsultants.com> wrote:

Hi Chase,

Please find our most recent consultation letter attached for your review and comment. A hardcopy of this letter should arrive in your office today.

Thank you,

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 |    

l.ferry@gaiconsultants.com



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Ali Trunzo






From: Lori Ferry
Sent: Friday, September 30, 2016 9:15 AM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline
Attachments: 9-29-16 USFWS Letter.pdf


From: Lori Ferry
Sent: Thursday, September 29, 2016 4:51 PM
To: chase_allred@fws.gov
Cc: 'trisha_crabill@fws.gov' <trisha_crabill@fws.gov>
Subject: Spire STL Pipeline

Hi Chase,
Please find our most recent consultation letter attached for your review and comment. A hardcopy of this letter should arrive in your office tomorrow.
If you should have any questions, please don't hesitate to contact me.

Thank you,
Lori

Lori Ferry
Environmental Manager-Energy Business Unit

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l.ferry@gaiconsultants.com

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September 29, 2016

Mr. Chase Allred
Project Manager
United States Fish and Wildlife Service
Rock Island Field Office
1511 47th Avenue
Moline, Illinois 61265

**Re: Rare, Threatened and Endangered Species Consultation
Spire STL Pipeline LLC
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Allred:

GAI Consultants, Inc. ("GAI") is performing environmental services on behalf of Spire STL Pipeline LLC ("Spire"), for the Spire STL Pipeline ("Project") in Scott, Jersey, and Greene Counties, Illinois, and St. Charles and St. Louis Counties, Missouri. A letter was submitted to the United States Fish and Wildlife Service ("USFWS") on August 12, 2016 requesting additional information regarding the presence of rare, threatened, and endangered species within the Project area. As requested, GAI is submitting further information to coordinate surveys for the proposed Project.

Project Description

Spire is in the planning stages of the Project. As proposed, the Project will serve the energy needs of residential, commercial, and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project will consist of approximately 57.4 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri. The new build pipeline then crosses the Missouri River and ties 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"). Spire plans to purchase Line 880, including its appurtenant and ancillary facilities, from LGC and modify the pipeline before placing it into interstate service. Line 880 consists of approximately 7.6 miles of existing 20-inch-diameter steel natural gas pipeline located in St. Louis County, Missouri, that will connect the new build portion of the Project to the Enable Mississippi River Transmission, LLC ("Enable MRT") pipeline along the western bank of the Mississippi River, in St. Louis County, Missouri. The total length of the Project pipelines will be approximately 65.0 miles. No compression will be required. The Project will include pipeline interconnects with REX in Illinois and LGC and Enable MRT in Missouri. The Project will also include the construction of minor aboveground facilities.

Spire anticipates a 90-foot temporary construction right-of-way width, which will include a 50-foot permanent easement. An additional 25 feet of temporary workspace will be required through agricultural areas, and additional temporary workspace may be required to facilitate construction in

certain areas, such as crossings of roads, railroads, streams, and wetlands. The construction right-of-way width will be reduced to 75-feet at streams and wetlands.

Federal-listed Species

Spire utilized the USFWS Information, Planning, and Conservation ("IPaC") System to develop a list of federally-listed species that are potentially located within the vicinity of the Project (Table 1). Based on a review of the habitats associated with each species, and an assessment of the potential impacts from the construction of the Project, the following preliminary determinations have been made.

Bird Species

Federally Listed Species

Least Tern and Piping Plover were included in the USFWS IPaC likely due to the crossing of the Mississippi and Missouri Rivers and Line 880's proximity to these rivers. Spire is planning to cross the Mississippi and Missouri rivers via a horizontal directional drill ("HDD") therefore no in-stream construction or disturbance to the stream bed is anticipated at these locations. It is anticipated that a HDD of these waterbodies would mitigate the potential effects of the Project on the Least Tern and Piping Plover. Furthermore, Line 880 does not cross large waterbodies containing habitat for these species. According to the reasons listed above, Spire has determined that the Project is not likely to adversely affect these species.

The Red Knot species is typically associated with large waterbodies with gravel and/or sandy edges. Based on a literature review and available observation data online, Red Knot is not likely to breed within the Project area, and may only be present as a transient species seeking out foraging opportunities along the Mississippi and Missouri Rivers. Additionally, the Line 880 portion of the Project does not cross large waterbodies of this type that would provide habitat for this species. According to the reasons listed above, Spire has determined that the Project is not likely to adversely affect these species.

Bald and Gold Eagle Protection Act

Spire is in process of conducting biological field surveys within a 300 foot corridor along the new build portion of the Project and within an approximate 200 foot corridor along Line 880. As part of these surveys, Spire will survey potential habitat along the Mississippi and Missouri Rivers for the presence of bald eagle nests. In addition, Spire will coordinate with the USFWS Rock Island Field Office to determine the locations of known bald eagle nests within the vicinity of the Project. If data or surveys identify bald eagle nests within the vicinity of the Project, Spire will consult with the USFWS Rock Island Field Office to implement the appropriate mitigation measures during construction of the Project.

Migratory Bird Treaty Act

During the meeting on July 18, 2016, the USFWS indicated that MBTA habitat would likely be associated with the habitat for federal listed bat species as the majority of the pipeline route traverses agricultural lands that will be disturbed by spring prepping. Spire has routed its pipeline such that it avoids trees to the extent practicable. Generally, locations of trees within the Project area are associated with property lines or riparian areas. In locations of streams or wetlands, Spire will reduce its construction right-of-way width to 75 feet in order to minimize the acreage of clearing that will be required for the Project. Spire anticipates commencing construction in Q1 2018, with an anticipated in-service date of November 1, 2018.

Bat Species

The Project is within the ranges of three federally-listed bats, including the endangered Indiana bat, endangered gray bat, and threatened northern long-eared bat. A known winter bat hibernaculum is located in Hannibal, Missouri which is located 51 miles from the closest point of the Project area.

During the July 8, 2016 meeting, the USFWS recommended performing mist net surveys, therefore, Spire intends on conducting mist net surveys to determine the presence/absence of listed bats. Surveys will be conducted between May 15 and August 15, 2017, in accordance with the latest Range-wide Indiana Bat Survey Protocols; currently the 2016 Range-wide Indiana Bat Summer Survey Guidelines, April 2016 (Guidelines). Due to the linear nature of the Project, mist net surveys will follow protocols required for a linear project in the Ozark-Central Recovery Unit for Indiana bat. If listed bats are not captured, then Spire assumes that tree clearing can proceed at any time during the year without restriction.

If Indiana bats are captured during mist netting, radio-telemetry will be required in order to document detailed habitat use. Due to the final 4(d) rule for the northern long-eared bat, which does not prohibit incidental take associated with tree clearing under most circumstances, Spire assumes that USFWS would not require northern long-eared bats to be tracked in order to find known roost trees. Gray bats would not be tracked to diurnal roosts, due to difficulty in detecting bats located in subterranean voids (e.g. caves/mines), and the overall low effect of Project development on gray bat habitat.

In addition, Spire conducted a cursory GIS desktop analysis to determine if there is potential for caves or other underground features in the vicinity of the Project. Karst topography and mining resources were overlaid and revealed that much of the Project is within known karst resource areas, and numerous sinkholes could be detected via aerial photograph analyses. A permitted bat biologist will assess any open portals in distinct locations along the Project route and within Spire's 300-foot survey corridor, to determine their ability to support bats. Portal assessments will be conducted in the winter of 2016/2017 in an effort to determine if bats may be present in suitable portals. This assumes that suitable portals that could not be ruled out during the winter survey would be harp-trapped in the spring, between April 1 and May 1, pending USFWS approval.

A study plan will be prepared and submitted to the USFWS Rock Island Field Office for their approval prior to the commencement of any presence/absence survey work. Once surveys are complete, Spire will provide a report to the USFWS Rock Island Field Office for review and concurrence.

Aquatic Species

The Project is within the ranges of Higgins eye clam and pallid sturgeon. During the July 8, 2016, meeting, the USFWS also requested an assessment of the Illinois cave amphipod. Spire assumes that the presence of the Higgins Eye clam is restricted to the Mississippi and Missouri Rivers. Spire is proposing to cross the Mississippi and Missouri Rivers via HDD, therefore no in-stream construction or disturbance to the stream bed is anticipated at these locations. It is anticipated that HDD of these waterbodies would mitigate potential effects of the Project on these species, therefore Spire has determined that the Project is not likely to adversely affect these species.

Based on an initial review of the Project, Spire does not anticipate impacts to the Illinois cave amphipod. Range information available online through the USFWS states that the species is endemic to Monroe and St. Clair Counties, which are not proposed to be crossed by the Project, therefore, Spire has determined that the Project will have no effect to this species.

Plant Species

A review of the USFWS IPaC System indicated that Decurrent False Aster, Eastern Prairie Fringed Orchid, Mead's Milkweed, and Running Buffalo Clover are potentially located within the vicinity of the Project.

Based on further consultation with the USFWS on August 2nd and 8th, 2016, Decurrent False Aster surveys will be limited to Jersey County, Illinois in locations of forested floodplains that are frequently flooded and disturbed. Spire has identified one location, Otter Creek, for Decurrent False Aster surveys. Surveys for Decurrent False Aster will occur during October 2016. Although Decurrent False Aster is listed in the counties crossed by the Project in Missouri, the Project will not cross locations of forested floodplains in Missouri, with the exception of the area south of the Mississippi River. Spire will be crossing this area via HDD as part of its crossing of the Mississippi River, therefore, no further surveys are necessary for Decurrent False Aster.

Spire is currently conducting 2016 biological field surveys for wetlands and waterbodies within a 300-foot survey corridor over the entire Project where landowner permissions have been granted. During these surveys, Spire will identify areas of potential high-quality habitat for Running Buffalo Clover, Mead's Milkweed, and Eastern Prairie Fringed Orchid. Based on the results of Spire's initial surveys, and in coordination with the USFWS, Spire will determine if there is a need to conduct plant species-specific surveys for these three plant surveys in 2017. If necessary, surveys will be conducted in 2017 between late April and early July in accordance with the flowering period of these species.

Once species-surveys have been completed, Spire will provide the USFWS with a report for review and concurrence.

Conclusion

Should the Project design change, Spire will coordinate with USFWS to discuss changes to species determinations as appropriate. Spire understands that the Rock Island Field Office will handle coordination with the Columbia Field Office.

At this time, Spire is requesting concurrence on the species determinations and survey protocols provided on the rare, threatened, and endangered species that may exist within the Project area. GAI and Spire thank you in advance for your assistance.

If you have any questions regarding this submission, please feel free to contact me at 331.301.2002 or by e-mail at l.ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in blue ink that reads "Lori M. Ferry".

Lori Ferry
Environmental Manager

cc. Mr. Kraig McPeck, USFWS Director
Ms. Trisha Crabill, USFWS Columbia Field Office

Table 1
Species Identified by the IPaC System

Species	Status	County, State	Habitat	Project Facility Reviews	Preliminary Assumptions	ESA Determination
Birds						
Least Tern (<i>Sterna antillarum</i>)	Endangered	St. Charles and St. Louis, Missouri	Nest on barren to sparsely vegetated sandbars along rivers, sand and gravel pits, lake and reservoir shorelines, and occasionally gravel rooftops.	New build 24-inch pipeline (MO only), Line 880	Habitat associated with the Mississippi River. Project crossing location does not consist of sandbars. Project will cross the Mississippi River via horizontal directional drill without impacting shorelines and river islands. No habitat present along Line 880.	Project is not likely to adversely affect this species.
Piping Plover (<i>Charadrius melodus</i>)	Threatened	St. Charles, St. Louis, Missouri	Piping plovers use wide, flat, open, sandy beaches with very little grass or other vegetation. Nesting territories often include small creeks or wetlands.	New build 24-inch pipeline (MO only), Line 880	Habitat associated with the Mississippi and Missouri River. Project crossing location does not consist of sandbars. Project will cross the Mississippi River via horizontal directional drill without impacting shorelines and river islands. No habitat present along Line 880.	Project is not likely to adversely affect this species.

Species	Status	County, State	Habitat	Project Facility Reviews	Preliminary Assumptions	ESA Determination
Red Knot (<i>Calidris canutus rufa</i>)	Threatened	St. Charles and St. Louis, Missouri	Large waterbodies with gravel and/or sandy edges	New build 24-inch pipeline (MO only), Line 880	Species is a transient individual but does not breed within the Project areas.	Project is not likely to adversely affect this species.
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	Bald and Golden Eagle Protection Act ("BGEPA")	Various	Large, tall trees near rivers or reservoirs. Prefer trees which have 1 or 2 open edges in which they roost or nest in the upper open branches, allowing for easy surveillance for food and accessibility.	New build 24-inch pipeline, Line 880	Surveys for bald eagle nests will be conducted within the Project's 300-foot survey corridor along areas of potential habitat along the Mississippi and Missouri Rivers (24-inch new build pipeline). No habitat present along Line 880	Surveys in progress
Bats						
Indiana bat (<i>Myotis sodalis</i>)	Endangered	Scott, Greene, Jersey, Illinois St. Charles, St. Louis, Missouri	Hibernate during winter in caves or abandoned mines. For hibernation, they require cool, humid caves with stable temperatures, under 50° F but above freezing. Summer habitat is in wooded areas where they usually roost under loose tree bark on dead	New build 24-inch pipeline, Line 880	Spire will conduct mist net surveys in 2017 in necessary locations and portal searches in 2016/2017.	Surveys to be conducted in 2017. Spire will provide the USFWS information regarding the results of these surveys upon completion.

Species	Status	County, State	Habitat	Project Facility Reviews	Preliminary Assumptions	ESA Determination
			or dying trees and forage in or along the edges of forested areas.			
Northern long-eared bat <i>(Myotis septentrionalis)</i>	Endangered	Scott, Greene, Jersey, Illinois St. Charles, St. Louis, Missouri	Hibernates in caves and mines. They use areas in various sized caves or mines with constant temperatures, high humidity, and no air currents. Roost underneath bark in the summer, in cavities or in crevices of both live trees and snags, choosing roost trees based on suitability to retain bark or provide cavities or crevices.	New build 24-inch pipeline, Line 880	Spire will conduct mist net surveys in 2017 in necessary locations and portal searches in 2016/2017.	Surveys to be conducted in 2017. Spire will provide the USFWS information regarding the results of these surveys upon completion.
Gray bat <i>(Myotis grisescens)</i>	Threatened	St. Charles, St. Louis, Missouri	Lives in caves year-round. During the winter they hibernate in deep, vertical caves. In the summer, they roost in caves which are scattered along	New build 24-inch pipeline (MO only), Line 880	Spire will conduct mist net surveys in 2017 in necessary locations and portal searches in 2016/2017.	Surveys to be conducted in 2017. Spire will provide the USFWS information regarding the results of these surveys upon completion.

Species	Status	County, State	Habitat	Project Facility Reviews	Preliminary Assumptions	ESA Determination
			rivers. These caves are in limestone karst areas.			
Aquatics						
Higgins eye (pearlymussel) (<i>Lampsilis higginsii</i>)	Endangered	Not known or believed to occur in counties crossed by the Project	Larger rivers where it is usually found in deep water with moderate currents. Not identified in the counties crossed by the Project in Missouri.	New build 24-inch pipeline (MO only)	Project will cross the Mississippi River via horizontal directional drill.	Project is not likely to adversely affect.
Pallid sturgeon (<i>Scaphirhynchus albus</i>)	Endangered	St. Charles and St. Louis, Missouri	Large, silty rivers with natural a hydrograph with a diversity of depths and velocities formed by braided channels, sand bars, sand flats and gravel bars.	New build 24-inch pipeline (MO only)	Project will cross the Mississippi River via horizontal directional drill.	Project is not likely to adversely affect.
Cave amphipod (<i>Gammarus acherondytes</i>)	Endangered	Not known or believed to occur in counties crossed by the Project	Lives in the "dark zone" of cave streams, needs cold water and does not tolerate a wide range in water temperatures.	Not identified on IPaC	Not known or believed to occur in counties crossed by the Project.	Project is anticipated to have no effect to the species.

Species	Status	County, State	Habitat	Project Facility Reviews	Preliminary Assumptions	ESA Determination
			Currently, the Illinois cave amphipod is found in only three of the original six cave sites. These caves are all in Monroe County.			
Plants						
Decurrent false aster (<i>Boltonia decurrens</i>)	Threatened	Scott, Greene, Jersey; Illinois St Charles, St. Louis, Missouri	Moist, sandy floodplains and prairie wetlands	New build 24-inch pipeline (IL and MO), Line 880	Surveys will be performed in 2016 in Jersey County (Otter Creek), Illinois. Other potential habitat in Missouri associated with the Mississippi River will be crossed via horizontal directional drill.	Surveys to be conducted in 2016. Spire will provide the USFWS information regarding the results of these surveys upon completion.
Eastern prairie fringed orchid (<i>Platanthera leucophaea</i>)	Threatened	Scott, Greene, Jersey, Illinois MO- Not known or believed to occur in Counties crossed by the Project	Mesic prairie to wetlands, requires full sun for optimum growth and flowering and a grassy habitat with little or no woody encroachment.	New build 24-inch new build pipeline (IL and MO)	Surveys will be performed if necessary in 2017.	Surveys to be conducted in 2017. Spire will provide the USFWS information regarding the results of these surveys upon completion.
Mead's milkweed (<i>Asclepias meadii</i>)	Threatened	St. Louis County, Missouri	Mesic to dry mesic, upland tallgrass prairie or glade/barren. Habitat	New build 24-inch build pipeline (MO only), Line 880	Surveys will be performed if necessary in 2017.	Surveys to be conducted in 2017. Spire will provide the USFWS information regarding the results of

Species	Status	County, State	Habitat	Project Facility Reviews	Preliminary Assumptions	ESA Determination
			characterized by vegetation adapted for drought and fire. Persists in stable late-successional prairie.			these surveys upon completion.
Running buffalo clover <i>(Trifolium stoloniferum)</i>	Endangered	St. Charles, St. Louis, Missouri	Mesic habitats of partial to filtered sunlight, where there is a prolonged pattern of moderate periodic disturbance, such as mowing, trampling, or grazing. It is most often found in regions underlain with limestone or other calcareous bedrock.	New build 24-inch pipeline (MO only), Line 880	Surveys will be performed if necessary in 2017.	Surveys to be conducted in 2017. Spire will provide the USFWS information regarding the results of these surveys upon completion.



August 12, 2016

Mr. Kraig McPeek
Director
United States Fish and Wildlife Service
Rock Island Field Office
1511 47th Avenue
Moline, Illinois 61265

**Re: Rare, Threatened and Endangered Species Consultation
Spire STL Pipeline LLC
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL**

Dear Mr. McPeek:

GAI Consultants, Inc. ("GAI") is submitting this information request on behalf of Spire STL Pipeline LLC ("Spire"), for the Spire STL Pipeline ("Project") in Scott, Jersey, and Greene Counties, Illinois, and St. Charles and St. Louis Counties, Missouri. Representatives from Spire and GAI met with your office on July 8, 2016 to introduce the Project. As requested, GAI is submitting further information to coordinate anticipated reviews and surveys for the proposed Project.

Project Description

Spire is in the planning stages of the Project. As proposed, the Project will serve the energy needs of residential, commercial, and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri, until crossing the Missouri River and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri, that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri, that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi River, in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles and will include the construction of minor aboveground facilities. A pig launcher/receiver will also be installed at each portion of the Project. The overall design capacity of the new build portion of the pipeline is expected to be 400,000 Dth/d. No compression will be required.

Spire anticipates a typical 90-foot temporary construction right-of-way ("ROW") width, and a 50-foot permanent ROW. The construction ROW is anticipated to be reduced to 50-foot 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.

Illinois

Approximately 45 miles of the new build 24-inch diameter steel pipeline will be located in Illinois and traverse Scott, Greene, and Jersey Counties. One metering and regulating station and one pig launcher are proposed in Scott County, Illinois, at the interconnection location with the REX pipeline.

The pipeline facilities are shown on the attached United States Geological Survey ("USGS") 7.5-minute series topographic maps (Figure 1). In addition, Spire has assumed the use/development of new and/or existing access roads throughout the Project area. Temporary extra work spaces and contractor yards will also be utilized to accommodate equipment staging and stockpiling of materials along the proposed corridor during construction. The locations of these facilities are still pending.

Missouri

Approximately 13 miles of new build 24-inch diameter steel pipeline will be located in Missouri and traverse St. Charles and St. Louis Counties. Approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri, will be modified. One regulation station, one metering and regulating station, and one pigging facility are proposed in St. Louis County, Missouri.

The pipeline facilities are shown on the attached USGS topographic map (Figure 1). In addition, Spire has assumed the use/development of new and/or existing access roads throughout the Project area. Temporary extra work spaces will be utilized to accommodate equipment staging and stockpiling of materials along the proposed corridor during construction. The locations of these facilities are still pending.

Site Description

The Project is located in Scott, Greene, and Jersey Counties, Illinois, and in St. Charles and St. Louis Counties, Missouri, and is depicted on the attached portions of the Alsey (1983), Roodhouse West (1983), Carrolton (1985), Boyer Creek (1983), Otterville (1983), Elsah (1979), and Grafton (1995), Illinois and the Grafton (1979), Elsah (1979), Alton (1979), Florissant (1979), and Columbia Bottom (1979), Missouri USGS maps (Figure 1). Based on discussions at the meeting, Spire is evaluating potential impacts to the following species or communities:

- bat species including Indiana bat (*Myotis sodalis*), Northern long-eared bat (*Myotis septentrionalis*), and gray bat (*Myotis grisescens*);
- known winter hibernaculum located in Hannibal, Missouri;
- tree nesting migratory birds;
- mussel and fish species including Higgins eye pearlymussel (*Lampsilis higginsii*), Spectaclecase (*Cumberlandia monodonta*), and Pallid sturgeon (*Scaphirhynchus albus*);
- Cave amphipod (*Gammarus acherondytes*);
- plant species including Decurrent false aster (*Boltonia decurrens*) and Running buffalo clover (*Trifolium stoloniferum*); and
- nesting bald eagles (*Haliaeetus leucocephalus*).

The majority of the pipeline is greenfield and crosses a primarily agricultural landscape. The existing pipeline to be modified is located primarily within existing ROW, which traverses residential, agricultural, and some wooded areas. The Project is located within the North Little Sandy Creek [USGS Hydrologic Unit Code ("HUC") #071300110503], Little Sandy Creek (HUC #071300110504), Hurricane Creek (HUC #071300110806), Whitaker Creek-Apple Creek (HUC #071300110702), Coates Creek-Apple Creek (HUC #071300110703), Link Branch-Lower Macoupin Creek (HUC #071300120602), Wines Branch-Lower Macoupin Creek (HUC #071300120603), De Arcy Branch-Phils Creek (HUC #071300120502), Sandy Creek-Otter Creek (HUC #071300110901), Shilow

Hollow-South Fork Otter Creek (HUC #071300110902), Lower Piasa Creek (HUC #071100090204), Marais Temps Clair-Mississippi River (HUC #071100090401), Marais Temps Clair-Mississippi River (HUC #071100090401), Outlet Missouri River (HUC #103002000804), Coldwater Creek (HUC #103002000803), and Maline Creek-Mississippi River (HUC #071401010401) watersheds.

Based on an initial review of the Project, Spire does not anticipate impacts to the Illinois cave amphipod. Range information available online through the United States Fish and Wildlife Service ("USFWS") states that the species is endemic to Monroe and St. Clair Counties, which are not proposed to be crossed by the Project. Should the Project design change and facilities be proposed for these counties, Spire will coordinate with USFWS to avoid or minimize potential impacts to this species.

Spire is continuing to refine the Project area, and will contact the USFWS for additional technical assistance to determine the appropriate species and/or habitat surveys. Spire is aware that some properties crossed by the Project may have USFWS easements, and will evaluate available information obtained during title searches. Spire understands that the Rock Island District will handle coordination with the Columbia Field Office as well as the Two Rivers Refuge.

GAI understands that species and/or habitat surveys are recommended, and would appreciate further technical assistance. In addition, GAI would appreciate the identification of any additional federally-listed species or significant biological features within one-half-mile of the proposed Project centerline, as shown on Figure 1.

Please note the intent of this letter is solely for the purpose of formally initiating consultation and/or applicable permit applications. An invitation for you to participate in the Federal Energy Regulatory Commission's National Environmental Policy Act Pre-Filing Process will be addressed to you under separate cover.

If you have any questions regarding this submission, please feel free to contact me at 234.203.0763 or by e-mail at J.Fuller@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

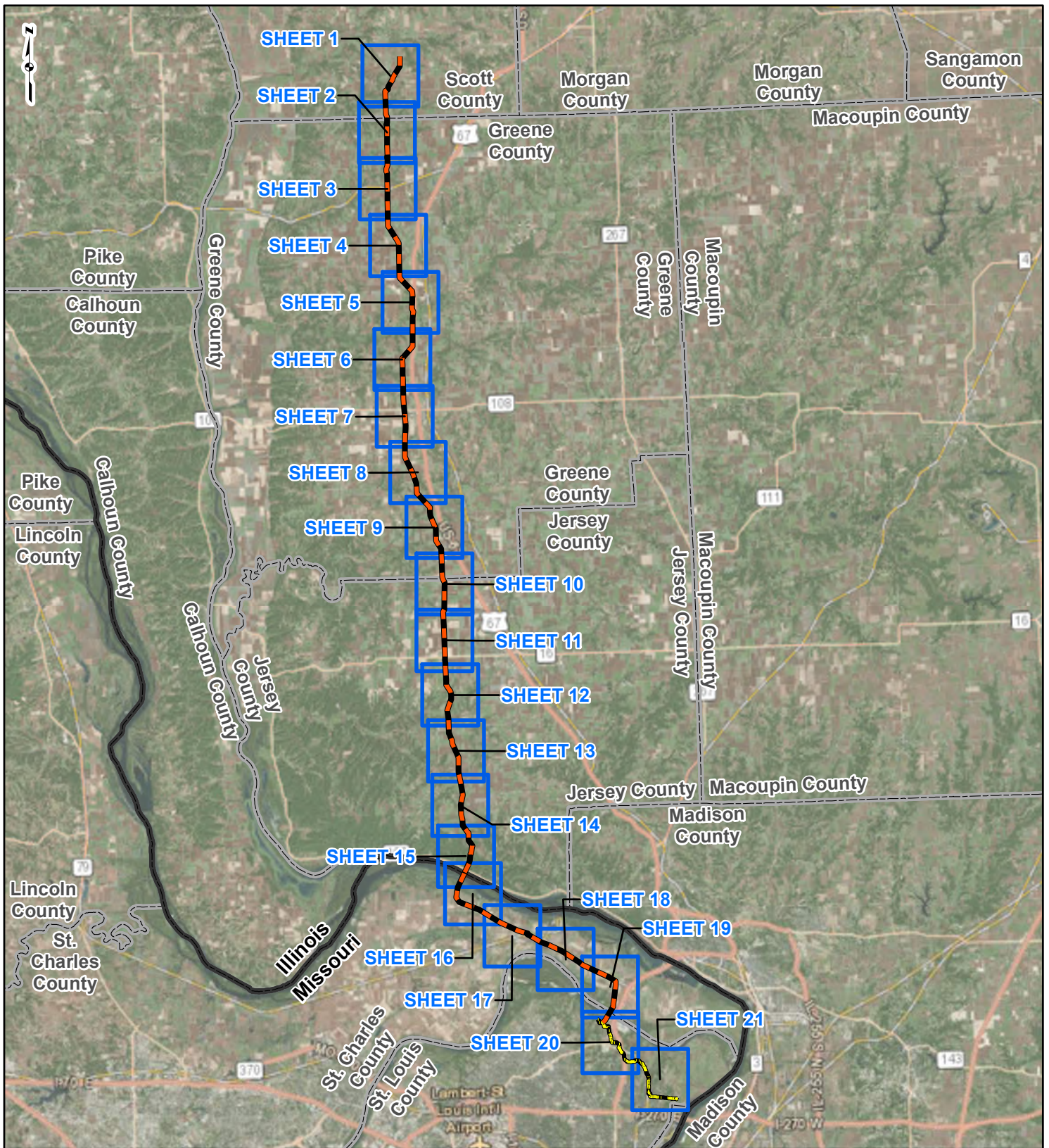


Jayne L. Fuller
Environmental Manager

JLF/jbm

Attachment: USGS Topographic Map (Figure 1)

ATTACHMENT
USGS TOPOGRAPHIC MAP (FIGURE 1)



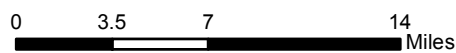
PROJECT LOCATION



SCOTT, GREENE AND JERSEY COUNTIES, ILLINOIS AND ST. CHARLES AND ST. LOUIS COUNTIES, MISSOURI

LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY
- SHEET INDEX



**FIGURE 1
LOCATION MAP
SHEET INDEX**



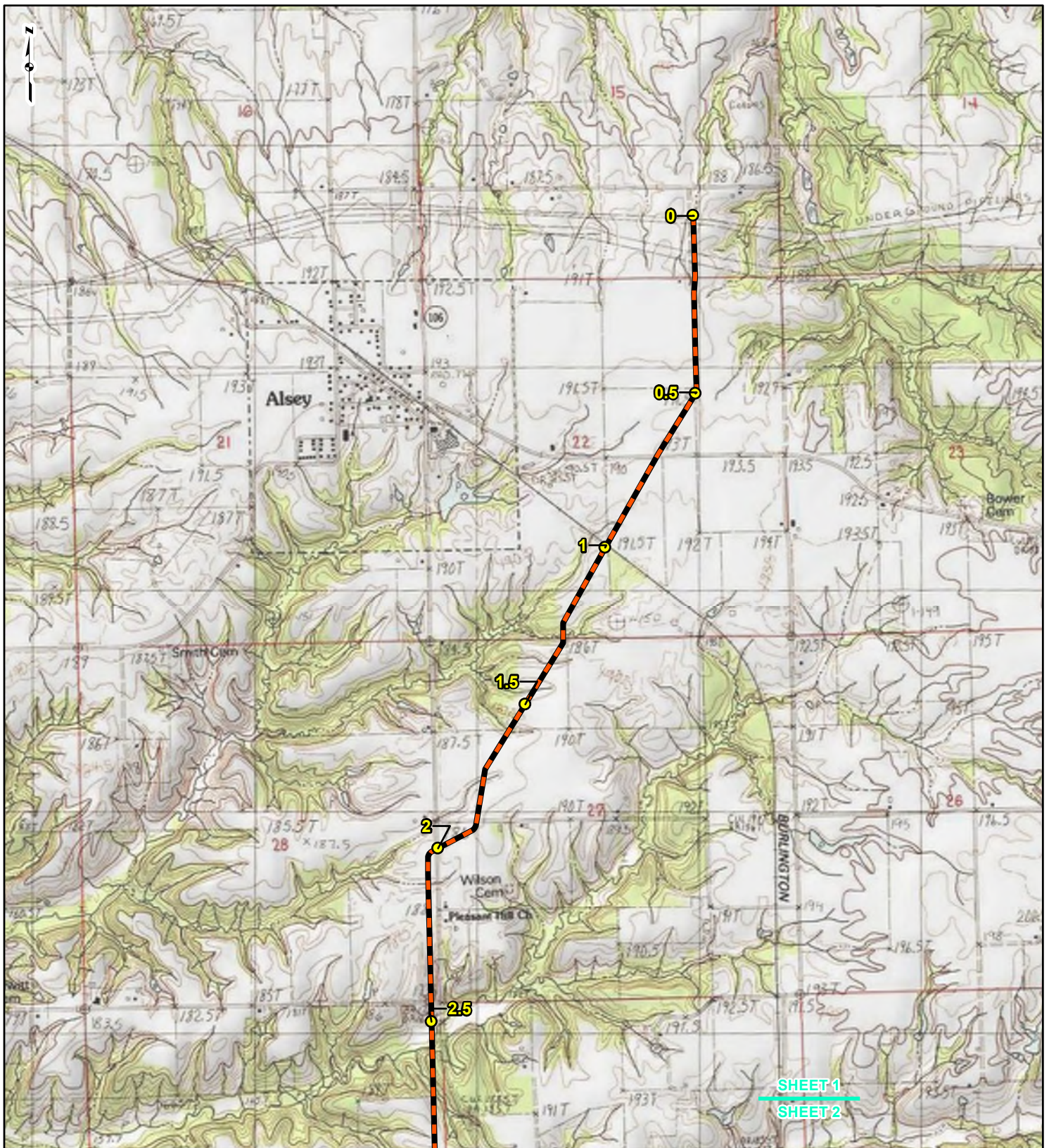
Spire STL Pipeline



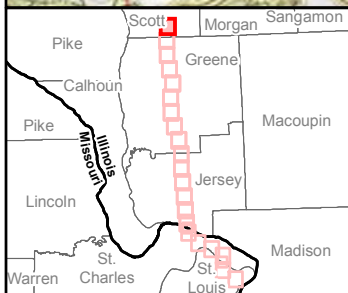
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CHECKED: SWW

DATE: 8/12/2016
APPROVED: LMF

REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2015, ACCESSED 08/2016.



SHEET 1
SHEET 2



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

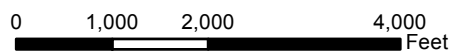


FIGURE 1
LOCATION MAP
SHEET 1 OF 21



Spire STL
Pipeline



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DATE: 8/12/2016

CHECKED: SWW

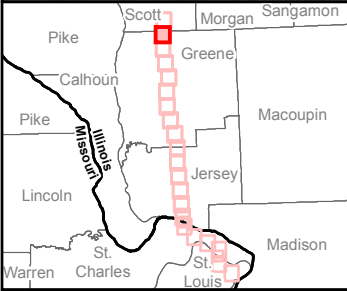
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SHEET 1
SHEET 2

SHEET 2
SHEET 3



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

0 1,000 2,000 4,000
Feet

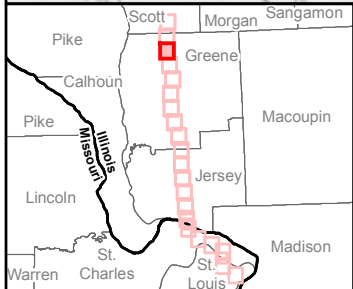
**FIGURE 1
LOCATION MAP
SHEET 2 OF 21**

Spire STL Pipeline

gi consultants **spire**

DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), EL SAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

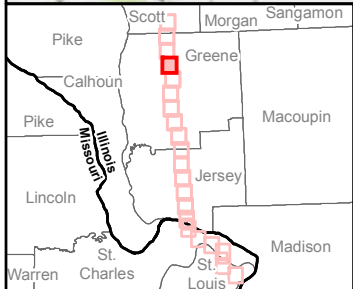
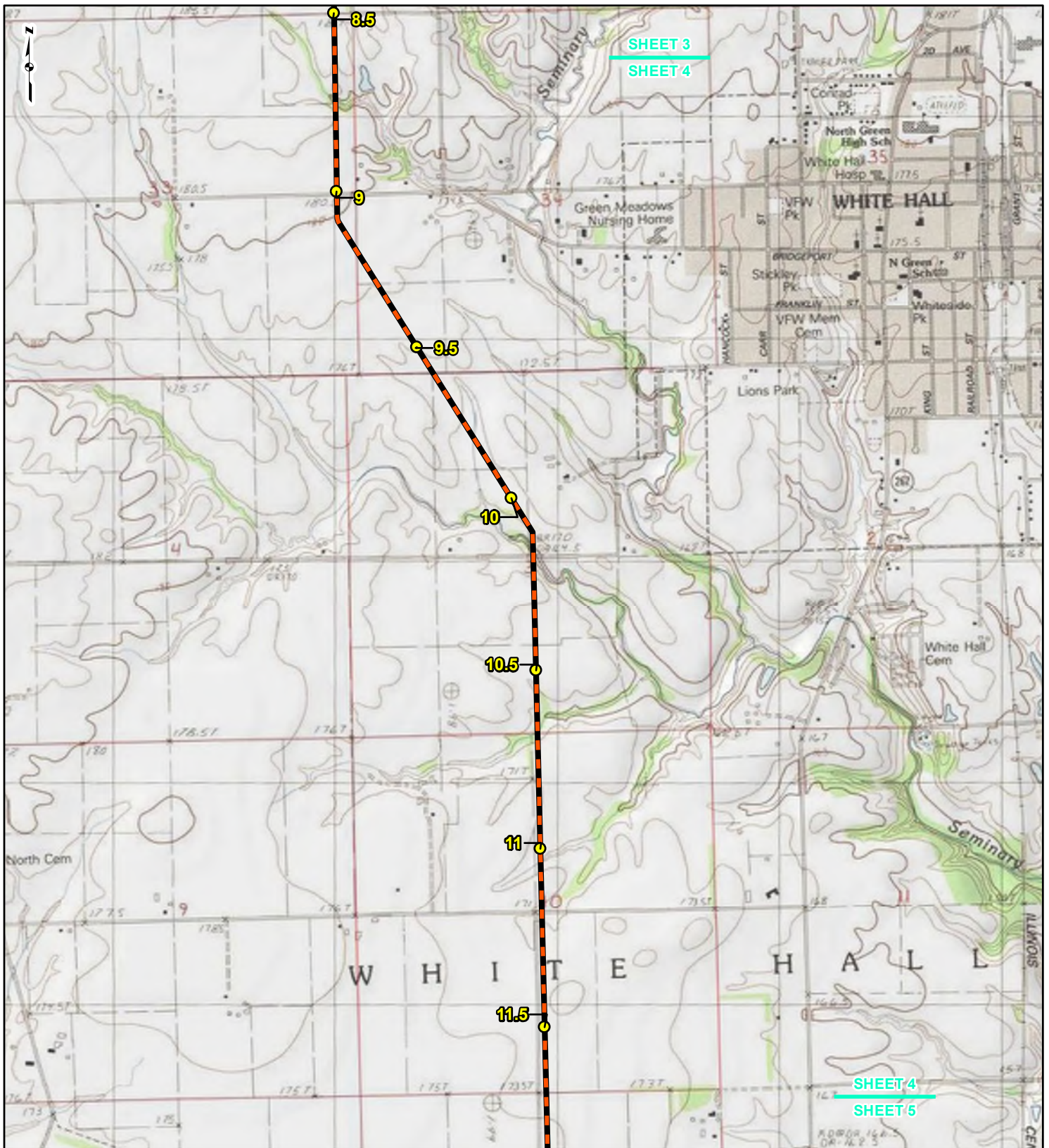
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FIGURE 1
LOCATION MAP
SHEET 3 OF 21



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CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

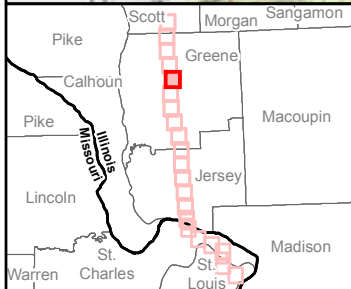
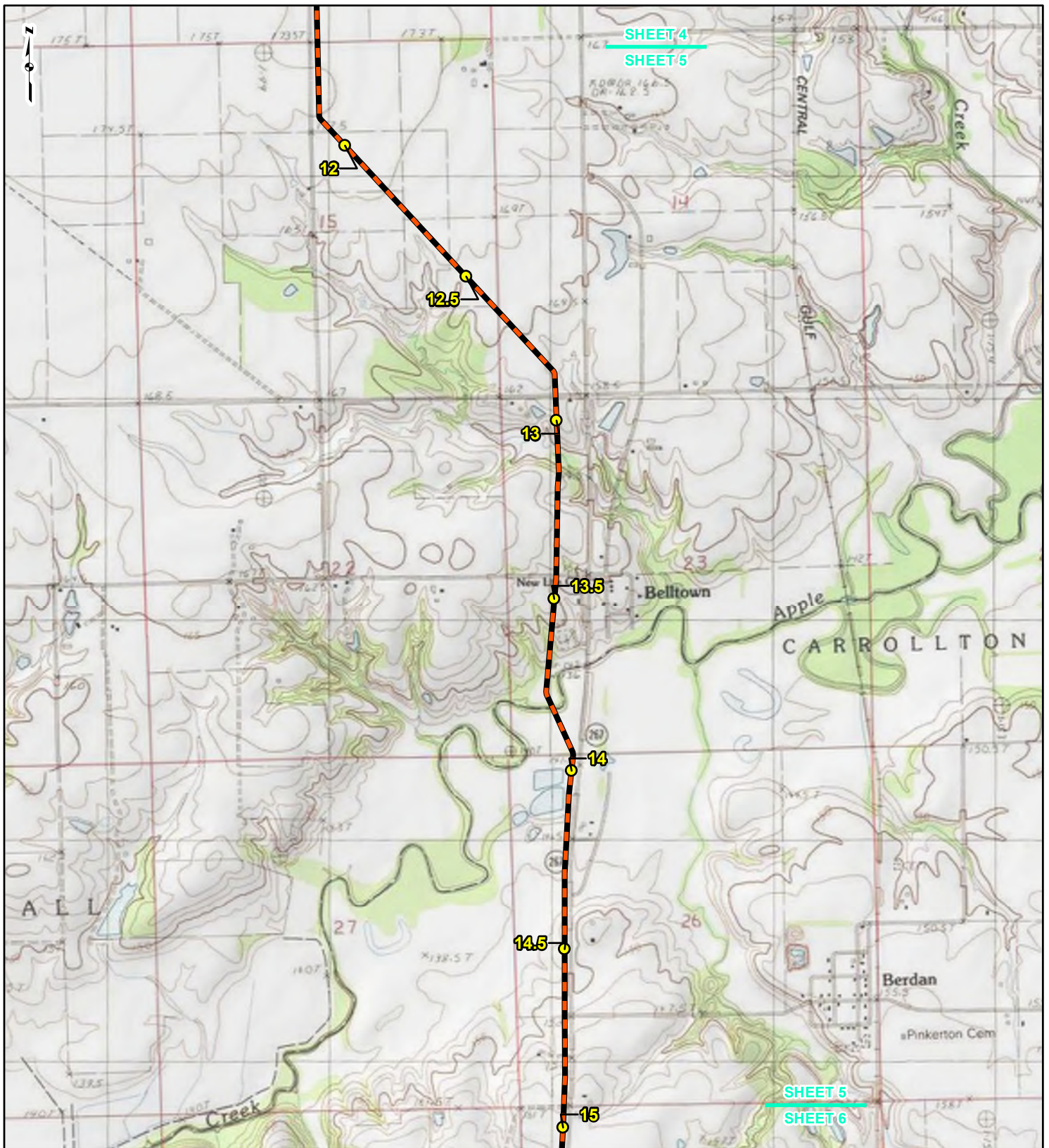
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**FIGURE 1
LOCATION MAP
SHEET 4 OF 21**

**Spire STL
Pipeline**

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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

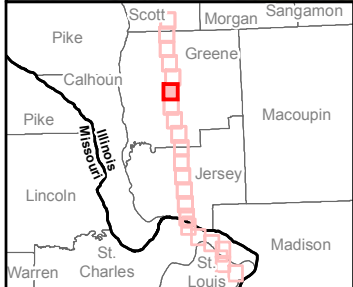
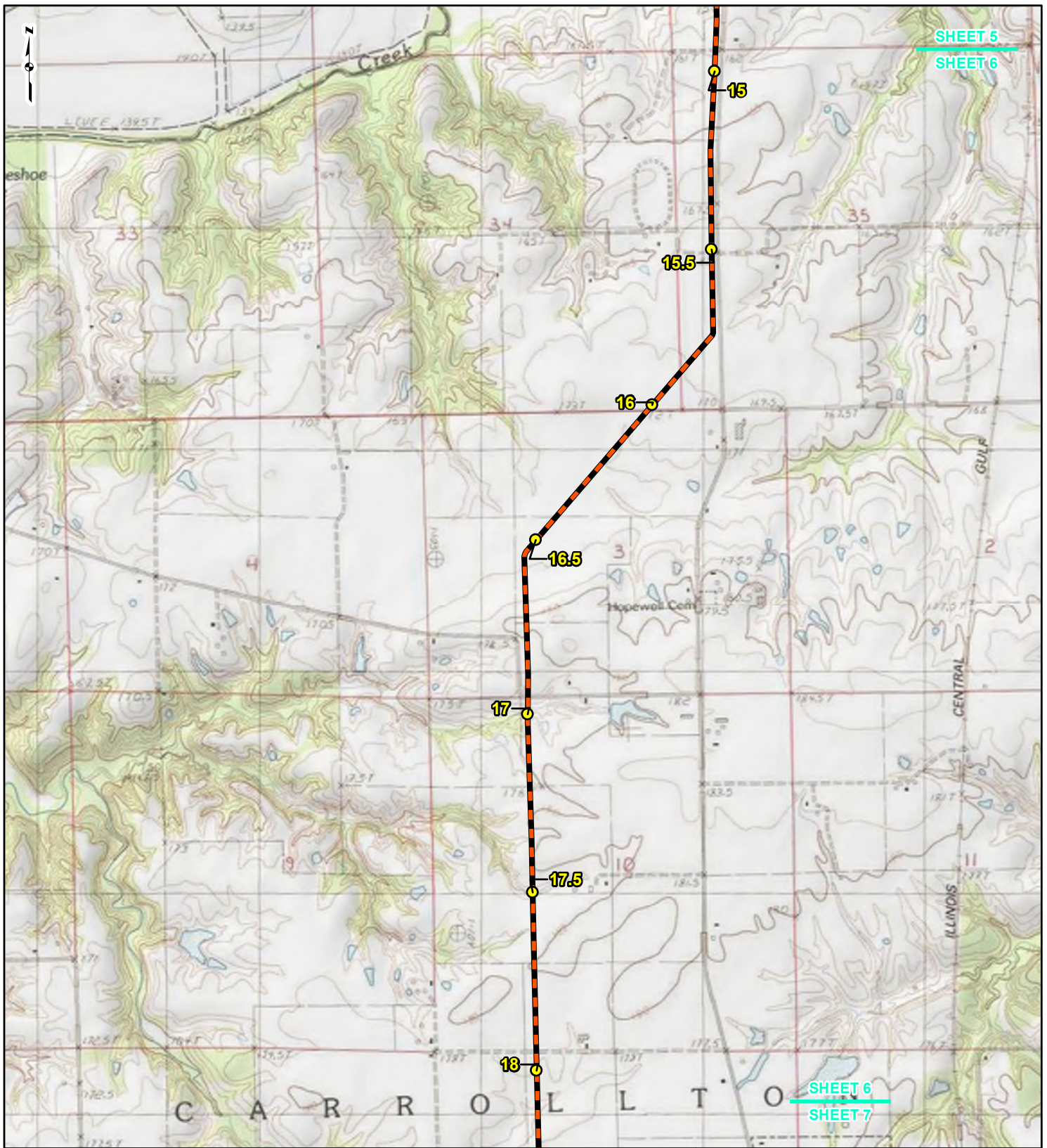
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**FIGURE 1
LOCATION MAP
SHEET 5 OF 21**



DRAWN BY: PMH DATE: 8/12/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

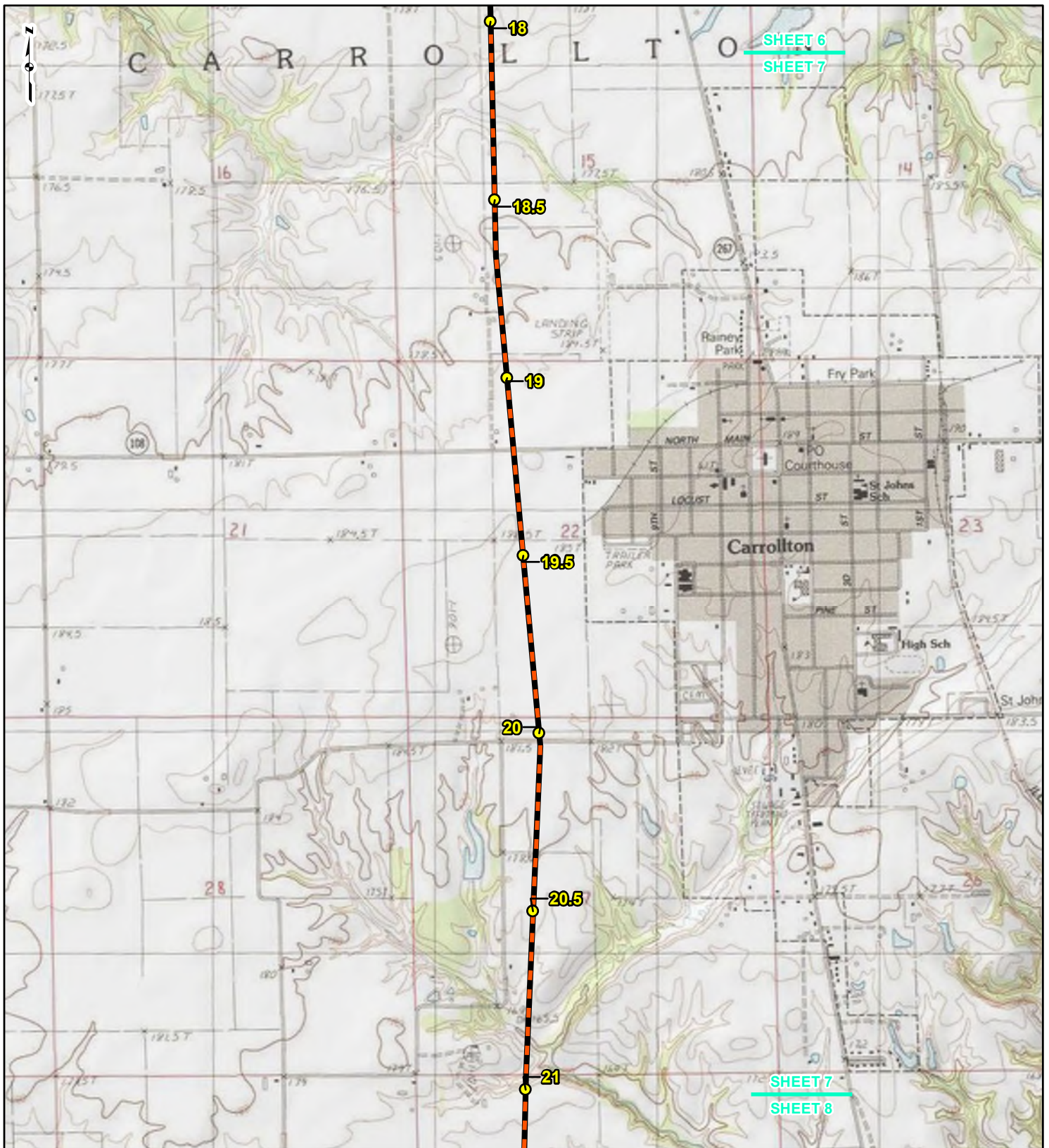
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FIGURE 1
LOCATION MAP
SHEET 6 OF 21



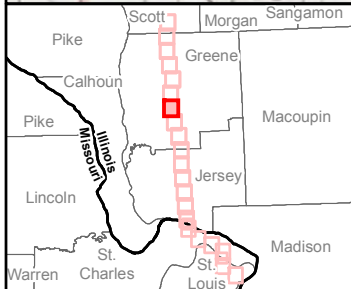
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 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983), OTTERTVILLE (1983), AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



SHEET 6
SHEET 7

SHEET 7
SHEET 8



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

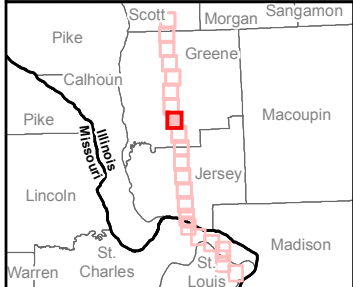
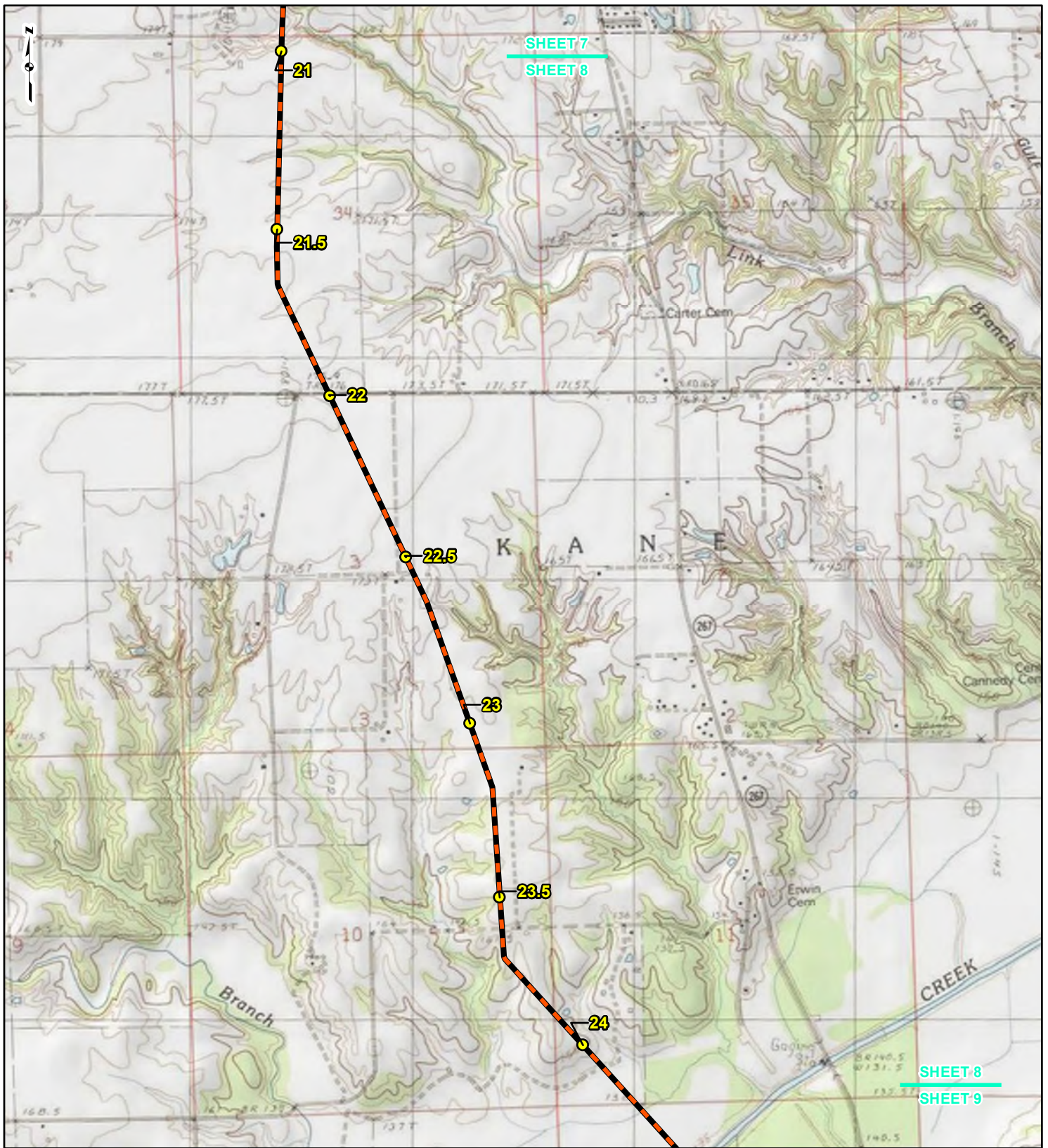
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**FIGURE 1
LOCATION MAP
SHEET 7 OF 21**

Spire STL Pipeline

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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

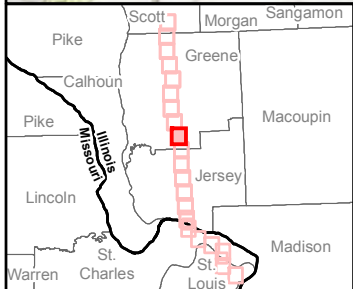
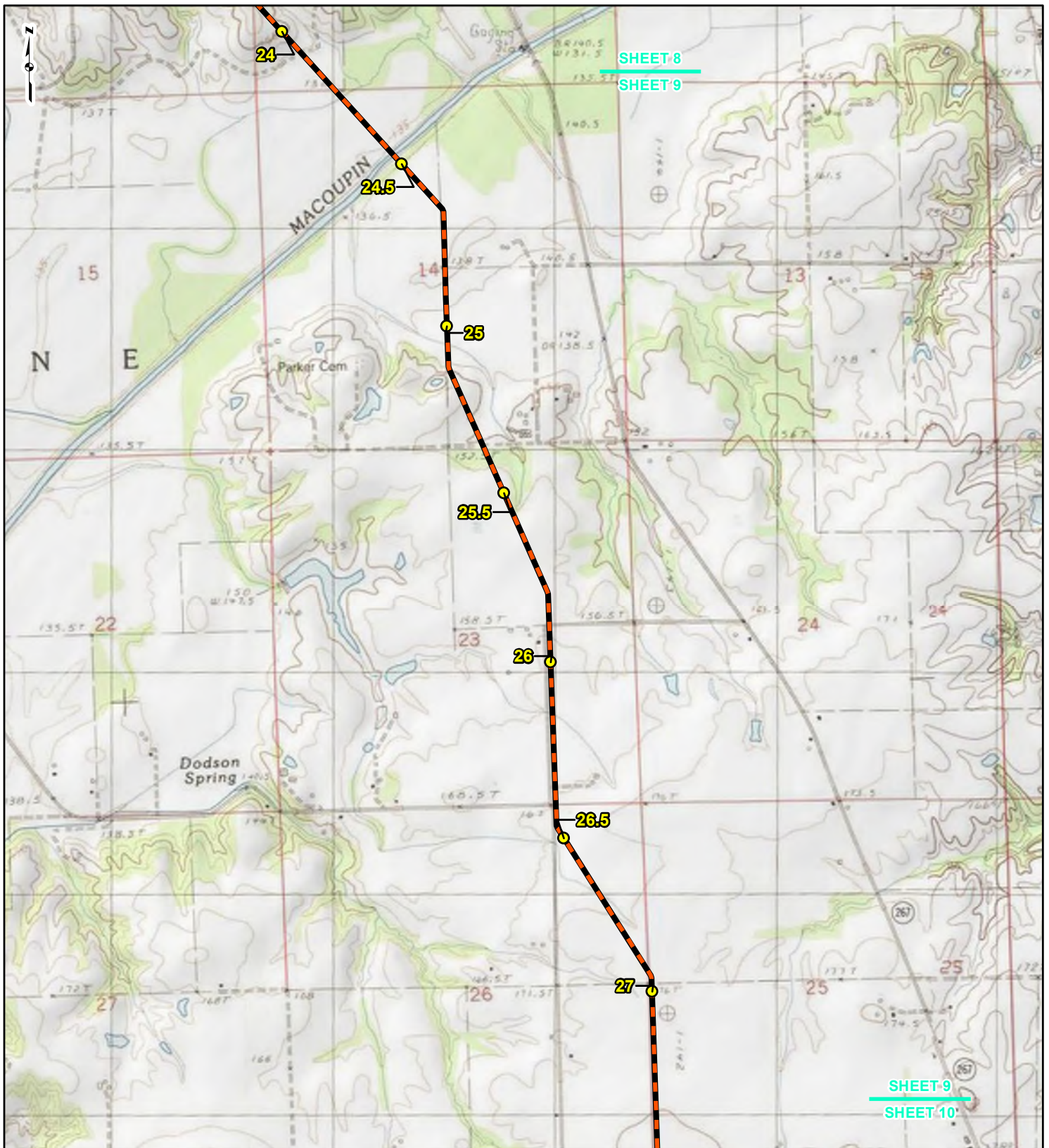
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**FIGURE 1
LOCATION MAP
SHEET 8 OF 21**



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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

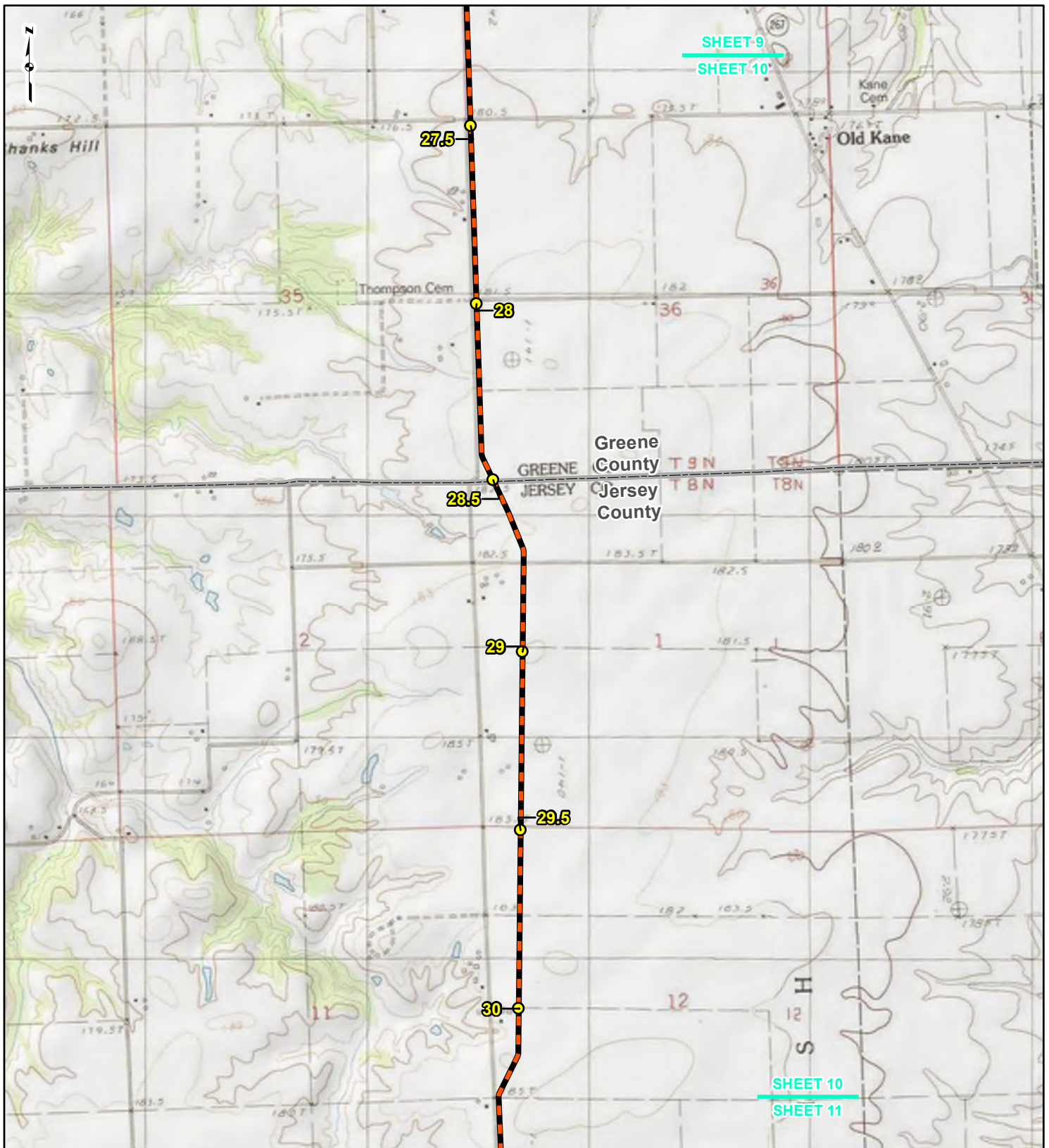
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**FIGURE 1
LOCATION MAP
SHEET 9 OF 21**

Spire STL Pipeline

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 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

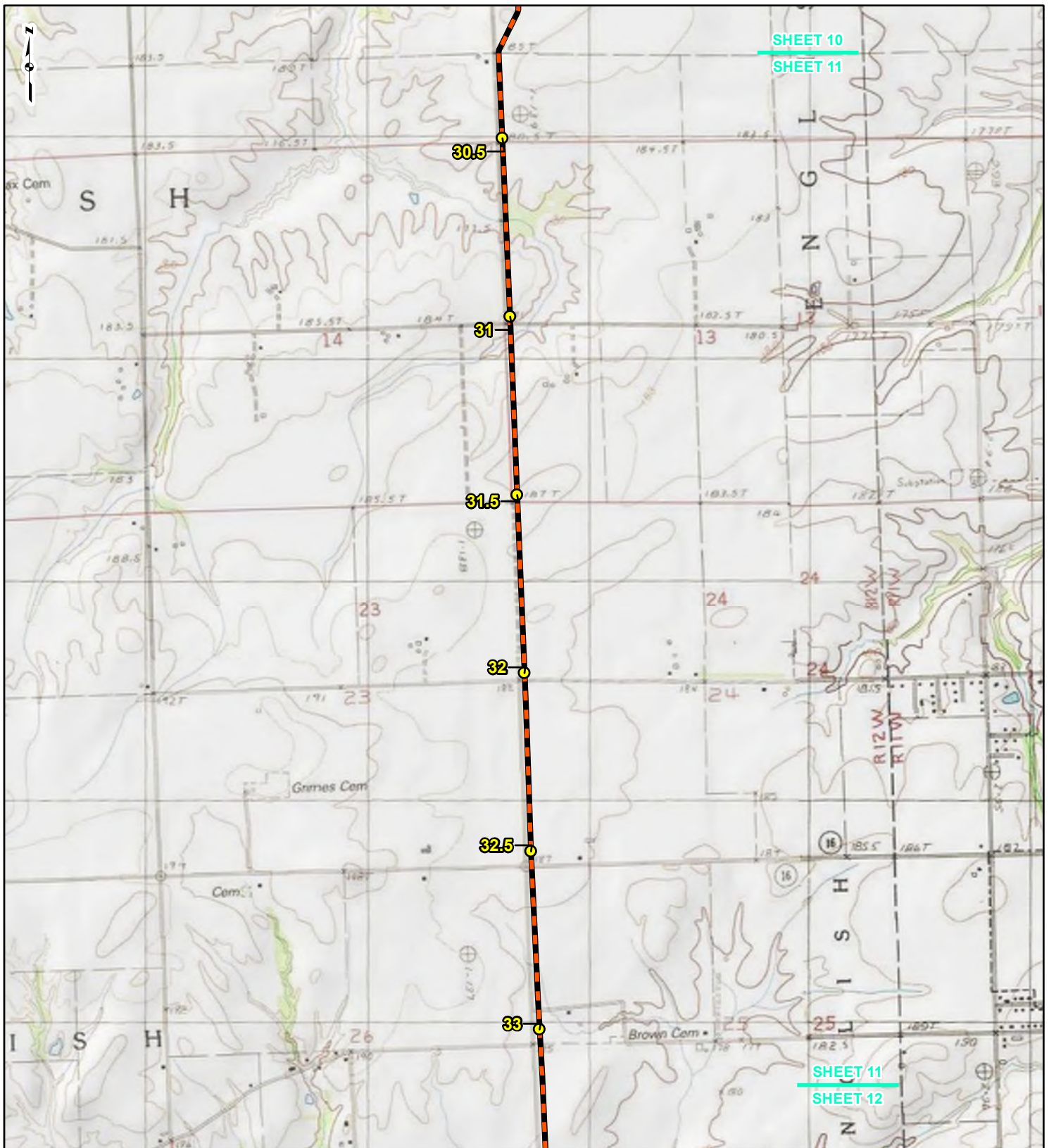
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**FIGURE 1
LOCATION MAP
SHEET 10 OF 21**

Spire STL Pipeline

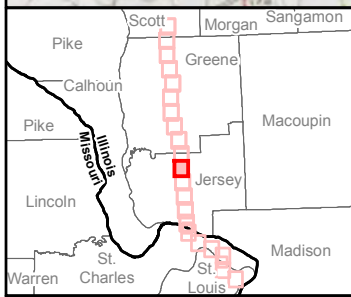
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SHEET 10
SHEET 11

SHEET 11
SHEET 12



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

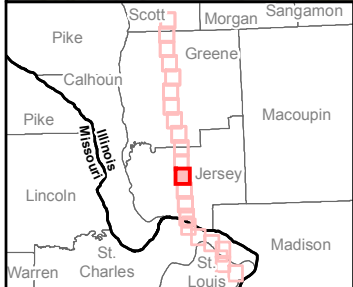
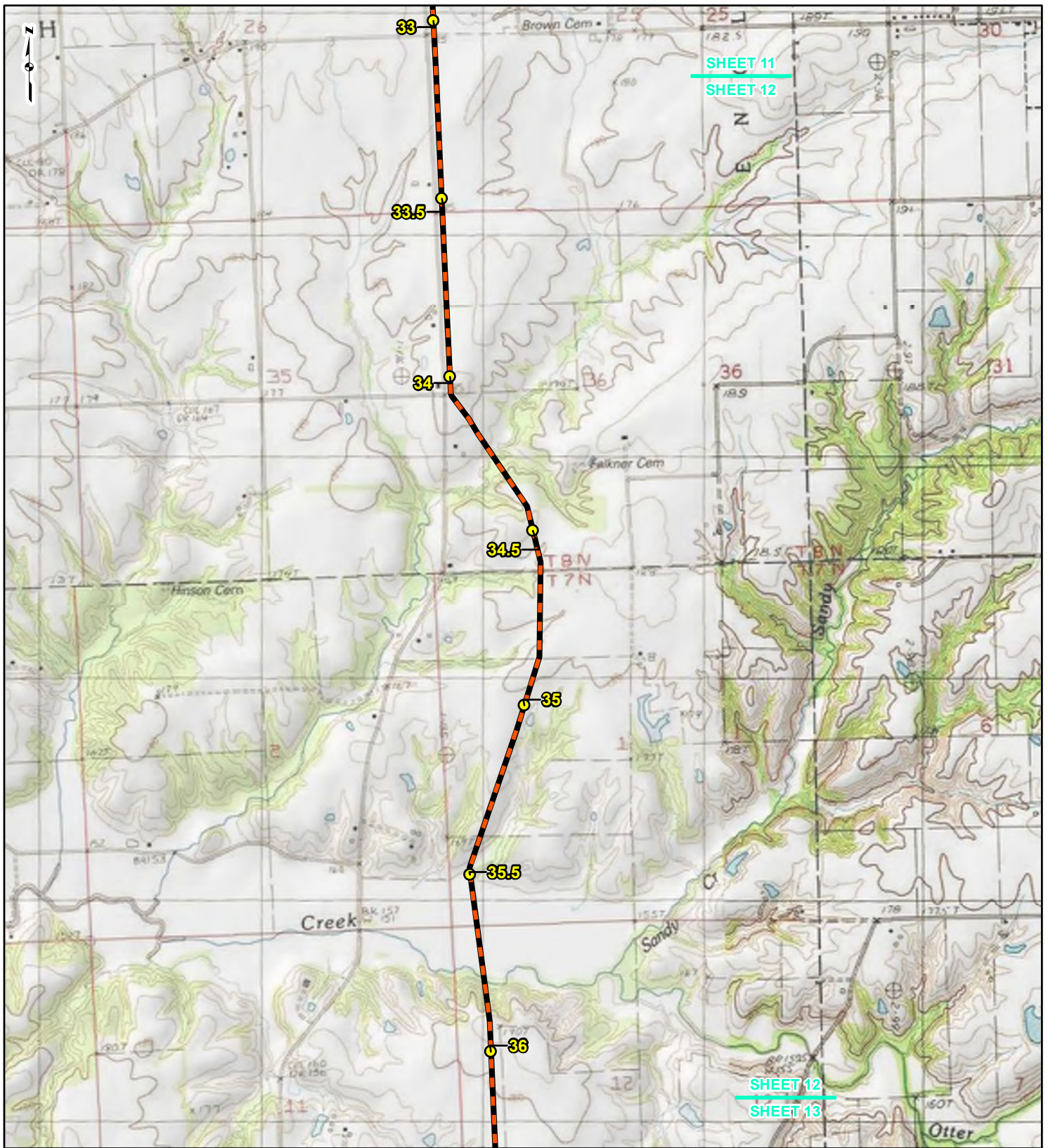
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**FIGURE 1
LOCATION MAP
SHEET 11 OF 21**



DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), EL SAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

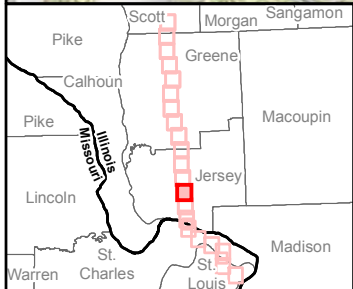
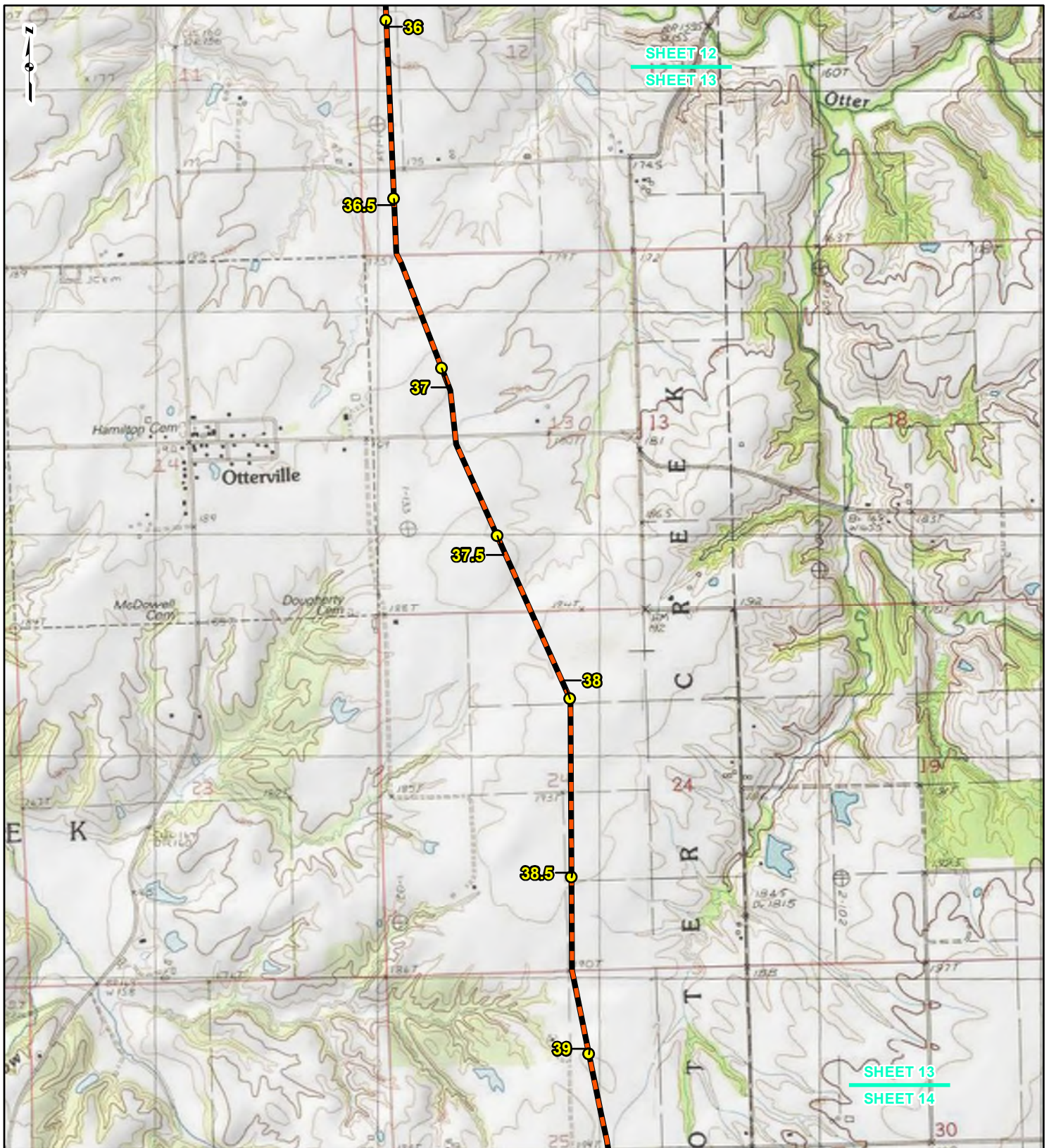
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 12 OF 21



DRAWN BY: PMH DATE: 8/12/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

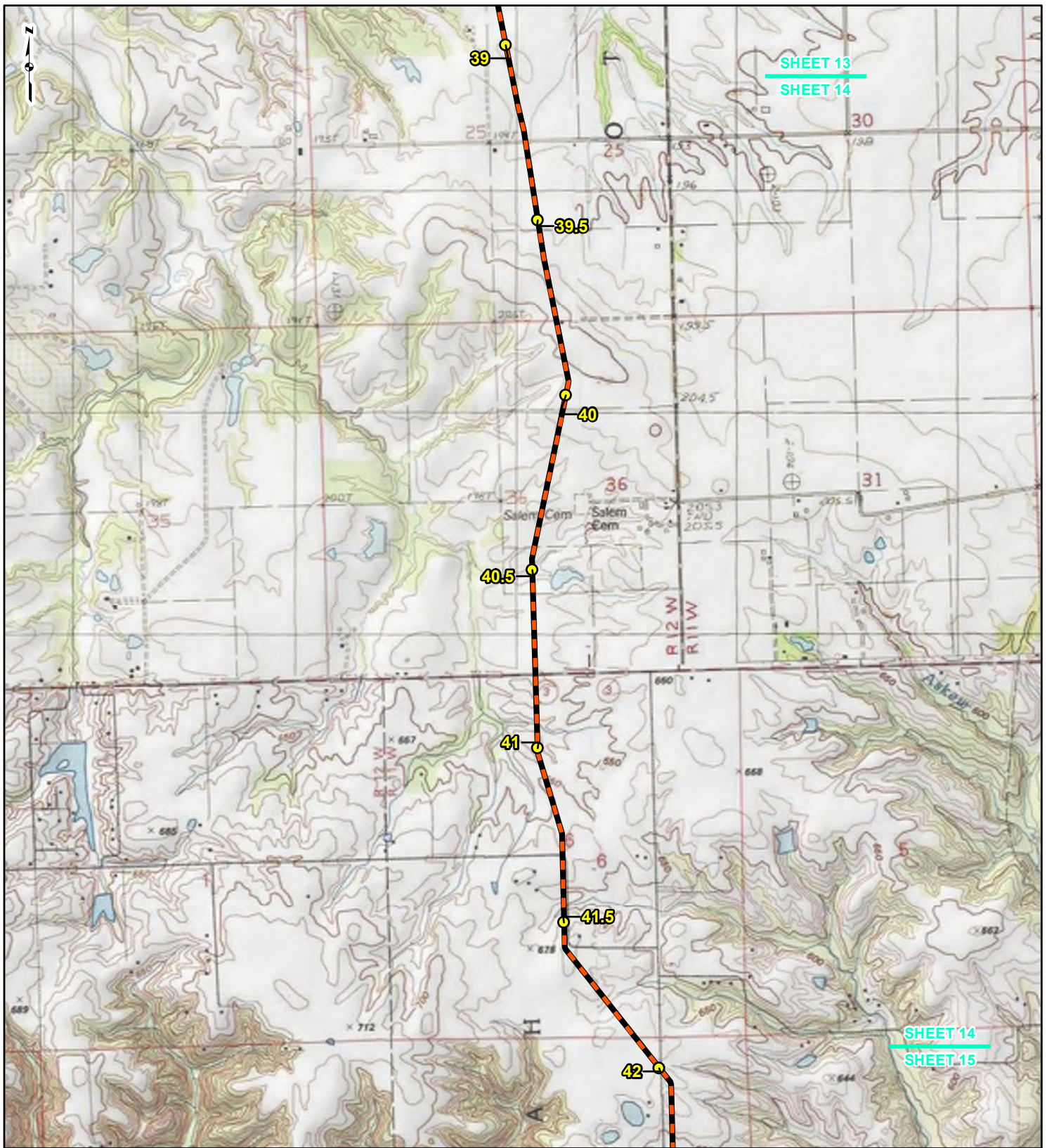
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**FIGURE 1
LOCATION MAP
SHEET 13 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



SHEET 13
SHEET 14

SHEET 14
SHEET 15



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

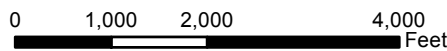


FIGURE 1
LOCATION MAP
SHEET 14 OF 21



Spire STL Pipeline



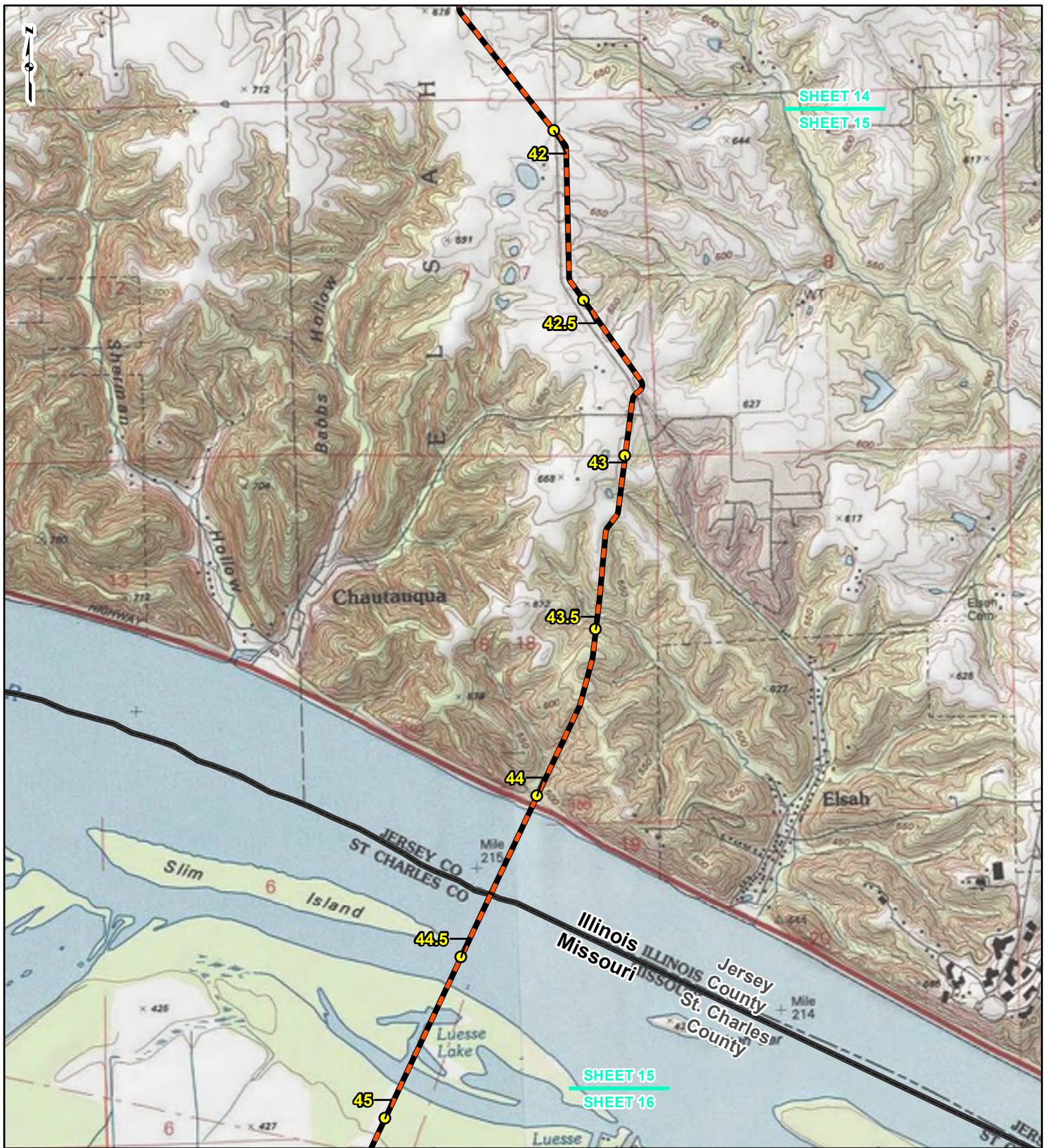
DRAWN BY: PMH

DATE: 8/12/2016

CHECKED: SWW

APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



SHEET 14
SHEET 15

SHEET 15
SHEET 16



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

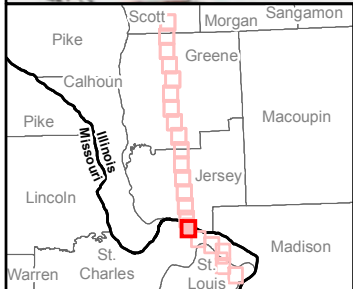
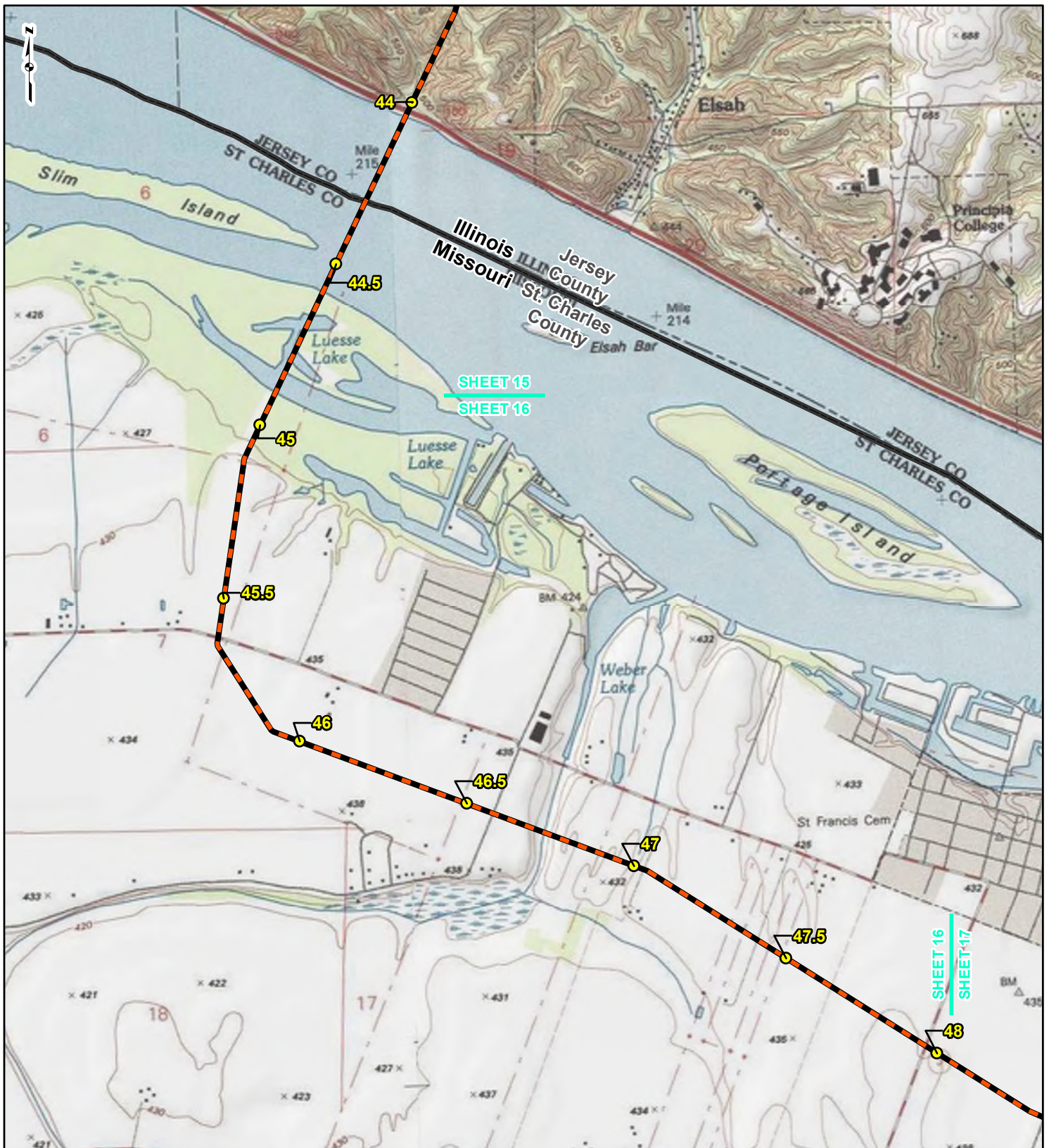
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Feet

**FIGURE 1
LOCATION MAP
SHEET 15 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

0 1,000 2,000 4,000
Feet

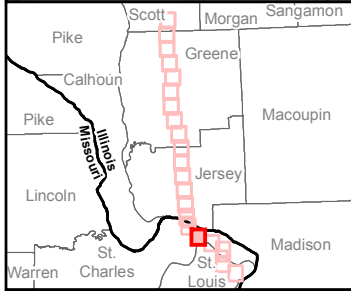
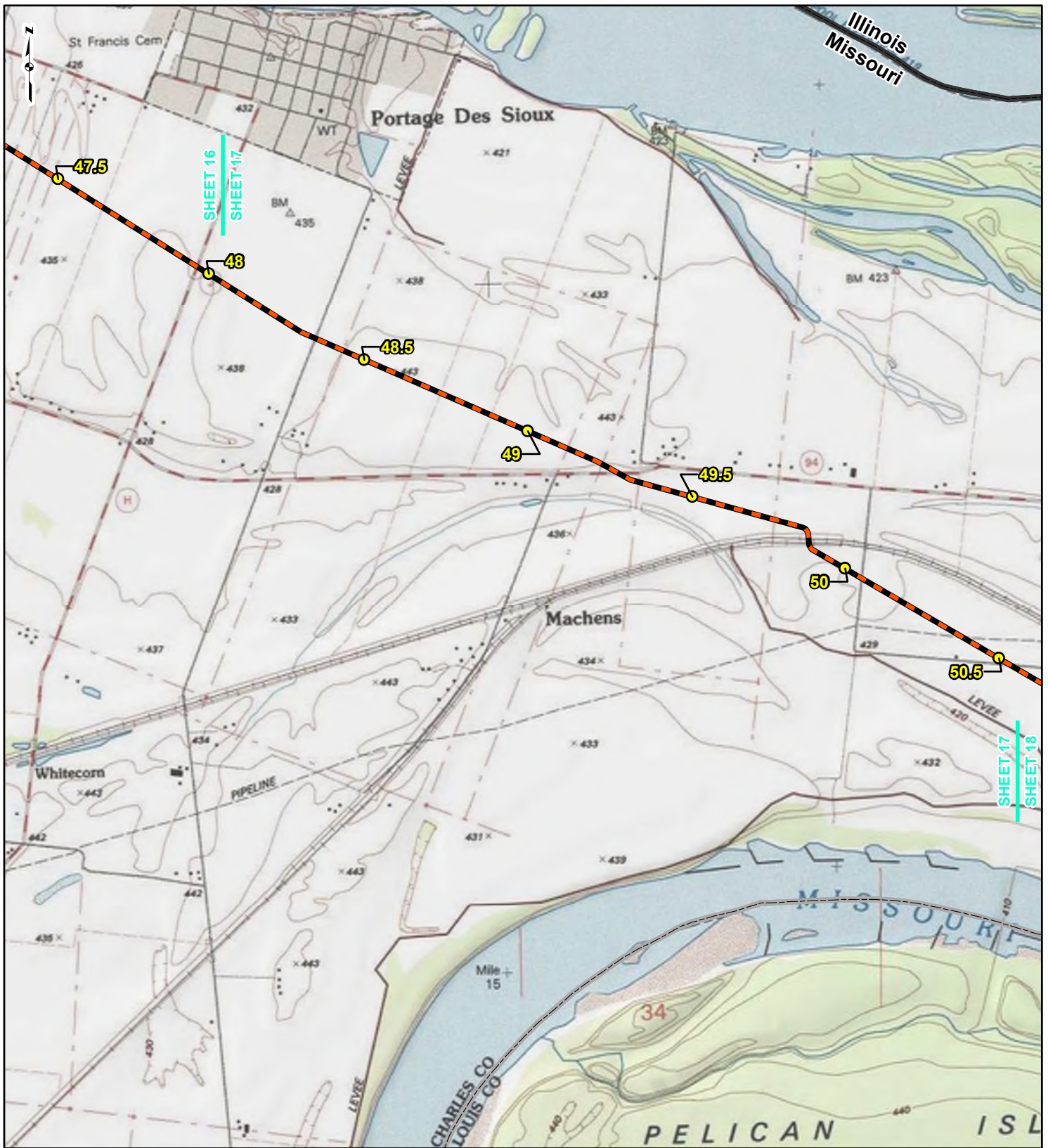
**FIGURE 1
LOCATION MAP
SHEET 16 OF 21**

Spire STL Pipeline

spire

DRAWN BY: PMH DATE: 8/12/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

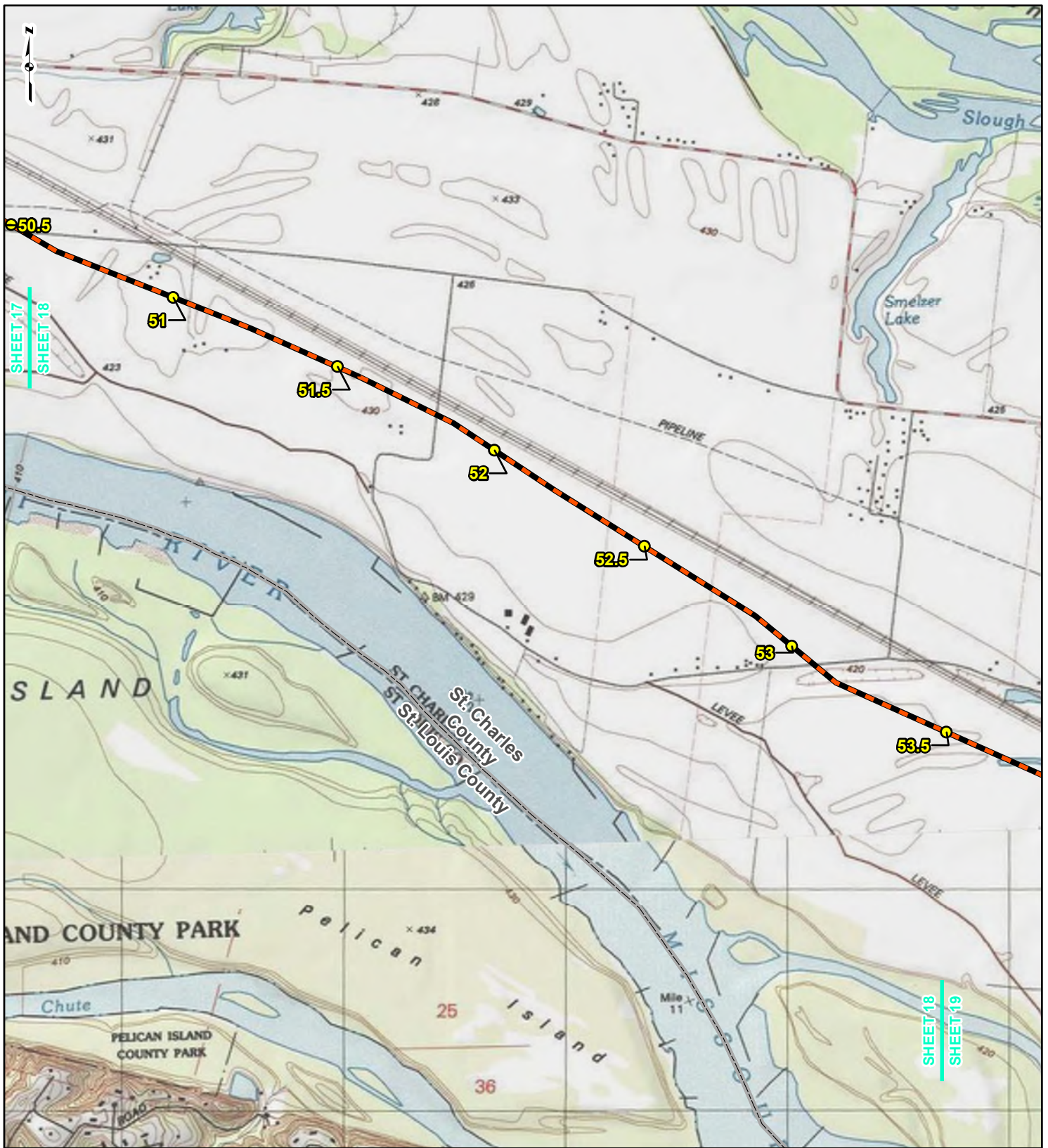
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**FIGURE 1
LOCATION MAP
SHEET 17 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

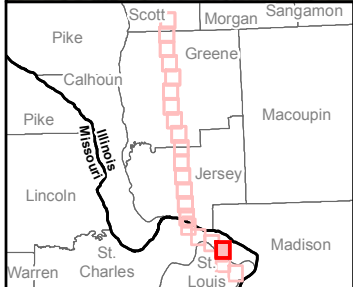
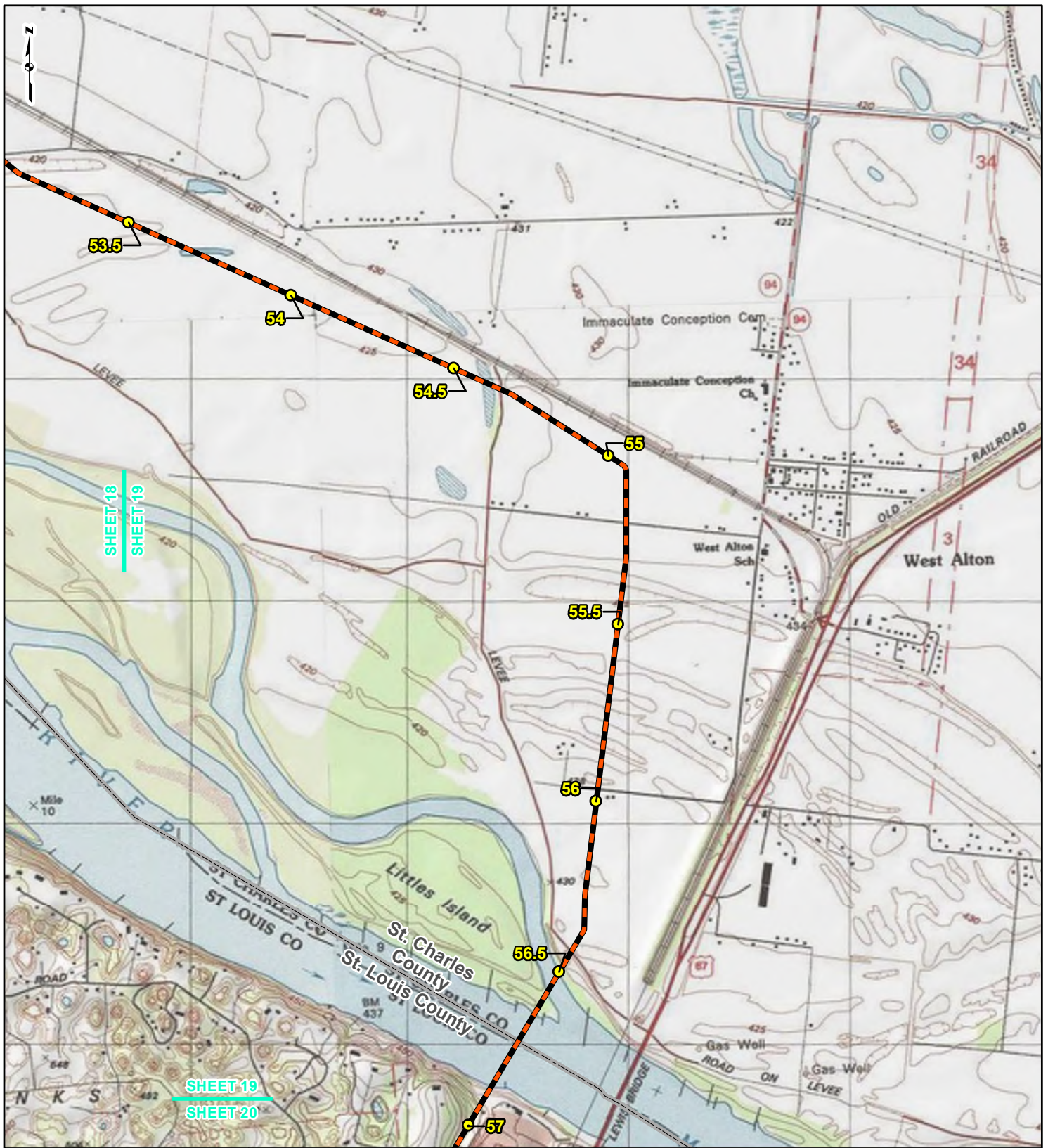
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Feet

**FIGURE 1
LOCATION MAP
SHEET 18 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 8/12/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

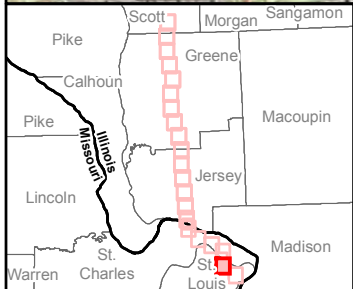
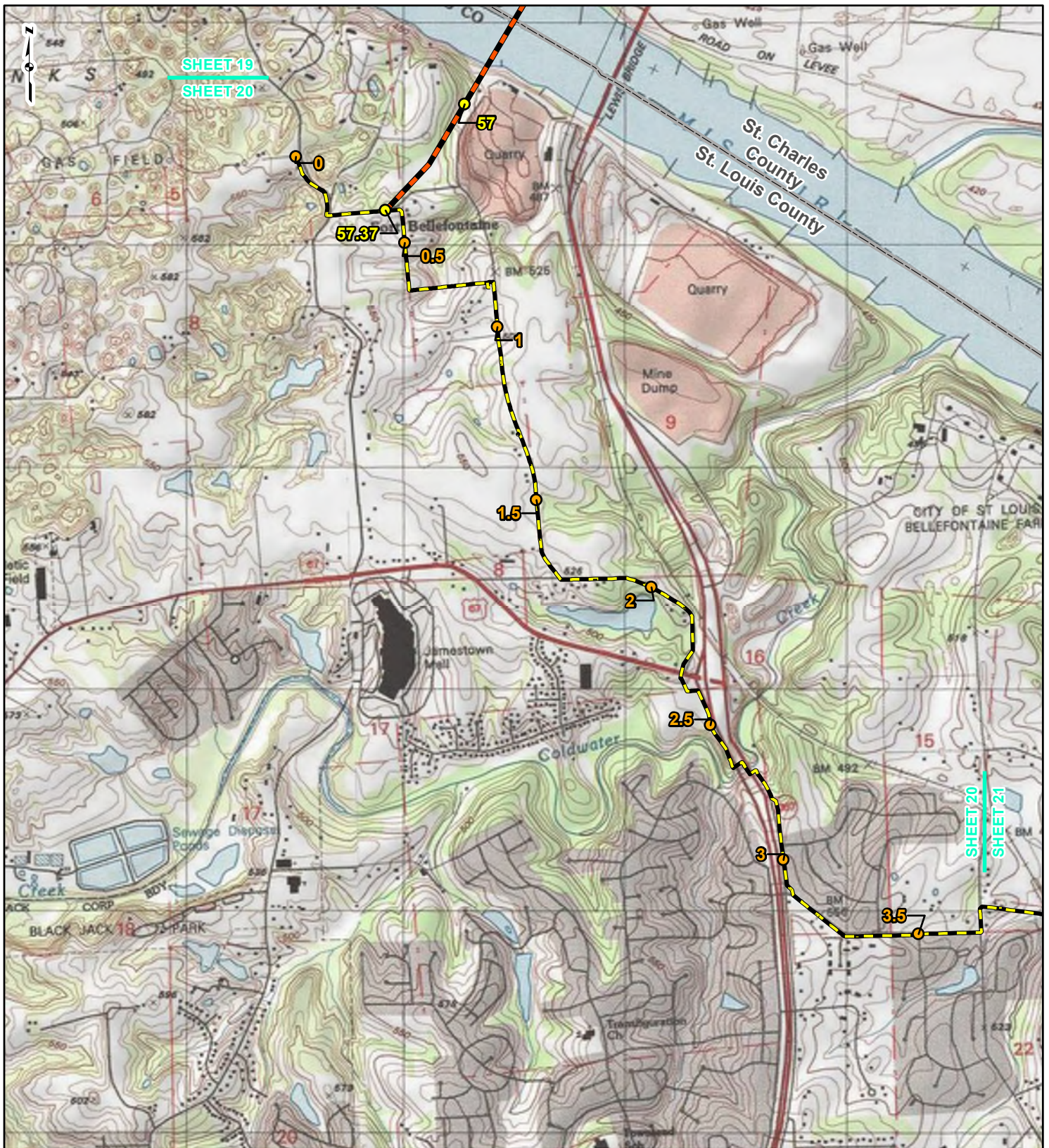
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Feet

**FIGURE 1
LOCATION MAP
SHEET 19 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

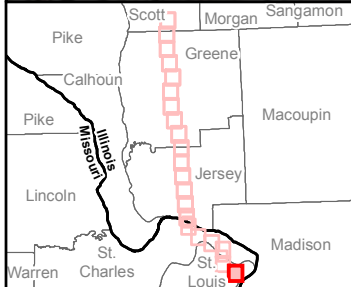
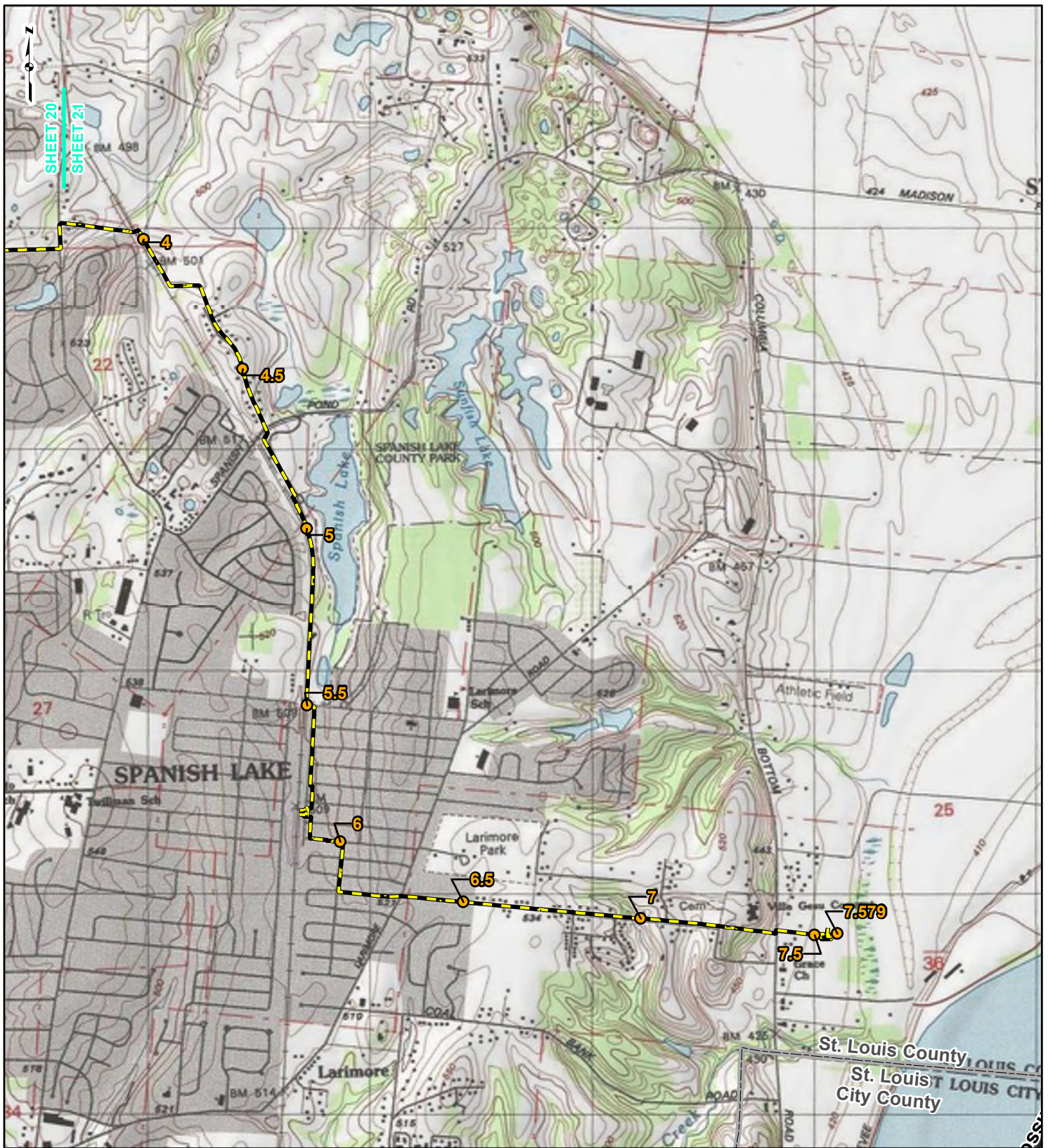
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Feet

**FIGURE 1
LOCATION MAP
SHEET 20 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.



LEGEND

- NEW BUILD MILEPOST
- LINE 880 MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY

0 1,000 2,000 4,000
Feet

**FIGURE 1
LOCATION MAP
SHEET 21 OF 21**

**Spire STL
Pipeline**

DRAWN BY: PMH DATE: 8/12/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.

Ali Trunzo

From: Jayme Fuller
Sent: Monday, August 08, 2016 4:22 PM
To: Allred, Chase
Cc: Lori Ferry; Ali Trunzo
Subject: Spire STL Pipeline and FERC meeting

Hi Chase,

Thanks for getting back to me on the plant survey for Boltonia. We will plan to survey in Jersey and St Charles counties as the project approaches the Mississippi River.

Also as we discussed, FERC and USACE are planning to take a project tour and will be specifically reviewing the Mississippi River crossing. You are more than welcome to attend and as you mentioned, would be a good way to get all agencies talking together.

We plan to meet at 9am at the USACE Rivers Office:
Rivers Project Office
301 Riverlands Way
West Alton, MO 63386

Thanks

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 |     

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Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Chase Allred
Ecological Services United States Fish and Wildlife - Rock Island Field Office
1511 47th Avenue
Moline, IL 61265

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Allred,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

Included with this letter, for your information, is a general overview map of the proposed pipeline route and a diagram illustrating the FERC process.

We believe that we can create a better project by hearing from you and listening to your feedback. That's why we are hosting open houses this month so you can learn more about the project and we can learn more about you.

At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

Spire STL Pipeline open house schedule

Tuesday August 16, 2016 5 p.m. – 7:30 p.m.	Wednesday August 17, 2016 5 p.m. – 7:30 p.m.	Thursday August 18, 2016 5 p.m.– 7:30 p.m.	Tuesday August 23, 2016 5 p.m.– 7:30 p.m.	Wednesday August 24, 2016 5 p.m. – 7:30 p.m.
Scott County, Illinois	Jersey County, Illinois	St. Louis County, Missouri	St. Charles County, Missouri	Greene County, Illinois
Scott County Fairgrounds 401 North Walnut Winchester, IL 62694	Jerseyville Recreation Center 401 Mound Street Jerseyville, IL 62052	Hazelwood Civic Center East 8969 Dunn Road Hazelwood, MO 63042	American Legion Post 312 2500 Raymond Drive St Charles, MO 63301	Knights of Columbus Hall U.S. HWY 67 Carrollton, IL 62016

Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

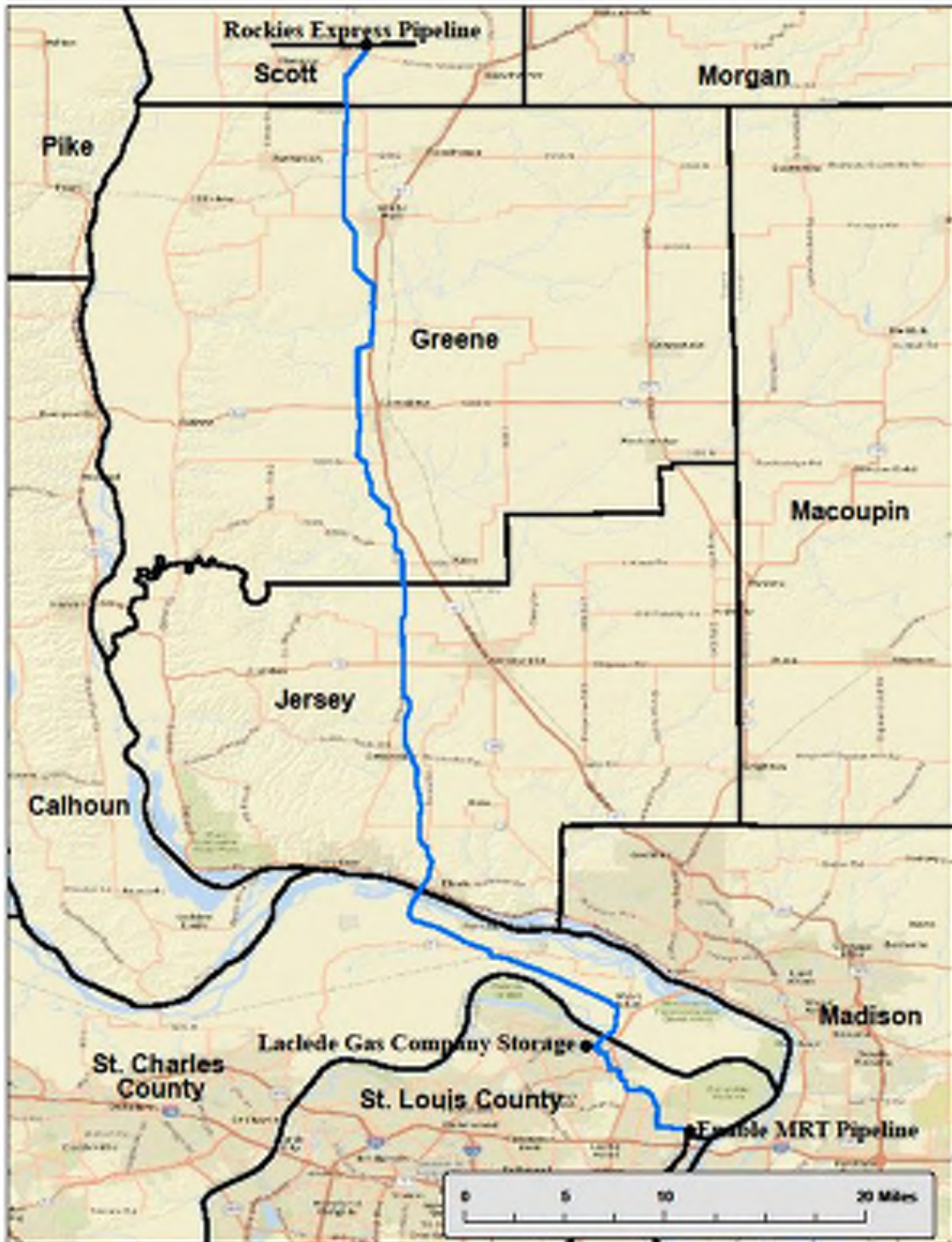
We look forward to working with you.

Sincerely,

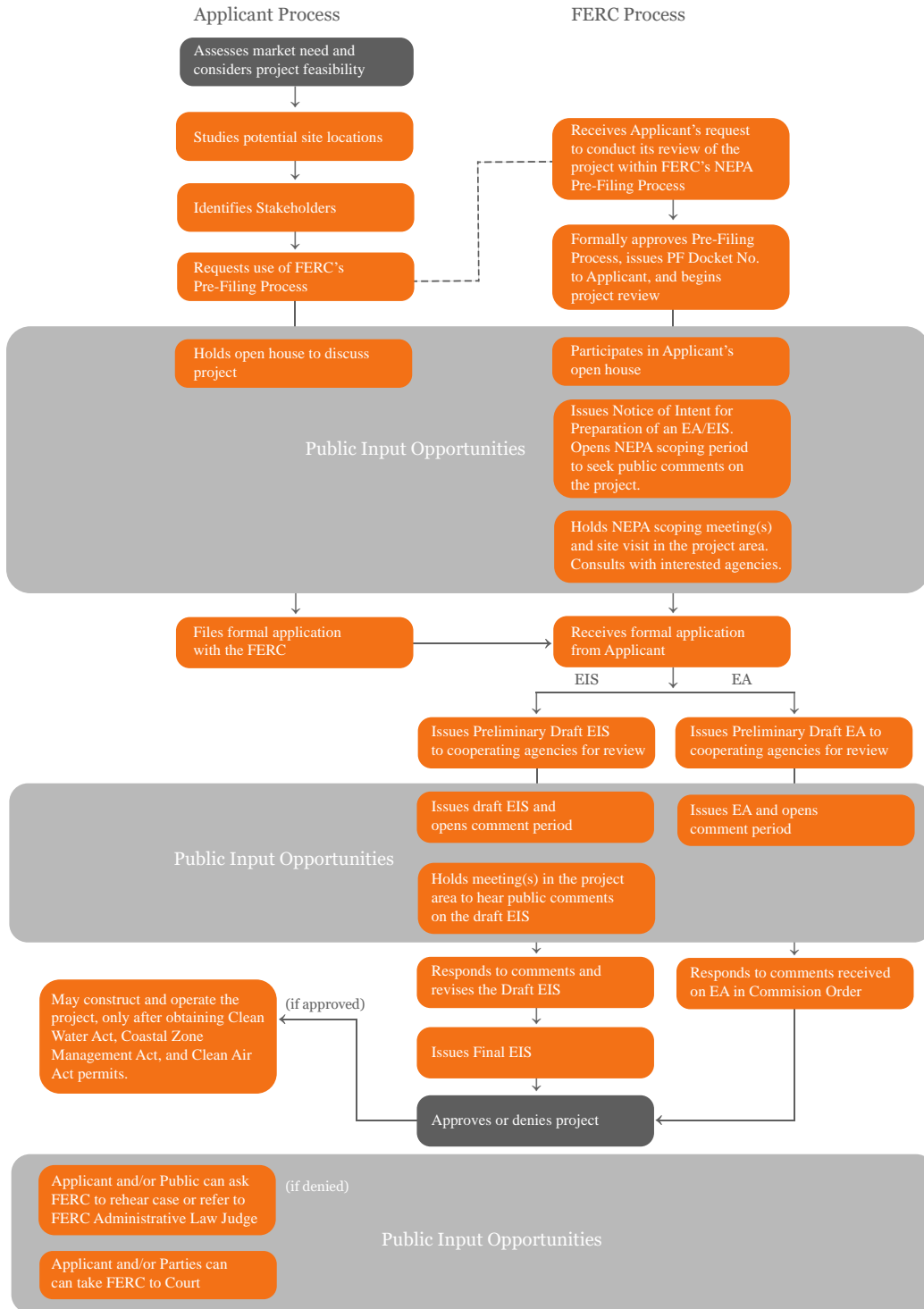


Scott Jaskowiak
Vice President
Spire STL Pipeline LLC

Project Map



FERC Pre-Filing Process





Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Matthew Mangan
United States Fish and Wildlife - Marion County Sub-Office
8588 Route 148
Marion, IL 62959

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Mangan,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

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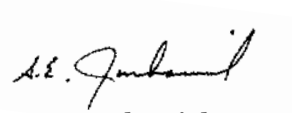
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We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Kraig McPeek
United States Fish and Wildlife - Rock Island Field Office
1511 47th Avenue
Moline, IL 61265

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. McPeek,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

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We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Justin Sexton
Refuge Manager United States Fish and Wildlife - Two Rivers National Wildlife Refuge
HC 82, Box 107
Brussels, IL 62013

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Sexton,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

Included with this letter, for your information, is a general overview map of the proposed pipeline route and a diagram illustrating the FERC process.

We believe that we can create a better project by hearing from you and listening to your feedback. That's why we are hosting open houses this month so you can learn more about the project and we can learn more about you.

At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

Spire STL Pipeline open house schedule

Tuesday August 16, 2016 5 p.m. – 7:30 p.m.	Wednesday August 17, 2016 5 p.m. – 7:30 p.m.	Thursday August 18, 2016 5 p.m.– 7:30 p.m.	Tuesday August 23, 2016 5 p.m.– 7:30 p.m.	Wednesday August 24, 2016 5 p.m. – 7:30 p.m.
Scott County, Illinois	Jersey County, Illinois	St. Louis County, Missouri	St. Charles County, Missouri	Greene County, Illinois
Scott County Fairgrounds 401 North Walnut Winchester, IL 62694	Jerseyville Recreation Center 401 Mound Street Jerseyville, IL 62052	Hazelwood Civic Center East 8969 Dunn Road Hazelwood, MO 63042	American Legion Post 312 2500 Raymond Drive St Charles, MO 63301	Knights of Columbus Hall U.S. HWY 67 Carrollton, IL 62016

Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC

Ali Trunzo

From: Jayme Fuller
Sent: Tuesday, August 02, 2016 5:18 PM
To: Allred, Chase
Cc: Lori Ferry; Ali Trunzo
Subject: Spire Energy STL Pipeline- Plant Survey
Attachments: Plant_Survey_Field_Map_2016_08_02.pdf

Hi Chase,

In reference to our phone conversation, please see the attached pdf of the locations we proposed to survey for the Decurrent false aster (*Boltonia decurrens*). I have outlined a study corridor based on habitat along larger streams that would be subject to flooding and appeared to have an established riparian corridor. The study area would consist of a 300 ft x 300 ft square centered on the proposed centerline on the upstream and downstream sides of each stream crossing.

As you and I discussed, we are trying to work with our land agents to prioritize survey access due to the bloom period (August and September) for this species. We can certainly follow up with a more formal plant survey plan if needed, but for now, if you could comment on the proposed areas, it will help us communicate with our land agents to make sure we have the survey access we need within the timeframe for the bloom period.

Thanks so much for your help.

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 |     

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July 29, 2016

Mr. Matthew Mangan
United States Fish and Wildlife
Marion County Sub-Office
8588 Route 148
Marion, IL 62959

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Mangan:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Fish and Wildlife - Marion County Sub-Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

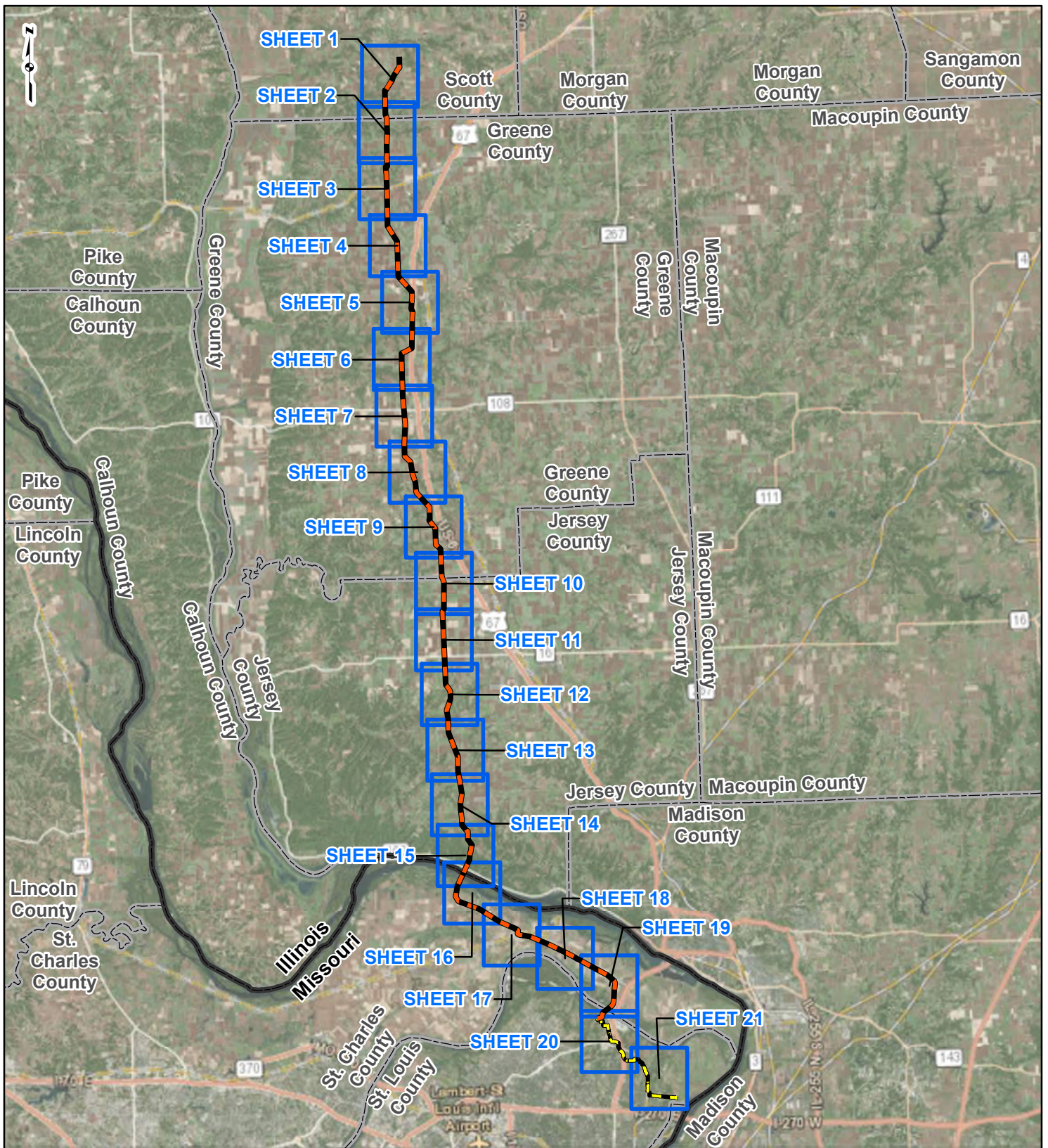
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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

ATTACHMENT
USGS TOPOGRAPHIC MAP (FIGURE 1)



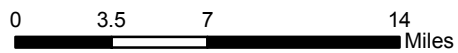
PROJECT LOCATION



SCOTT, GREENE
AND JERSEY
COUNTIES, ILLINOIS
AND ST. CHARLES AND
ST. LOUIS COUNTIES, MISSOURI

LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY
- SHEET INDEX

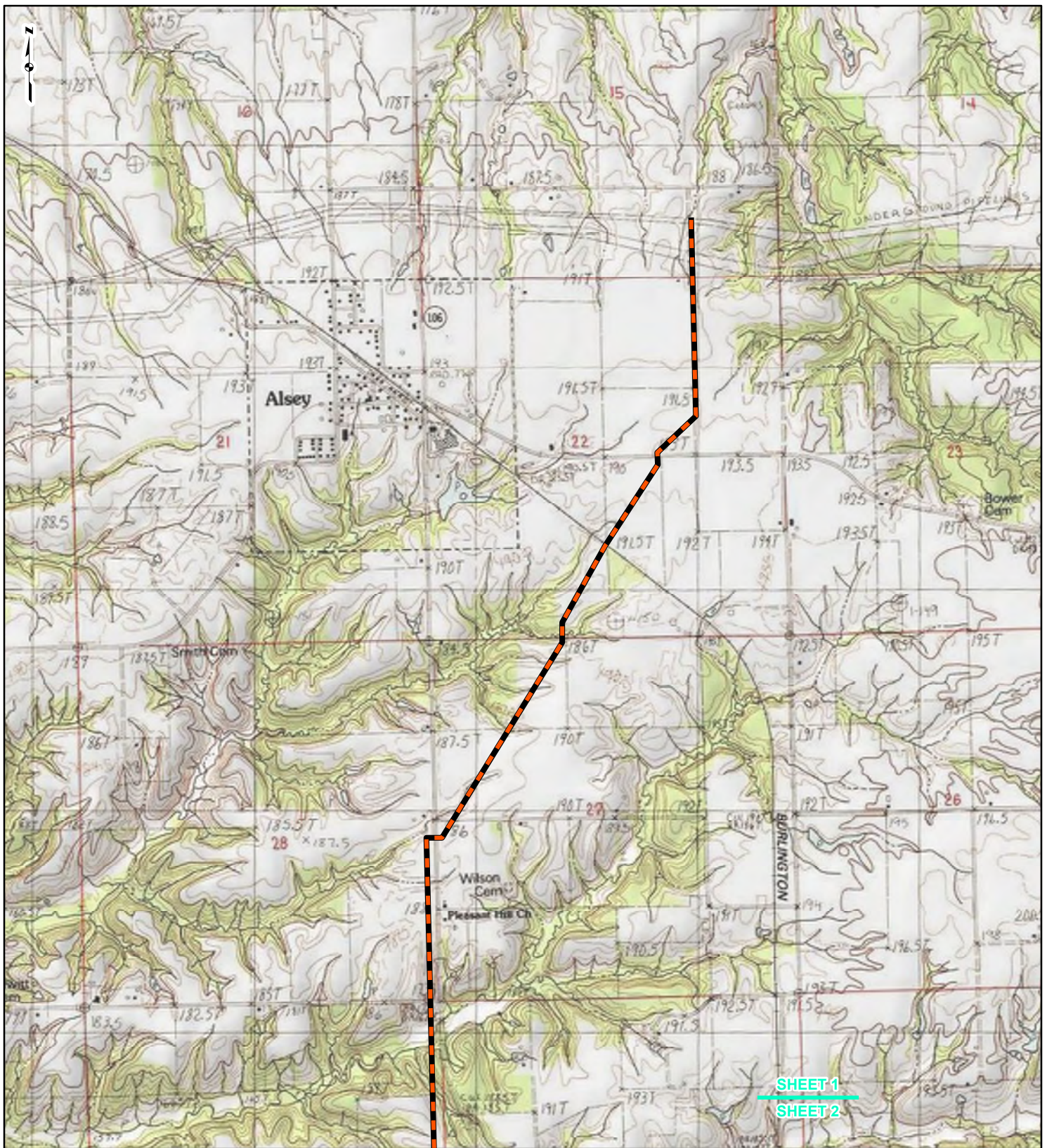


**FIGURE 1
LOCATION MAP
SHEET INDEX**

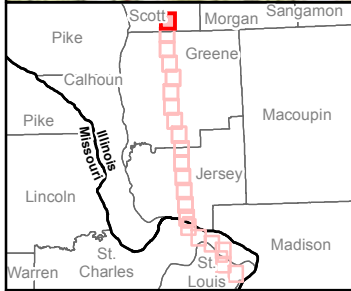


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CHECKED: SWW APPROVED: LMF

REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2015, ACCESSED 07/2016.



SHEET 1
SHEET 2



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 1 OF 21

Spire STL Pipeline

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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



SHEET 1
SHEET 2

SHEET 2
SHEET 3





Scott
County
Greene
County

R O O D H C

R O O D H C



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

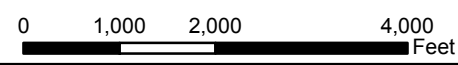
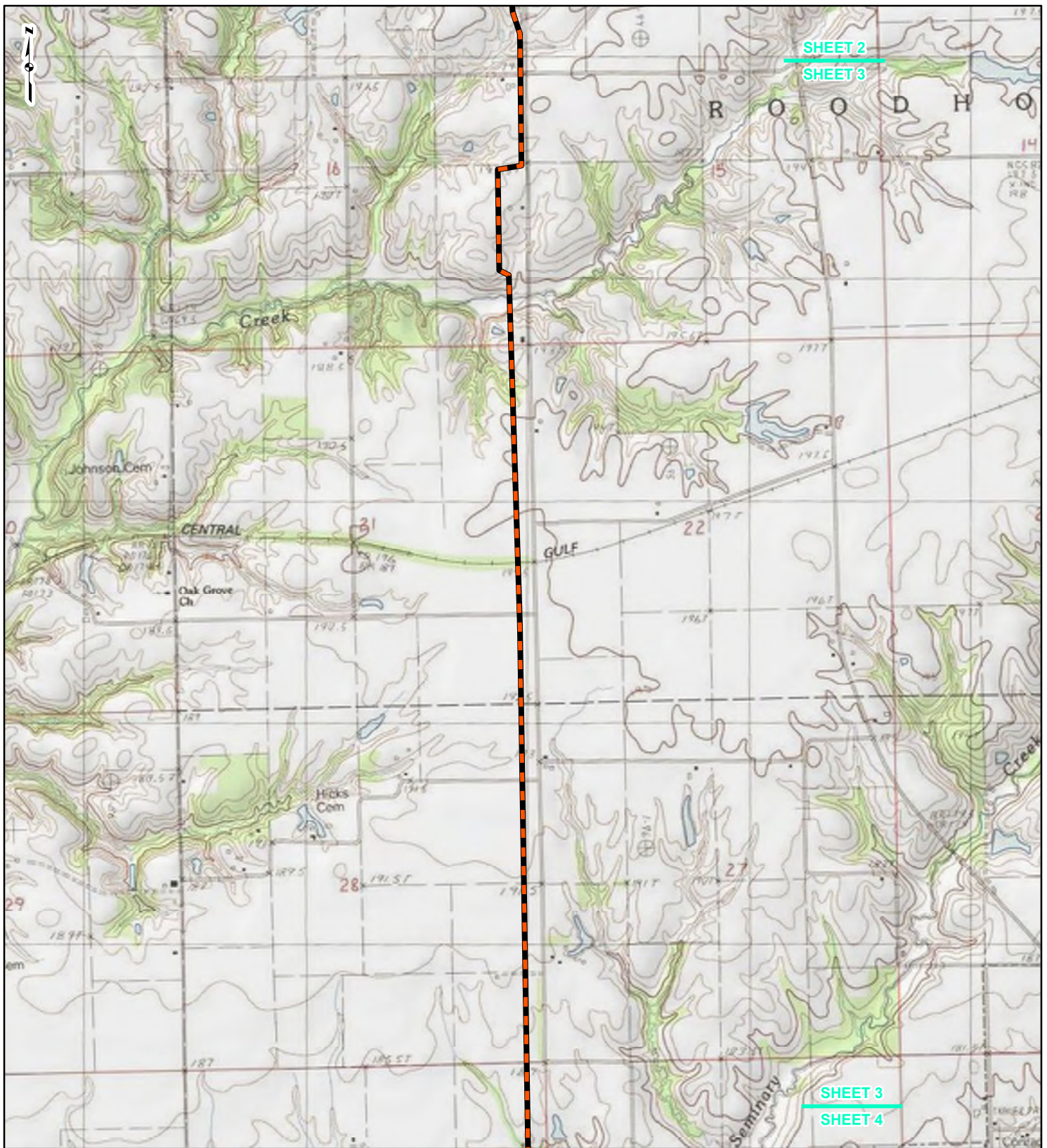


FIGURE 1
LOCATION MAP
SHEET 2 OF 21



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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 2





SHEET 3

SHEET 3

SHEET 4



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

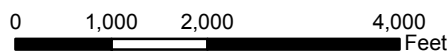
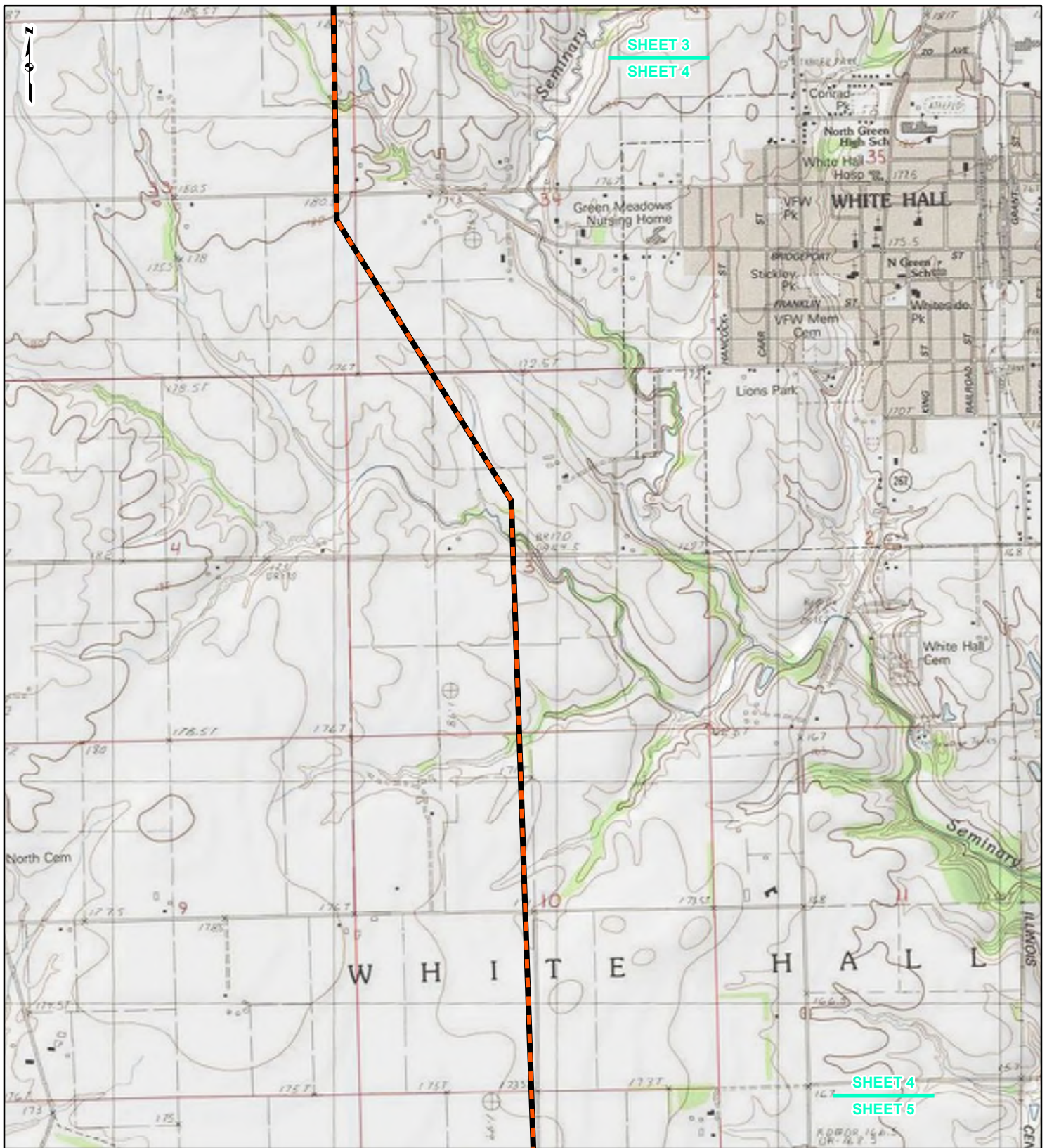


FIGURE 1
LOCATION MAP
SHEET 3 OF 21



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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSLEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1995), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

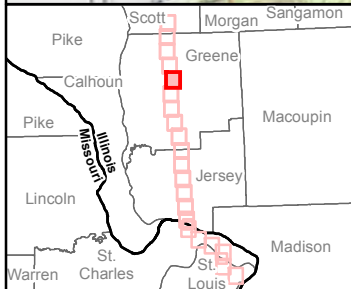
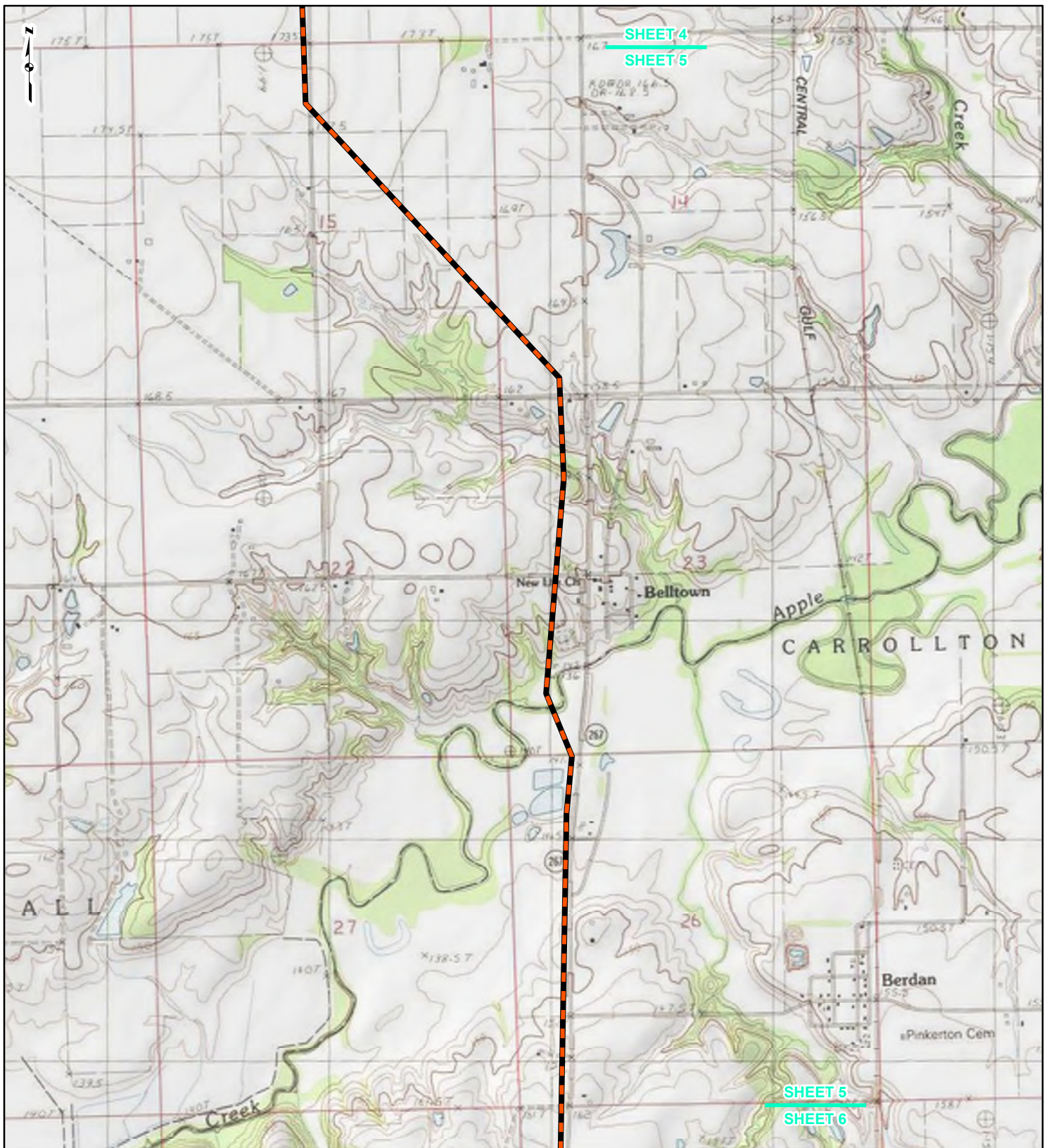
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FIGURE 1
LOCATION MAP
SHEET 4 OF 21

Spire STL Pipeline

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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

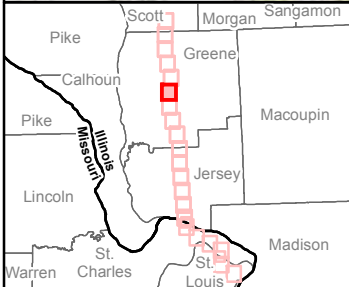
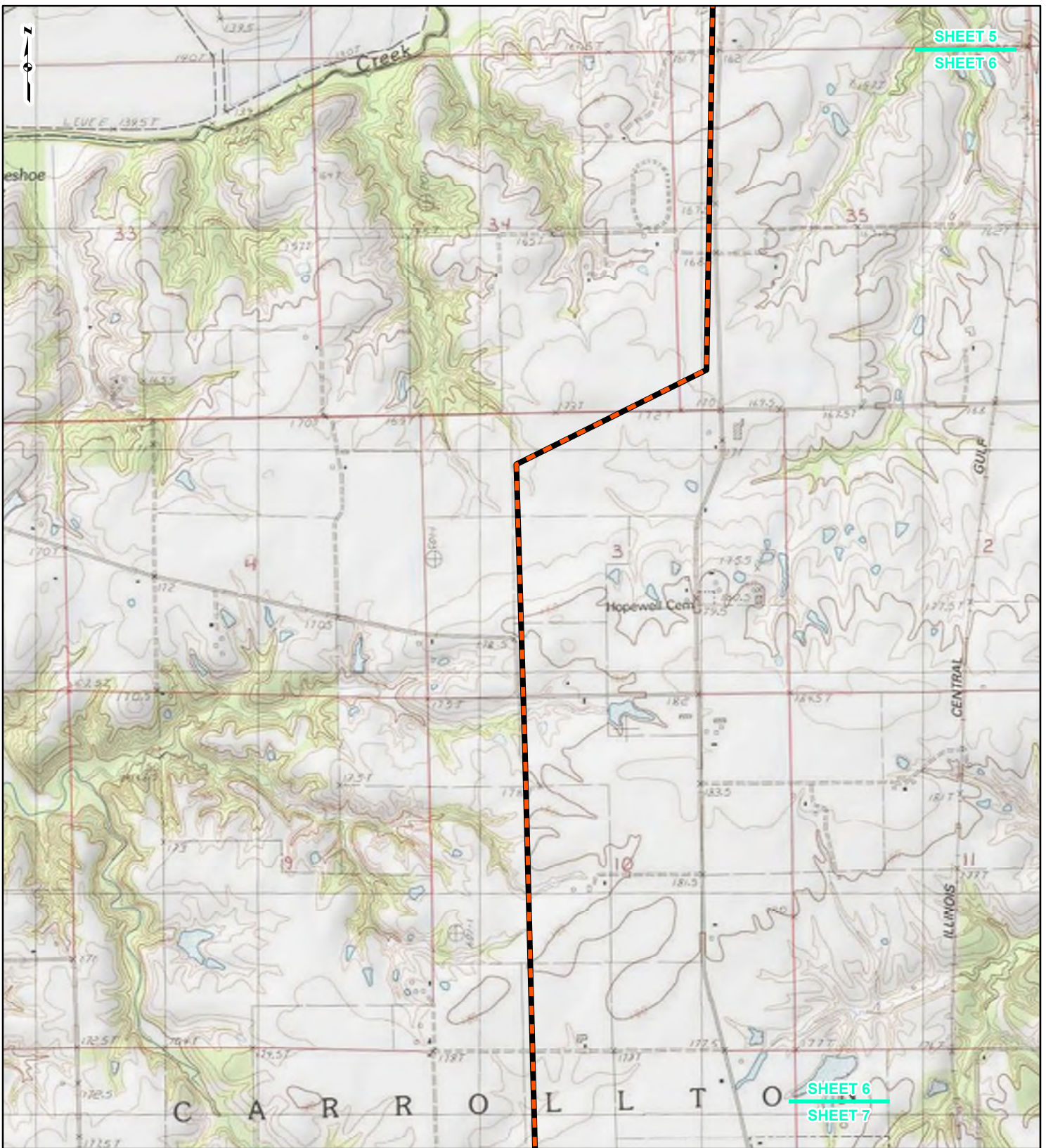
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FIGURE 1
LOCATION MAP
SHEET 5 OF 21





Spire STL Pipeline

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LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

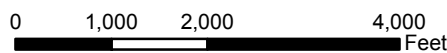
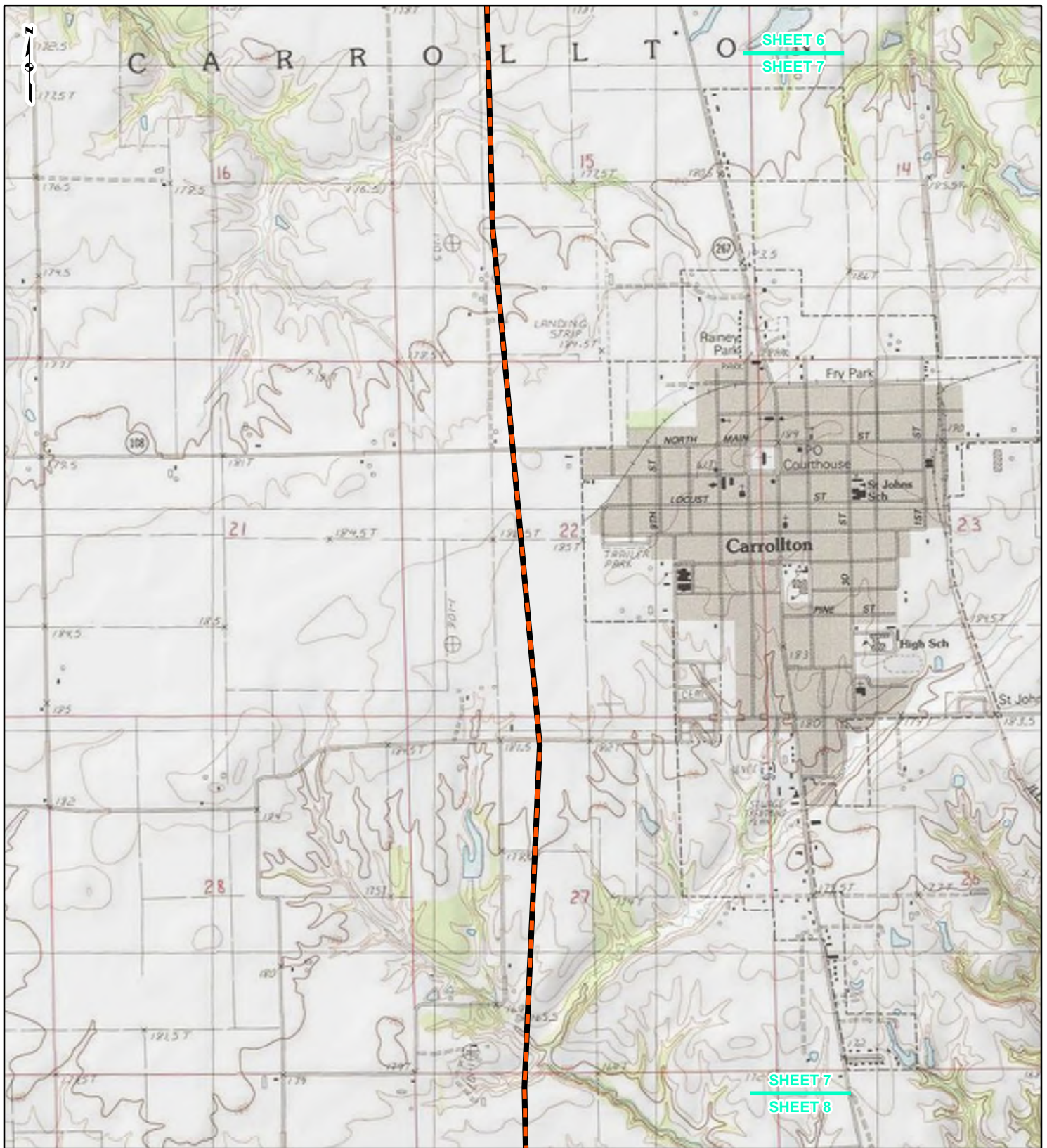


FIGURE 1
LOCATION MAP
SHEET 6 OF 21



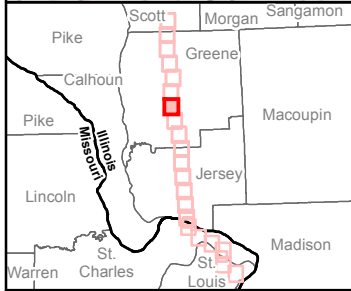
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SHEET 6
SHEET 7

SHEET 7
SHEET 8



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

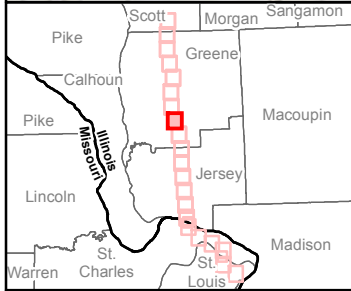
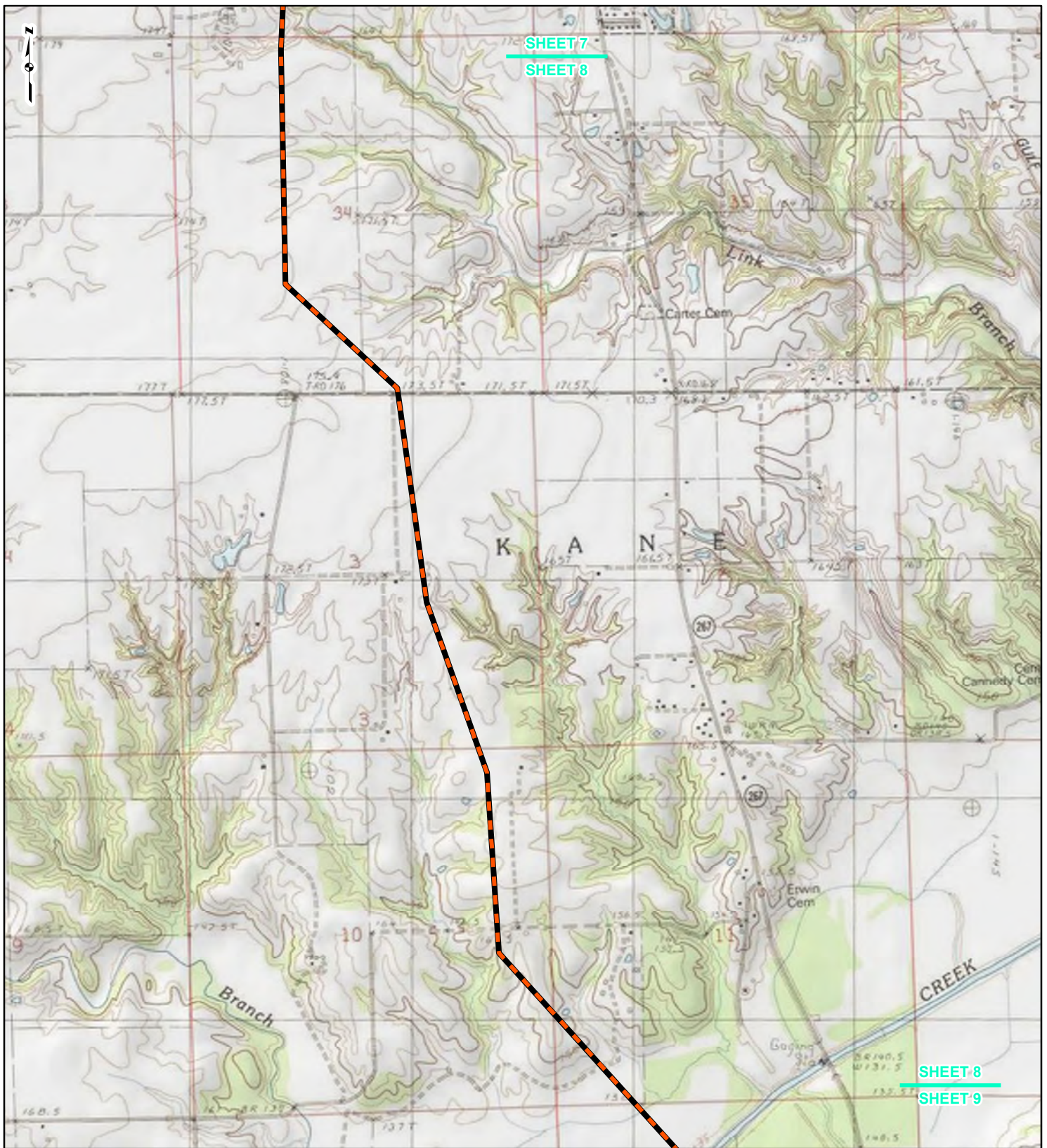
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FIGURE 1
LOCATION MAP
SHEET 7 OF 21

Spire STL Pipeline

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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

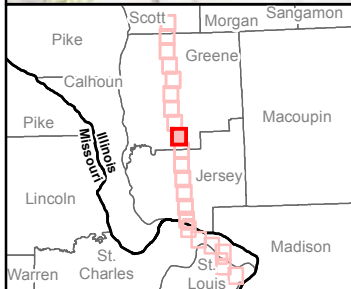
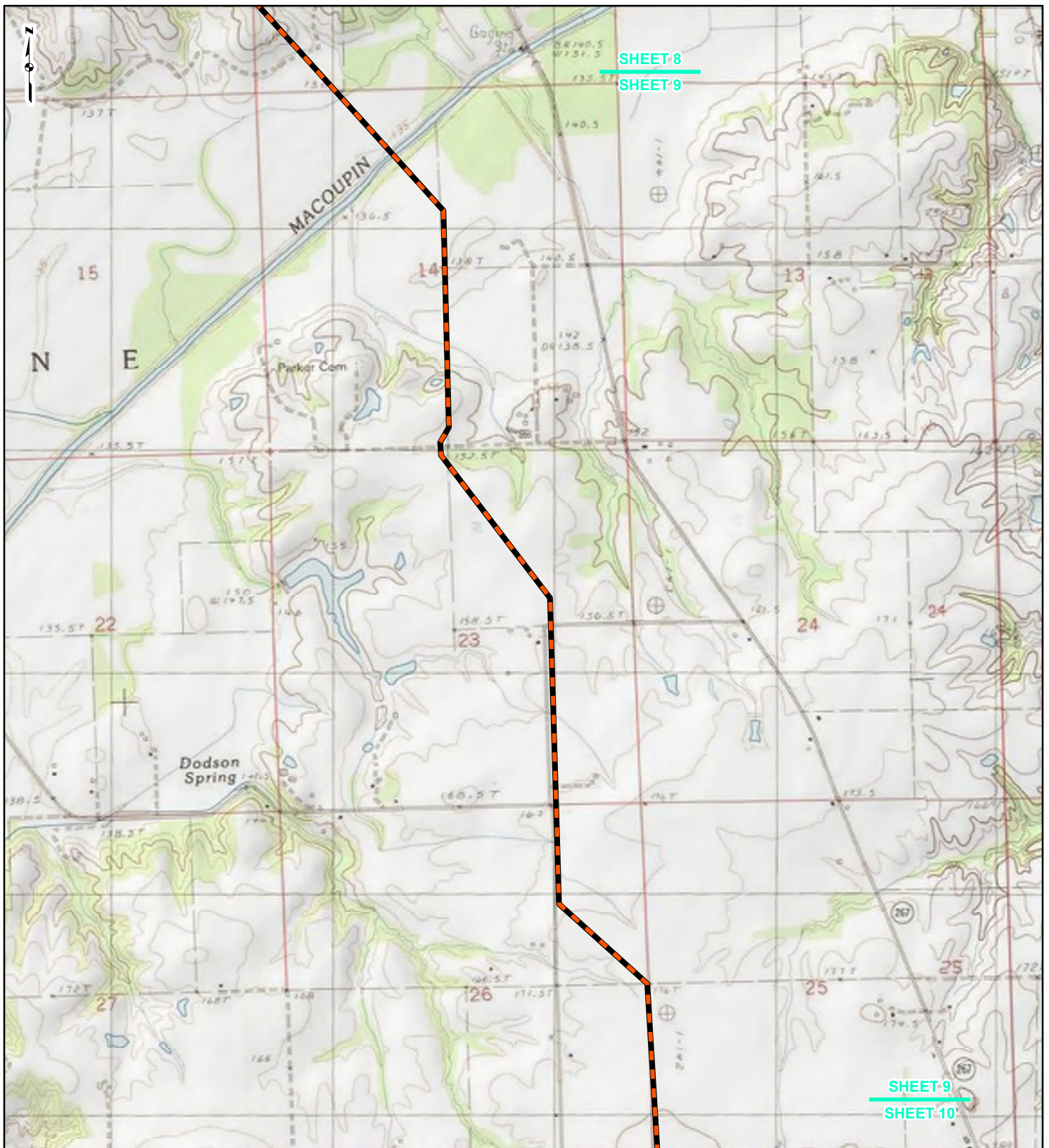
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**FIGURE 1
LOCATION MAP
SHEET 8 OF 21**

Spire STL Pipeline

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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

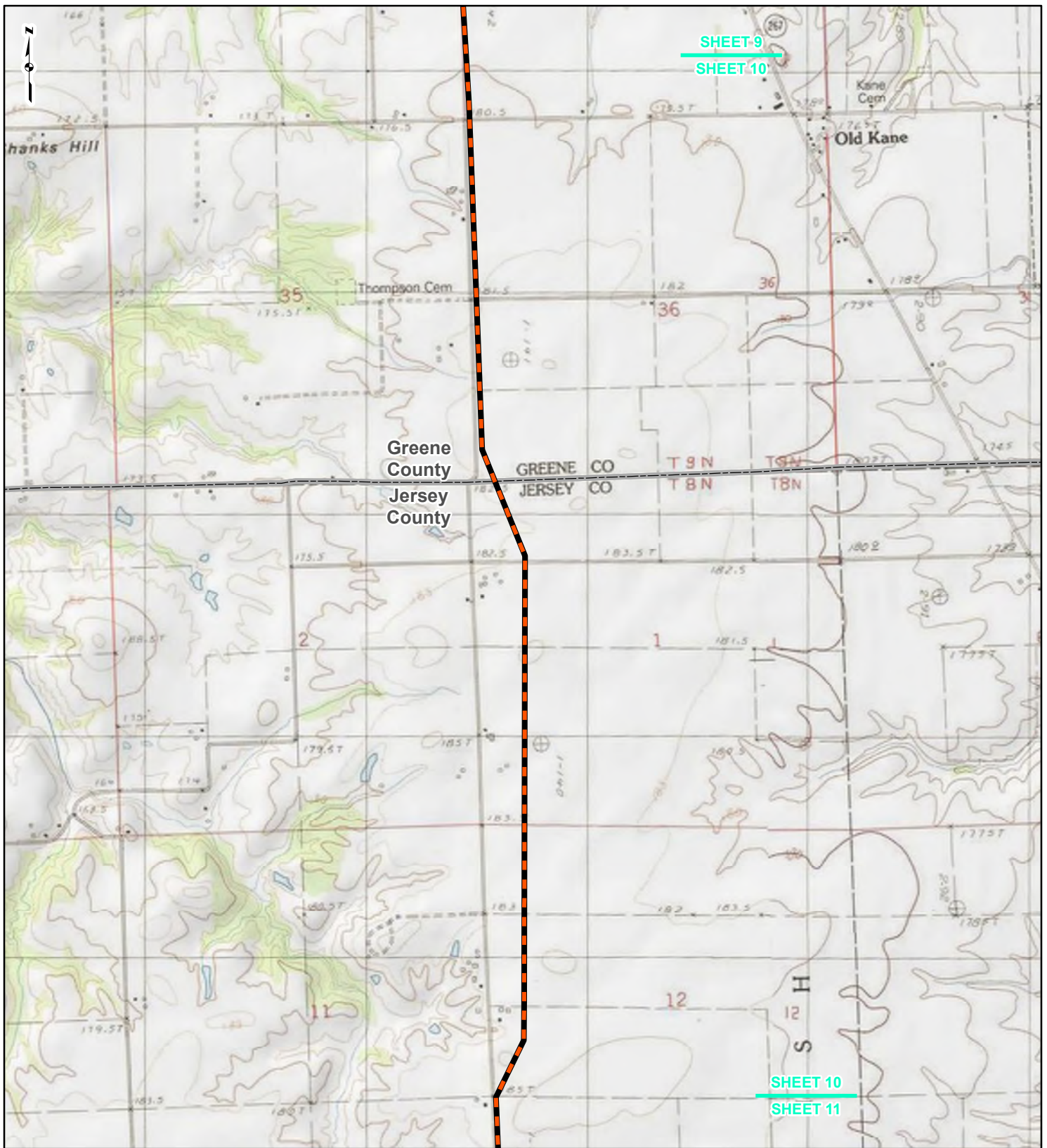
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**FIGURE 1
LOCATION MAP
SHEET 9 OF 21**

Spire STL Pipeline

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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

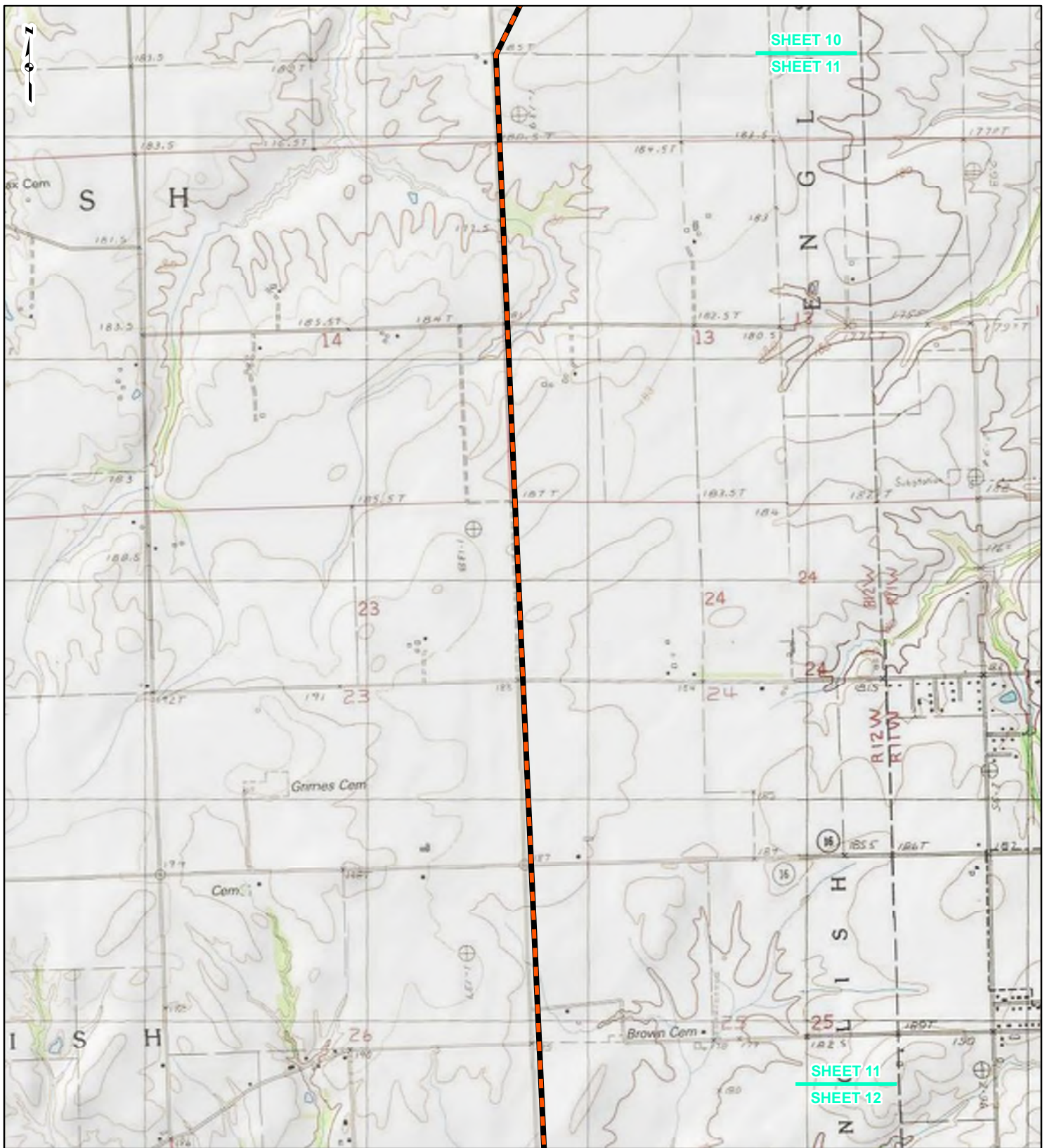
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FIGURE 1
LOCATION MAP
SHEET 10 OF 21



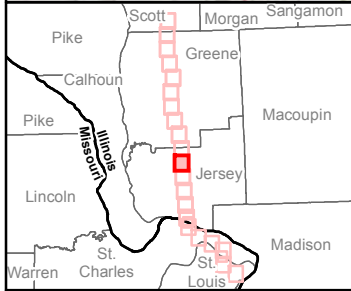
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SHEET 10
SHEET 11

SHEET 11
SHEET 12



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

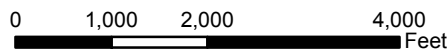
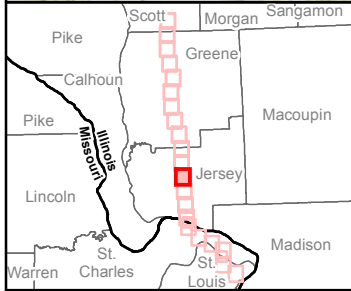
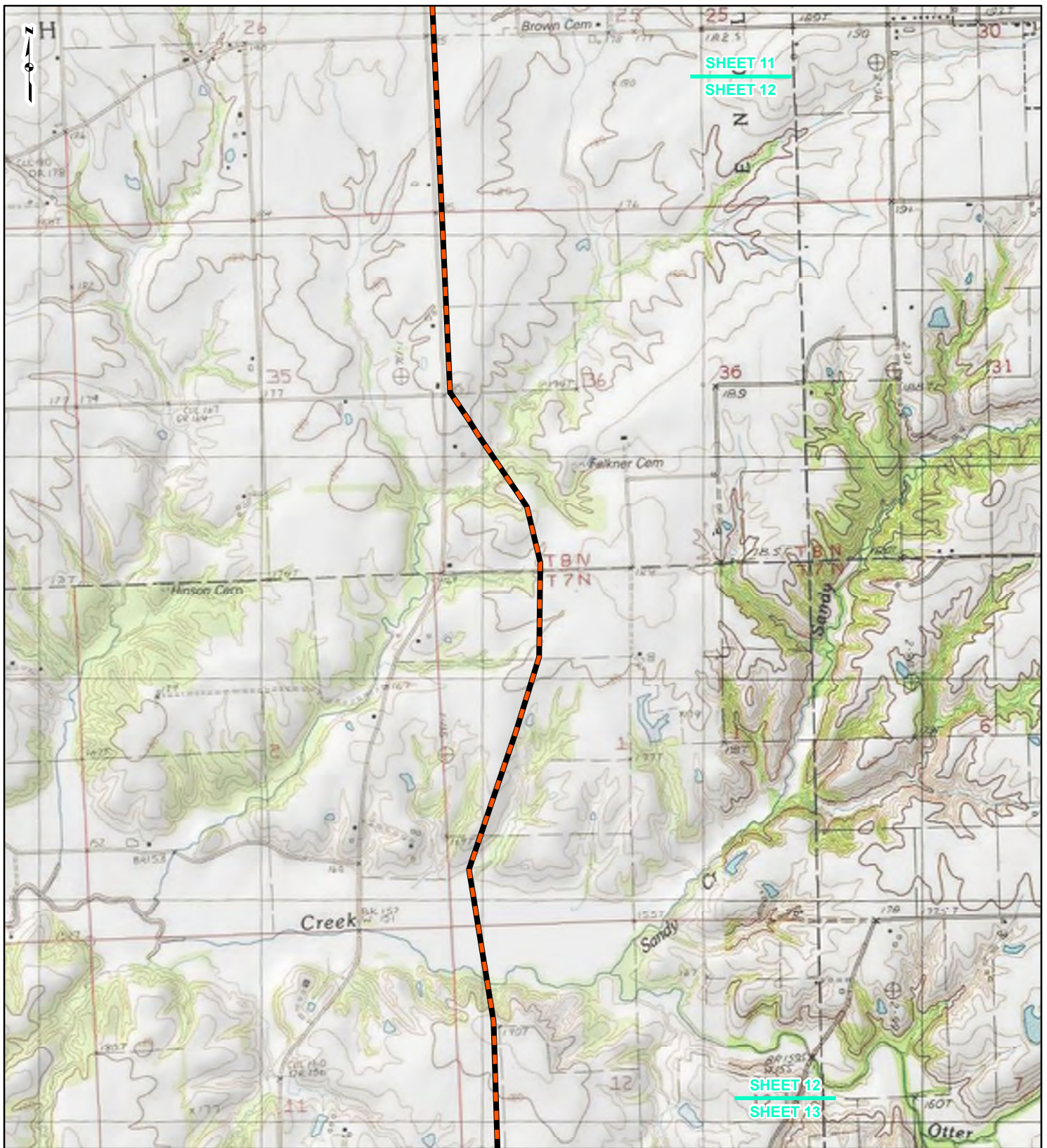


FIGURE 1
LOCATION MAP
SHEET 11 OF 21



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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

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Feet

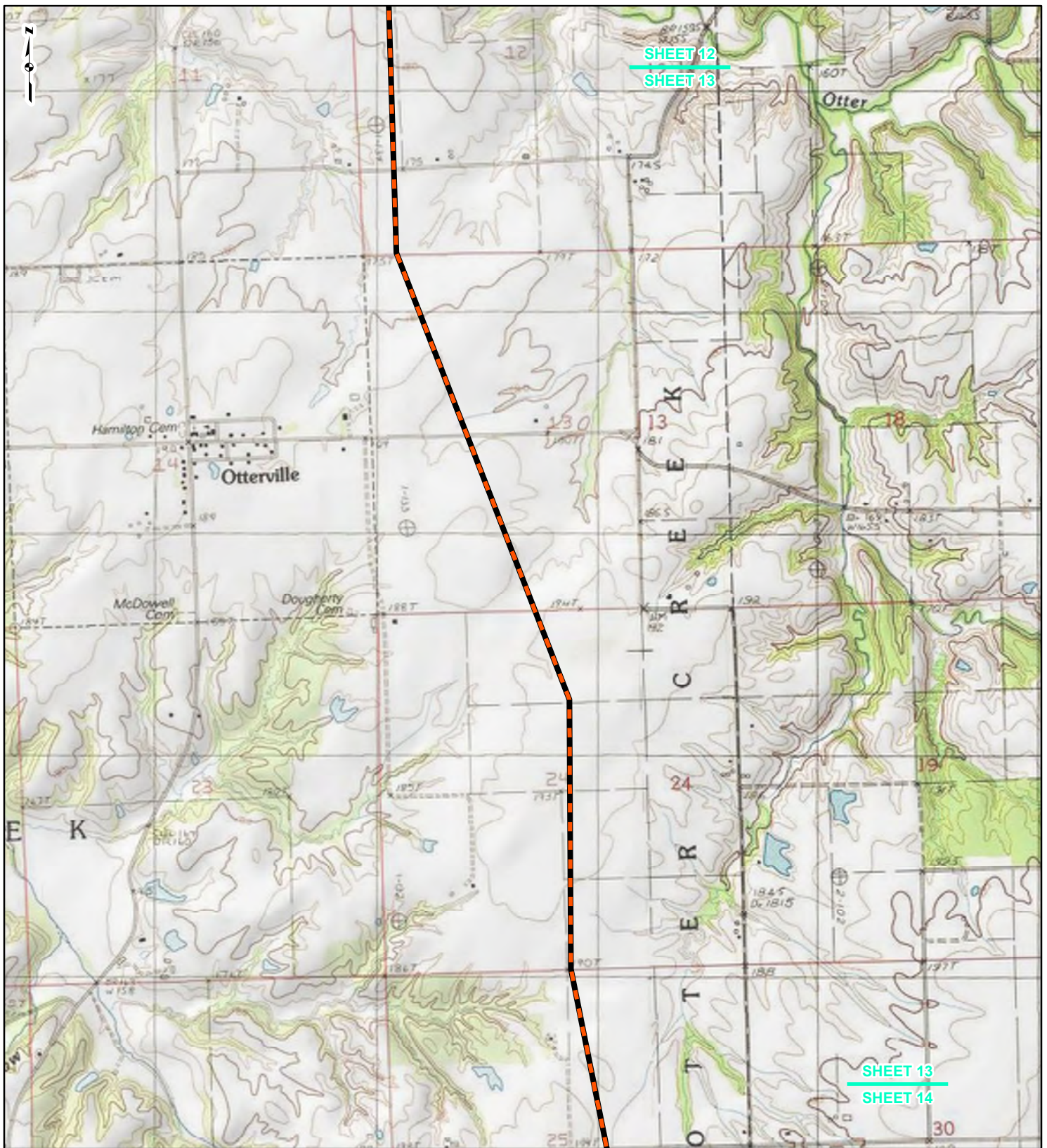
FIGURE 1
LOCATION MAP
SHEET 12 OF 21

Spire STL Pipeline

gi consultants

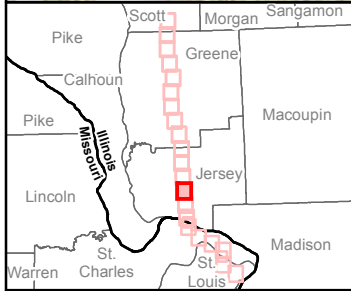
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SHEET 12
SHEET 13

SHEET 13
SHEET 14



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

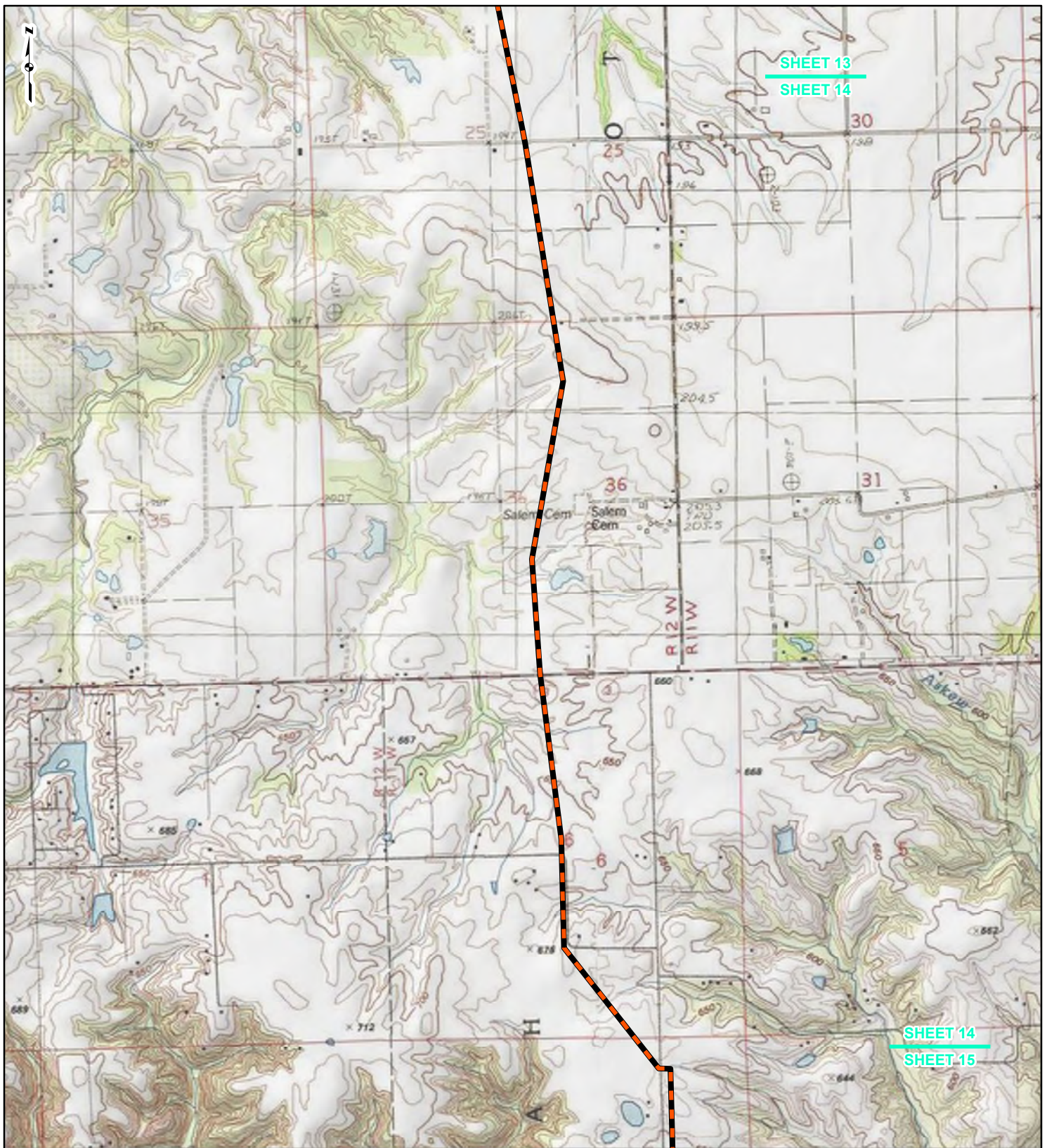
0 1,000 2,000 4,000
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FIGURE 1
LOCATION MAP
SHEET 13 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

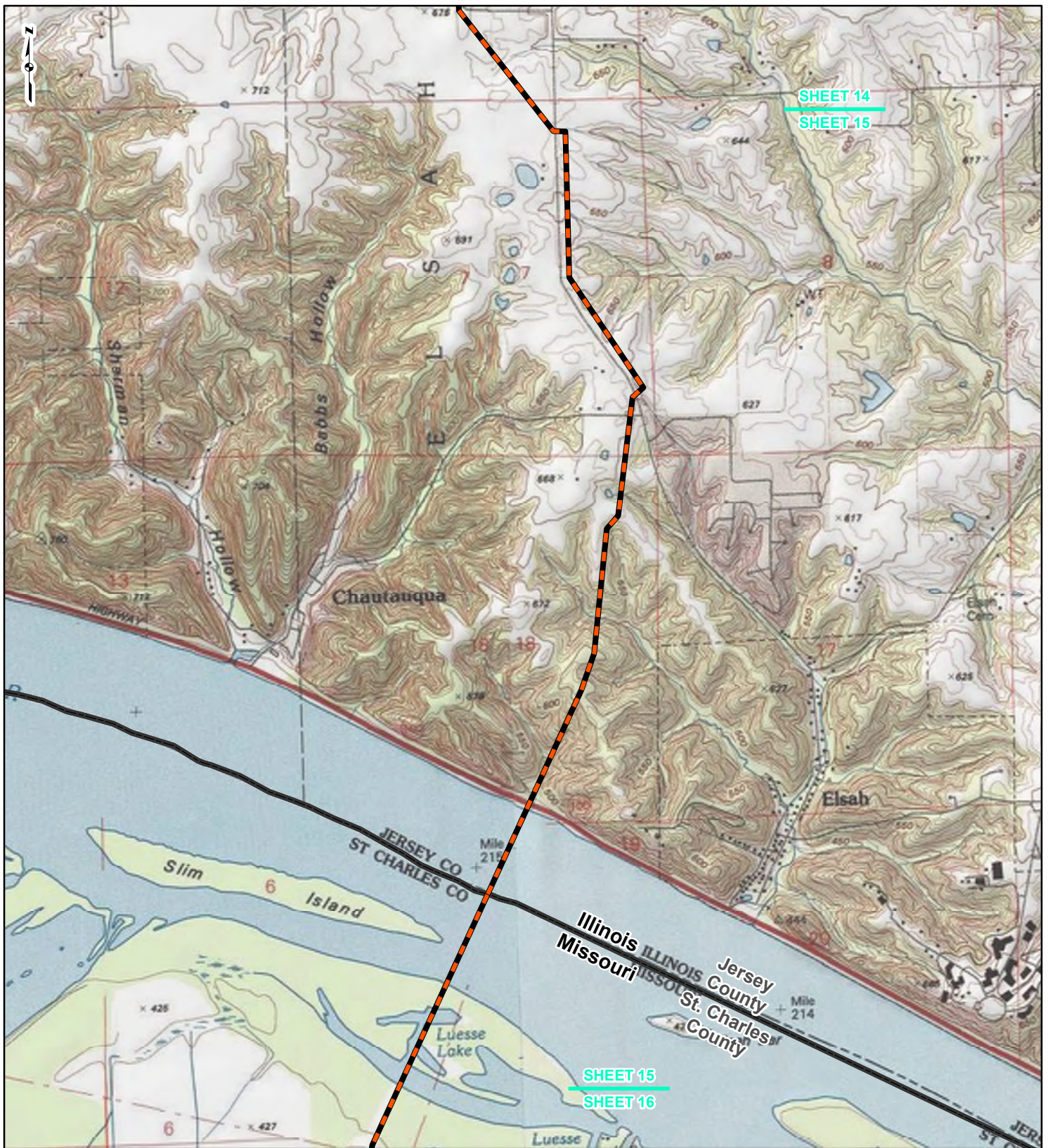
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FIGURE 1
LOCATION MAP
SHEET 14 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 14
SHEET 15

SHEET 15
SHEET 16



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

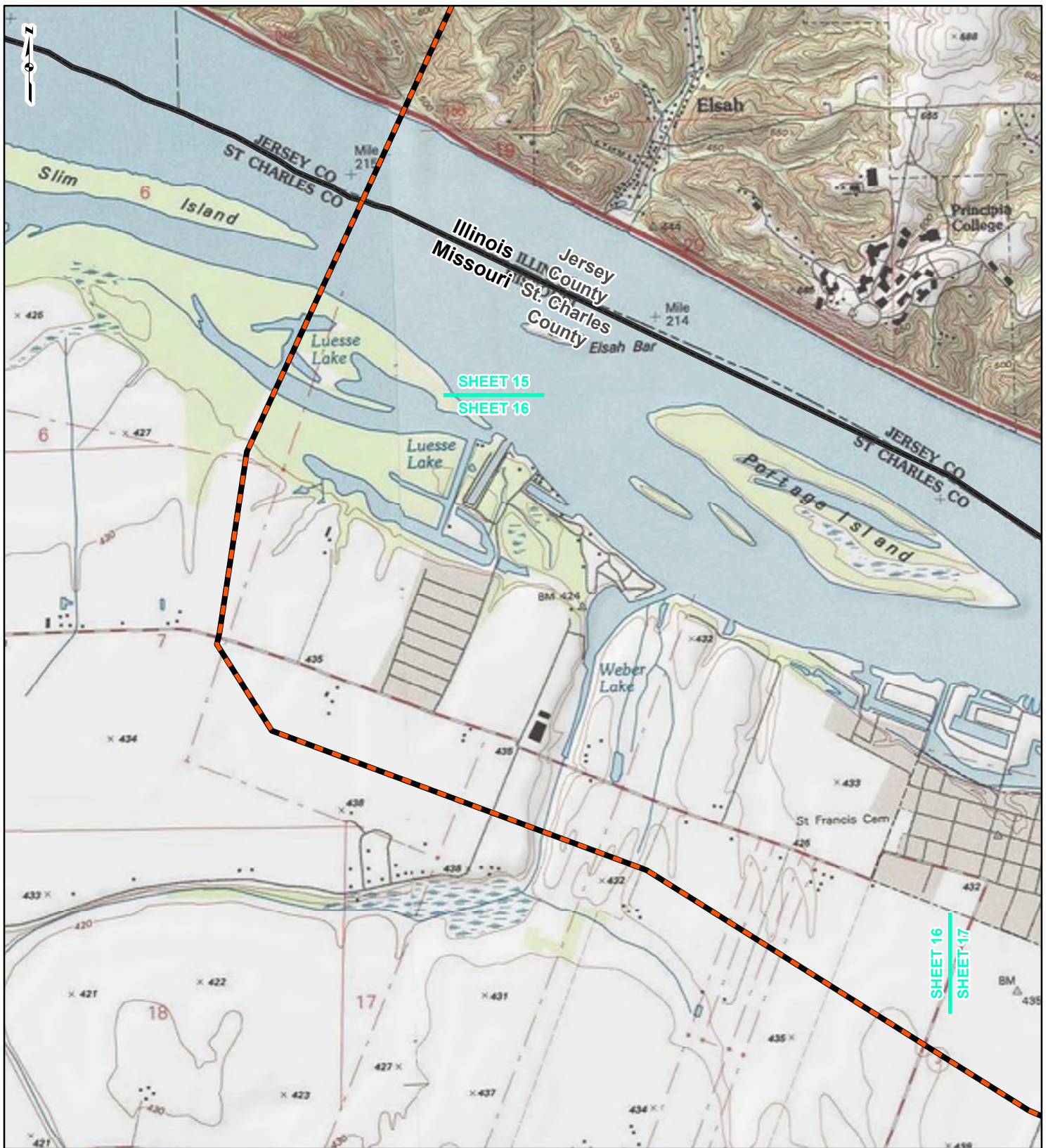
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**FIGURE 1
LOCATION MAP
SHEET 15 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

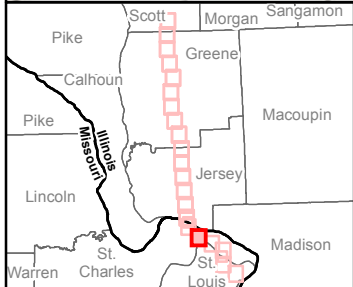
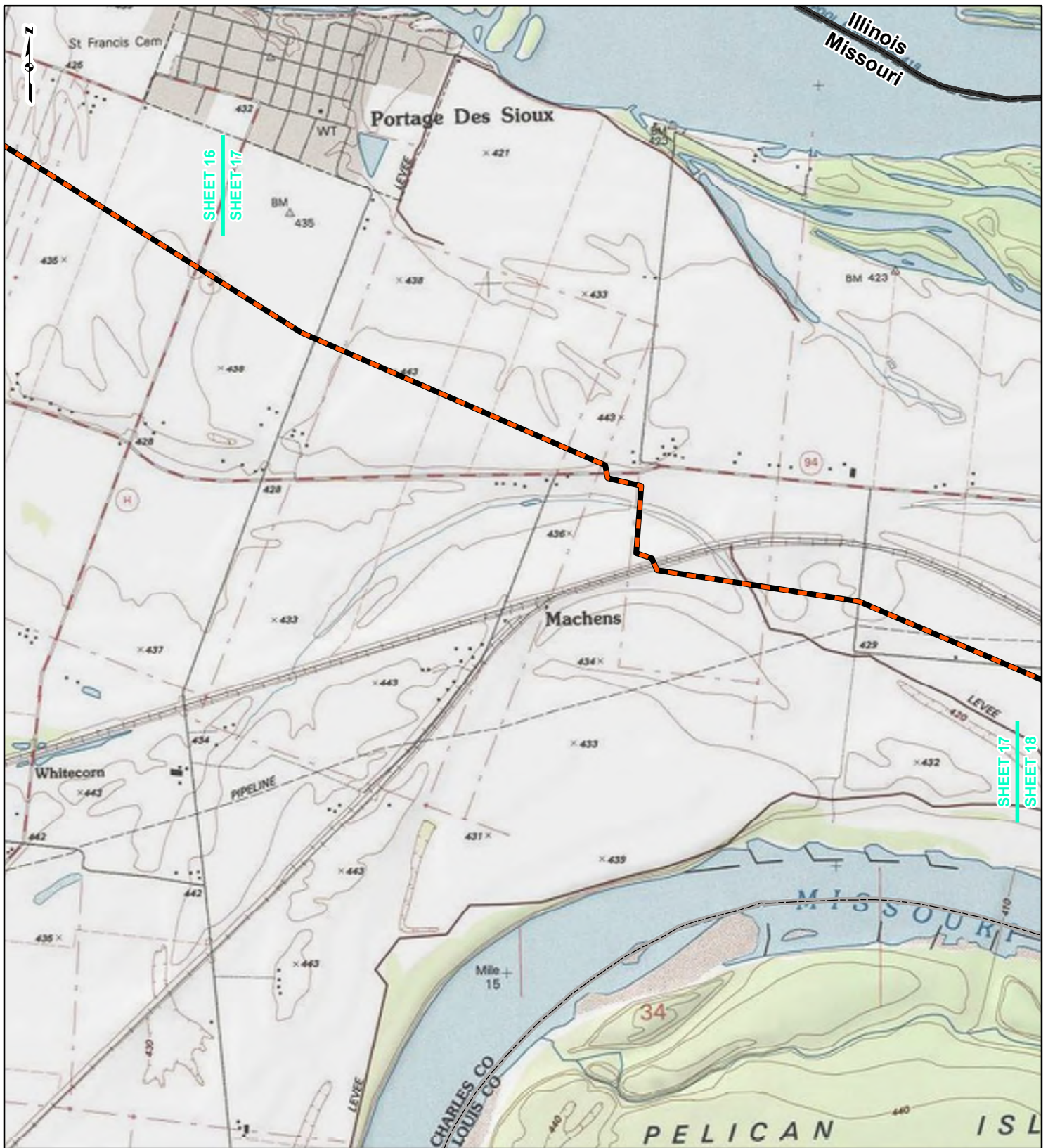
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

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FIGURE 1
LOCATION MAP
SHEET 16 OF 21

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

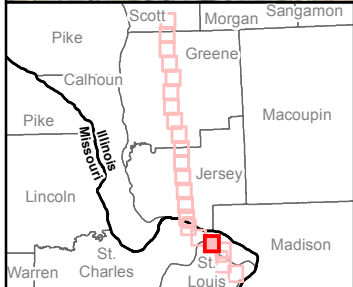
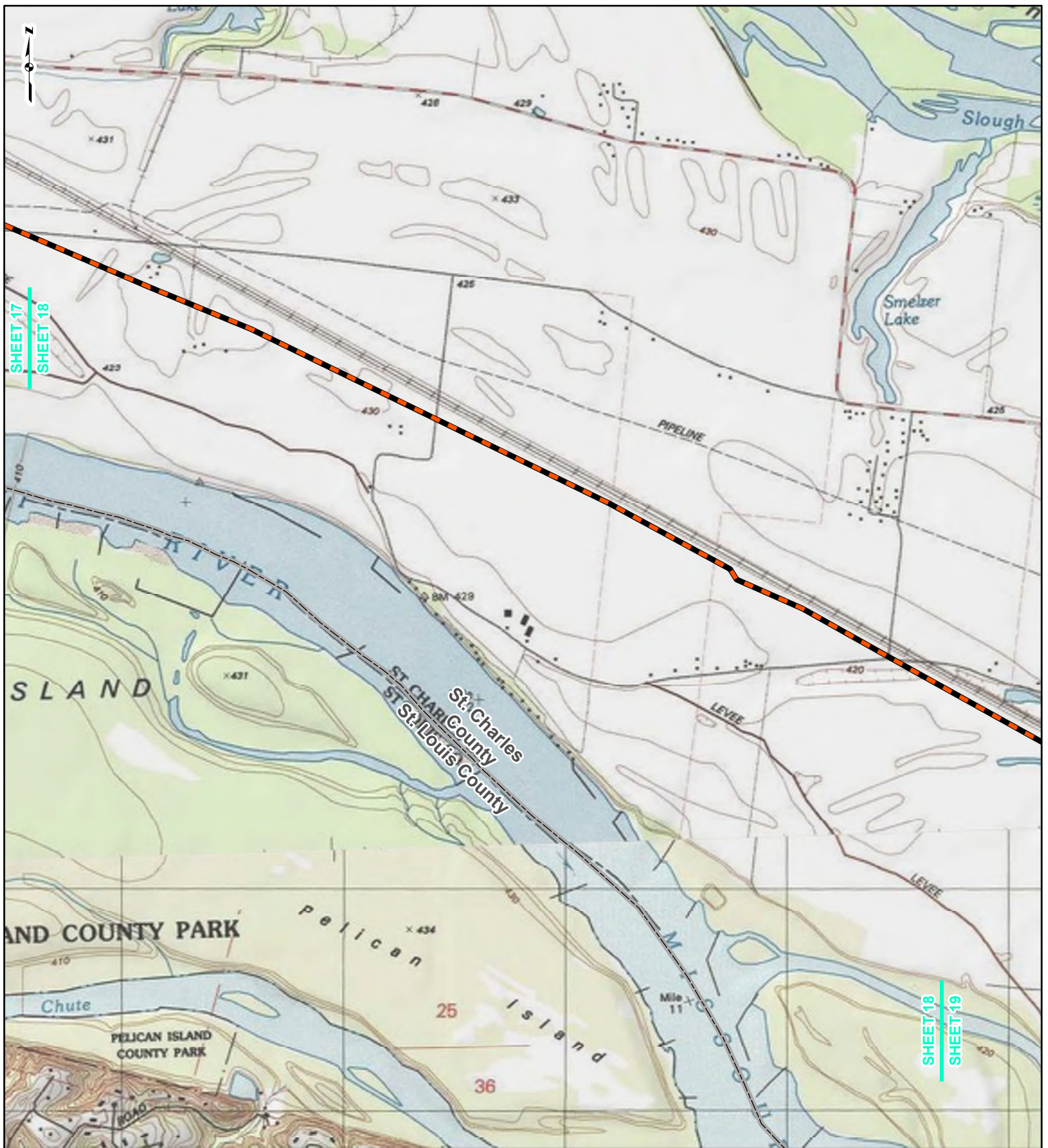
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

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FIGURE 1
LOCATION MAP
SHEET 17 OF 21

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSLEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



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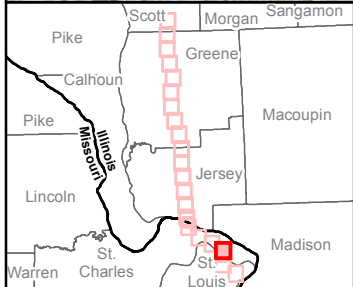
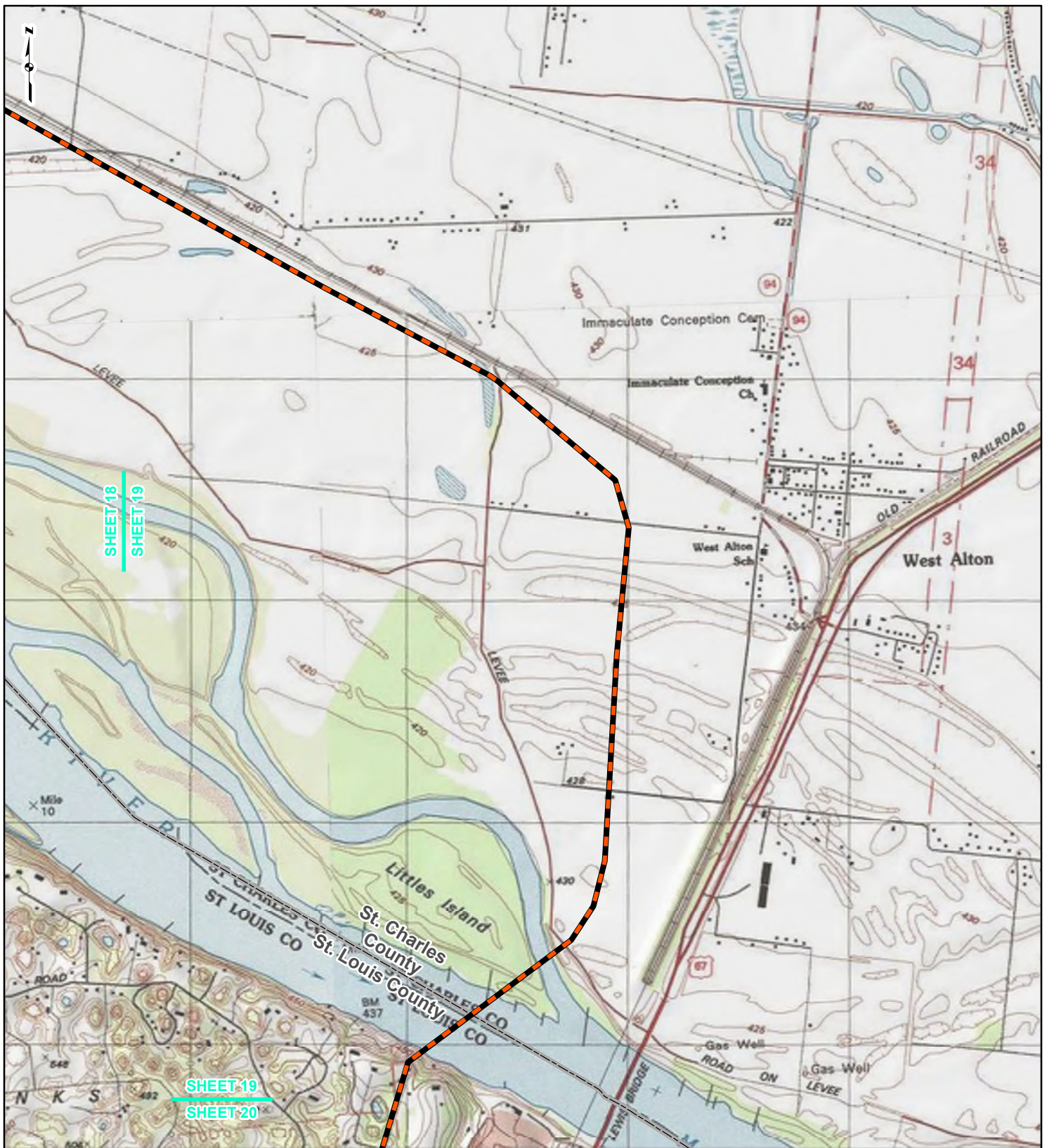
- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

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FIGURE 1
LOCATION MAP
SHEET 18 OF 21

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

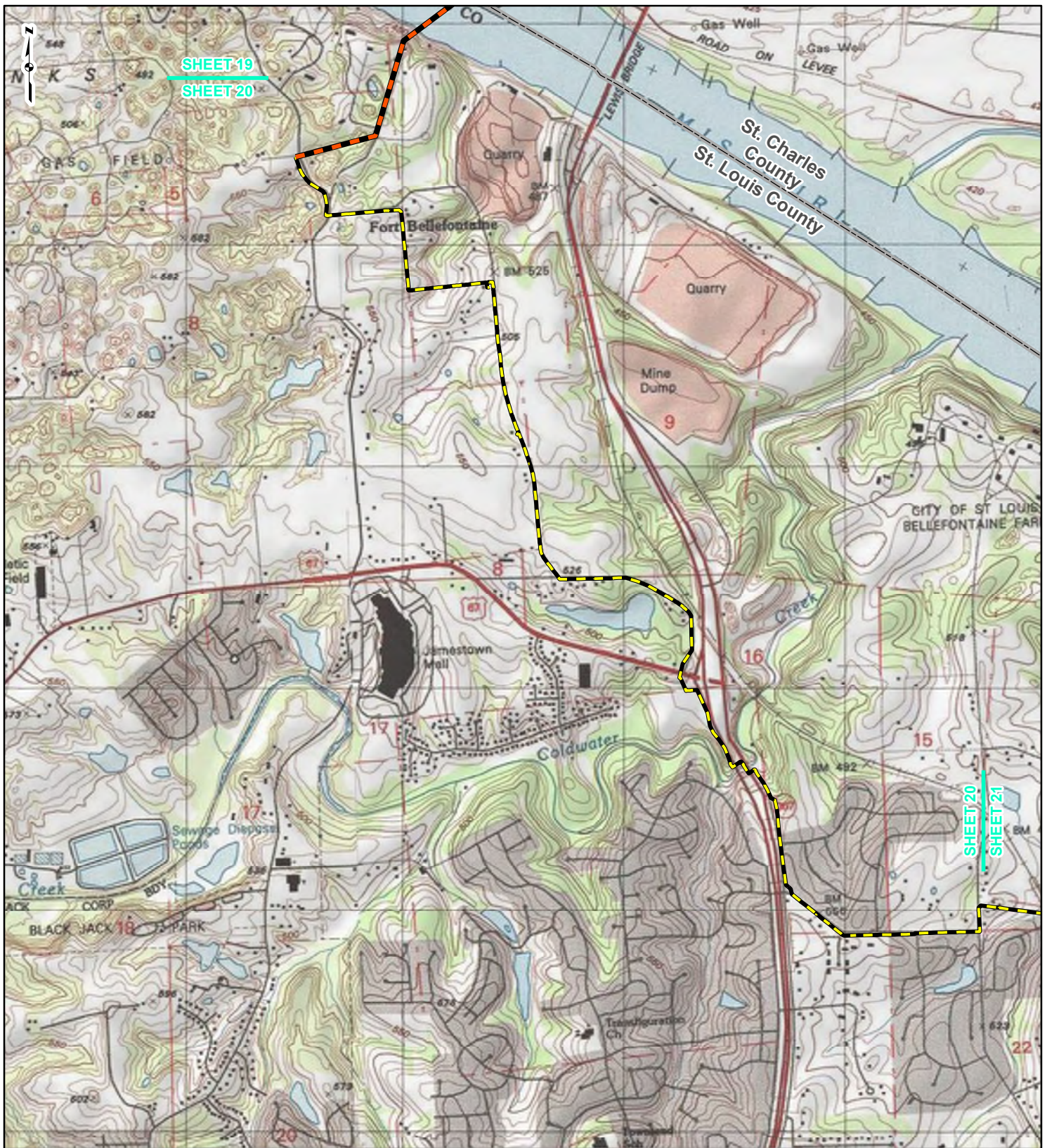
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**FIGURE 1
LOCATION MAP
SHEET 19 OF 21**



DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 19
SHEET 20

SHEET 20
SHEET 21



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

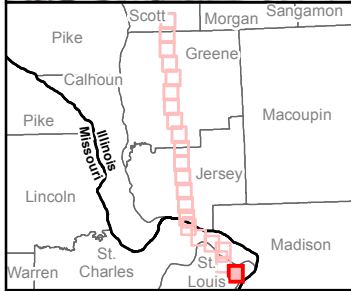
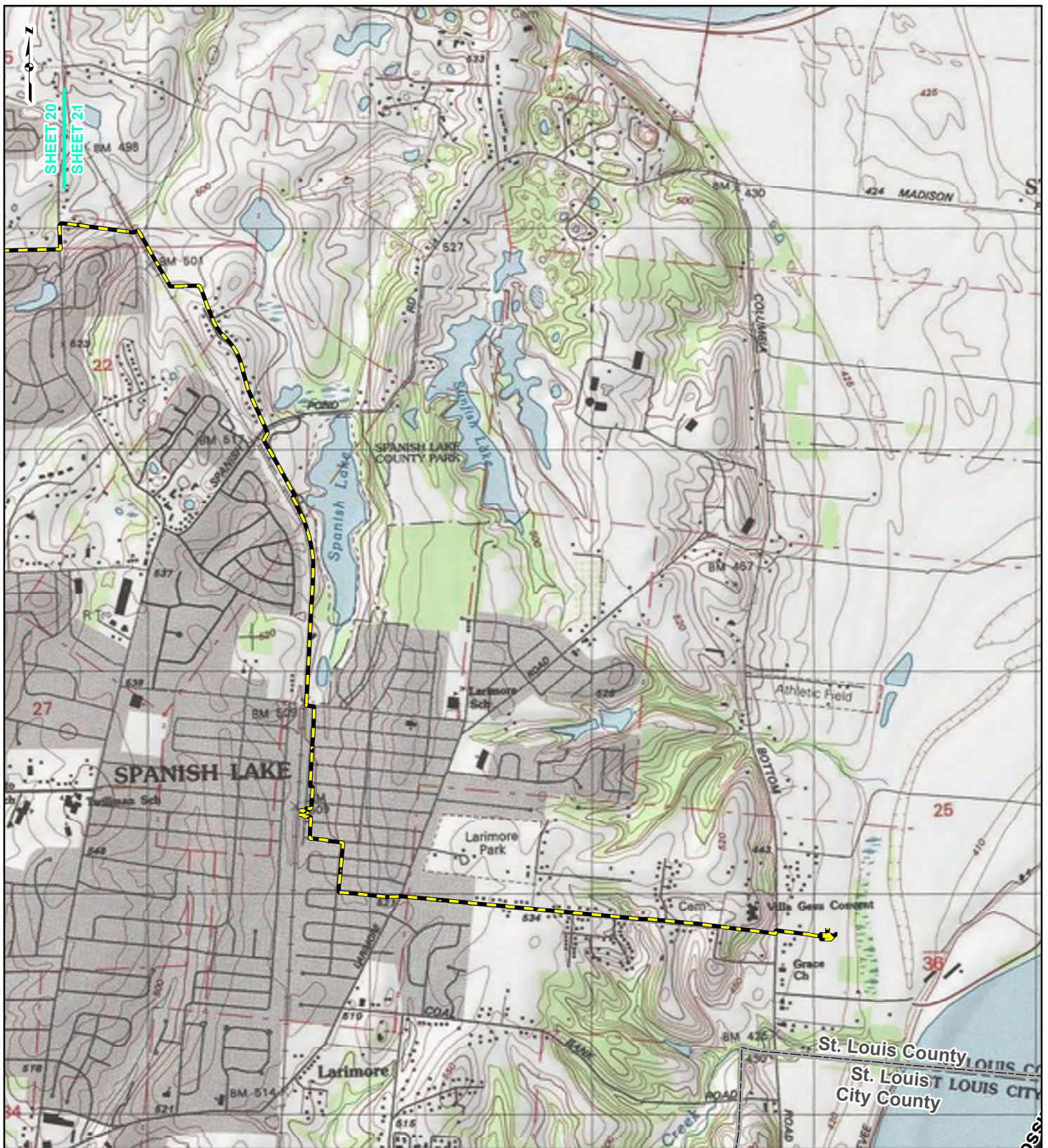
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FIGURE 1
LOCATION MAP
SHEET 20 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- - - NEW BUILD 24-INCH DIAMETER PIPELINE
- - - LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 21 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



July 29, 2016

Mr. Kraig McPeek
United States Fish and Wildlife Service
Rock Island Field Office
1511 47th Avenue
Moline, IL 61265

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. McPeek:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Fish and Wildlife - Rock Island Field Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Mr. Justin Sexton
Refuge Manager
United States Fish and Wildlife Service
Two Rivers National Wildlife Refuge
HC 82, Box 107
Brussels, IL 62013

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Sexton:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

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- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Fish and Wildlife - Two Rivers National Wildlife Refuge to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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

Ali Trunzo

From: Jayme Fuller
Sent: Thursday, June 30, 2016 2:58 PM
To: justin_sexton@fws.gov
Cc: Lori Ferry; Ali Trunzo; Allred, Chase
Subject: Spire STL Pipeline Project
Attachments: TRNWP_2016_06_30.pdf

Hi Justin,

I wanted to reach out to you to discuss a proposed pipeline project near two areas (Apple Creek and Portage Island) and any potential issues you may be able to identify. We met with the USACE St. Louis District yesterday and will be meeting with the USFWS Rock Island Field office next week (Chase Allred). I have attached a map of our proposed pipeline route alternatives near the locations of the Two Rivers National Wildlife Refuge. When I spoke with Rock Island, they indicated that if it was a refuge area, then threatened and endangered species issues, migratory bird issues, etc. would be managed by a different office. We will be discussing other potential T&E issues with FWS Rock Island Thursday July 7th at 11-12 central and they have set up a conference call number.

Would you like to attend this meeting in order to discuss specific migratory bird issues that we need to be concerned about? We are in the very early stages of this project and are meeting with agencies early in the process before we begin field surveys in the next month and would appreciate any feedback we can get before boots hit the ground so to speak.

Thanks and look forward to speaking with you!

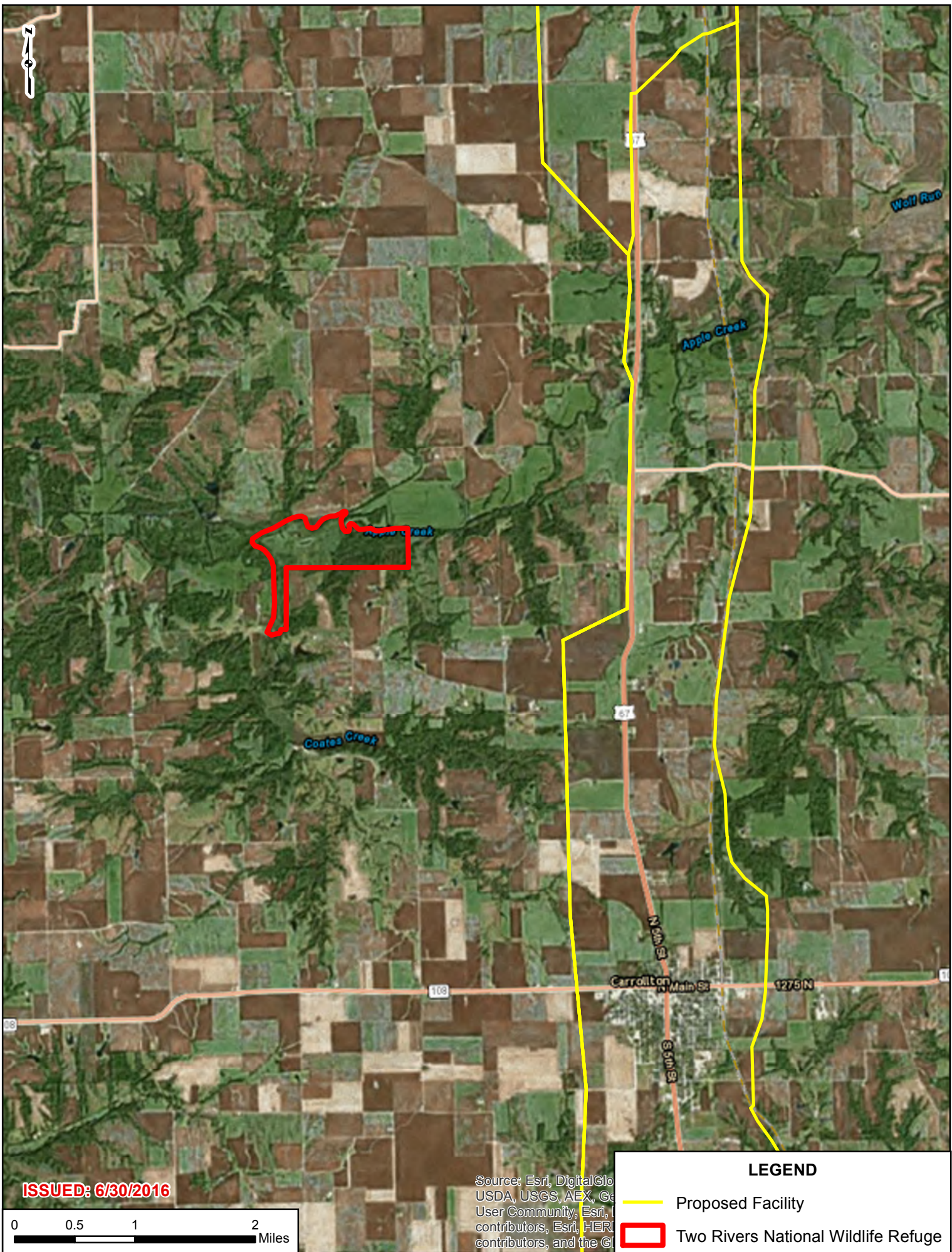
Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 | 

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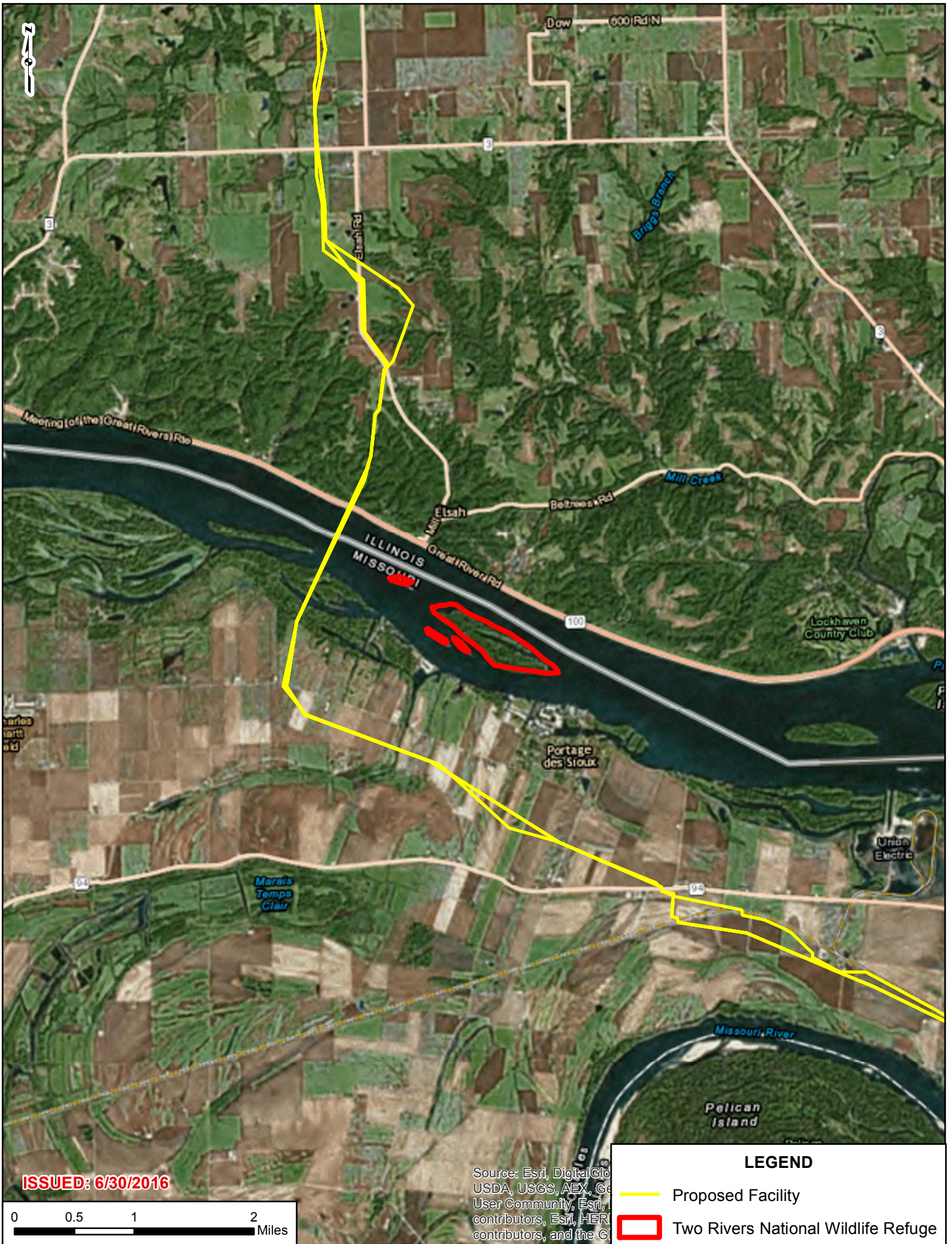
ISSUED: 6/30/2016



Source: Esri, DigitalGlobe, GeoEye, USDA, USGS, AEX, GeoEye, IGN, AerGRID, AIRPHOTON, Swire, User Community, Esri, and other contributors, Esri, HERE, DeLorme, Intermap, iPC, NITEL, GEBCO, Swire, GEBCO, Esri, and other contributors, and the CIA.

LEGEND



-  Proposed Facility
-  Two Rivers National Wildlife Refuge



ISSUED: 6/30/2016

Source: Esri, DigitalGlobe, GeoEye, USDA, USGS, AEX, GeoEye, AeroGRID, IGN, SDA, CNES, Airphoto, User Community, Esri, DeLorme, NAVTEQ, contributors, Esri, HERE, DeLorme, Swire, GEBCO, Esri, Swire, GEBCO, contributors, and the CIA

LEGEND

-  Proposed Facility
-  Two Rivers National Wildlife Refuge

Lori Ferry

From: Jayme Fuller
Sent: Wednesday, June 08, 2016 12:41 PM
To: Kraig_McPeek@fws.gov
Cc: Lori Ferry
Subject: Informal Review-Spire STL Pipeline
Attachments: Centerline_2016_06_07.zip

Hi Kraig,

Thank you for taking the time to speak with me this morning. I have provided a brief project description below and have attached shapefiles of the proposed route. We do not anticipate meeting with FERC until the first week of July, however, as we discussed our main concern is making the most out of our survey windows this season and talking through any other potential issues you may be concerned with. We would like to meet with you the week of June 20th if you have availability, if not we can look at the week of the 27th. Please let me know a day that works for you. Thanks

Spire STL Pipeline LLC (Spire) is proposing to build, operate, and maintain the Spire STL Pipeline Project (Project). The Project consists of approximately 60-miles of new 24-inch-diameter natural gas pipeline commencing in Scott County, Illinois at an interconnect with the existing Rockies Express Pipeline and traversing south through Greene and Jersey counties, Illinois and into St. Charles and St. Louis counties, Missouri. Spire plans to install three metering and regulating stations, one odorization station and one standalone regulating station as part of the new build section of the project. The Project also includes an upgrade of an existing 9-mile 20-inch natural gas pipeline in St. Louis County, Missouri which would include the addition of two additional measuring and regulating stations. No compressor stations are currently proposed for the Project. The proposed pipeline will be designed and built to carry up to 400,000 dekatherms per day (Dth/d) and is proposed to provide an additional source of natural gas to the local distribution company (LDC) in the St. Louis metropolitan area.

Jayme L. Fuller, Environmental Manager

GAI Consultants, Inc.

6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 |     

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National Oceanic and Atmospheric Administration



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

NOAA NEPA Coordinator
NOAA National Marine Fisheries Services
Office of General Counsel
1315 East-West Highway Room 15132
Silver Springs, MD 20910

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear To Whom It May Concern,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

Included with this letter, for your information, is a general overview map of the proposed pipeline route and a diagram illustrating the FERC process.

We believe that we can create a better project by hearing from you and listening to your feedback. That's why we are hosting open houses this month so you can learn more about the project and we can learn more about you.

At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

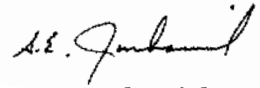
Spire STL Pipeline open house schedule

Tuesday August 16, 2016 5 p.m. – 7:30 p.m.	Wednesday August 17, 2016 5 p.m. – 7:30 p.m.	Thursday August 18, 2016 5 p.m.– 7:30 p.m.	Tuesday August 23, 2016 5 p.m.– 7:30 p.m.	Wednesday August 24, 2016 5 p.m. – 7:30 p.m.
Scott County, Illinois	Jersey County, Illinois	St. Louis County, Missouri	St. Charles County, Missouri	Greene County, Illinois
Scott County Fairgrounds 401 North Walnut Winchester, IL 62694	Jerseyville Recreation Center 401 Mound Street Jerseyville, IL 62052	Hazelwood Civic Center East 8969 Dunn Road Hazelwood, MO 63042	American Legion Post 312 2500 Raymond Drive St Charles, MO 63301	Knights of Columbus Hall U.S. HWY 67 Carrollton, IL 62016

Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,

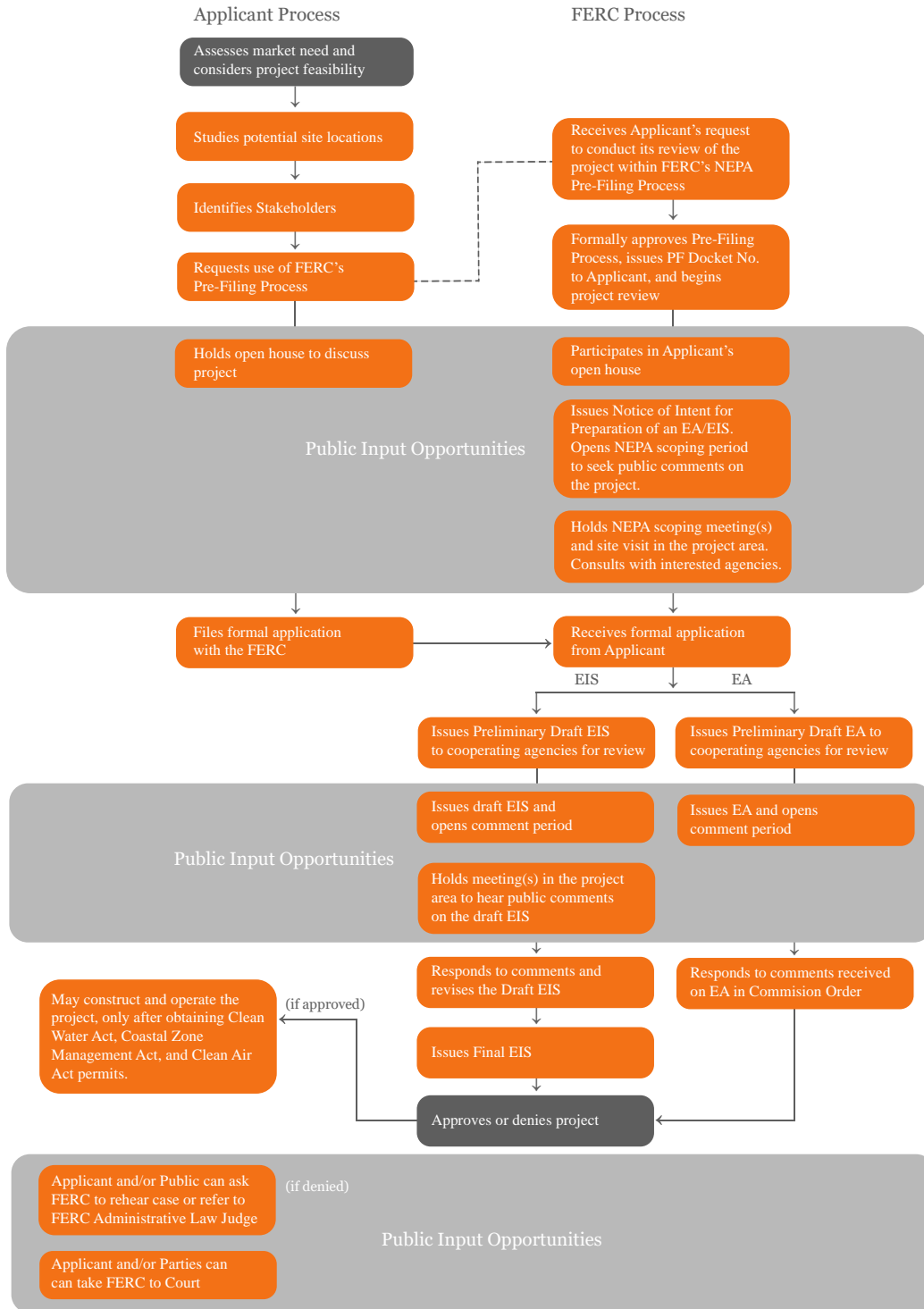


Scott Jaskowiak
Vice President
Spire STL Pipeline LLC

Project Map



FERC Pre-Filing Process





July 29, 2016

NOAA NEPA Coordinator
NOAA National Marine Fisheries Services
Office of General Counsel
1315 East-West Highway, Room 15132
Silver Springs, MD 20910

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Sir or Madam:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the NOAA National Marine Fisheries Services to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

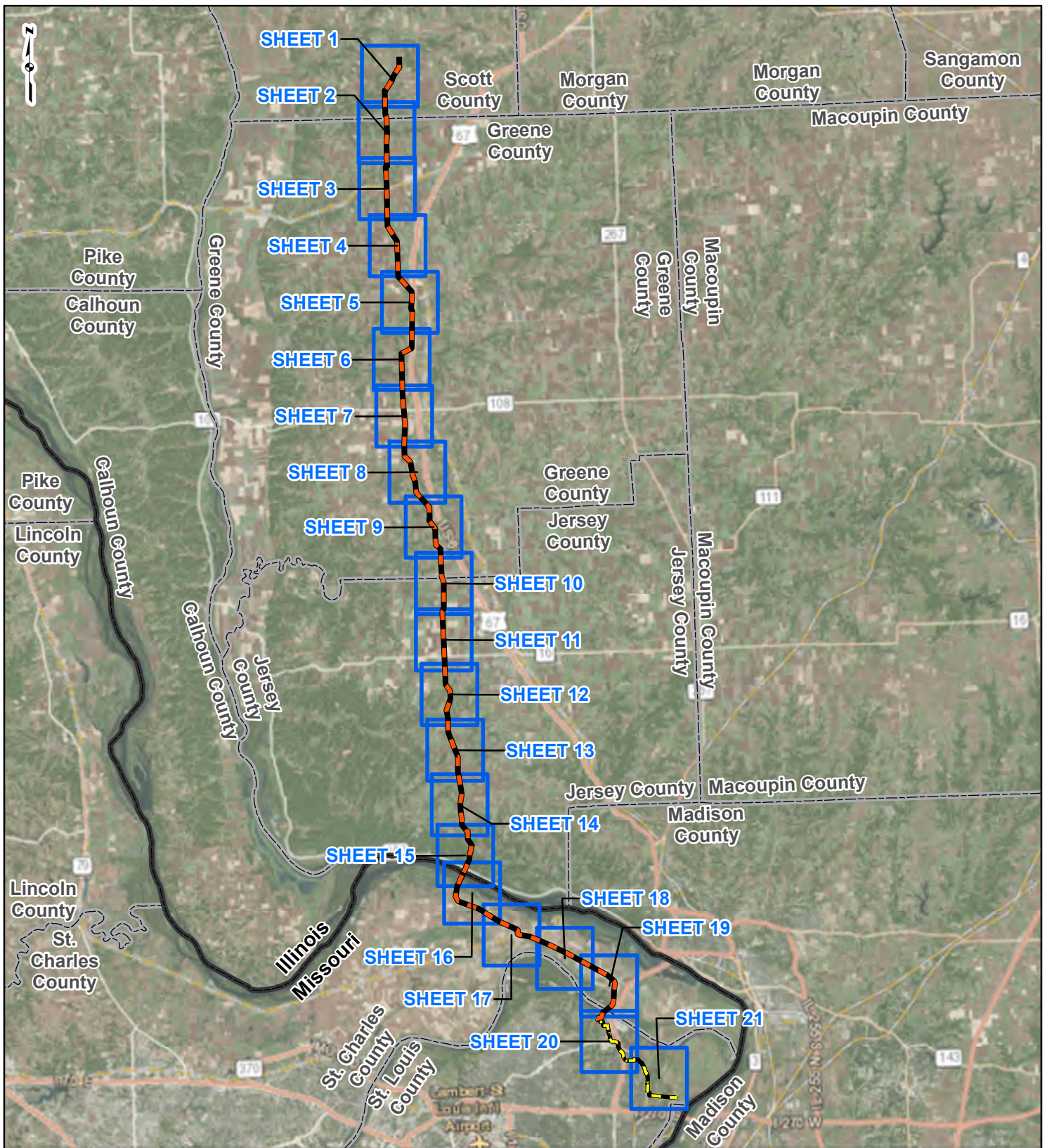
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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

ATTACHMENT
USGS TOPOGRAPHIC MAP (FIGURE 1)



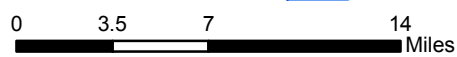
PROJECT LOCATION



SCOTT, GREENE
AND JERSEY
COUNTIES, ILLINOIS
AND ST. CHARLES AND
ST. LOUIS COUNTIES, MISSOURI

LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY
- SHEET INDEX

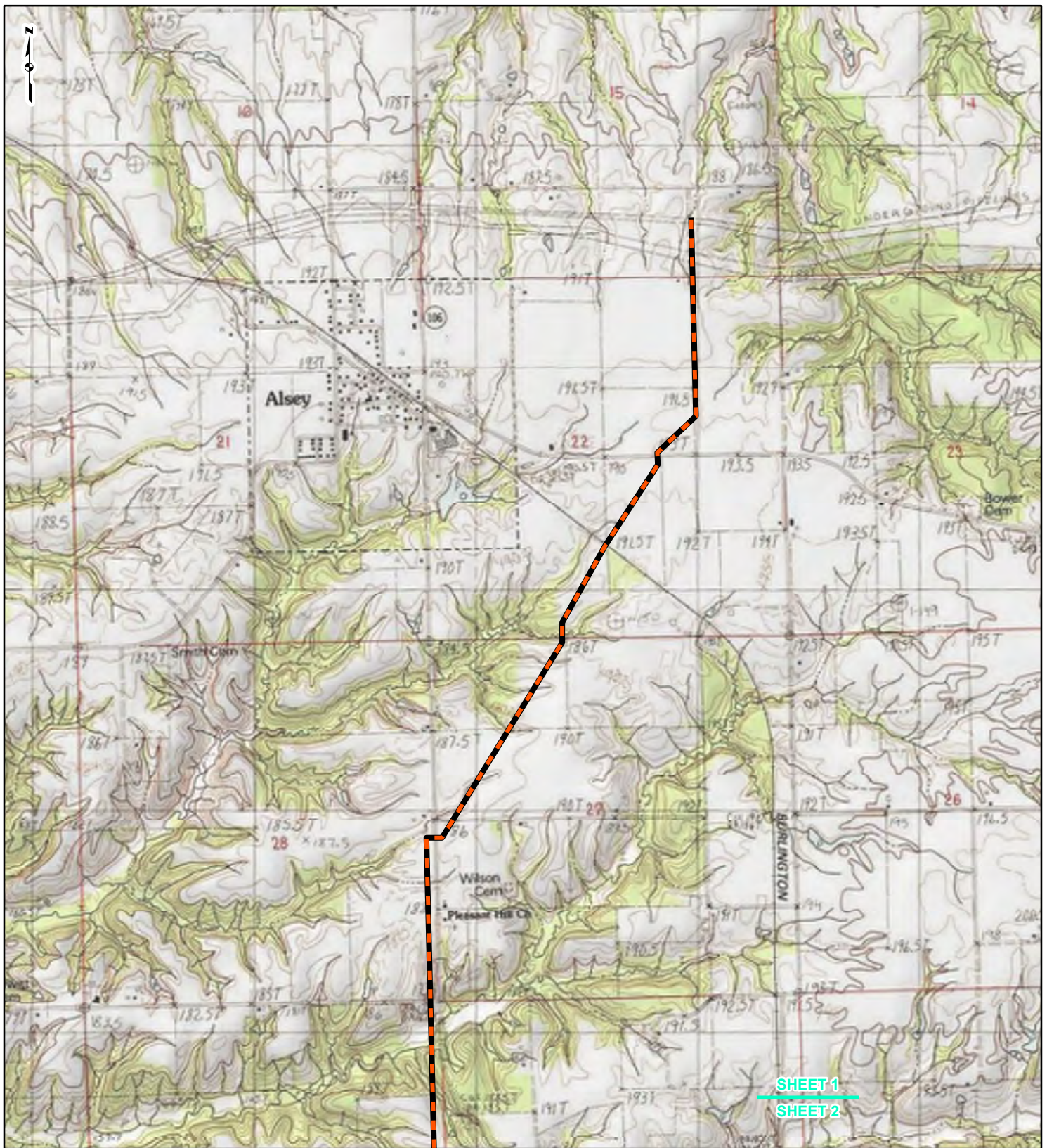


**FIGURE 1
LOCATION MAP
SHEET INDEX**

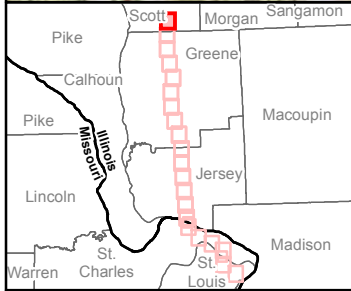


DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2015, ACCESSED 07/2016.



SHEET 1
SHEET 2



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 1 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.





SHEET 1
SHEET 2

Scott
County
Greene
County

SHEET 2
SHEET 3



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

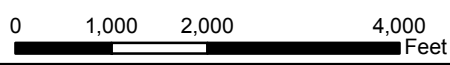


FIGURE 1
LOCATION MAP
SHEET 2 OF 21



DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 2





SHEET 3

SHEET 3

SHEET 4



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

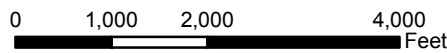
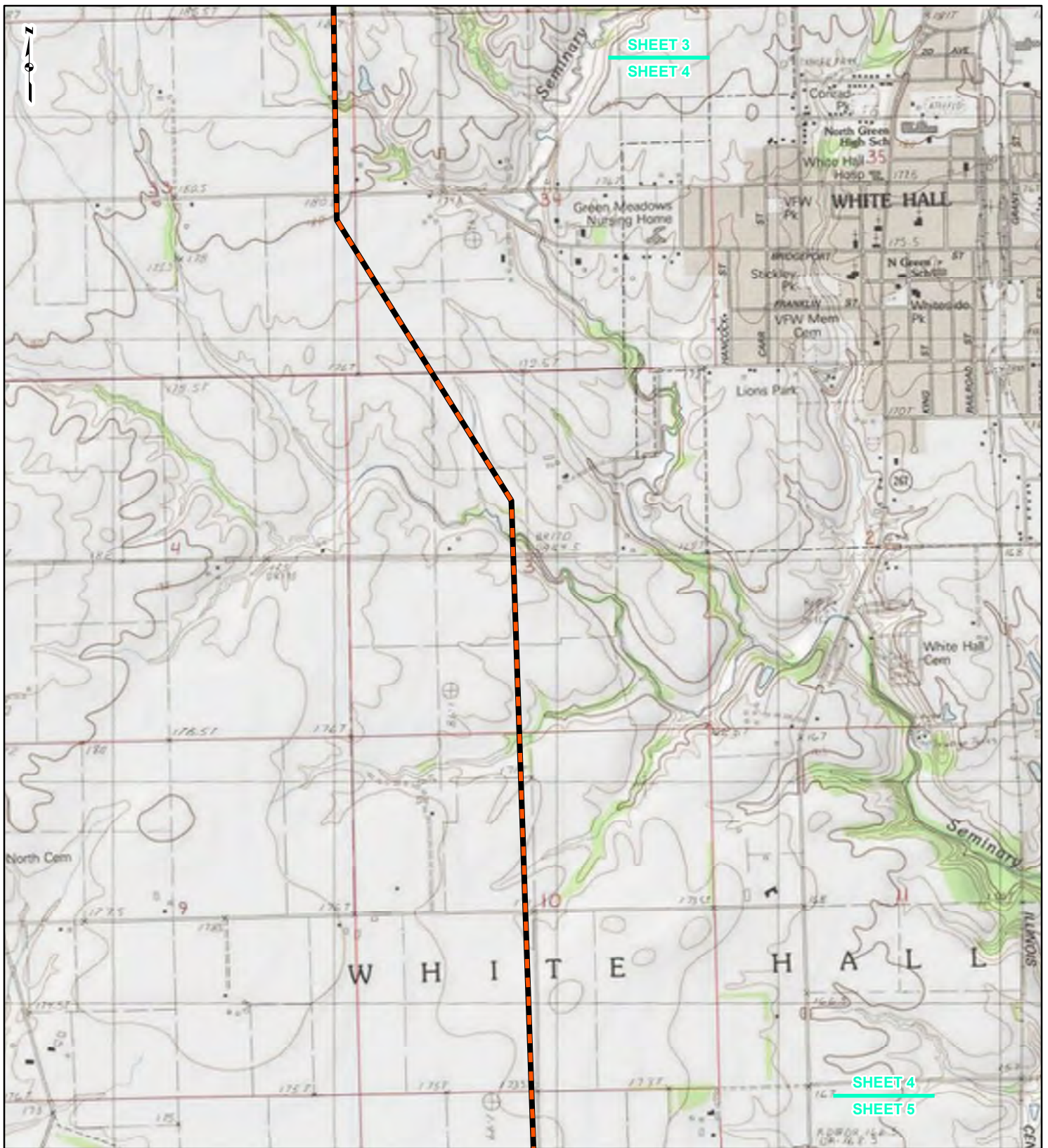


FIGURE 1
LOCATION MAP
SHEET 3 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

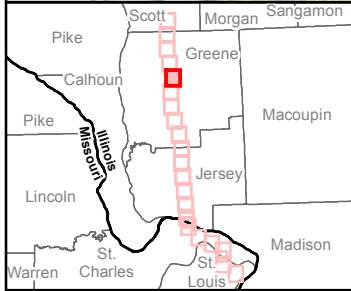
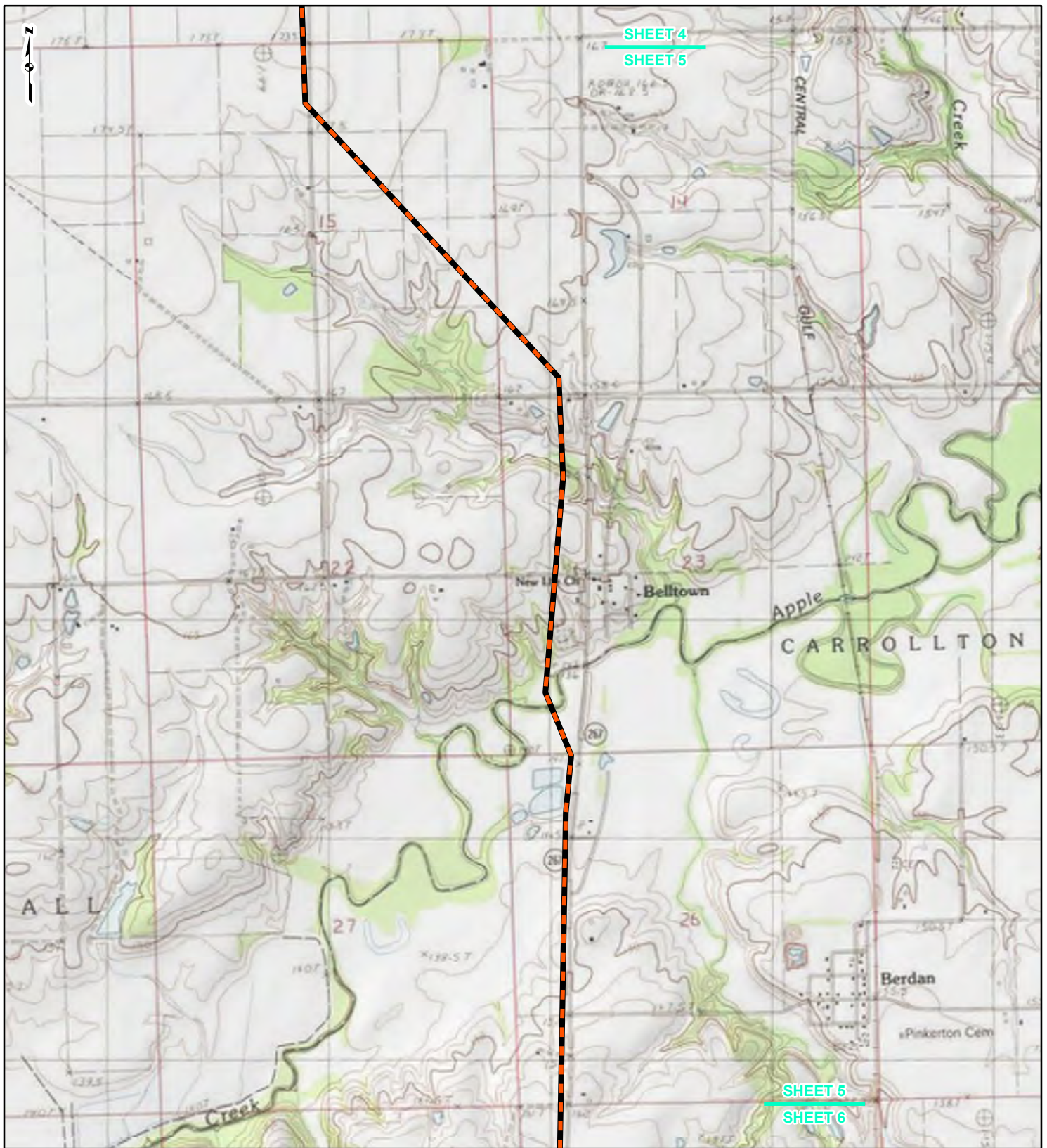
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 4 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

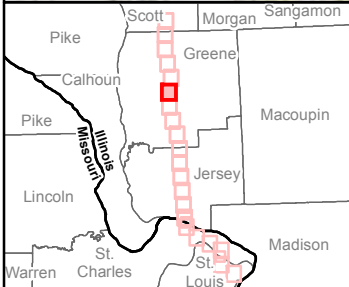
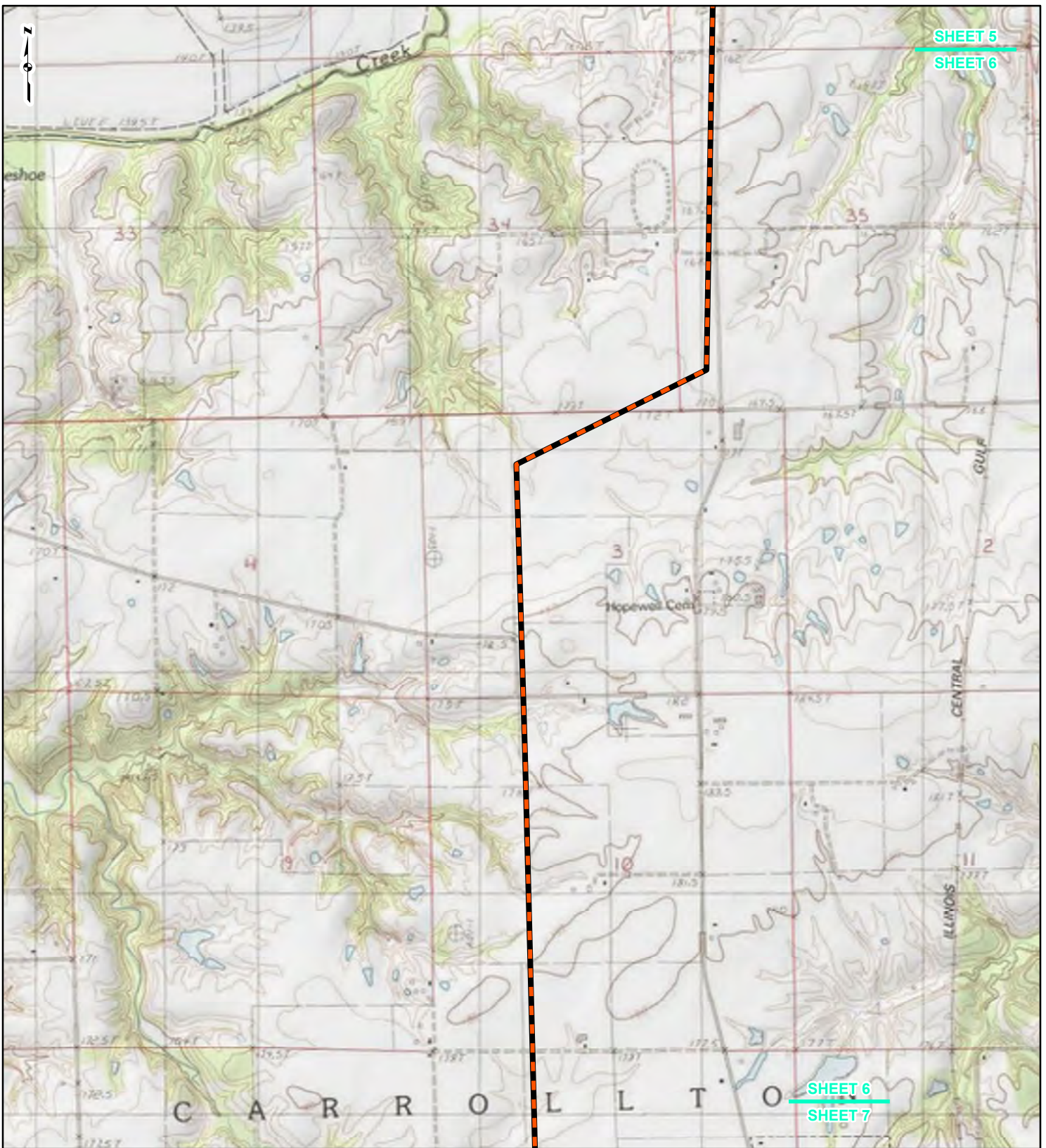
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Feet

FIGURE 1
LOCATION MAP
SHEET 5 OF 21







DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

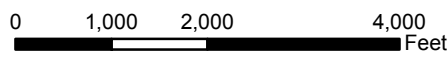
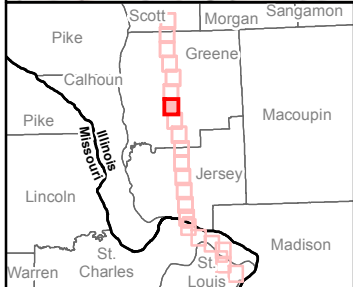
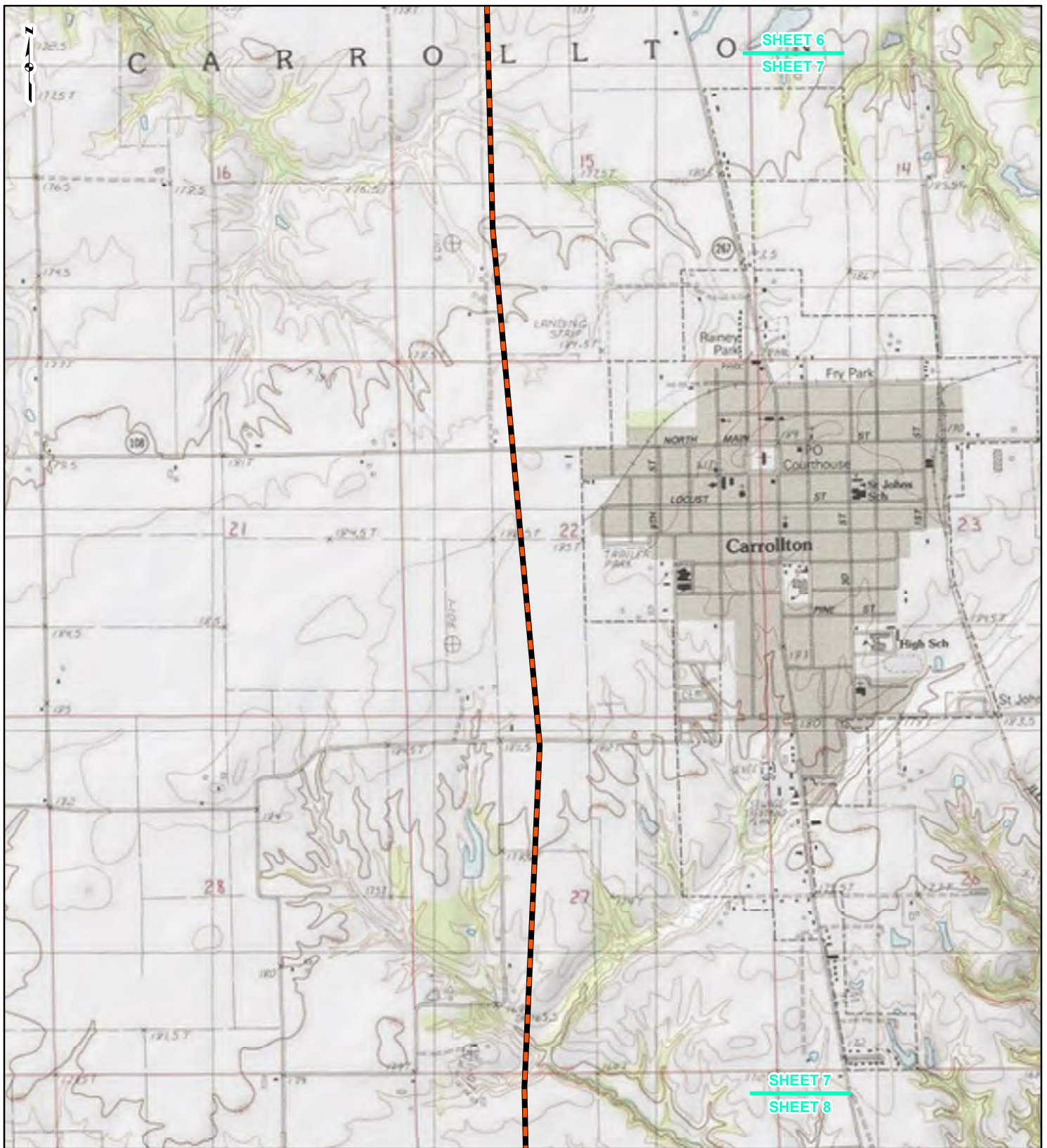


FIGURE 1
LOCATION MAP
SHEET 6 OF 21



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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 7 OF 21

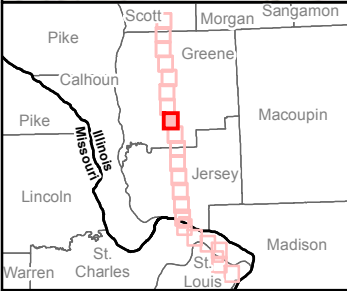
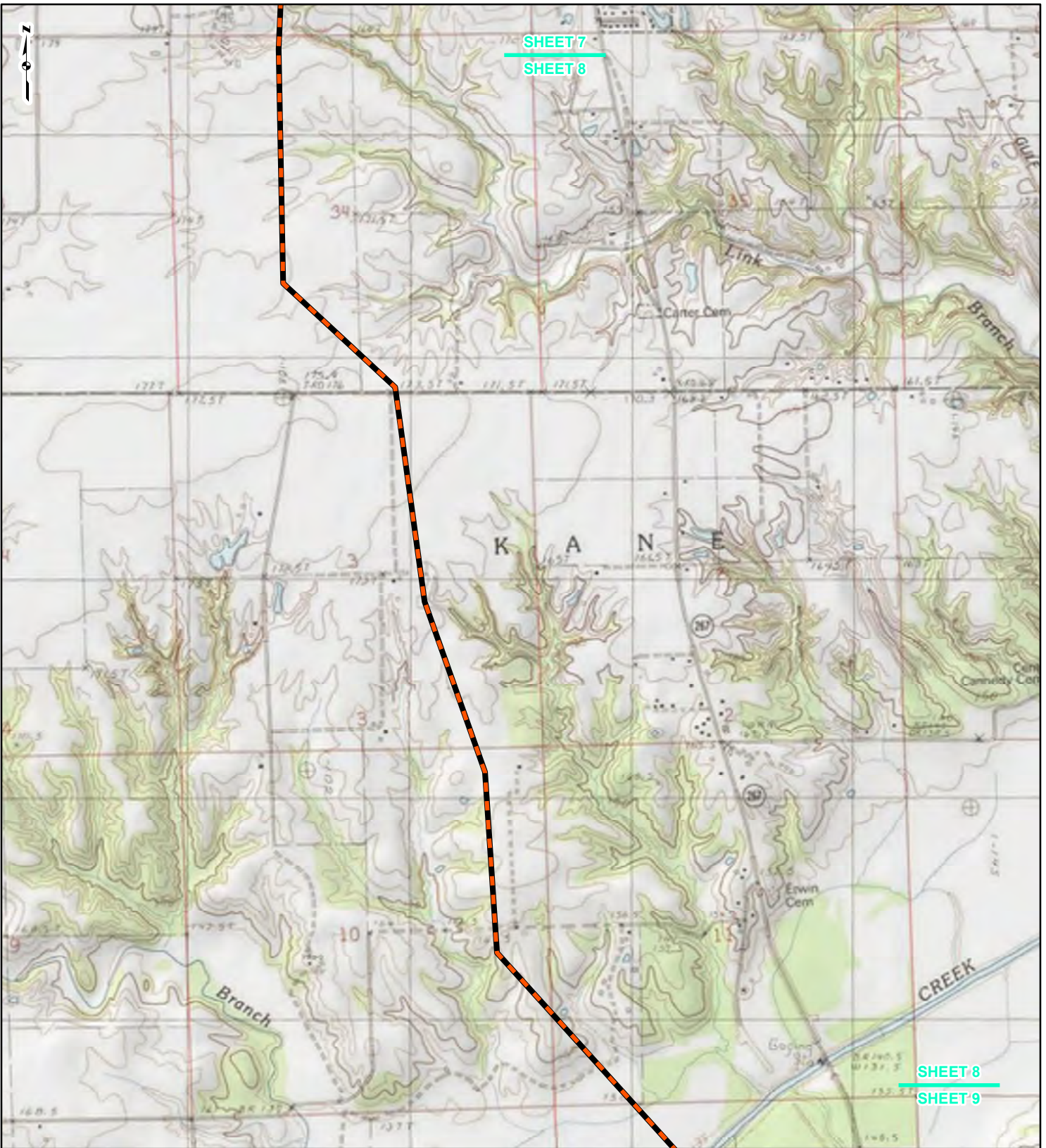
Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.

SHEET 7
SHEET 8

SHEET 8
SHEET 9



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

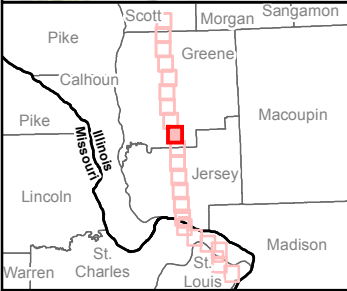
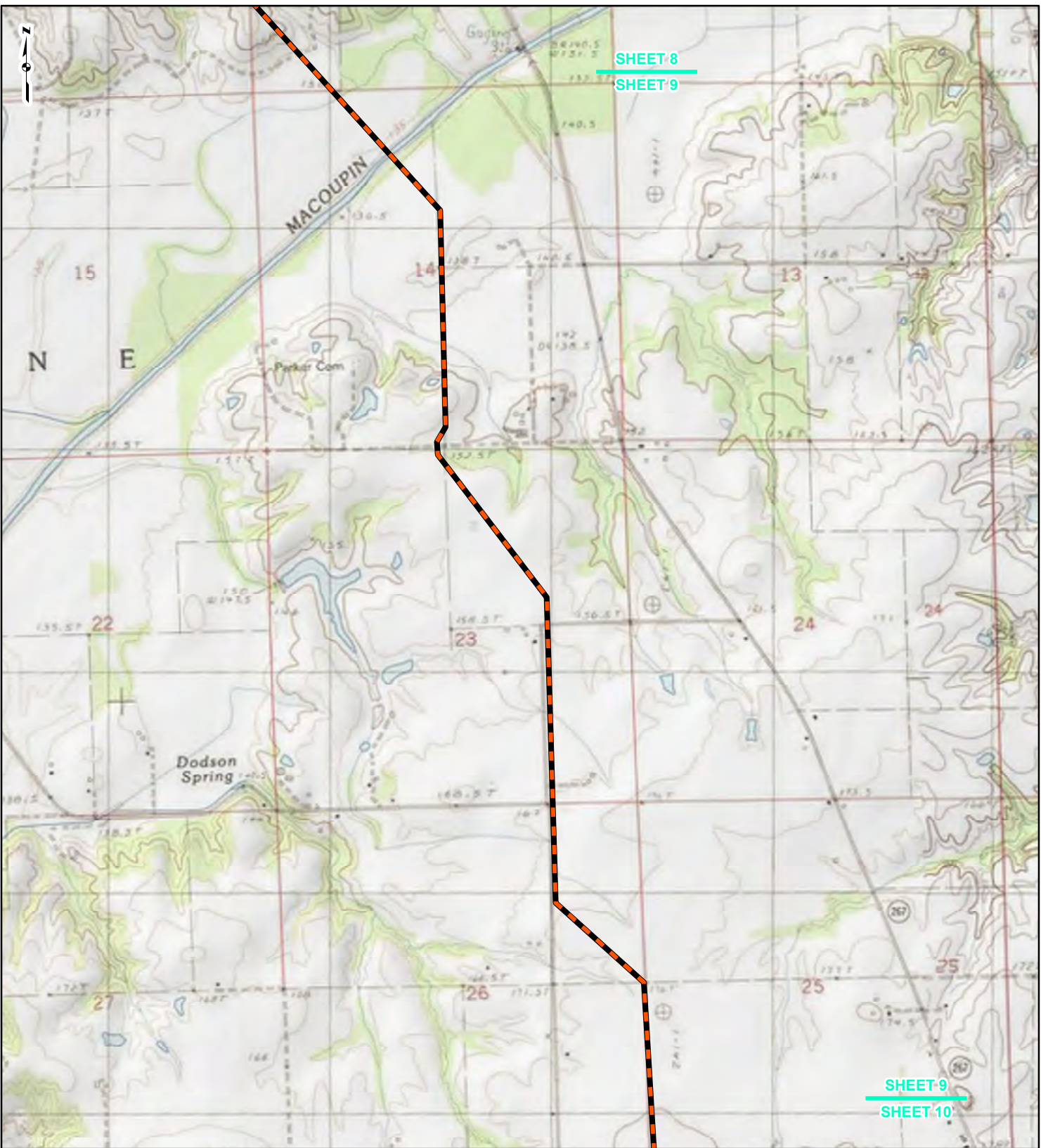
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Feet

FIGURE 1
LOCATION MAP
SHEET 8 OF 21

Spire STL Pipeline

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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

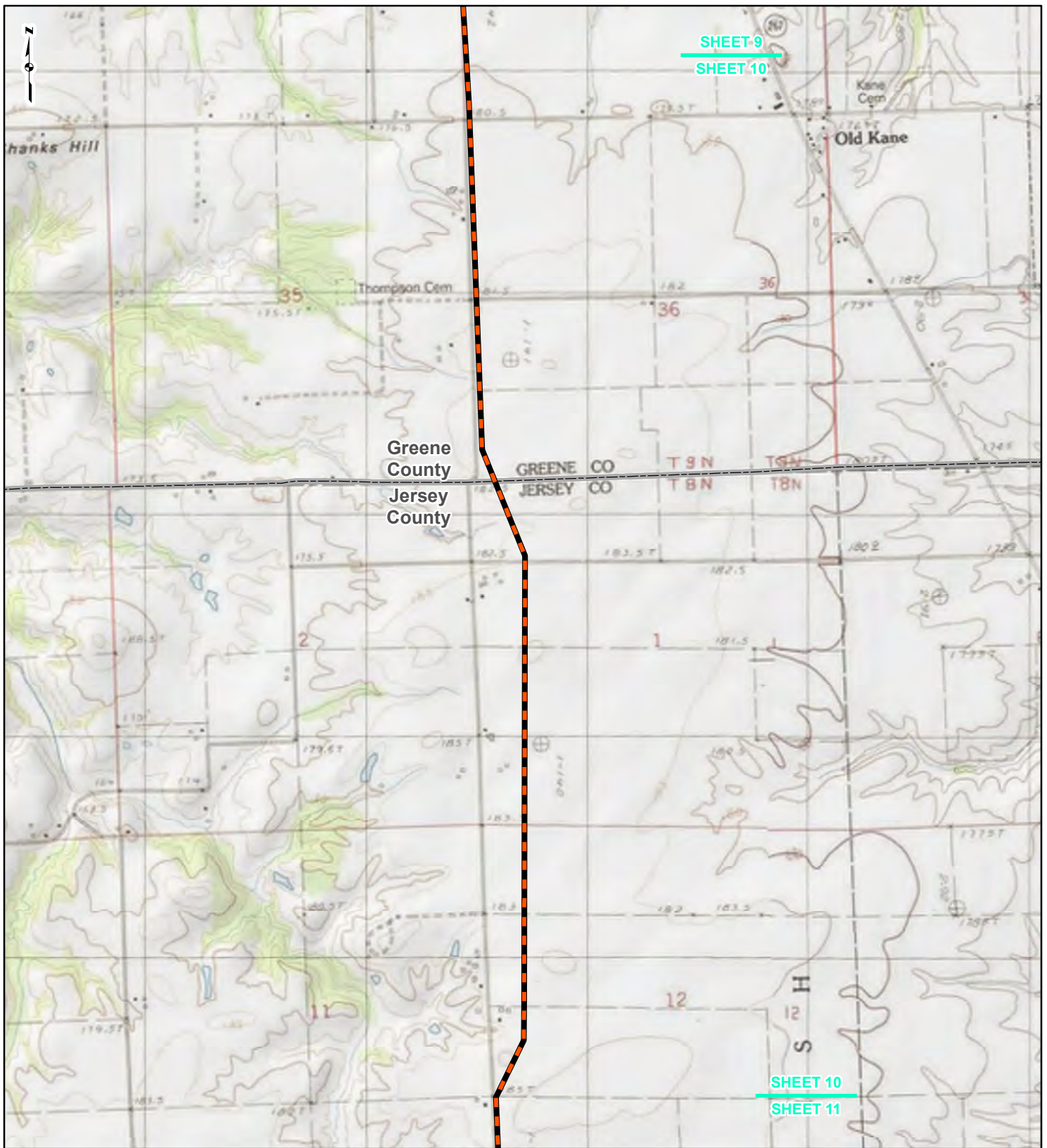
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FIGURE 1
LOCATION MAP
SHEET 9 OF 21



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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.

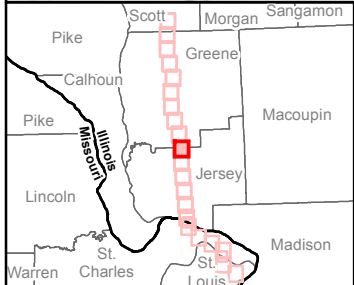


SHEET 9
SHEET 10

SHEET 10
SHEET 11

Greene
County
Jersey
County

GREENE CO T9N T8N
JERSEY CO T8N T7N



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

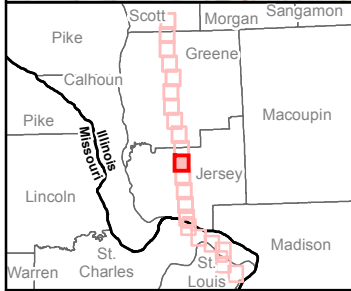
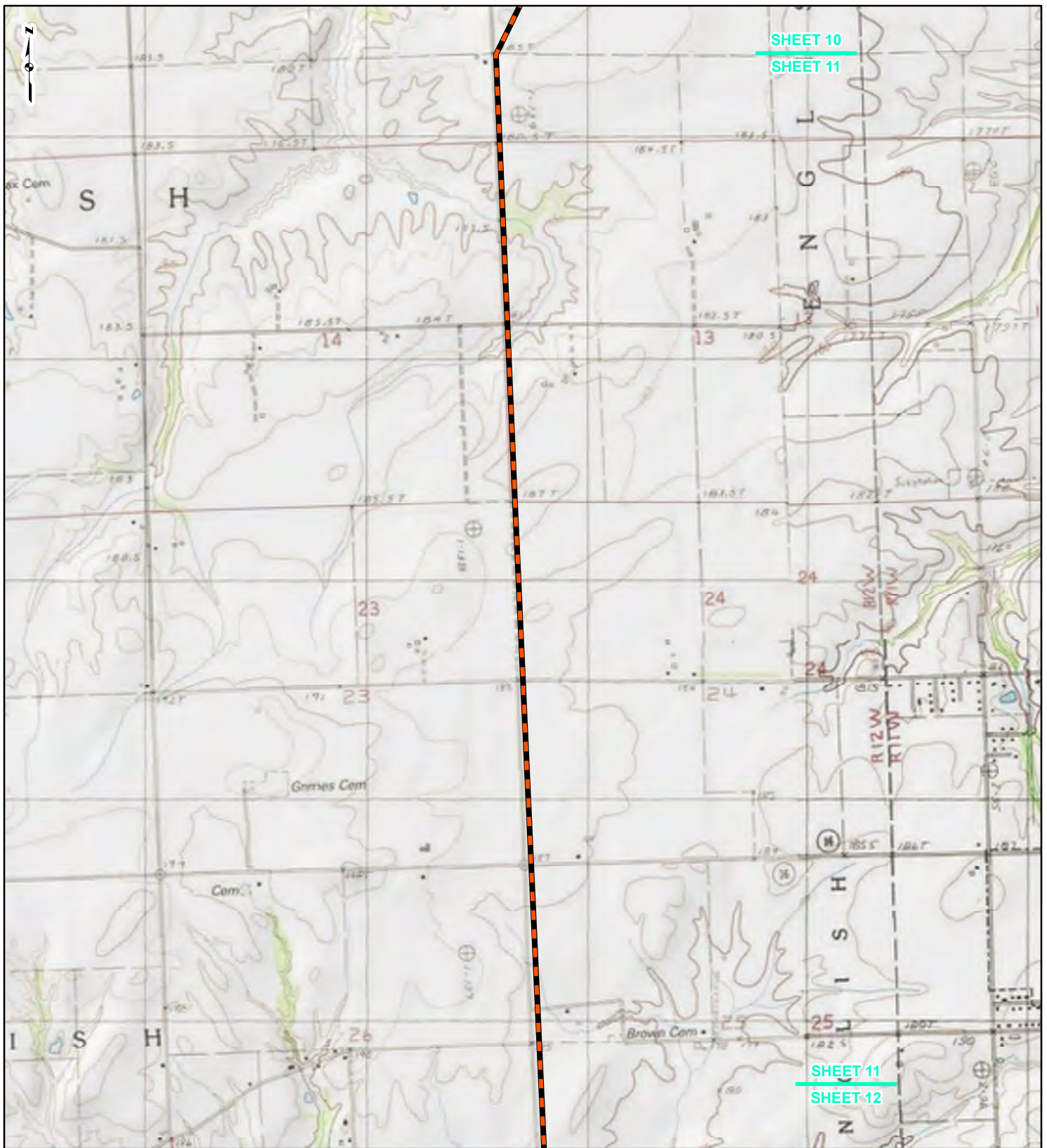
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Feet

FIGURE 1
LOCATION MAP
SHEET 10 OF 21

Spire STL Pipeline

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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

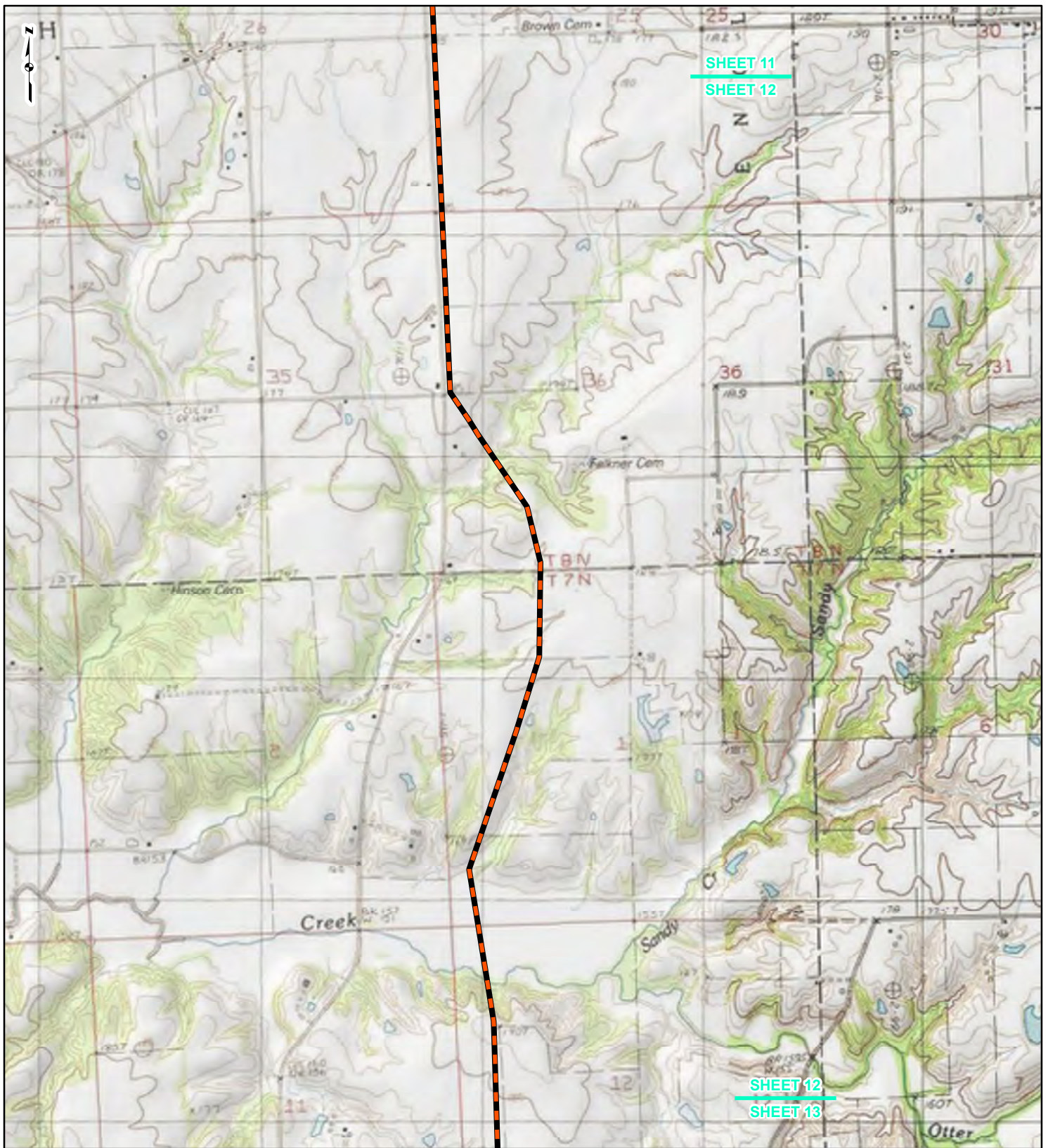
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Feet

FIGURE 1
LOCATION MAP
SHEET 11 OF 21



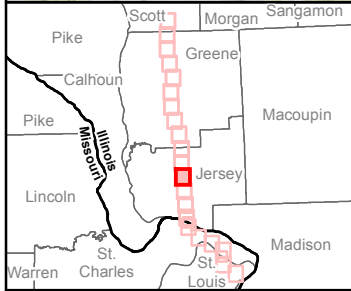
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SHEET 11
SHEET 12

SHEET 12
SHEET 13



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

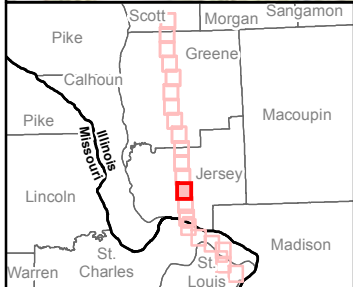
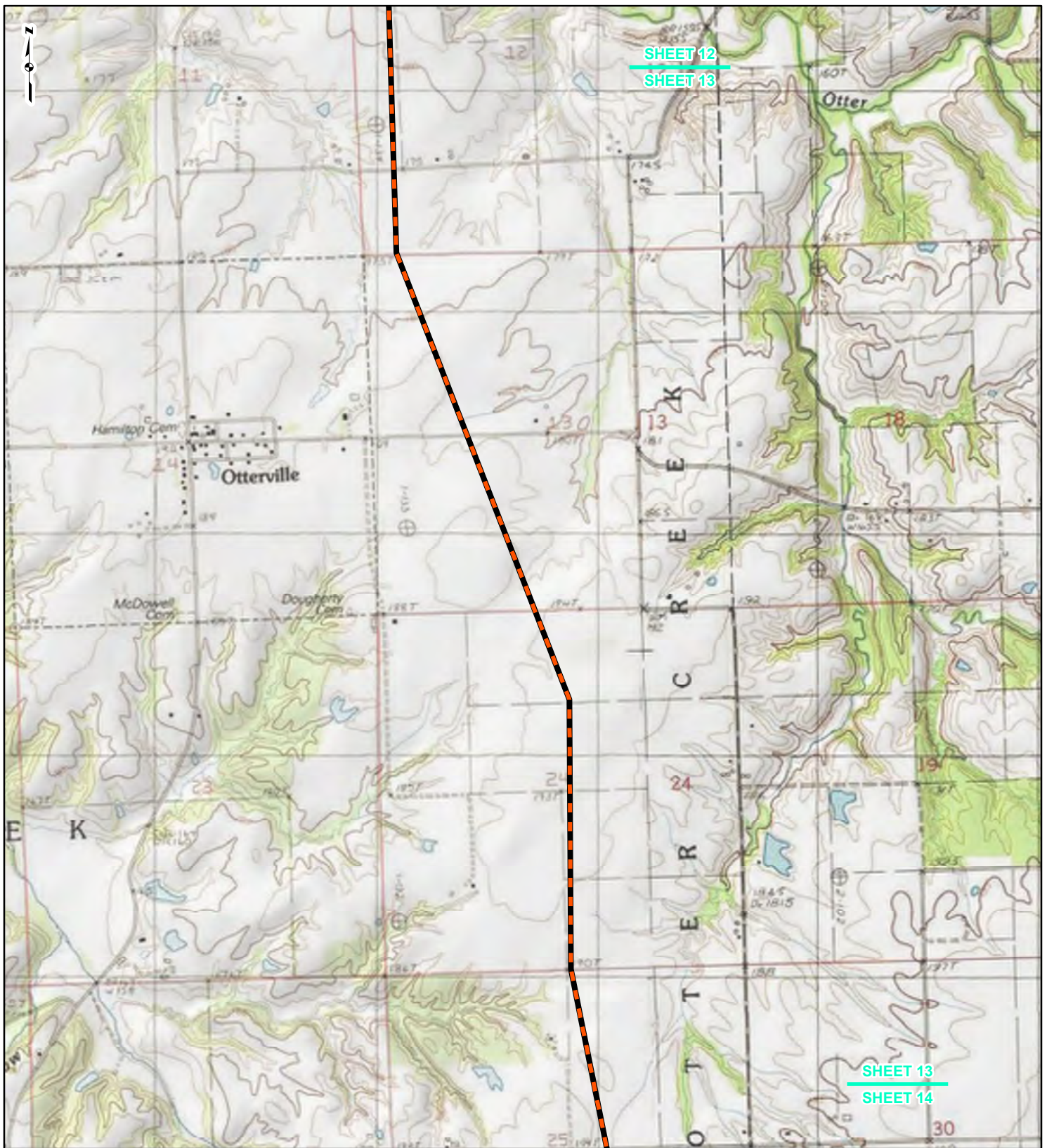
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Feet

FIGURE 1
LOCATION MAP
SHEET 12 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

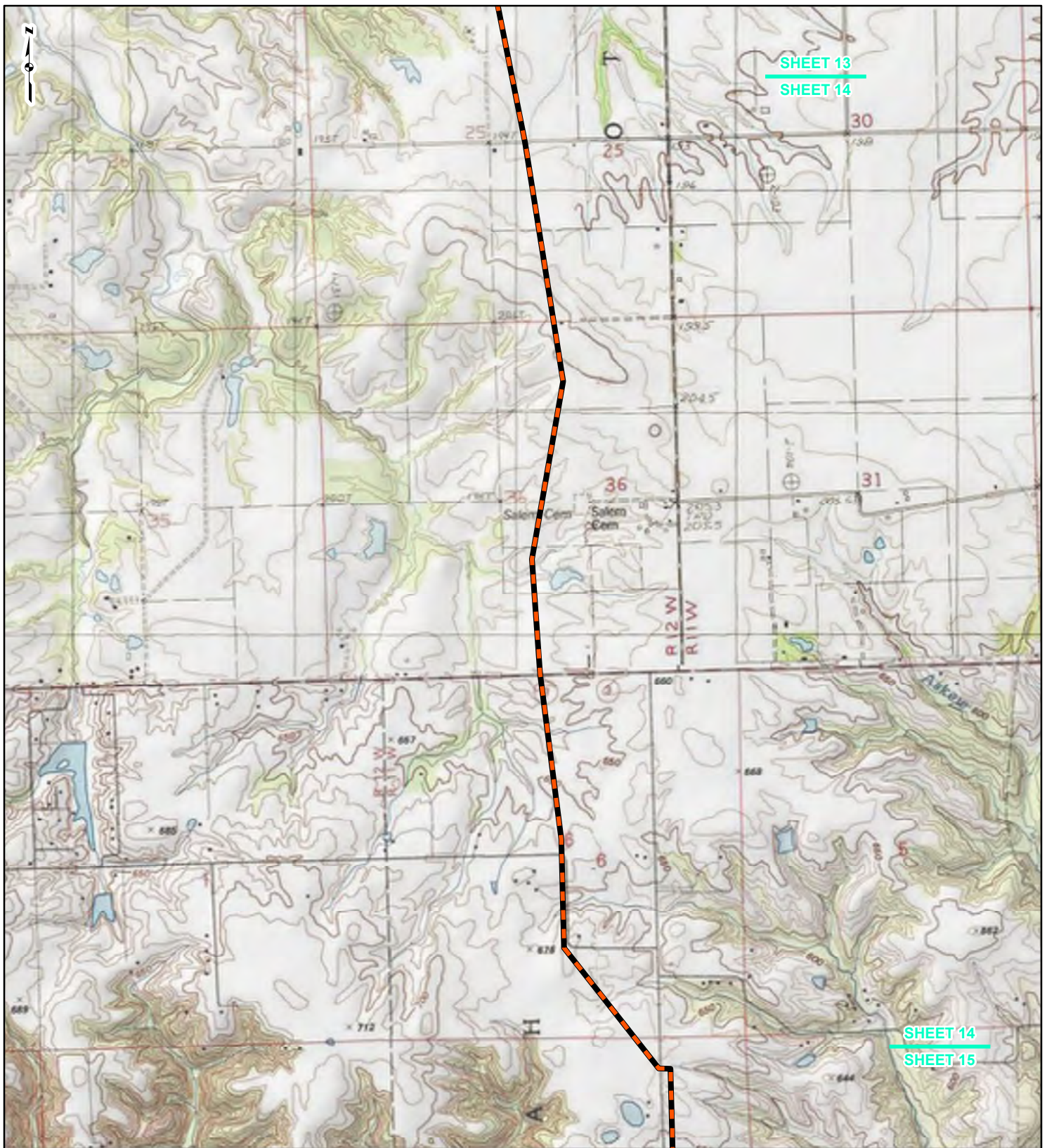
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 13 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

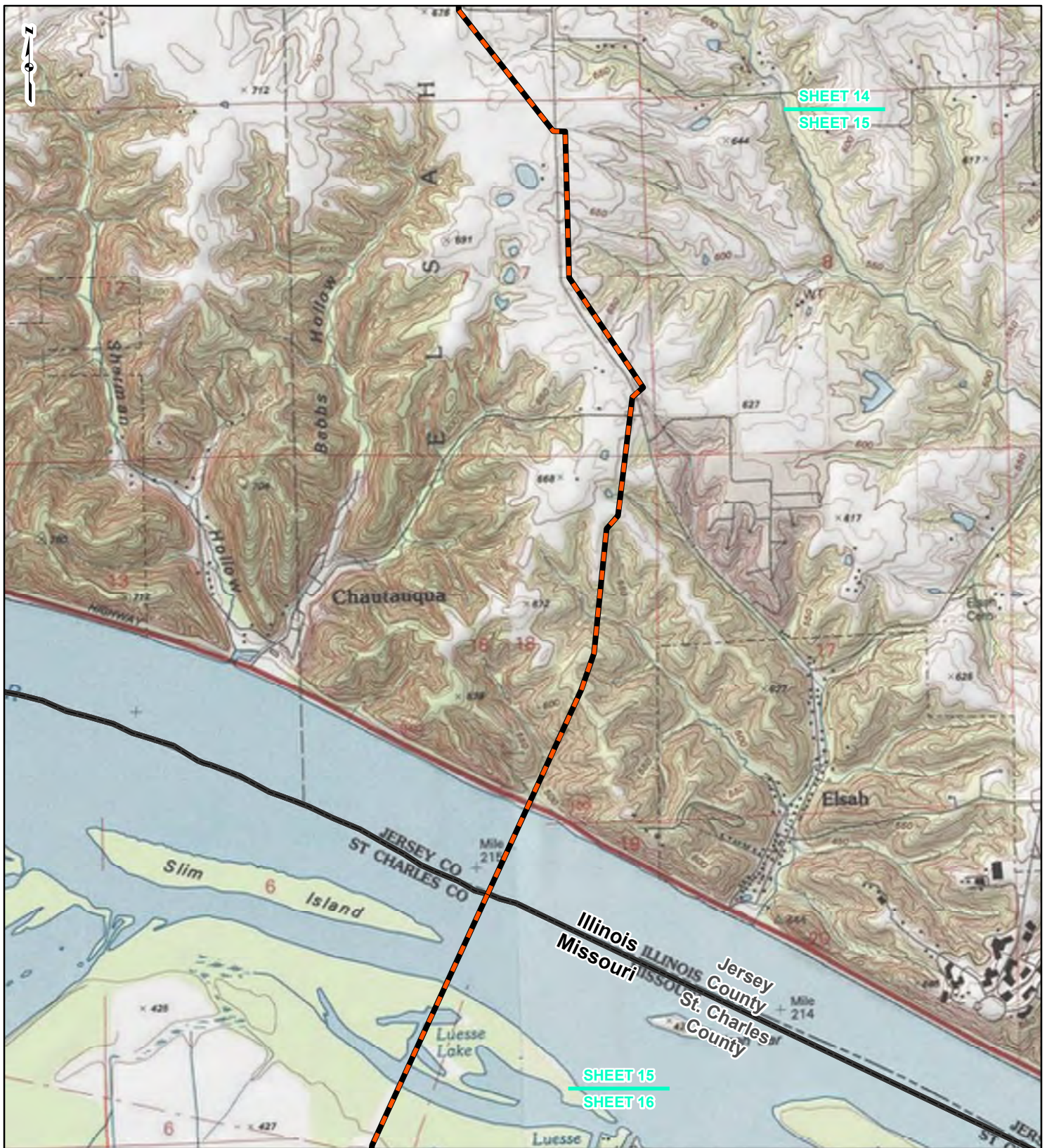
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 14 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 14
SHEET 15

SHEET 15
SHEET 16



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

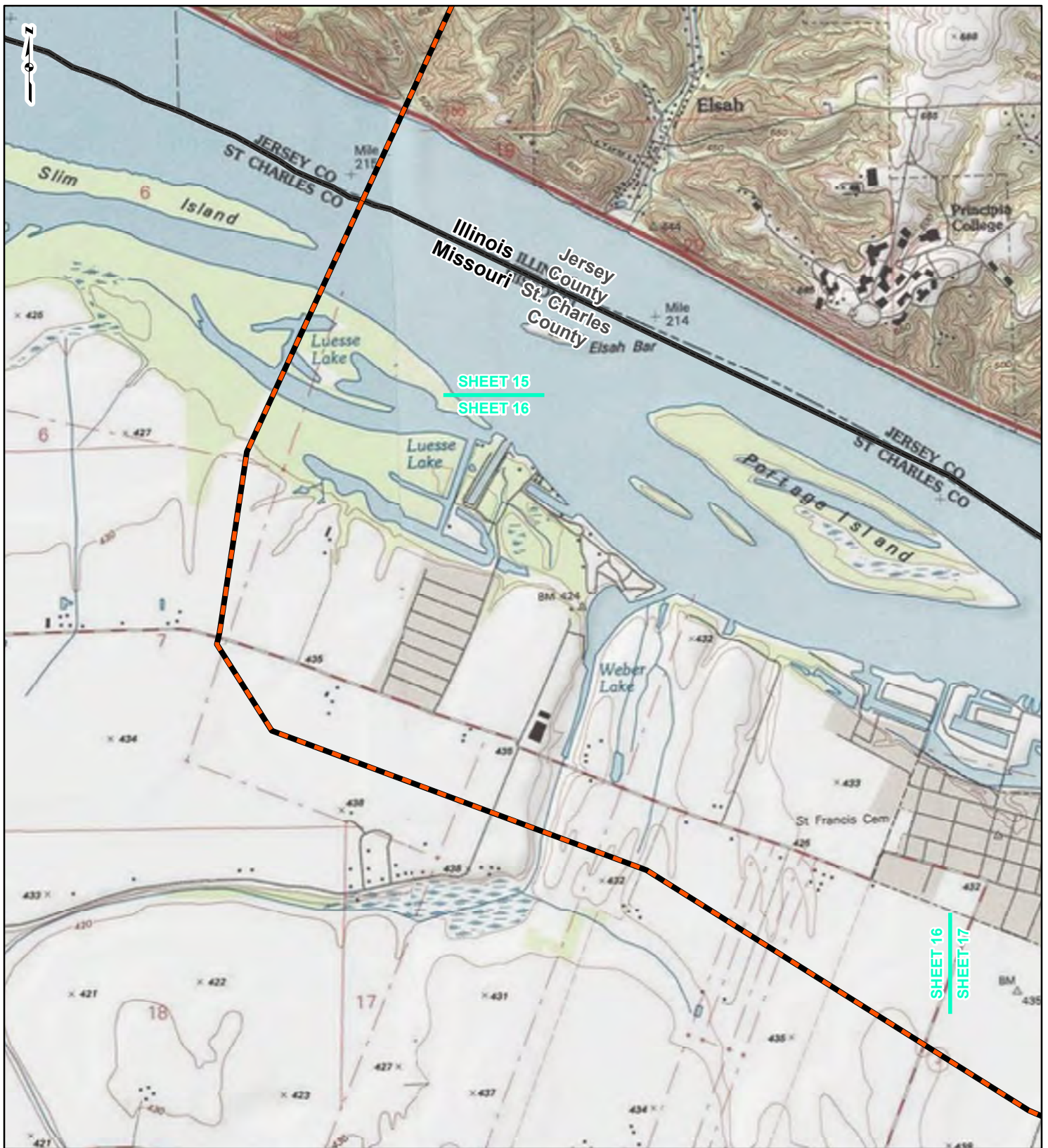
0 1,000 2,000 4,000
Feet

**FIGURE 1
LOCATION MAP
SHEET 15 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983), AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

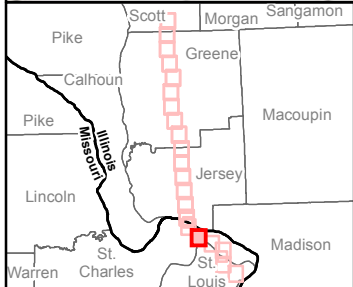
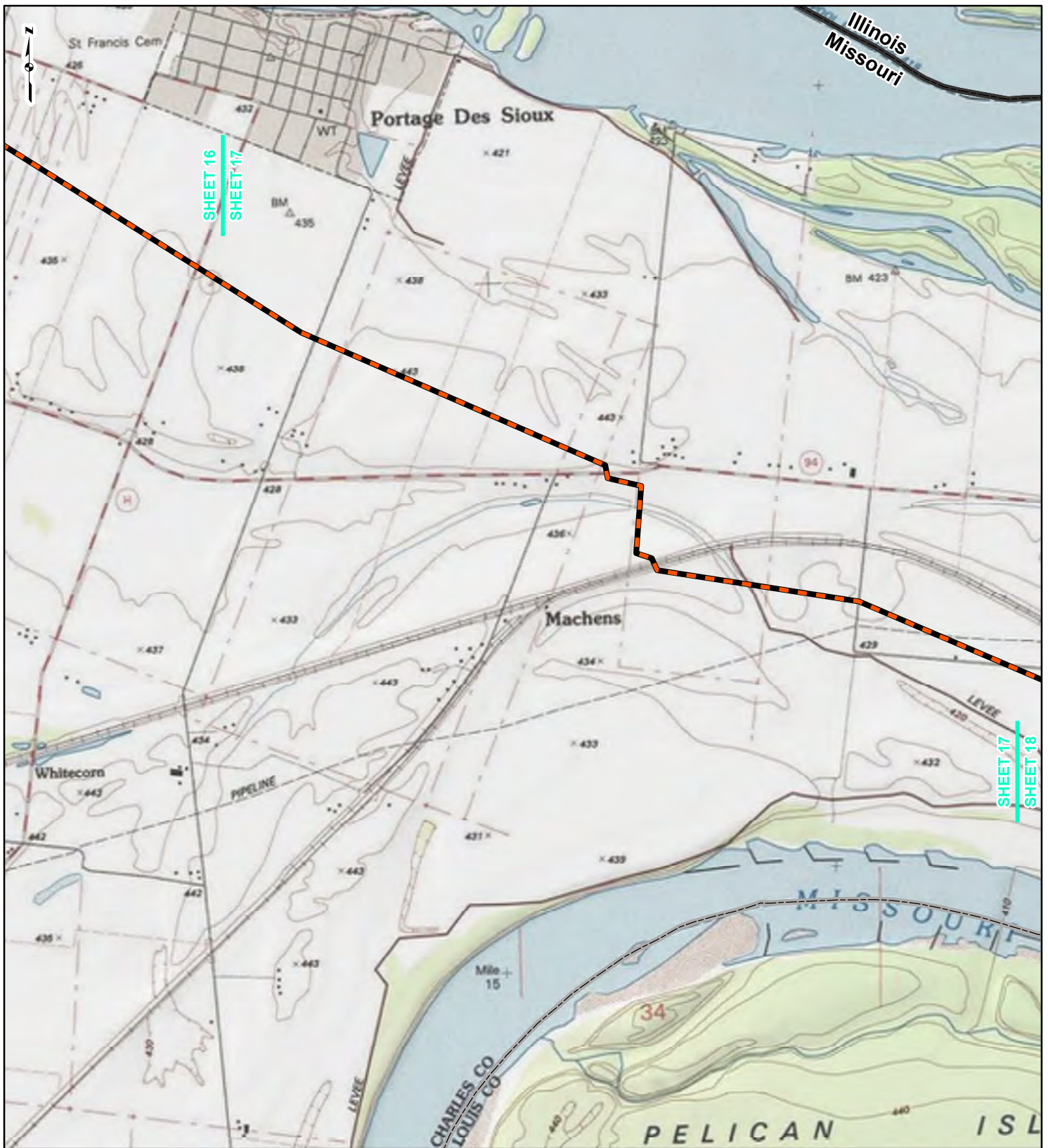
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 16 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

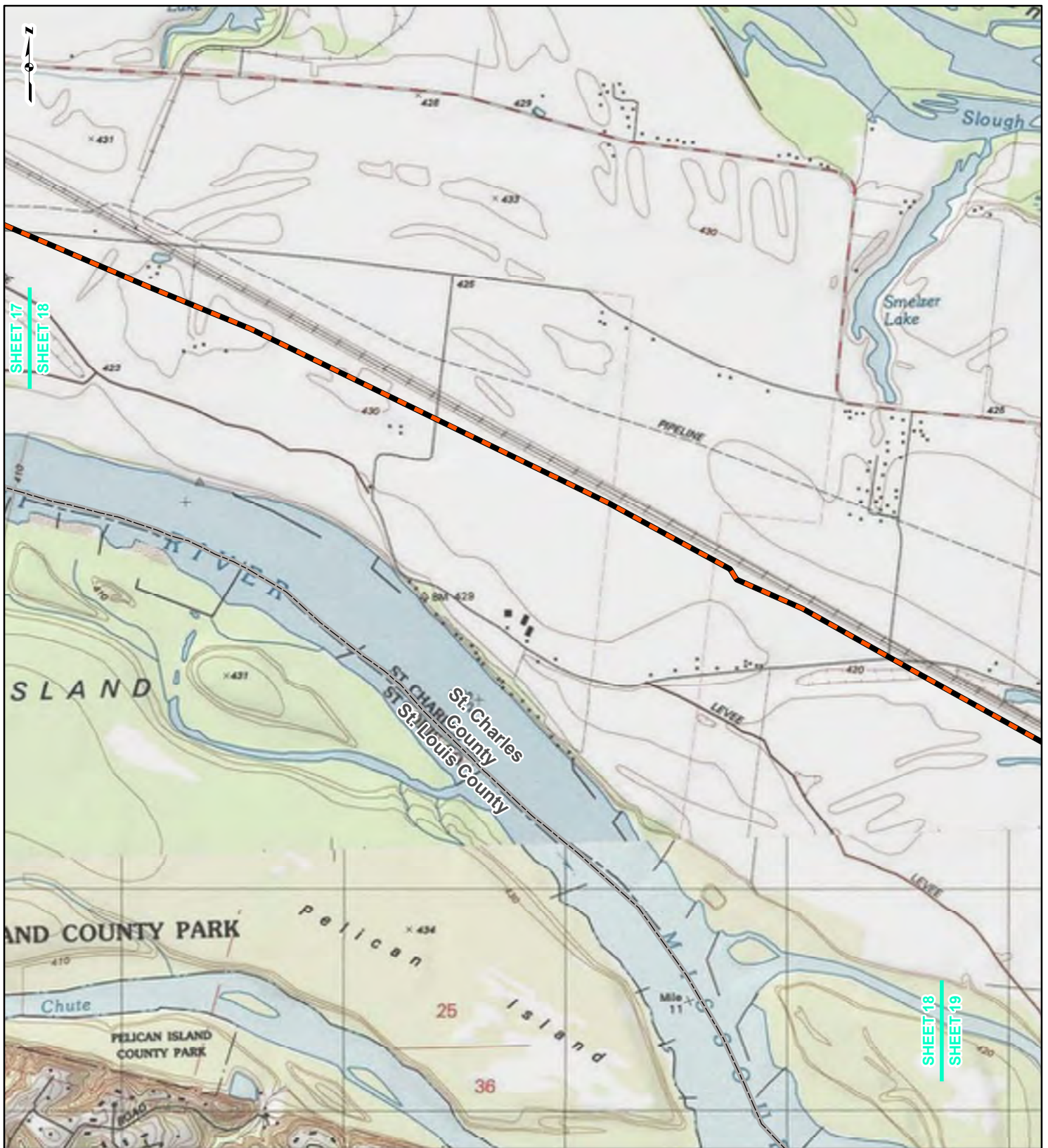
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 17 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

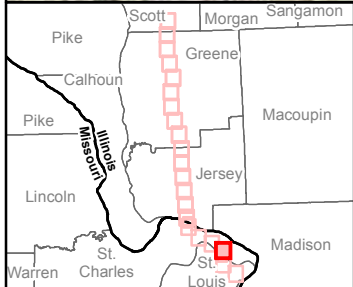
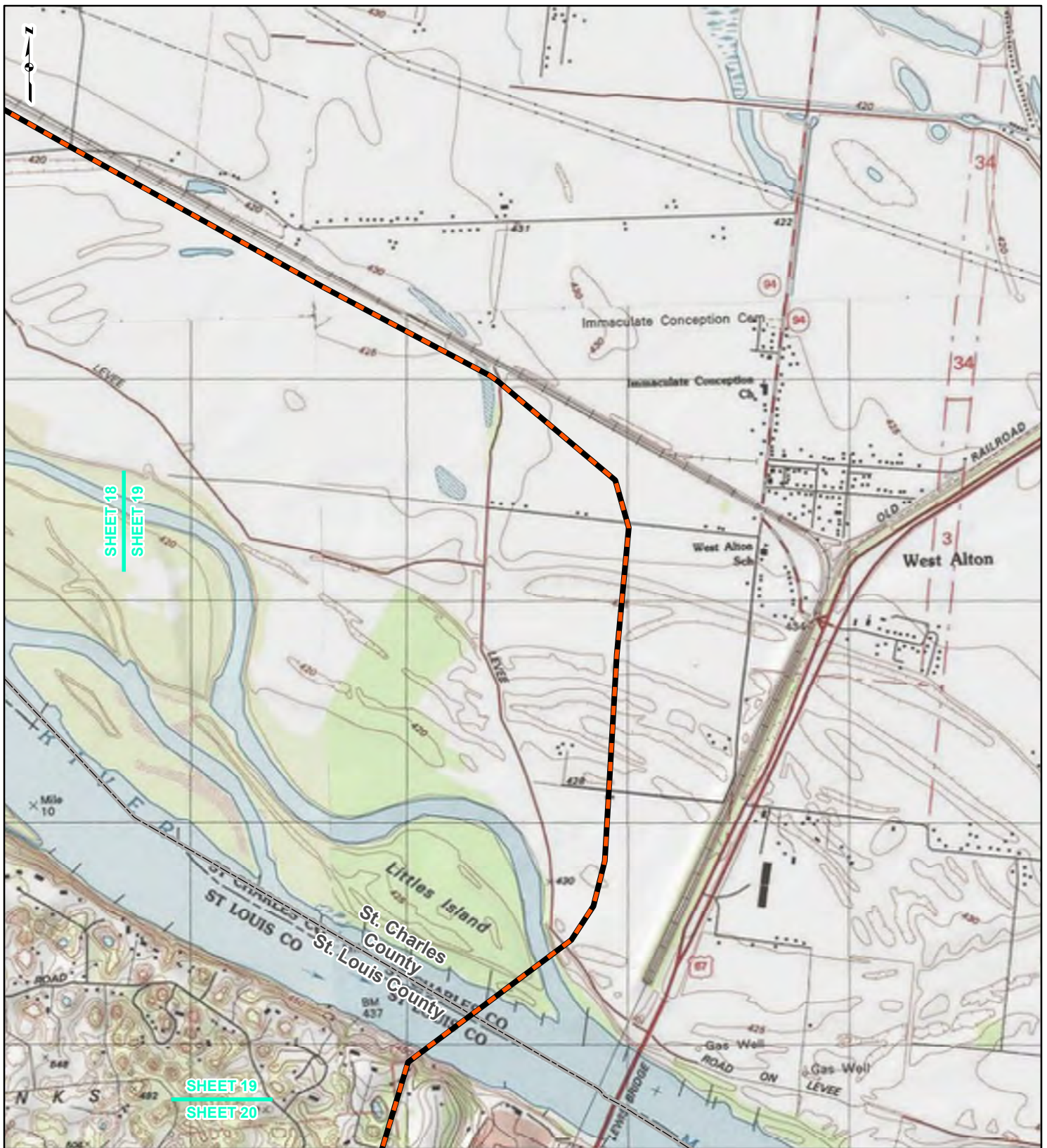
0 1,000 2,000 4,000
Feet

**FIGURE 1
LOCATION MAP
SHEET 18 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

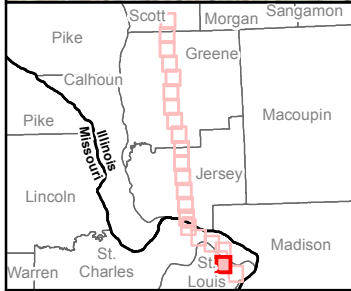
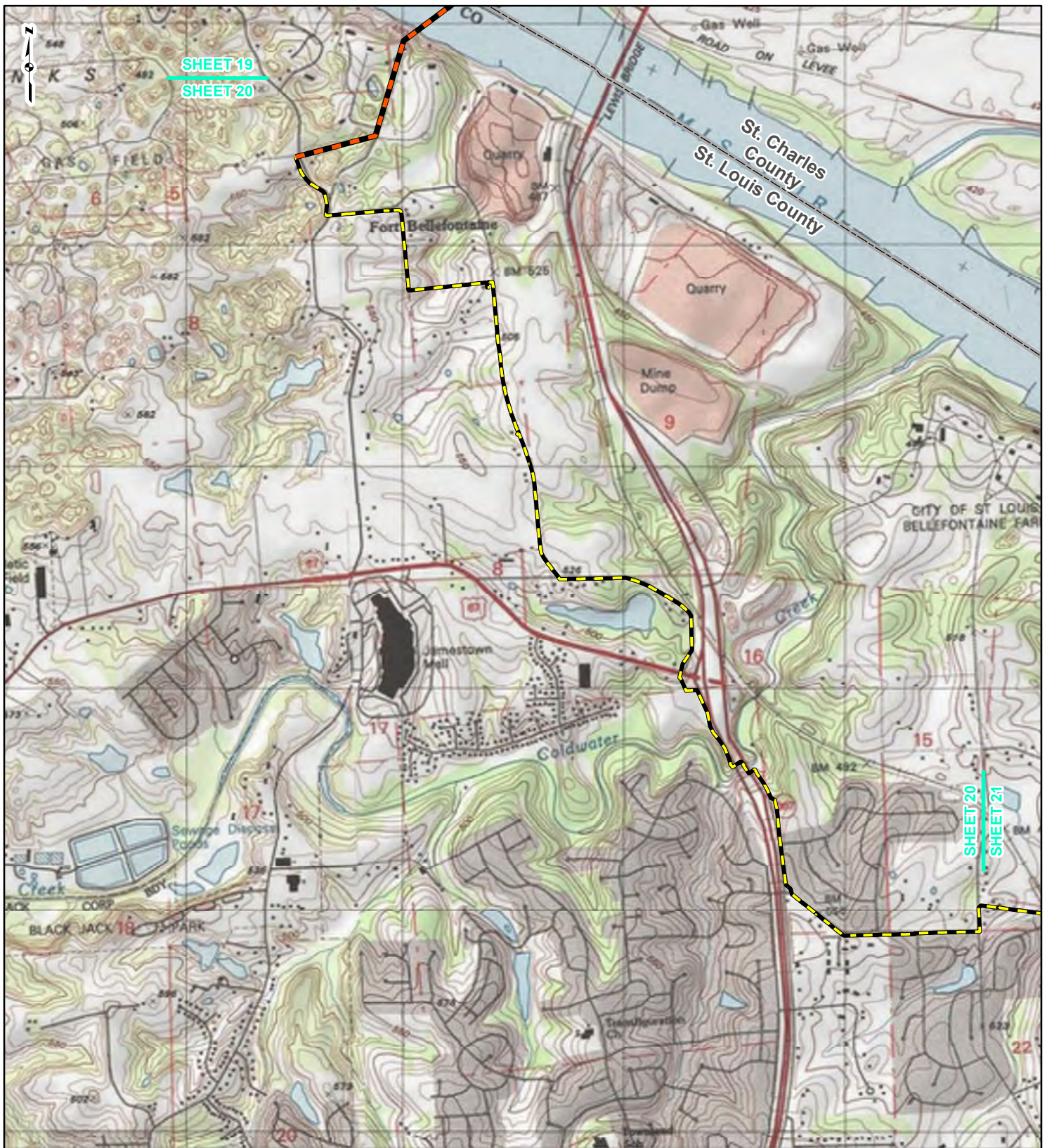
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 19 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

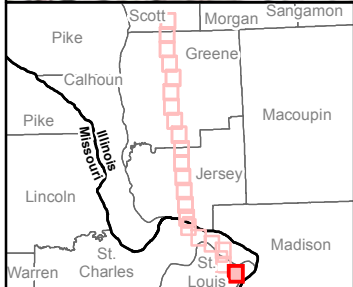
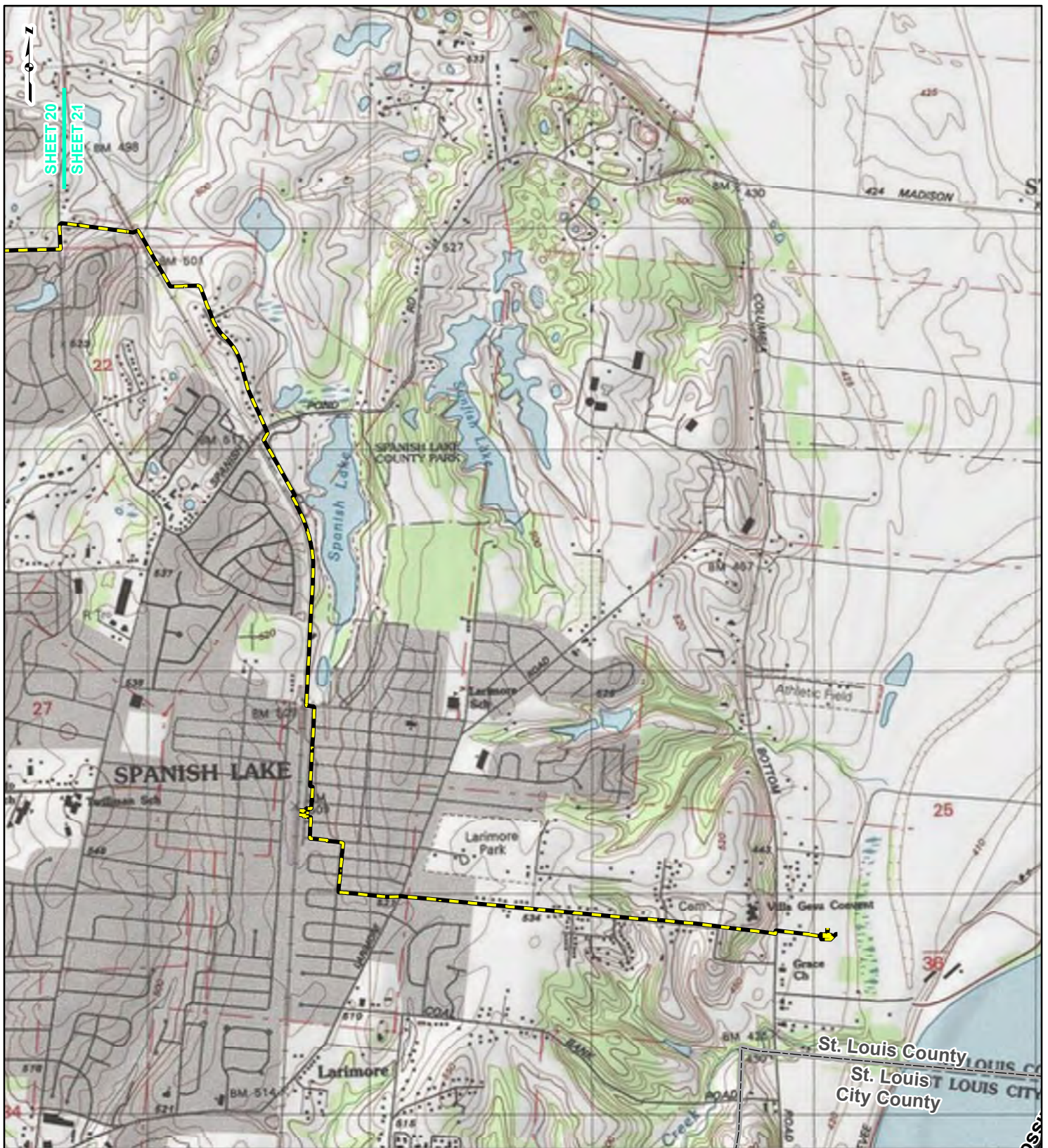
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 20 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 21 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



United States Environmental Protection Agency

Ali Trunzo






From: Lori Ferry
Sent: Thursday, December 29, 2016 10:34 AM
To: laszewski.virgina@epa.gov
Subject: Spire STL Pipeline-IL Agency Meeting Notes
Attachments: 12-13-16 IL Interagency Meeting Minutes Combined.pdf

Virginia,
Hope you had a nice holiday.
I have attached the meeting notes from the Illinois interagency meeting as requested.

Thank you and happy new year!

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 |     
l.ferry@gaiconsultants.com



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telephone log



gai consultants

Date: 11/7/2016

Project / Admin. No.: E160438.00

Call From: Virginia Laszewski

Company: GAI Consultants

Phone No.: 312-886-7501

Call To: Lori Ferry

Company: GAI Consultants

Phone No.: 630-605-5255

Subject: Draft Resource Report Review

cc:

Summary of Discussion, Decisions, and Commitments:

Called Ms. Laszewski to review the draft resource reports that were submitted to FERC on October 28, 2016. The draft resource reports will be reviewed on the FERC/Agency Bi-Weekly call to be held on November 10, 2016, however, Ms. Laszewski will be unable to attend the call.

Ms. Laszewski has not read or reviewed the resource reports (sent via electronic email on November 1 and hardcopies shipped on November 1) so a general overview of each individual report was completed. I went through the Project description and Purpose and Need. Ms. Laszewski had several questions on the Purpose and Need of the Project which will need to be handled separately as Spire (due to confidentiality) is unable to provide her with exact locations of all existing pipeline infrastructure, what the pipelines carry, how old they are and where they deliver to. I did remind Ms. Laszewski that she is able to review this data via the PHMSA website and the Community Assistance and Technical Services (CATS) coordinator for Illinois.

We reviewed all resource reports (1-12) in details. This included a high level discussion of each report. Ms. Laszewski asked questions as necessary and notes were updated so that similar information could be presented at the FERC/Agency call on November 10, 2016.

Ms. Laszewski was particularly interested in the alternative routes and how FERC could approve this project. I reviewed the two major alternatives with her (IL and MO routes) and why our proposed route is anticipated to have less total impact and would not require compressor stations. I have submitted Resource Report 10 to the USEPA via email but they have been unable to receive or download the information. Hardcopies were also sent to their offices on November 1, 2016.

Ms. Laszewski indicated the USEPA would try to get a scoping letter out to FERC during the scoping meeting

but indicated that staff were busy and it may not happen. She is very much interested in the type of information that will be presented in the NEPA document.

Ali Trunzo

From: Lori Ferry
Sent: Friday, November 04, 2016 3:23 PM
To: laszewski.virgina@epa.gov
Cc: Ali Trunzo; Douglas Sipe
Subject: Spire STL Pipeline-Follow-Up
Attachments: 10-28-16 Spire STL_DRAFT RR10_Alternatives_PUBLIC.PDF

Hi Virginia

I left you a voicemail in your office today but just wanted to follow back up with you to make sure you've received our electronic files of our recent filing with FERC.

Your voicemail indicated you were specifically looking for alternatives mapping. I have included Spire's Resource Report 10 as part of this email. This report specifically discusses the alternatives that have been considered on the Project, as well as other minor alterations and deviations. Hopefully this provides you the information you were seeking.

I also understand that you will be unable to attend next week's call regarding the Resource Report discussion. I will follow up with you next week to give you a high level summary of the reports separately.

Any questions, please let me know.

Thank you and have a good weekend.

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 |     

l.ferry@gaiconsultants.com

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but indicated that staff were busy and it may not happen. She is very much interested in the type of information that will be presented in the NEPA document.

GAI Consultants, Inc.

Chicago Office
 1444 Farnsworth Avenue, Suite 303
 Aurora, IL 60505
 T 313.301.2002
www.gaiconsultants.com

Letter of Transmittal

TRANSMITTAL NO.	T006
DATE:	11/1/2016
PROJECT NO.	E160438.00, Task 003

**United States Environmental Protection Agency
 Region 5
 77 West Jackson Boulevard
 Chicago, Illinois 60604
 Attention: Ms. Virginia Laszewski**

PROJECT TITLE:
**Spire STL Pipeline Project
 Spire STL Pipeline LLC
 Scott, Greene, and Jersey Counties, Illinois
 and St. Charles and St. Louis Counties, Missouri**

SUBJECT:
**PF16-9-000
 Federal Energy Regulatory Commission
 Draft Environmental Report**

WE ARE SENDING YOU: Paper Documents & Electronic Files
VIA: Next Day Delivery
PURPOSE: For Your Use

COMMENTS:

ATTACHMENTS:

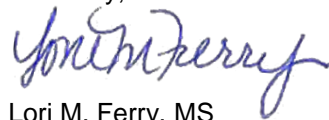
Quantity	Document No.	Rev.	Document Date	Document Description/Title	Status*
2 CDs	-	-	October 2016	Draft Environmental Report	-
1	-	-	October 2016	Draft Environmental Report Volume I (1 of 2) - Public Information	-
1	-	-	October 2016	Draft Environmental Report Volume I (2 of 2) - Public Information	-
1	-	-	October 2016	Rolled Set of Drawings	-

*Status Codes for Submittal Package Reviews: NE=No Exceptions; EN=Exceptions Noted; RR=Revise & Resubmit; RJ=Rejected

DISTRIBUTION:

Name	Company	Transmittal (Y/N)	Attachments (Y/N)
Mr. Scott Jaskowiak	Spire Inc.	Y	N
Mr. David Yonce	Spire Inc.	Y	N
Mr. Russell English	Spire Inc.	Y	N

Sincerely,



Lori M. Ferry, MS
 Environmental Manager

GAI Consultants, Inc.

Chicago Office
 1444 Farnsworth Avenue, Suite 303
 Aurora, IL 60505
 T 313.301.2002
www.gaiconsultants.com

Letter of Transmittal

TRANSMITTAL NO.	T007
DATE:	11/1/2016
PROJECT NO.	E160438.00. Task 003

United States Environmental Protection Agency
Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219
Attention: Mr. Joe Summerlin

PROJECT TITLE:
Spire STL Pipeline Project
Spire STL Pipeline LLC
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

SUBJECT:
PF16-9-000
Federal Energy Regulatory Commission
Draft Environmental Report

WE ARE SENDING YOU: Electronic Files
VIA: Next Day Delivery
PURPOSE: For Your Use

COMMENTS:

ATTACHMENTS:

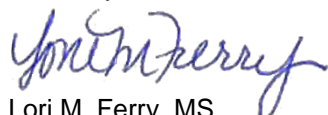
Quantity	Document No.	Rev.	Document Date	Document Description/Title	Status*
1 CD	-	-	October 2016	Draft Environmental Report	-

*Status Codes for Submittal Package Reviews: NE=No Exceptions; EN=Exceptions Noted; RR=Revise & Resubmit; RJ=Rejected

DISTRIBUTION:

Name	Company	Transmittal (Y/N)	Attachments (Y/N)
Mr. Scott Jaskowiak	Spire Inc.	Y	N
Mr. David Yonce	Spire Inc.	Y	N
Mr. Russell English	Spire Inc.	Y	N

Sincerely,



Lori M. Ferry, MS
 Environmental Manager

Ali Trunzo

From: Lori Ferry
Sent: Wednesday, October 12, 2016 1:03 PM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline-Mapping

From: Lori Ferry
Sent: Wednesday, October 12, 2016 12:02 PM
To: 'laszewski.virgina@epa.gov' <laszewski.virgina@epa.gov>
Cc: Douglas Sipe <dsipe@mdmcorp.com>
Subject: Spire STL Pipeline-Mapping

Hi Virginia

As a follow-up to your request a couple weeks back asking for information on the location of existing pipelines in the area of the Spire STL Pipeline Project, we are unable to provide this information to you as the information we have on existing pipelines was purchased through a third party. We are able to provide you with updated mapping of the Project areas and will do so at the end of the month with our filing of our draft environmental report to FERC. However, if you are looking for information on existing pipelines, operators, substances etc. I am told you are able to obtain this information from PHMSA and the Community Assistance and Technical Services (CATS) coordinator for Illinois.

<https://primis.phmsa.dot.gov/comm/CATS.htm>

Please let if you should have any questions.

Thanks,
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 |     

l.ferry@gaiconsultants.com

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Ali Trunzo

From: Laszewski, Virginia <Laszewski.Virginia@epa.gov>
Sent: Thursday, October 06, 2016 11:44 AM
To: Ali Trunzo
Cc: Moses, Althea; Summerlin, Joe; Freeman, Tamara; Laszewski, Virginia; Totten, Arthur; Cox, Sandra
Subject: FW: promising practice for EJ and NEPA - resending to GAI

Ali, See below email and attachment . . . I had typed in a wrong email address for you initially. Virginia

From: Laszewski, Virginia
Sent: Thursday, October 06, 2016 10:41 AM
To: a.tunzo@gaiconsultants.com; Moses, Althea <Moses.Althea@epa.gov>; Summerlin, Joe <summerlin.joe@epa.gov>; Freeman, Tamara <Freeman.Tamara@epa.gov>; Laszewski, Virginia <Laszewski.Virginia@epa.gov>
Cc: Totten, Arthur <Totten.Arthur@epa.gov>; Cox, Sandra <Cox.Sandra@epa.gov>
Subject: promising practice for EJ and NEPA

Hi Everyone, As I promised during today's conference call with EPA Region 7, Region 5 and GAI consultant for Spire . . . here is the link to the "*Promising Practises for EJ Methodologies in NEPA Reviews*" document.

https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

telephone log



gai consultants

Date: 10/6/2016

Project / Admin. No.: E160438.00

Call From: Ali Trunzo

Company: GAI Consultants

Phone No.: 412-399-5096

Call To: Althea Moses, Joe Summerlin, Tamara Freeman, Virginia Laszewski, Elizabeth Poole

Company: EPA Region 5 and EPA Region 7

Phone No.: Conference Call

Subject: Environmental Justice

cc:

Summary of Discussion, Decisions, and Commitments:

Provided an overview of the proposed Project.

EPA encourages use of the EJ Screen online tool to identify potential environmental justice communities. Using tool to look at demographics not just percentages, ID any concerns associated with linguistically isolated populations, education disparity, age disparity.

Recommend using minority news outlet such as St. Louis American in addition to the St. Louis Post Dispatch. There are some hot issues in St. Louis County, and public concerns may bleed over. There is a lot of concern for the West Lake Landfill, which is distant enough from the proposed Project, as well as Coldwater Creek contamination. Spire is coordinating with the USACE regarding Coldwater Creek.

Though there are no Native American tribes in area, there are a number of known historical sites in St Louis area. EPA suggests having awareness of sacred site, attentive to potential resources. Spire is providing information to tribes and is conducting review for cultural resources.

For an environmental justice analysis, the CEQ guidelines and a publication by the federal interagency working group will be helpful (Promising Practices for NEPA analysis). EPA will forward a copy of this publication. This will provide guidance on establishing a review area.

EPA will review more detailed maps when available and provide further recommendations as appropriate. Spire is documenting all stakeholder outreach and correspondence.

Ali Trunzo

From: Moses, Althea <Moses.Althea@epa.gov>
Sent: Thursday, October 06, 2016 12:37 PM
To: Freeman, Tamara; Singletary, DeAndre; Totten, Arthur; Poole, Elizabeth; Laszewski, Virginia; Summerlin, Joe
Cc: Ali Trunzo
Subject: Additional Spire Pipeline information
Attachments: Spire STL_Project Location in Missouri_2016_10_03.pdf; Spire STL_Project Overview_2016_10_03.pdf; Spire STL_Project Location in Illinois_2016_10_03.pdf

Please see additional information from Ali regarding Spire pipeline.

Please let me know if you have questions or concerns.

Thanks,

Althea M. Moses
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219
ph: 913-551-7649
fax: 913-551-9649
e-mail: moses.althea@epa.gov

Ali Trunzo

From: Ali Trunzo
Sent: Tuesday, October 04, 2016 9:37 AM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline Project
Attachments: Spire STL_Project Location in Missouri_2016_10_03.pdf; Spire STL_Project Overview_2016_10_03.pdf; Spire STL_Project Location in Illinois_2016_10_03.pdf

From: Ali Trunzo
Sent: Tuesday, October 04, 2016 9:36 AM
To: 'Moses.Althea@epa.gov' <Moses.Althea@epa.gov>
Subject: Spire STL Pipeline Project

Althea,

Please see the attached overview map and USGS figures showing the tentative route for the Spire STL Pipeline Project. The Project spans EPA Regions 5 and 7.

Please feel free to forward the mapping to your counterpart in Region 5 in advance of our call to discuss any concerns regarding Environmental Justice areas. Do you have a conference call number or would you like me to set one up?

Thank you,


Ali

Alessandra M. Trunzo
Senior Environmental Specialist

GAI Consultants
385 East Waterfront Drive, Homestead, PA 15120-5005

Direct 412.399.5096 | **Office** 412.476.2000 | a.trunzo@gaiconsultants.com | gaiconsultants.com     

* Please update your records with my new direct telephone number

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telephone log



gai consultants

Date: 9/30/2016

Project / Admin. No.: E160438.00

Call From: Ali Trunzo

Company: GAI Consultants

Phone No.: 412-399-5096

Call To: Althea Moses

Company: EPA Region 5

Phone No.: 913-551-7649

Subject: Environmental Justice

cc:

Summary of Discussion, Decisions, and Commitments:

Called Ms. Moses to introduce the Project and discuss Environmental Justice areas or concerns in the Project area. Ms. Moses will set up a call with herself and her EPA Region 7 counterpart for Tuesday, October 4 at 1:30pm to discuss in detail.

Ms. Moses requested a Project Location Map including coordinates before the call.

telephone log



gai consultants

Date: 9/16/2016

Project / Admin. No.: E160438.00

Call From: Lori Ferry

Company: GAI Consultants

Phone No.: 630-605-5255

Call To: Joe Summerlin

Company: EPA Region 7

Phone No.: 913-551-7029

Subject: Project Information and Follow-up

cc:

Summary of Discussion, Decisions, and Commitments:

Called Mr. Summerlin to follow-up with her regarding the Project and insure that the Spire team was keeping him informed. Mr. Summerlin indicated he had any information he needed so far and provided the Spire team with an internal EPA contact who may be able to help provide environmental justice areas near the Project. Mr. Summerlin also indicated that we should also be aware of the public's interest in contamination issues with Coldwater Creek and the West Lake Landfill.

telephone log



gai consultants

Date: 9/16/2016

Project / Admin. No.: E160438.00

Call From: Lori Ferry

Company: GAI Consultants

Phone No.: 630-605-5255

Call To: Virginia Laszewski

Company: EPA Region 5

Phone No.: 312-886-7501

Subject: Project Information and Followup

cc:

Summary of Discussion, Decisions, and Commitments:

Called Ms. Laszewski to follow-up with her regarding the Project and insure that the Spire team was keeping her informed. Ms. Laszewski provided a list of the information that she would like to see included in the NEPA document. This information included:

- Air-construction/operation impacts, greenhouse gas, methane, cumulative impacts from greenhouse gas
- Environmental justice
- Noise
- Threatened and endangered species
- Disturbance to trees and mitigation for trees
- Water intakes
- Farmland loss
- Tribal communications
- Cultural coordination and cultural sites
- Alternatives analysis
- Revegetation plan and the potential for the Project to include or need to include pollinator friendly species

The EPA may submit a comment during the NEPA scoping period on what they want as well, if they have time. Ms. Laszewski also asked if Spire could provide a map of existing pipelines in the area (who owns them, how big they are, where they start/end, what product they are carrying) and the Project route.

EPA Region 5 would also request 1 hardcopy and 2 CD's of the Project application.



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Robert Kaplan
Acting Regional Administrator United States Environmental Protection Agency - Region 5
77 W. Jackson Blvd
Chicago, IL 60604

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Kaplan,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

Included with this letter, for your information, is a general overview map of the proposed pipeline route and a diagram illustrating the FERC process.

We believe that we can create a better project by hearing from you and listening to your feedback. That's why we are hosting open houses this month so you can learn more about the project and we can learn more about you.

At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

Spire STL Pipeline open house schedule

Tuesday August 16, 2016 5 p.m. – 7:30 p.m.	Wednesday August 17, 2016 5 p.m. – 7:30 p.m.	Thursday August 18, 2016 5 p.m.– 7:30 p.m.	Tuesday August 23, 2016 5 p.m.– 7:30 p.m.	Wednesday August 24, 2016 5 p.m. – 7:30 p.m.
Scott County, Illinois	Jersey County, Illinois	St. Louis County, Missouri	St. Charles County, Missouri	Greene County, Illinois
Scott County Fairgrounds 401 North Walnut Winchester, IL 62694	Jerseyville Recreation Center 401 Mound Street Jerseyville, IL 62052	Hazelwood Civic Center East 8969 Dunn Road Hazelwood, MO 63042	American Legion Post 312 2500 Raymond Drive St Charles, MO 63301	Knights of Columbus Hall U.S. HWY 67 Carrollton, IL 62016

Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,

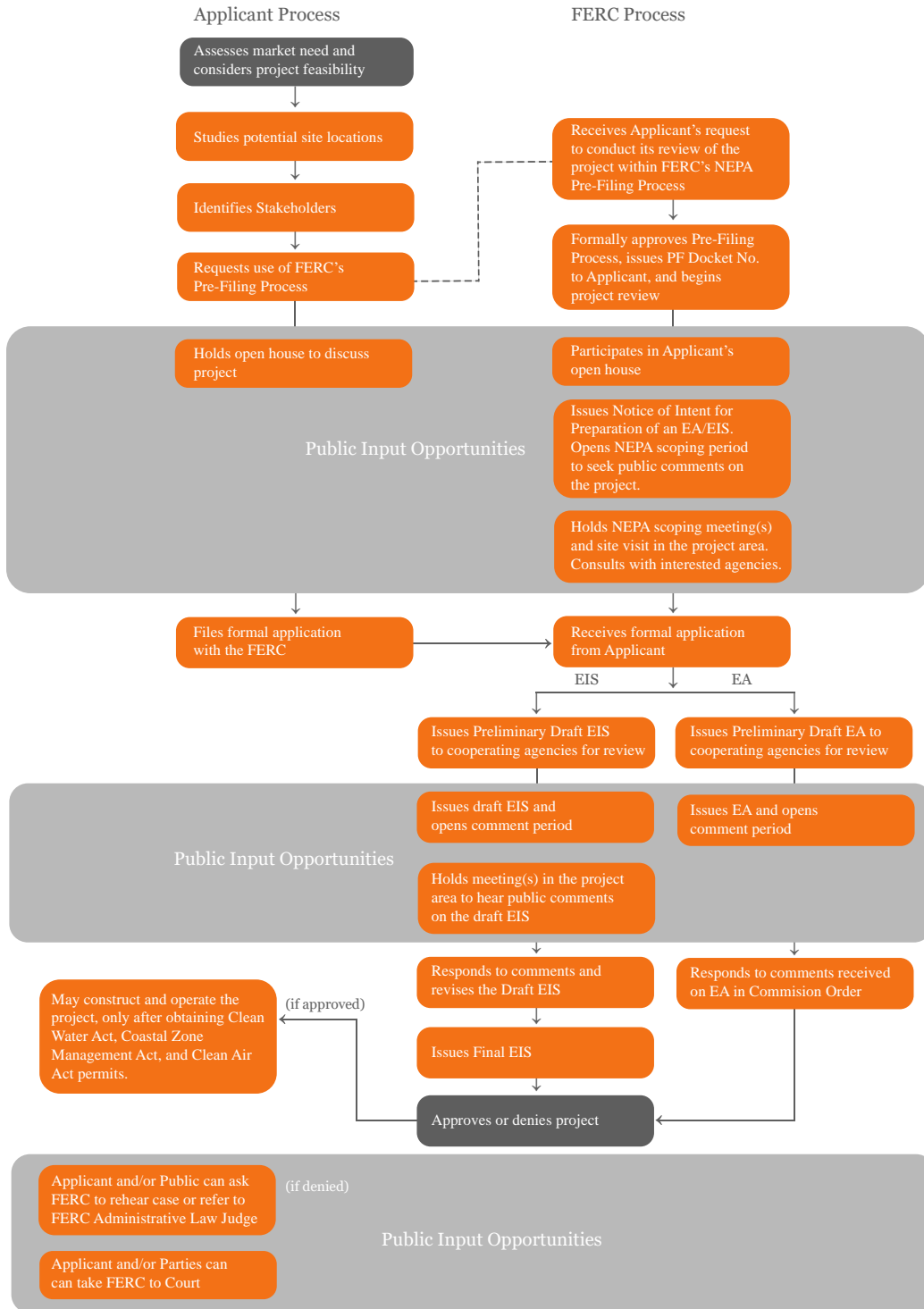


Scott Jaskowiak
Vice President
Spire STL Pipeline LLC

Project Map



FERC Pre-Filing Process





Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Mark Hague
Regional Administrator United States Environmental Protection Agency - Region 7
11201 Renner Blvd
Lenexa, KS 66219

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Hague,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

Included with this letter, for your information, is a general overview map of the proposed pipeline route and a diagram illustrating the FERC process.

We believe that we can create a better project by hearing from you and listening to your feedback. That's why we are hosting open houses this month so you can learn more about the project and we can learn more about you.

At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

Spire STL Pipeline open house schedule

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Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



July 29, 2016

Mr. Robert Kaplan
Acting Regional Administrator
United States Environmental
Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Kaplan:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Environmental Protection Agency - Region 5 to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

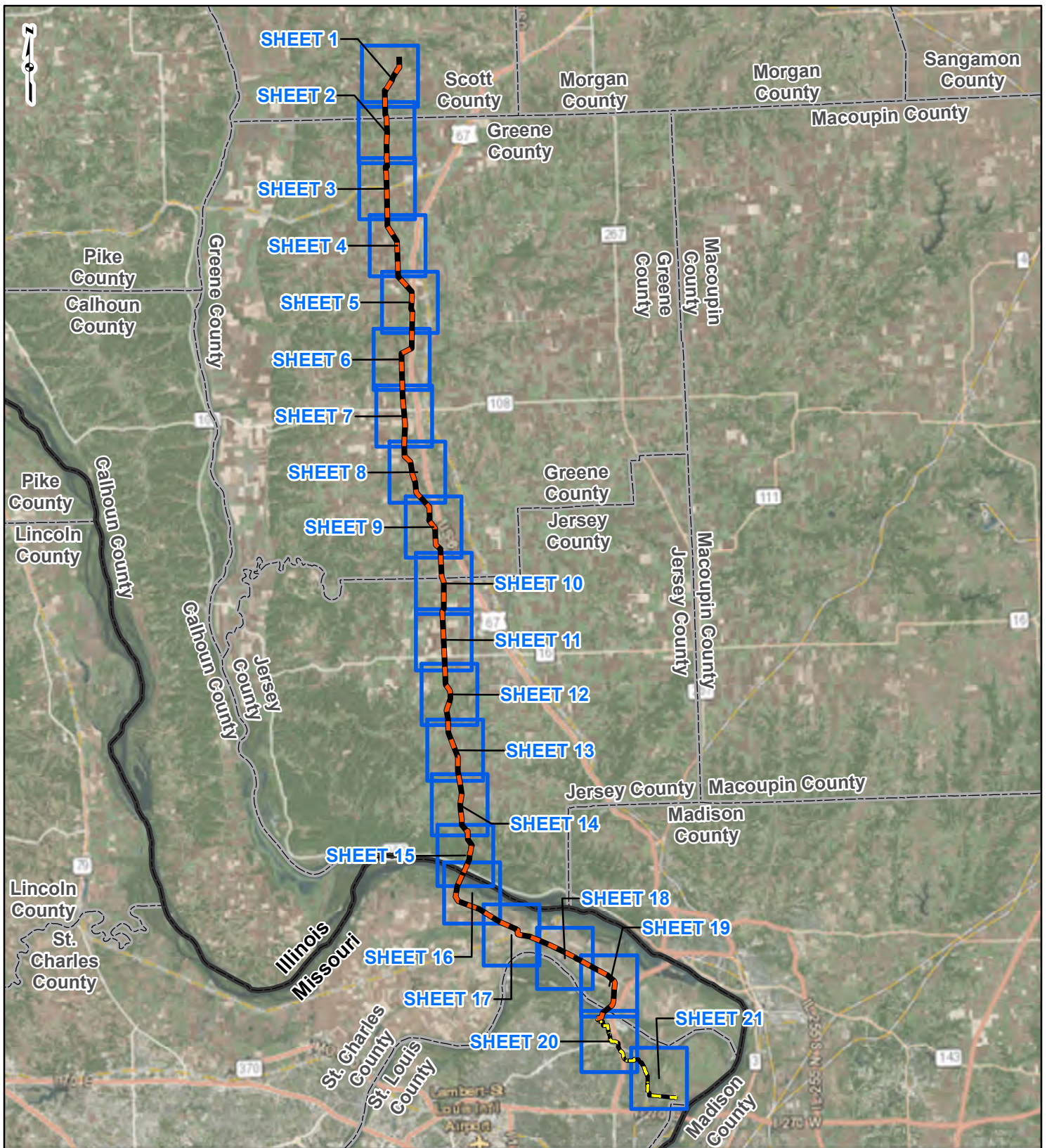
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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

ATTACHMENT
USGS TOPOGRAPHIC MAP (FIGURE 1)



PROJECT LOCATION



SCOTT, GREENE
AND JERSEY
COUNTIES, ILLINOIS
AND ST. CHARLES AND
ST. LOUIS COUNTIES, MISSOURI

LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY
- SHEET INDEX



**FIGURE 1
LOCATION MAP
SHEET INDEX**



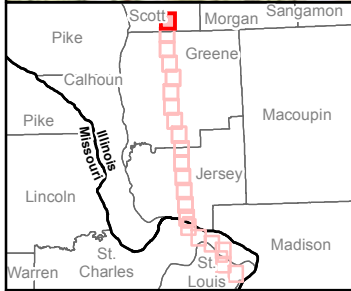
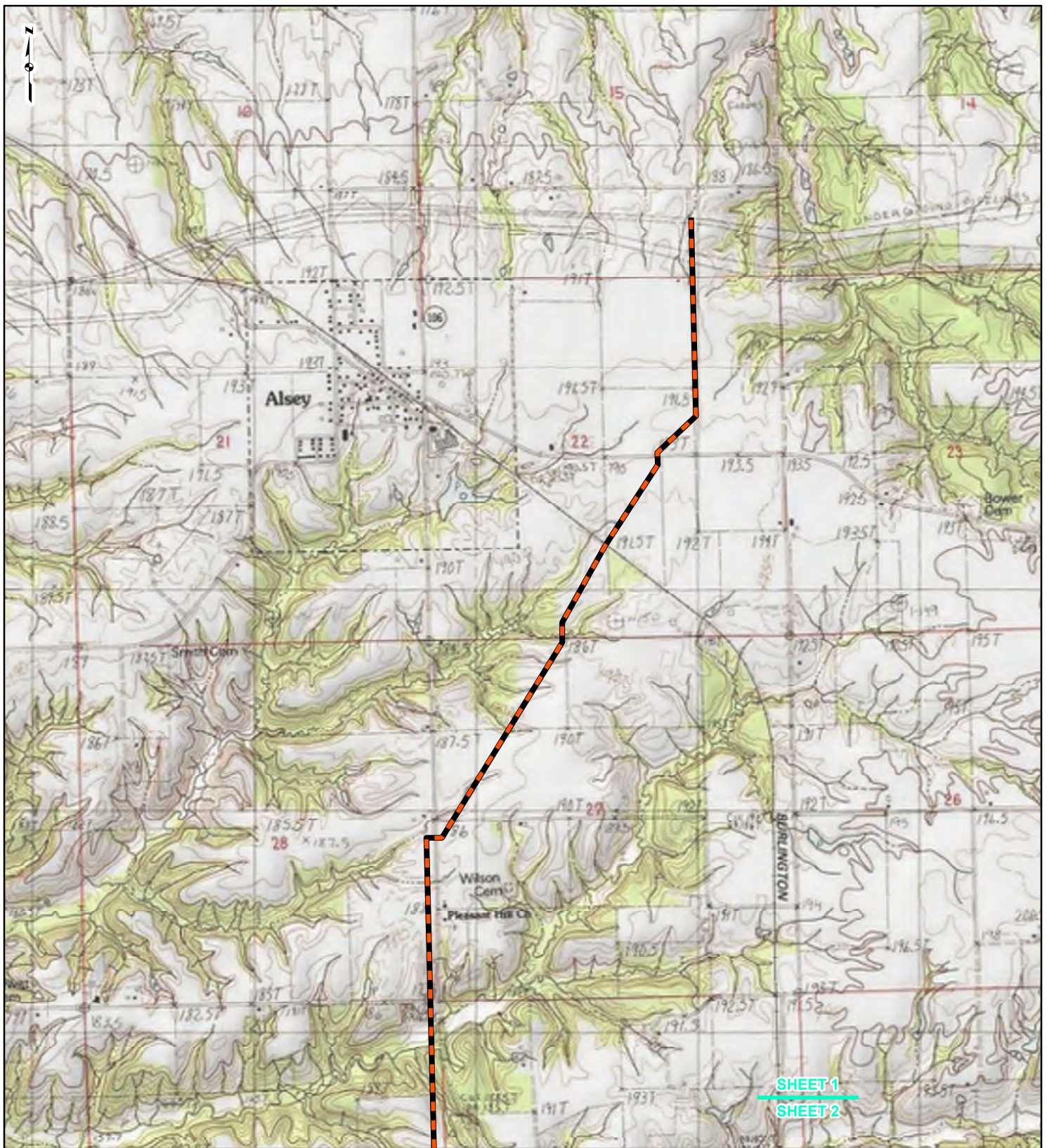
**Spire STL
Pipeline**



DRAWN BY: PMH
CHECKED: SWW

DATE: 7/28/2016
APPROVED: LMF

REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2015, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 1 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.

SHEET 1
SHEET 2

Scott
County
Greene
County

SHEET 2
SHEET 3



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

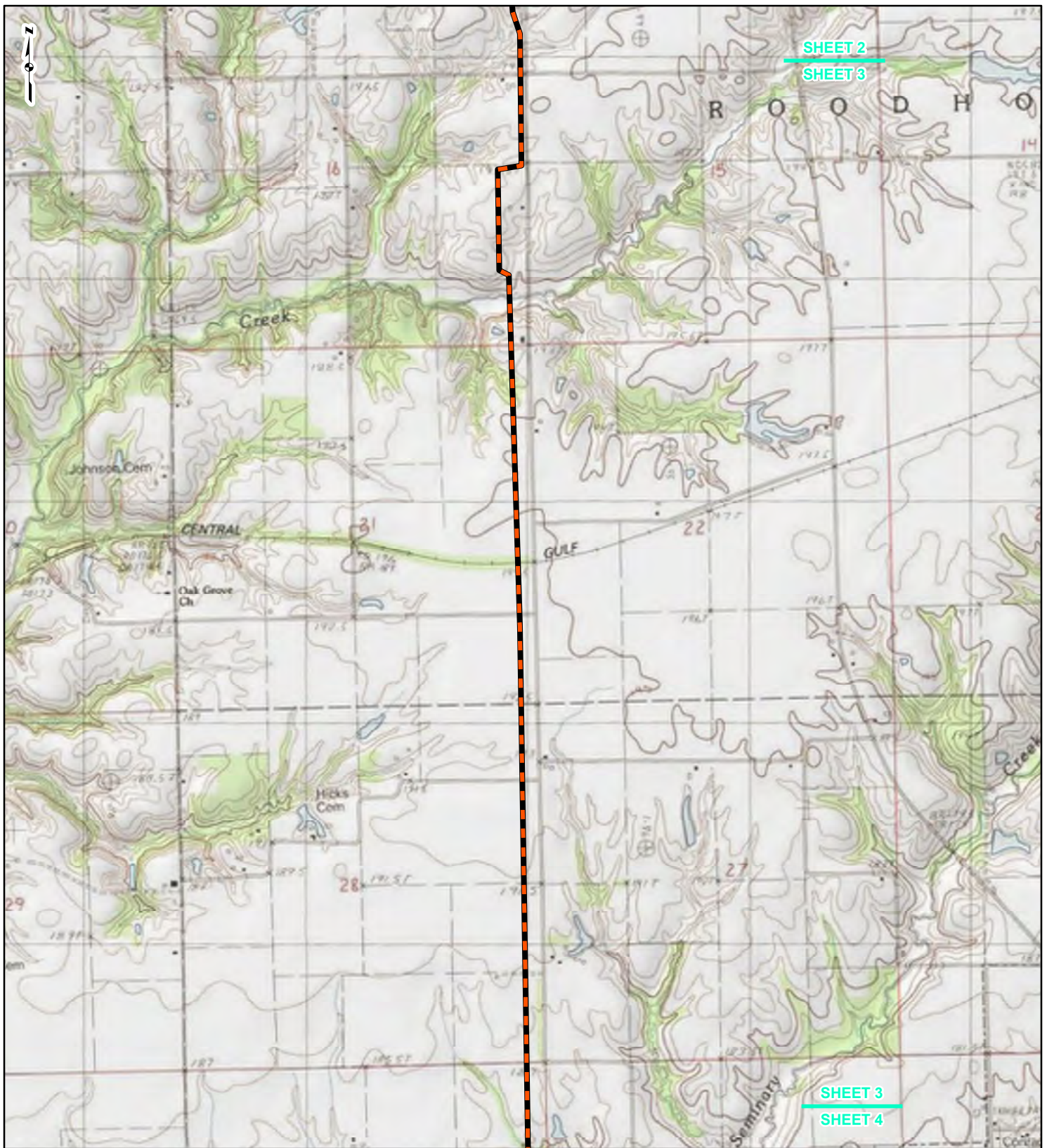
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FIGURE 1
LOCATION MAP
SHEET 2 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 2





SHEET 3

SHEET 3

SHEET 4



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

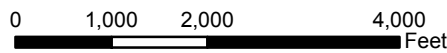
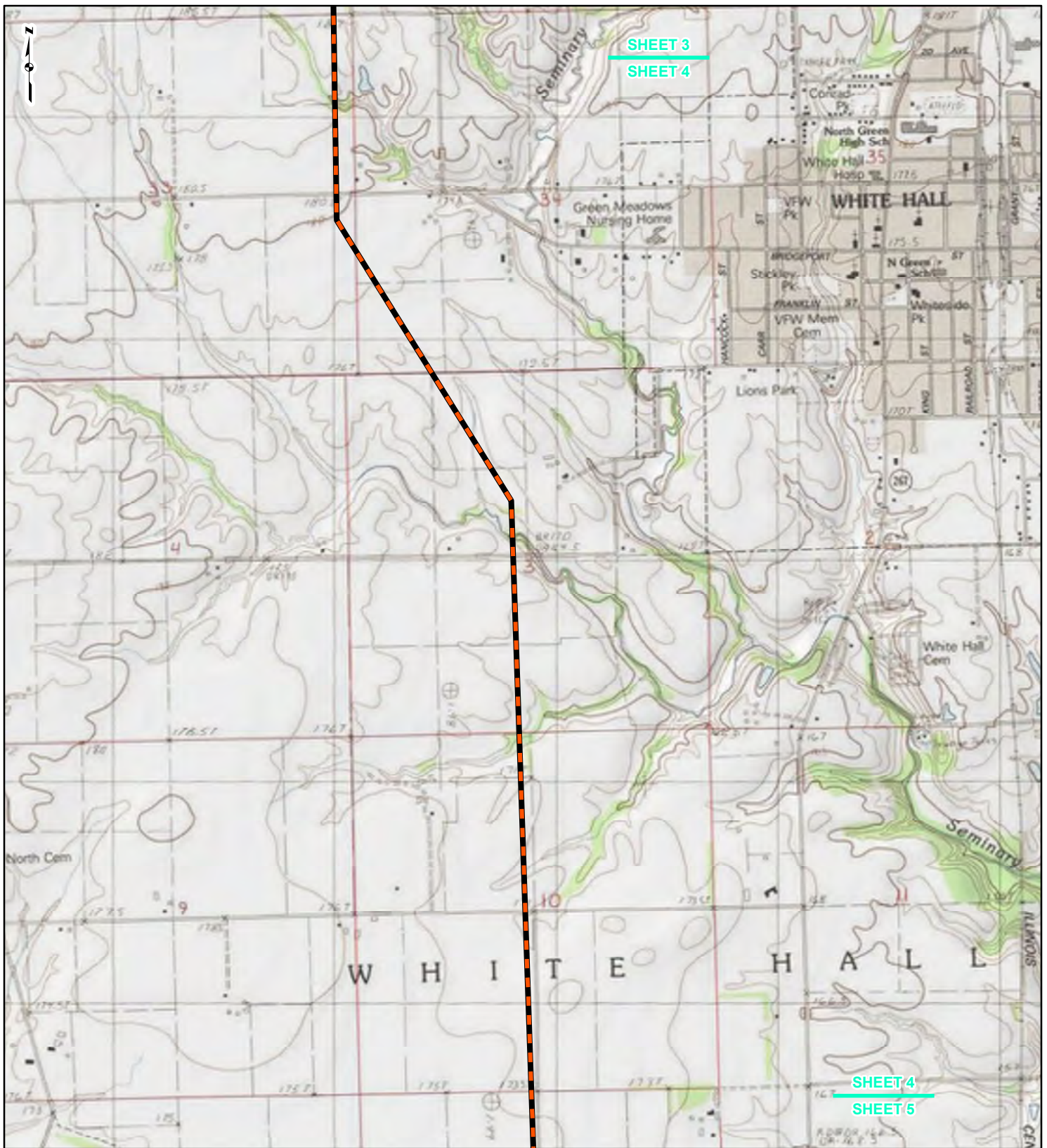


FIGURE 1
LOCATION MAP
SHEET 3 OF 21



DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

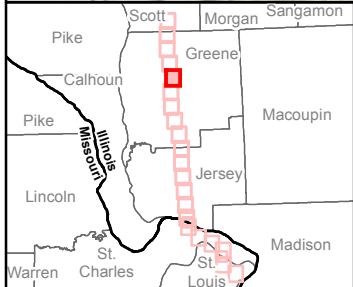
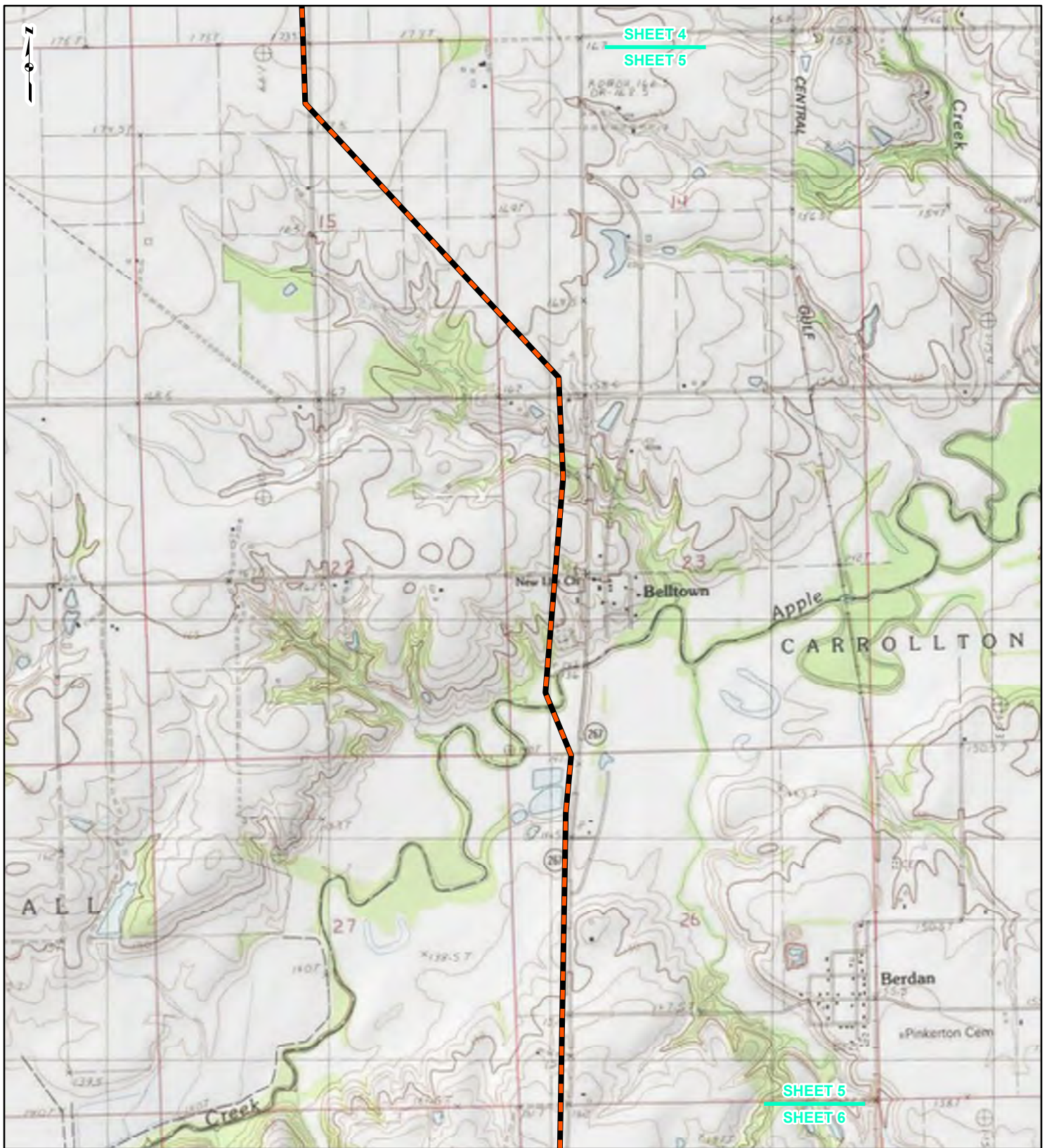
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FIGURE 1
LOCATION MAP
SHEET 4 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

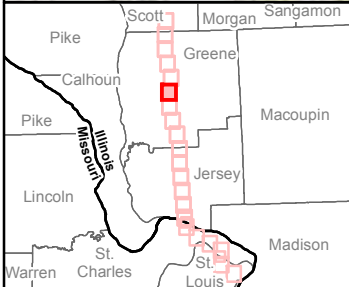
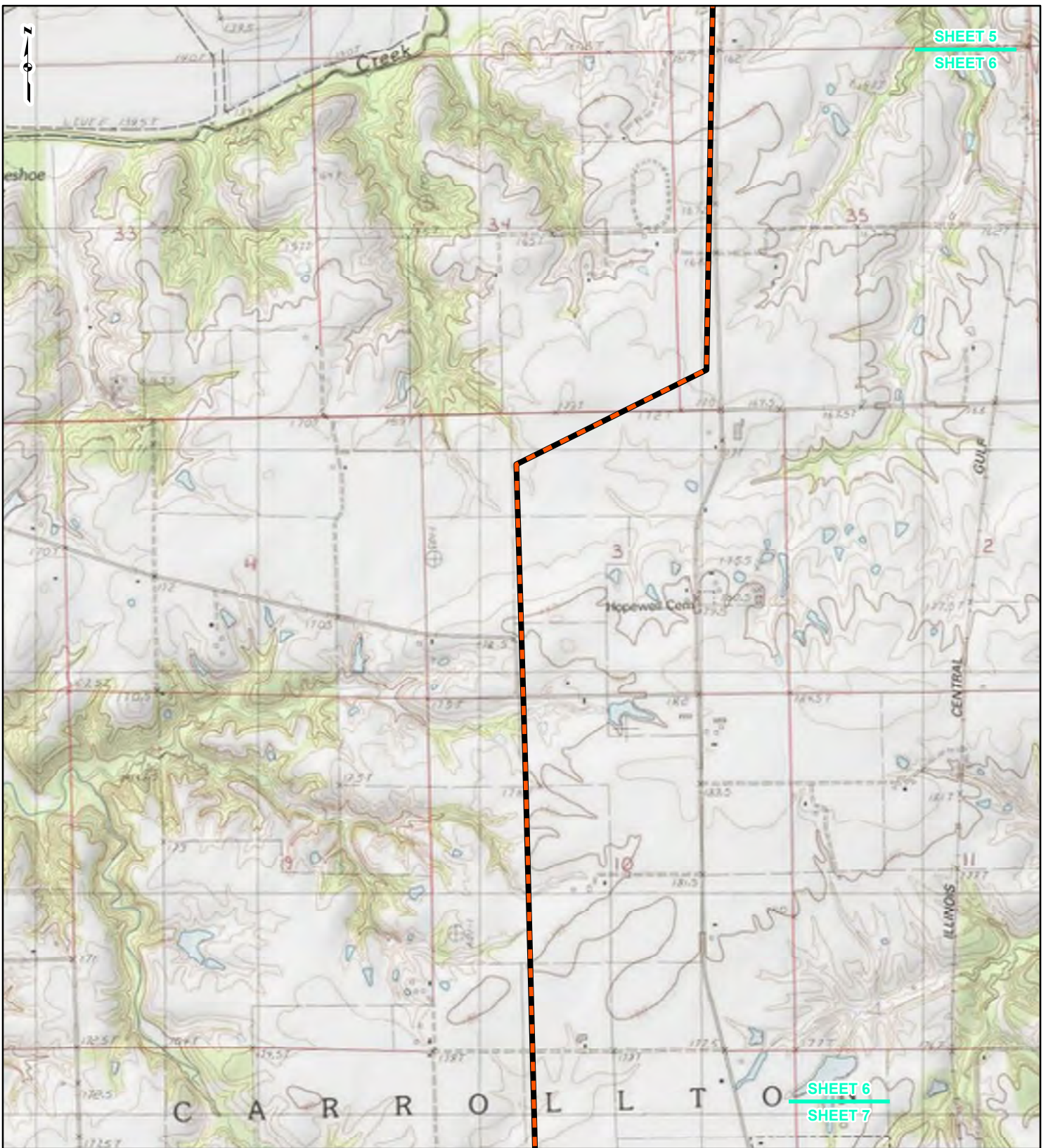
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FIGURE 1
LOCATION MAP
SHEET 5 OF 21







DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

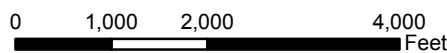
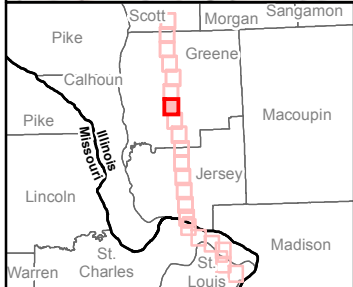
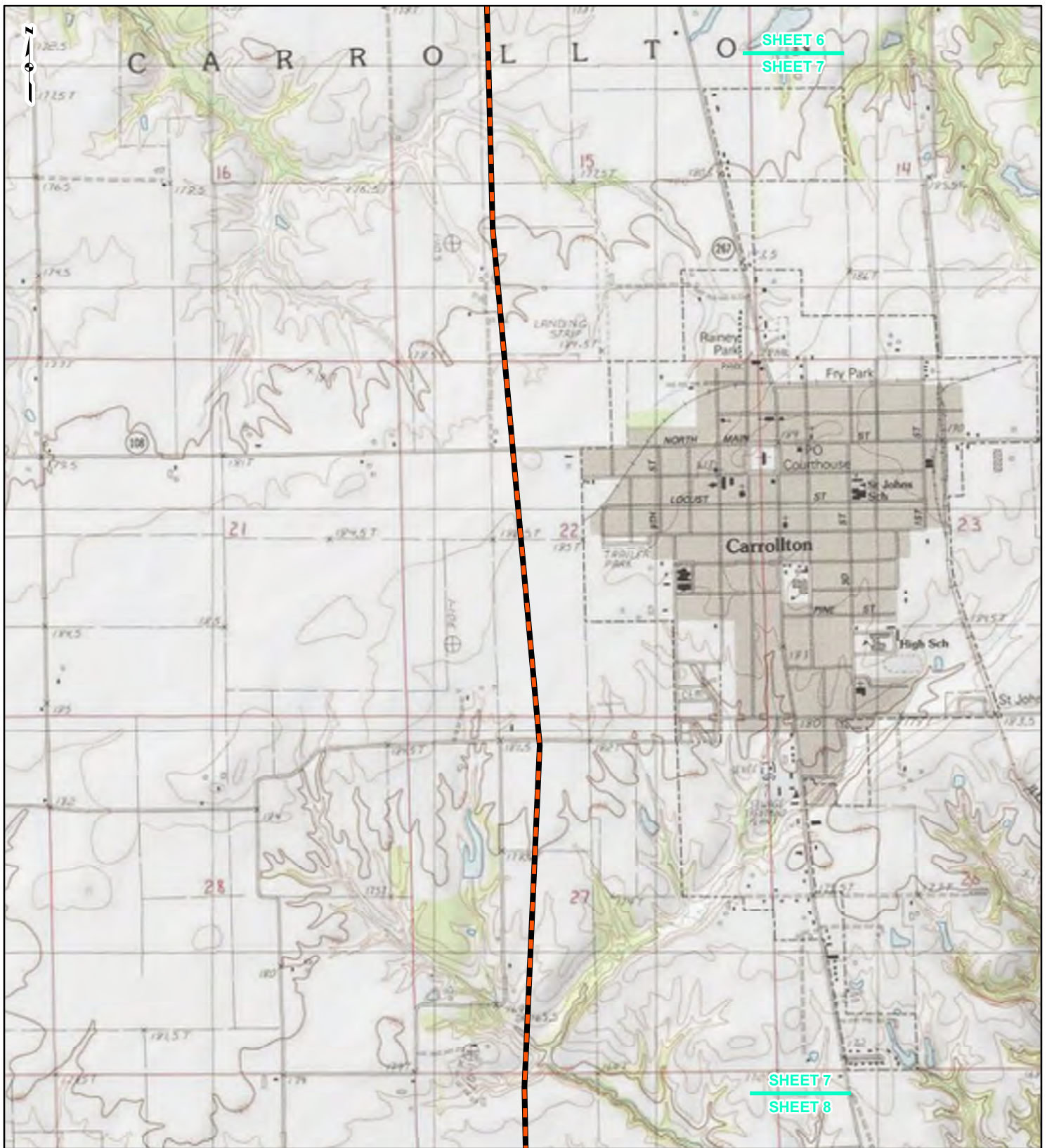


FIGURE 1
LOCATION MAP
SHEET 6 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

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**FIGURE 1
LOCATION MAP
SHEET 7 OF 21**

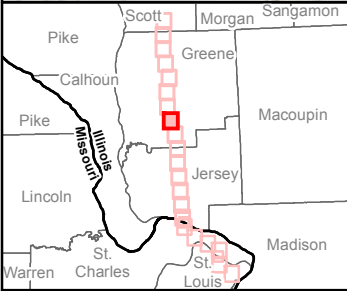
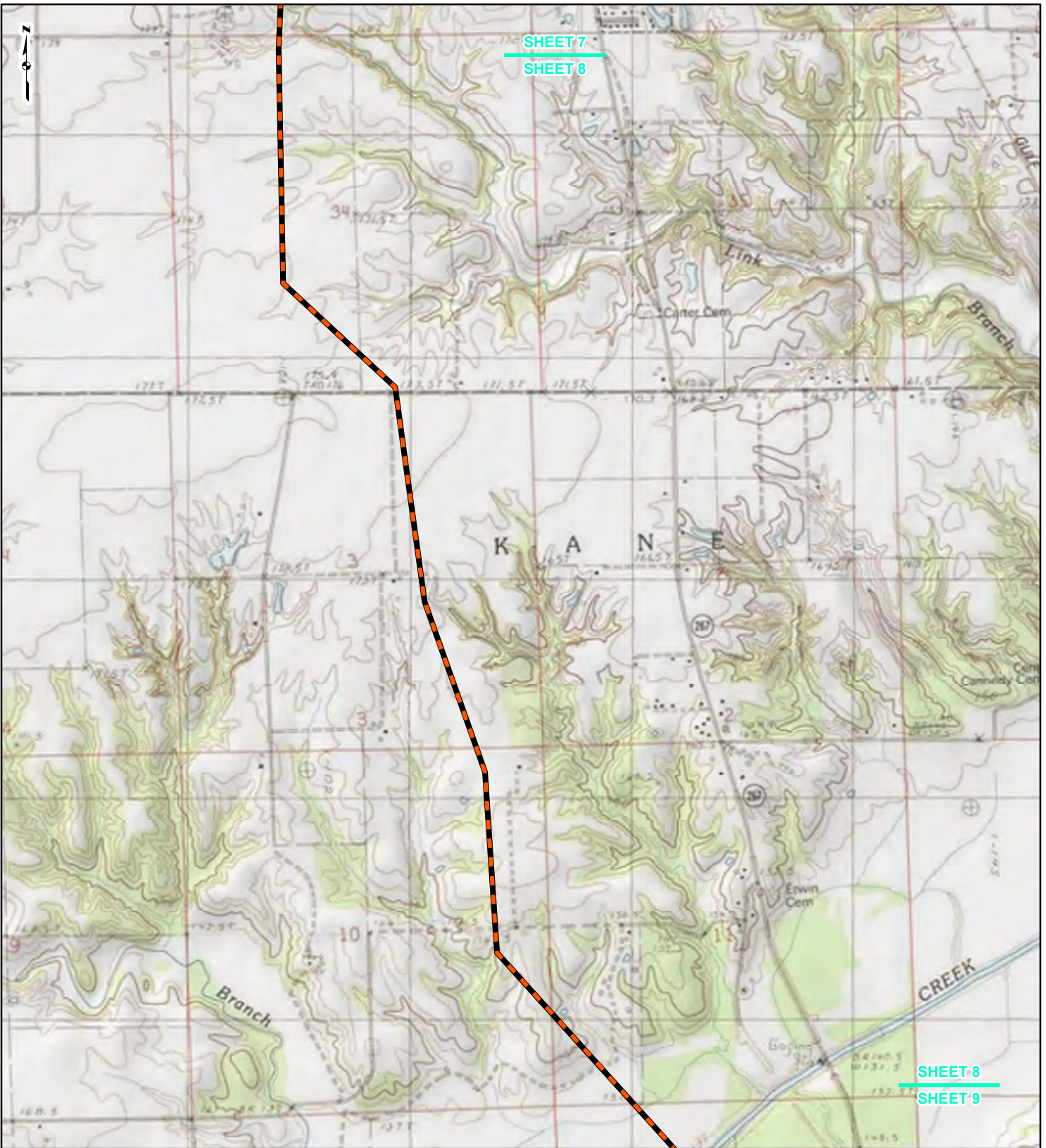
Spire STL Pipeline

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SHEET 7
SHEET 8

SHEET 8
SHEET 9



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

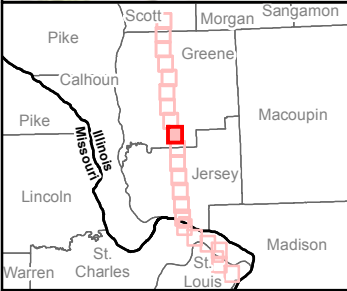
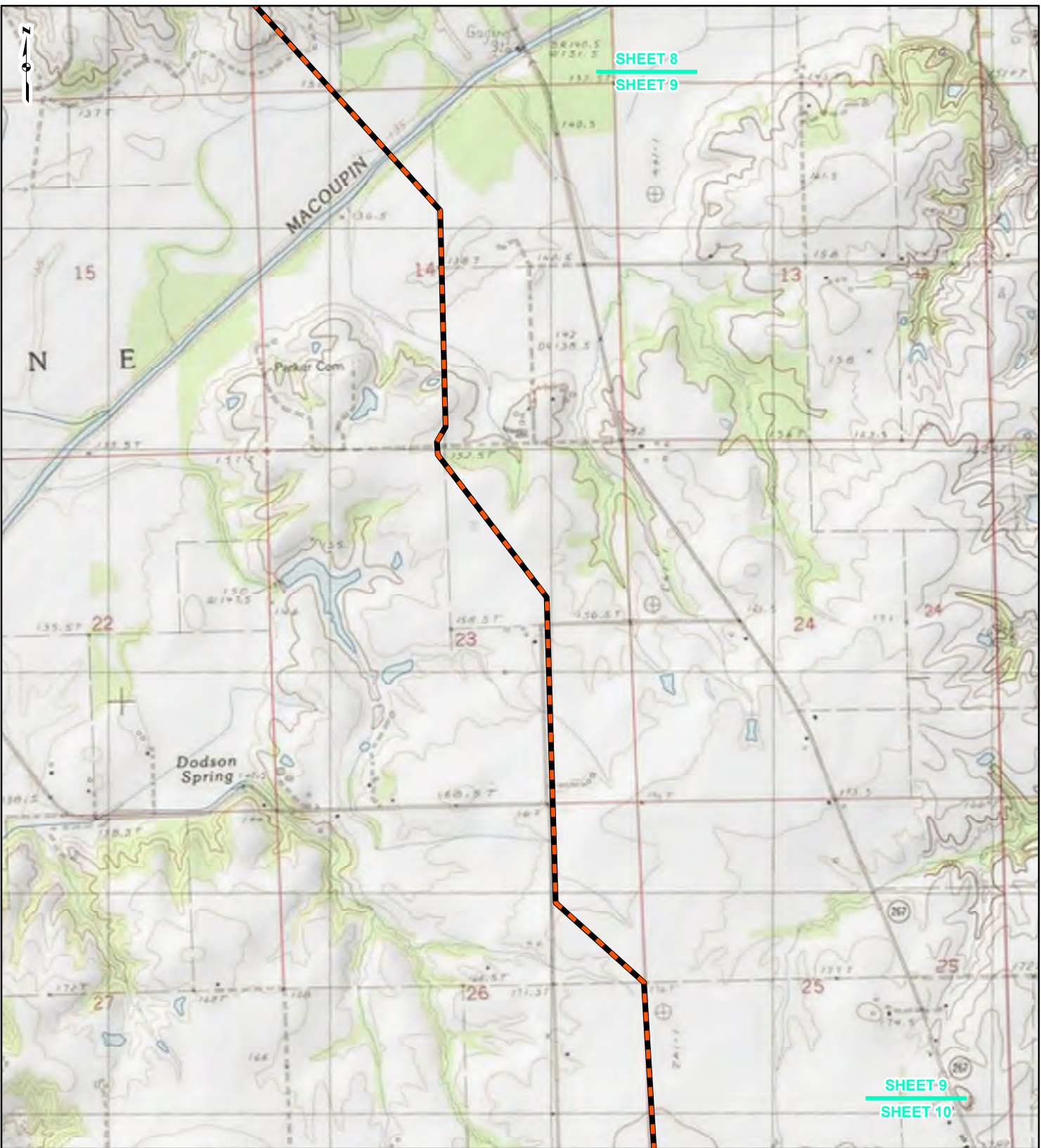
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**FIGURE 1
LOCATION MAP
SHEET 8 OF 21**

Spire STL Pipeline

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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

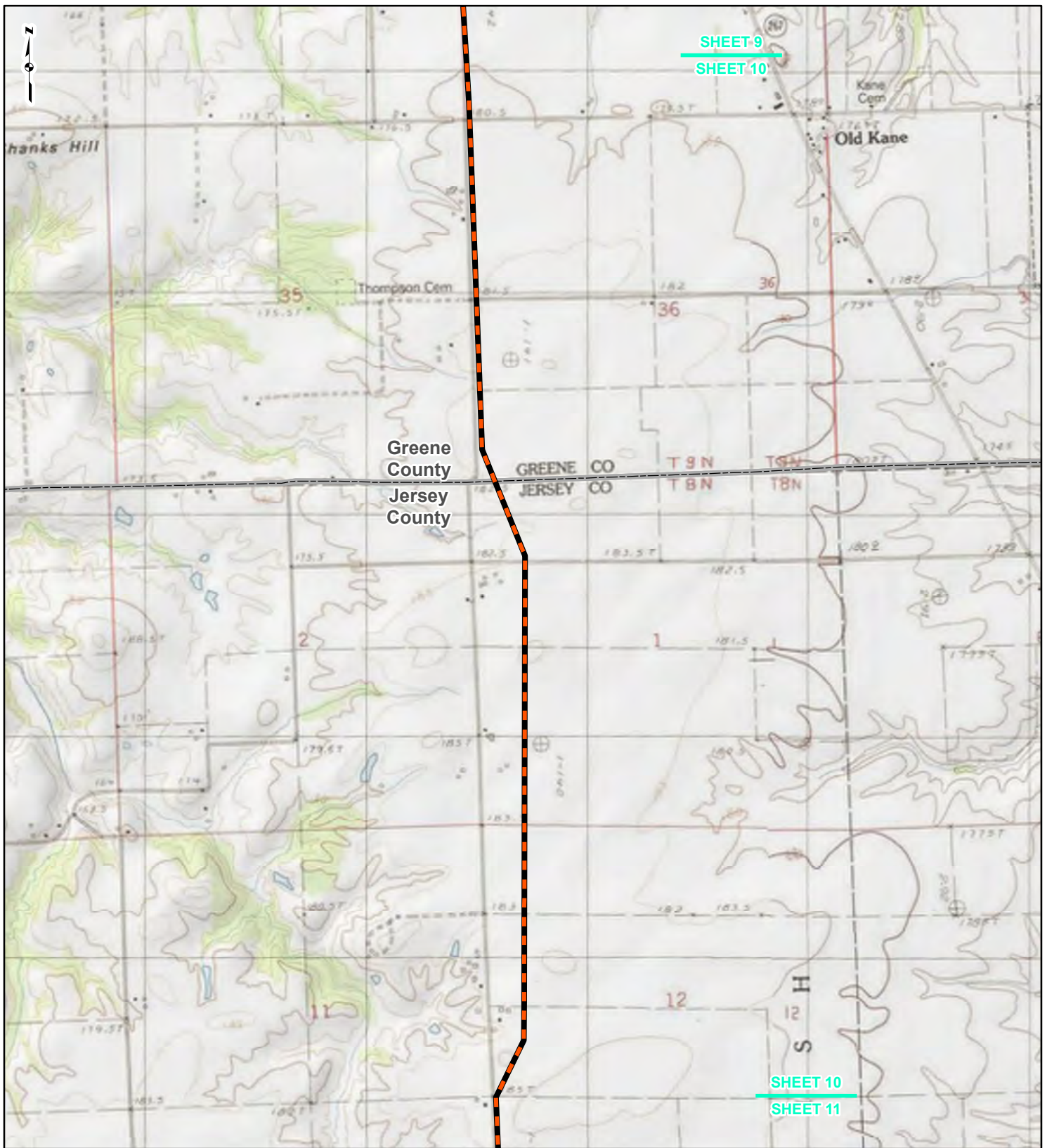
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FIGURE 1
LOCATION MAP
SHEET 9 OF 21

Spire STL Pipeline

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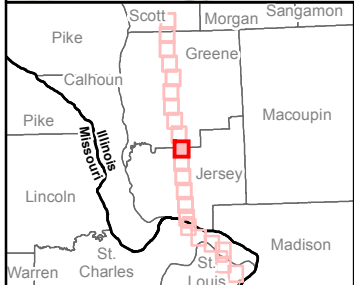


SHEET 9
SHEET 10





SHEET 10
SHEET 11

Greene
County
Jersey
County

GREENE CO T9N T8N
JERSEY CO T8N T7N



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

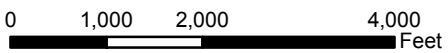
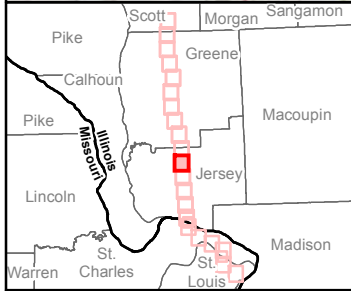
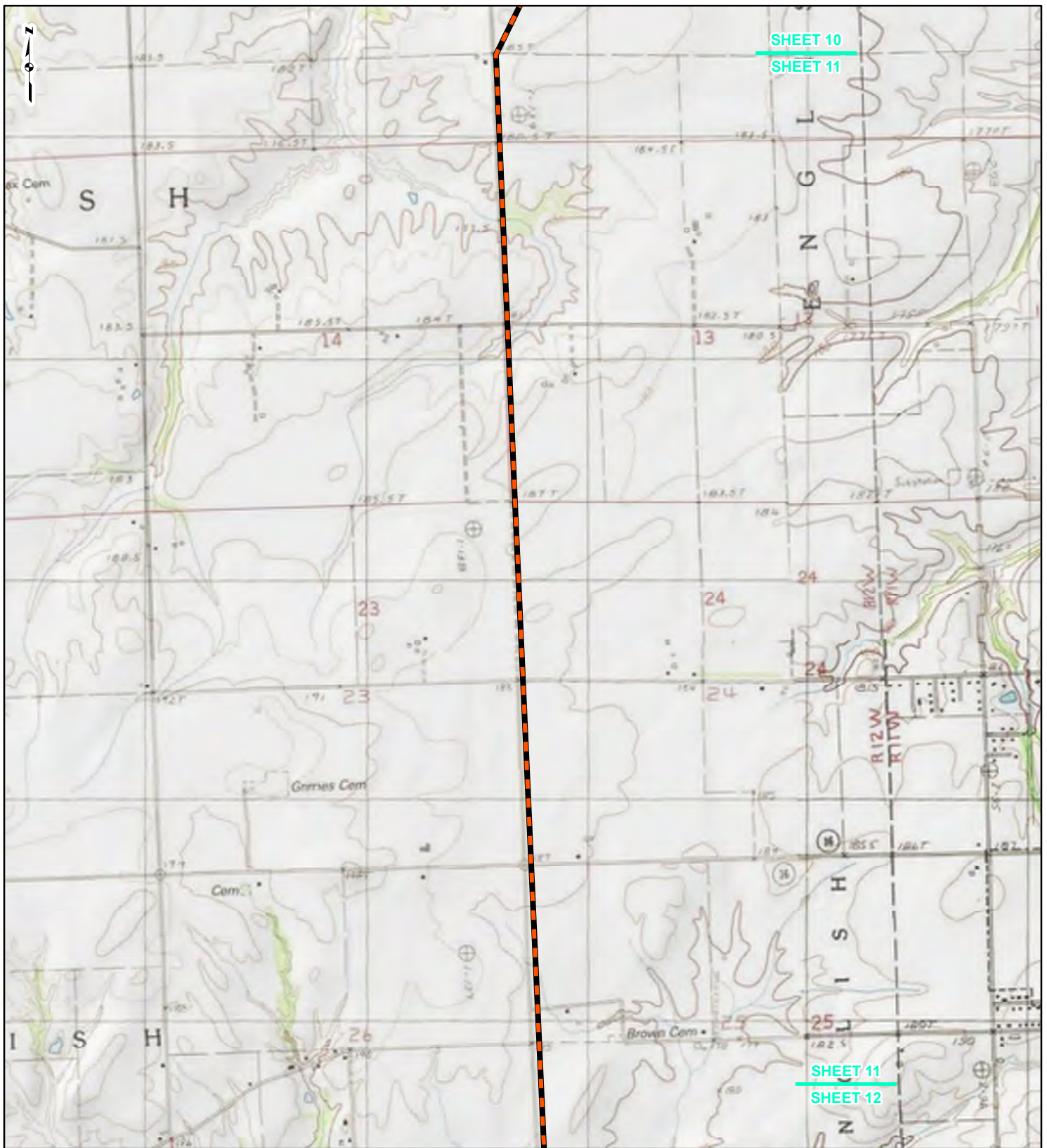


FIGURE 1
LOCATION MAP
SHEET 10 OF 21

 **Spire STL Pipeline** 

DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

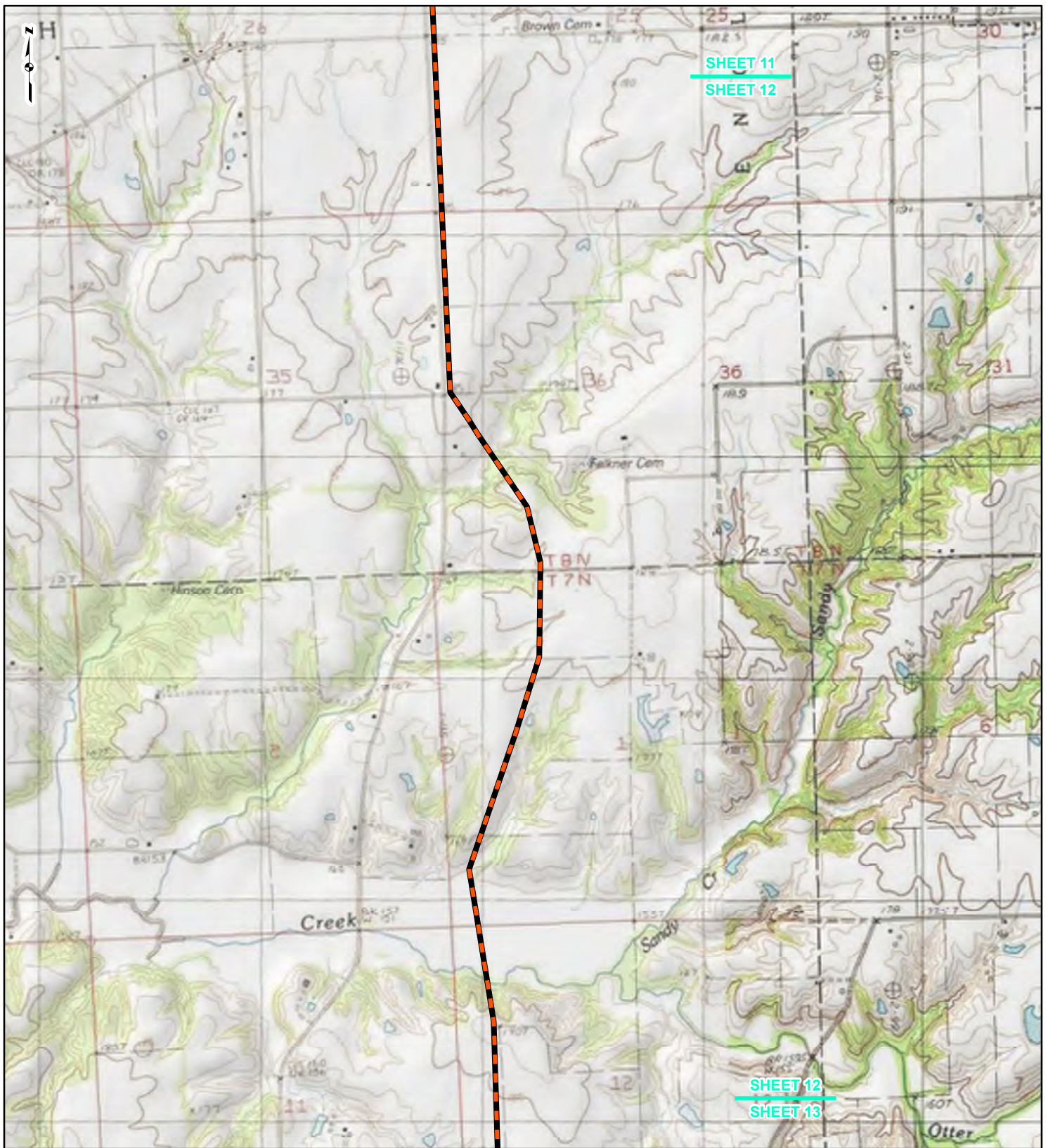
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FIGURE 1
LOCATION MAP
SHEET 11 OF 21



DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



SHEET 11
SHEET 12

SHEET 12
SHEET 13



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

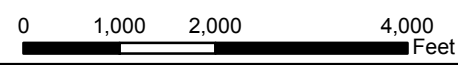
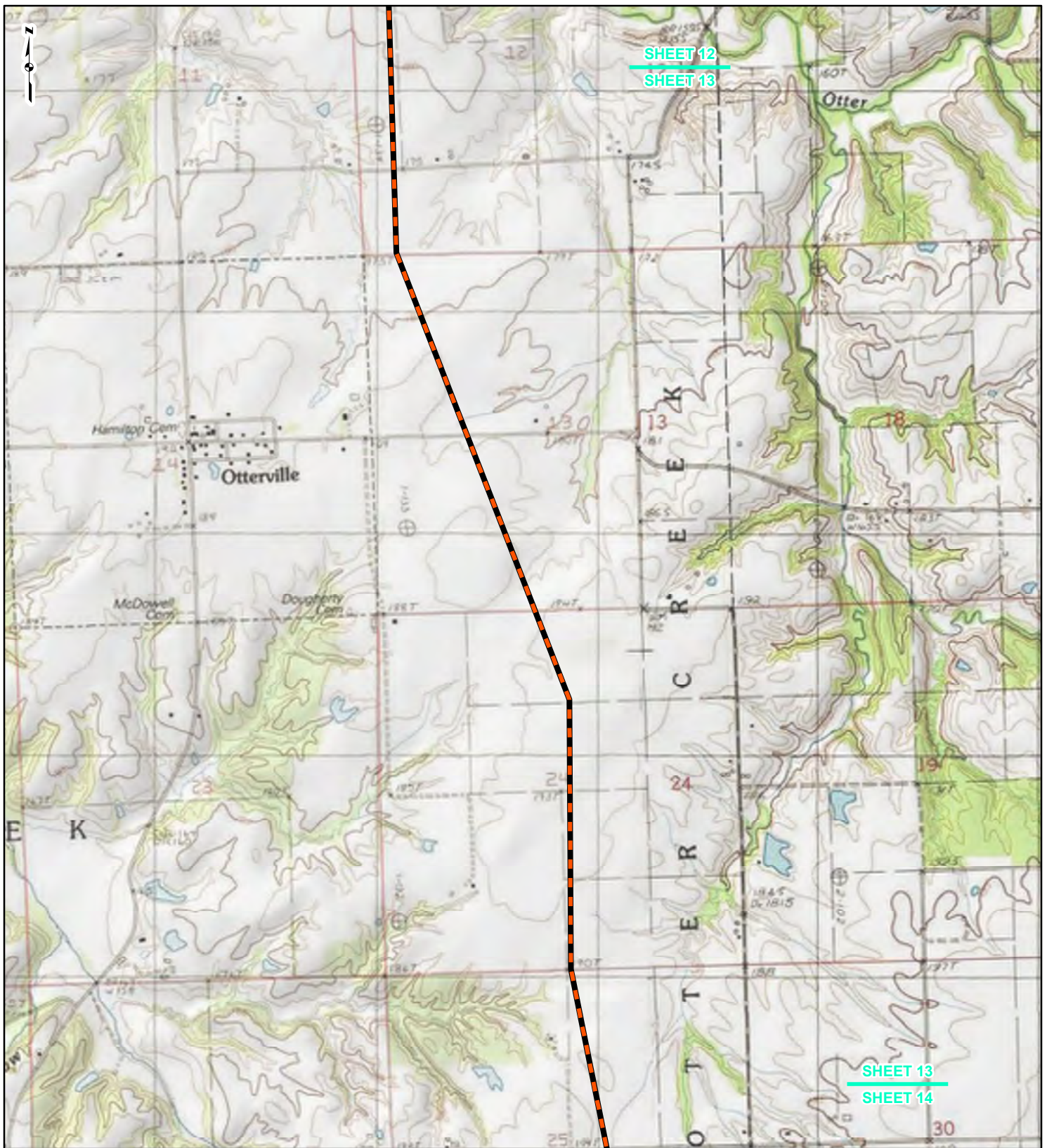


FIGURE 1
LOCATION MAP
SHEET 12 OF 21



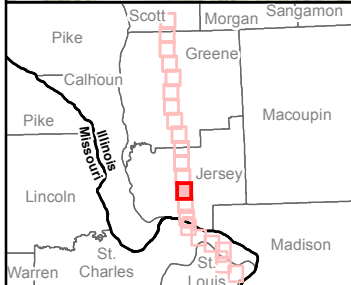
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SHEET 12
SHEET 13

SHEET 13
SHEET 14



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

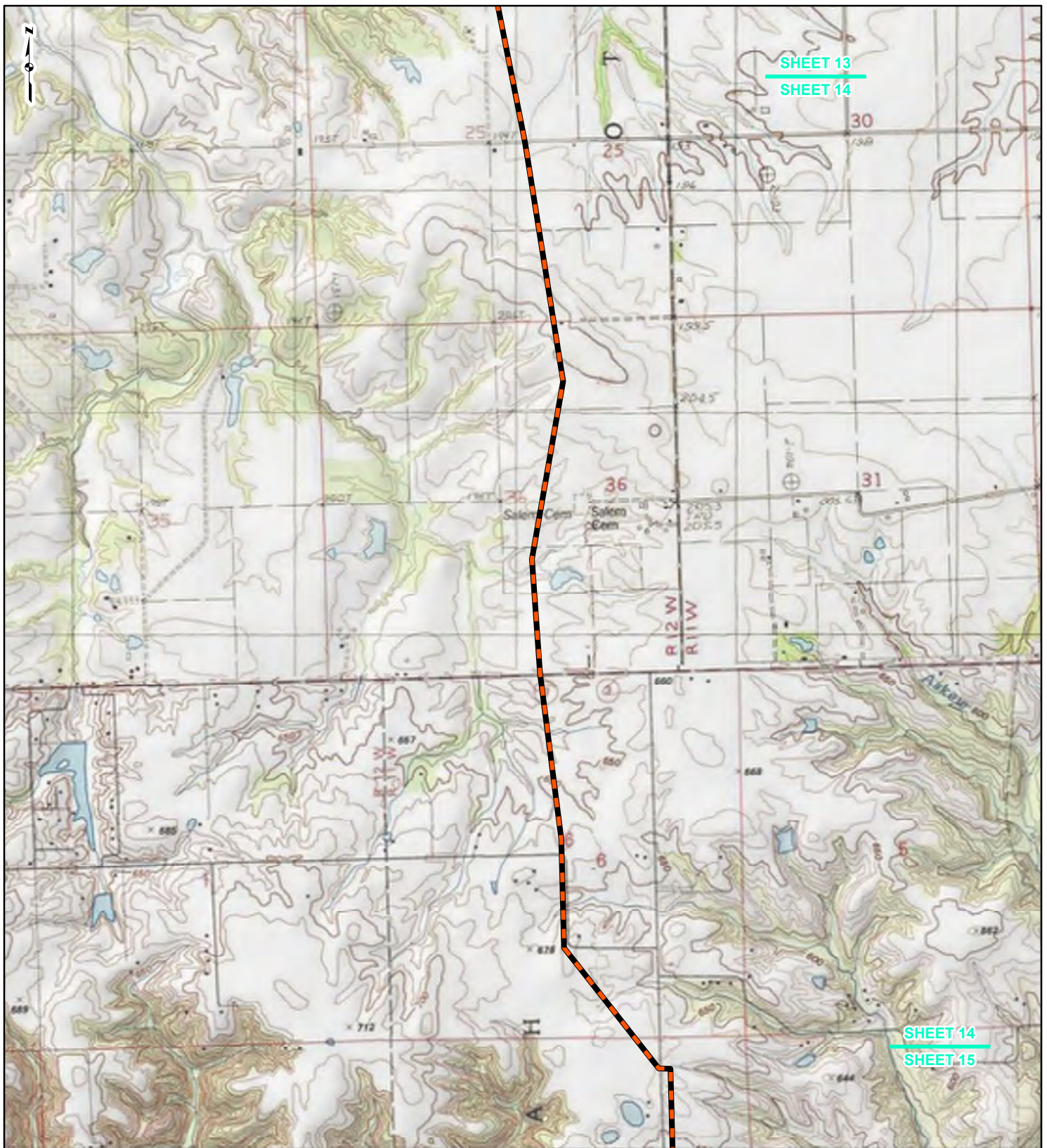
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 13 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.







SHEET 13
SHEET 14

SHEET 14
SHEET 15



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

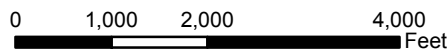


FIGURE 1
LOCATION MAP
SHEET 14 OF 21



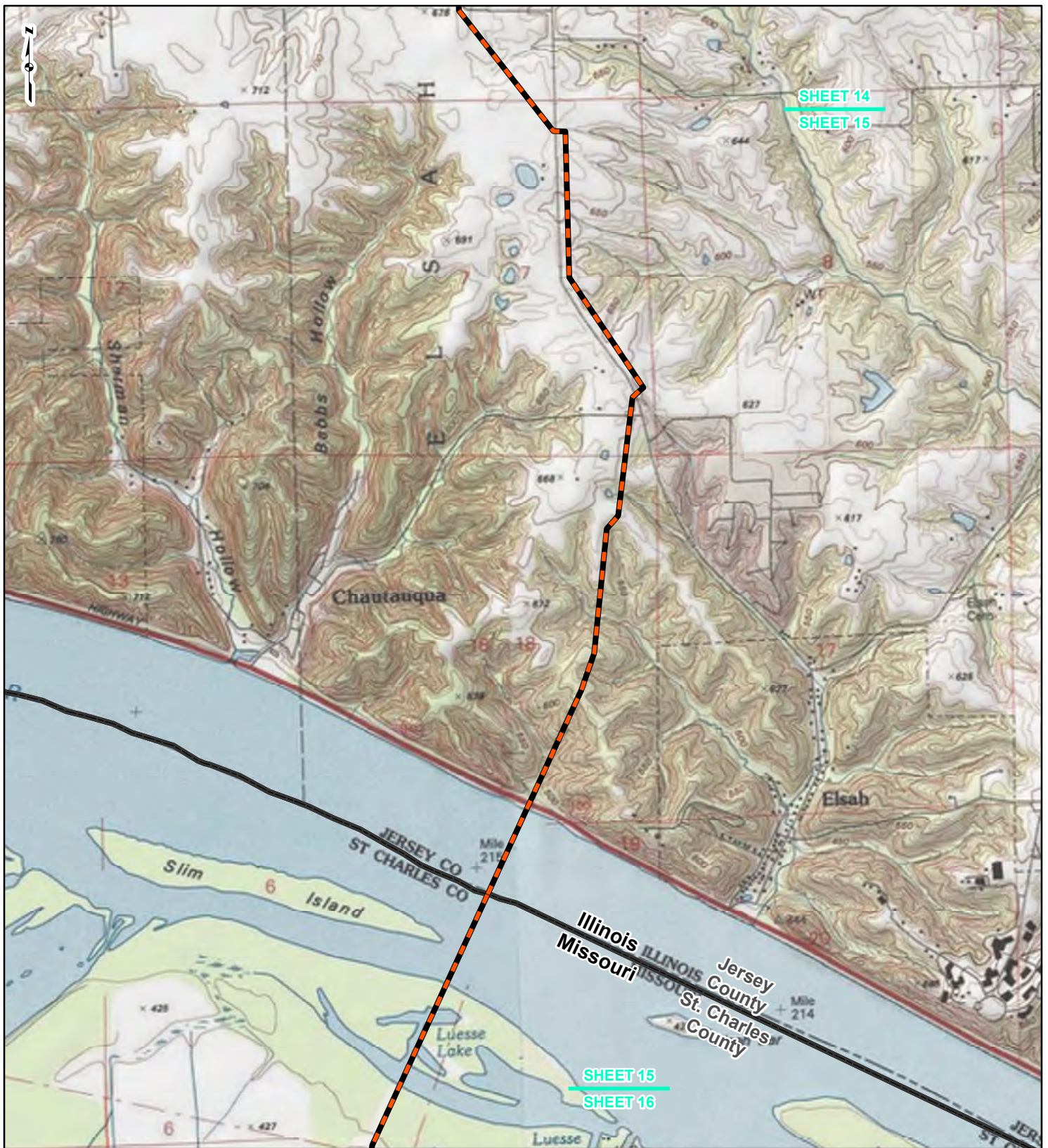
Spire STL Pipeline



DRAWN BY: PMH
CHECKED: SWW

DATE: 7/28/2016
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 14
SHEET 15

SHEET 15
SHEET 16



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

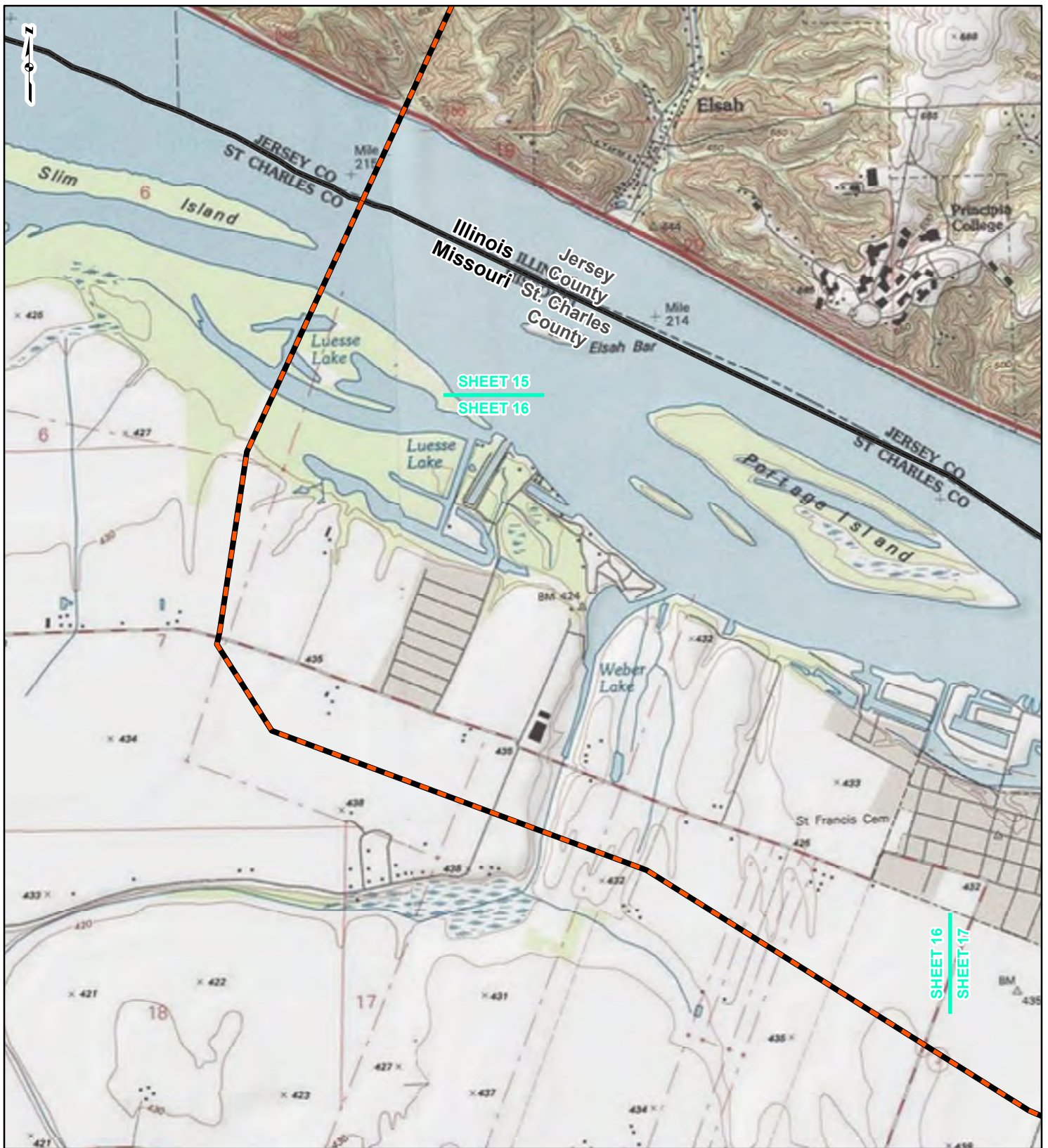
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Feet

**FIGURE 1
LOCATION MAP
SHEET 15 OF 21**

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

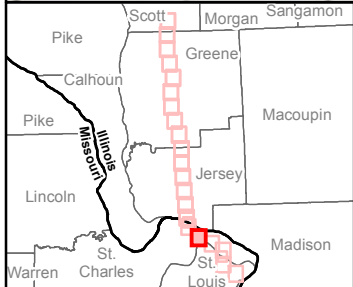
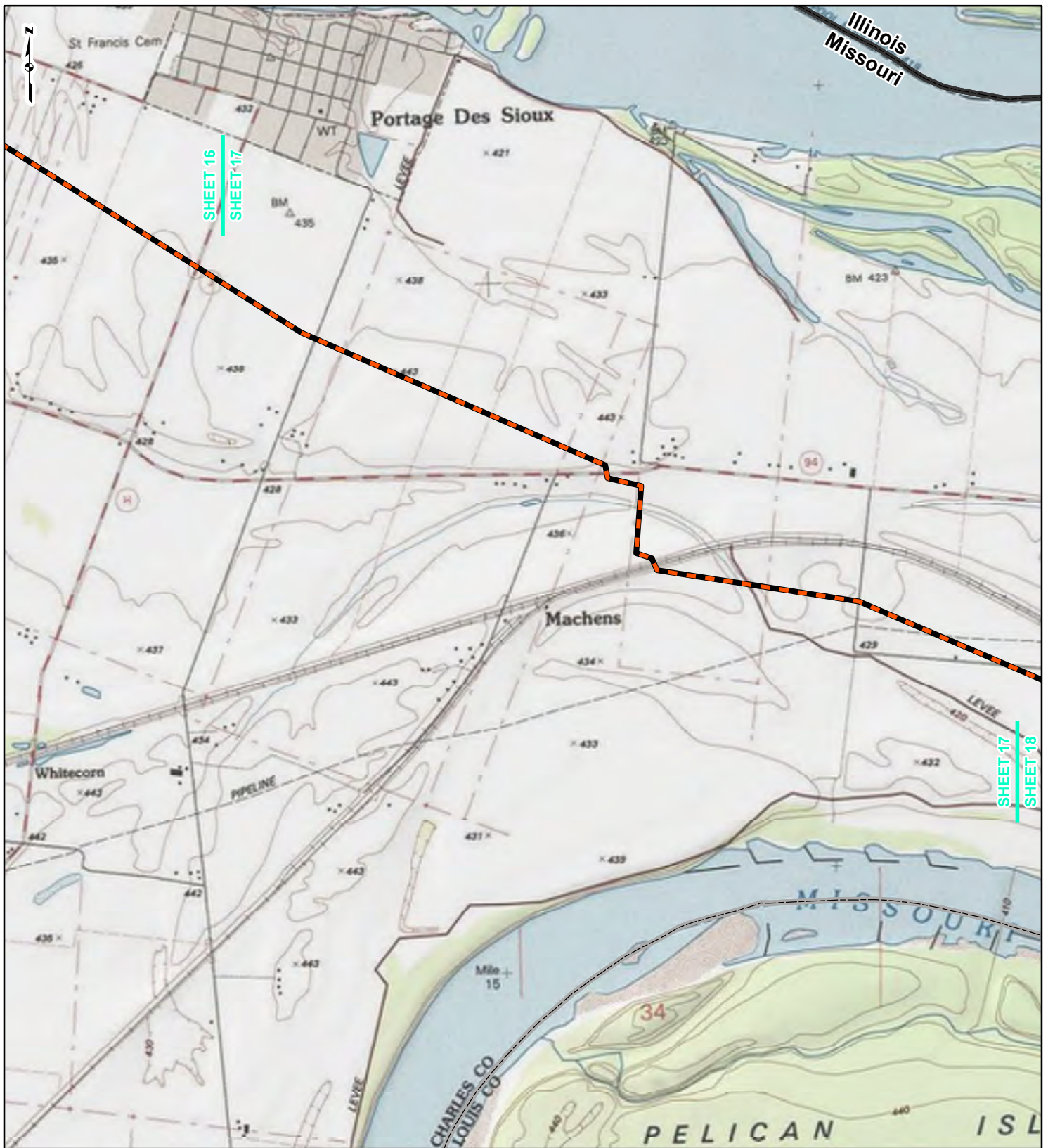
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FIGURE 1
LOCATION MAP
SHEET 16 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

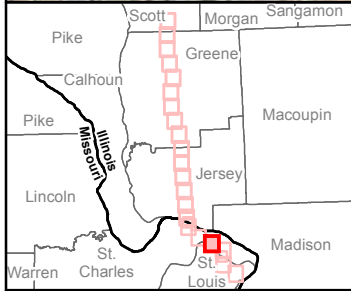
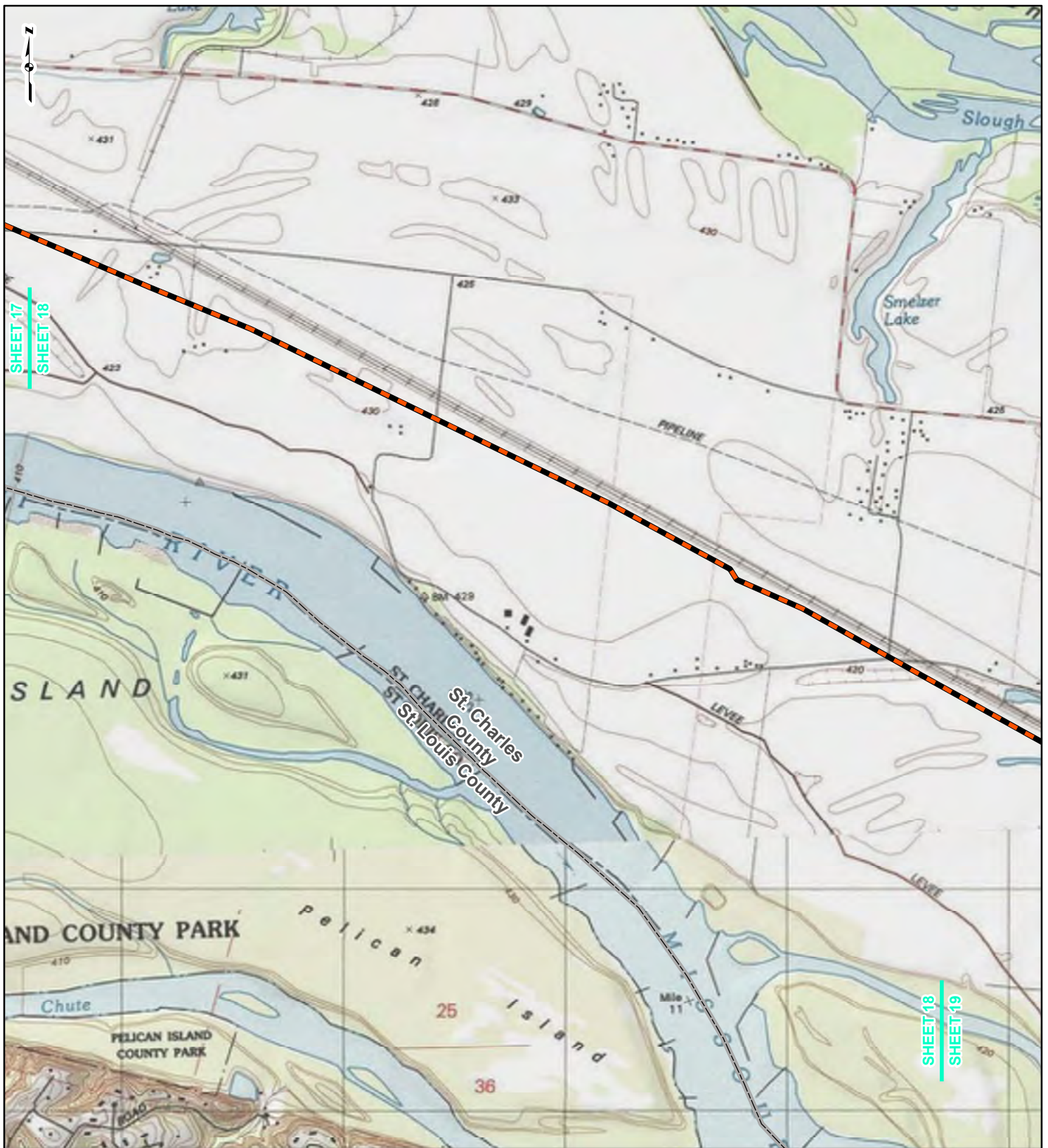
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FIGURE 1
LOCATION MAP
SHEET 17 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

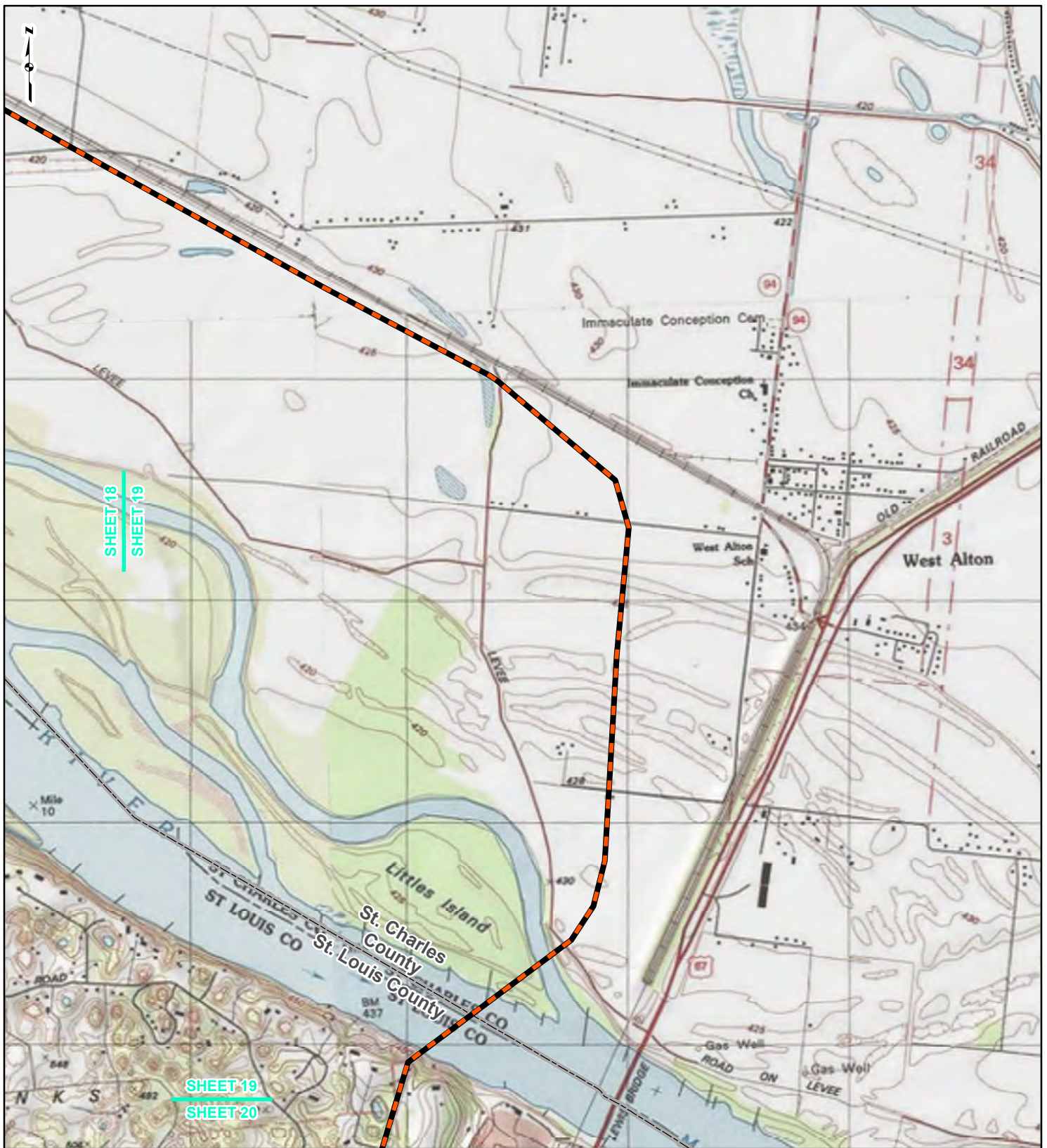
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FIGURE 1
LOCATION MAP
SHEET 18 OF 21

Spire STL Pipeline

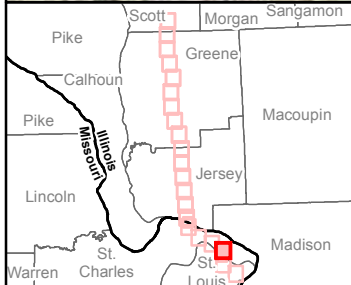
DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTerville (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 18
SHEET 19

SHEET 19
SHEET 20



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

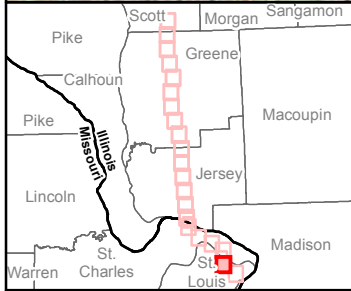
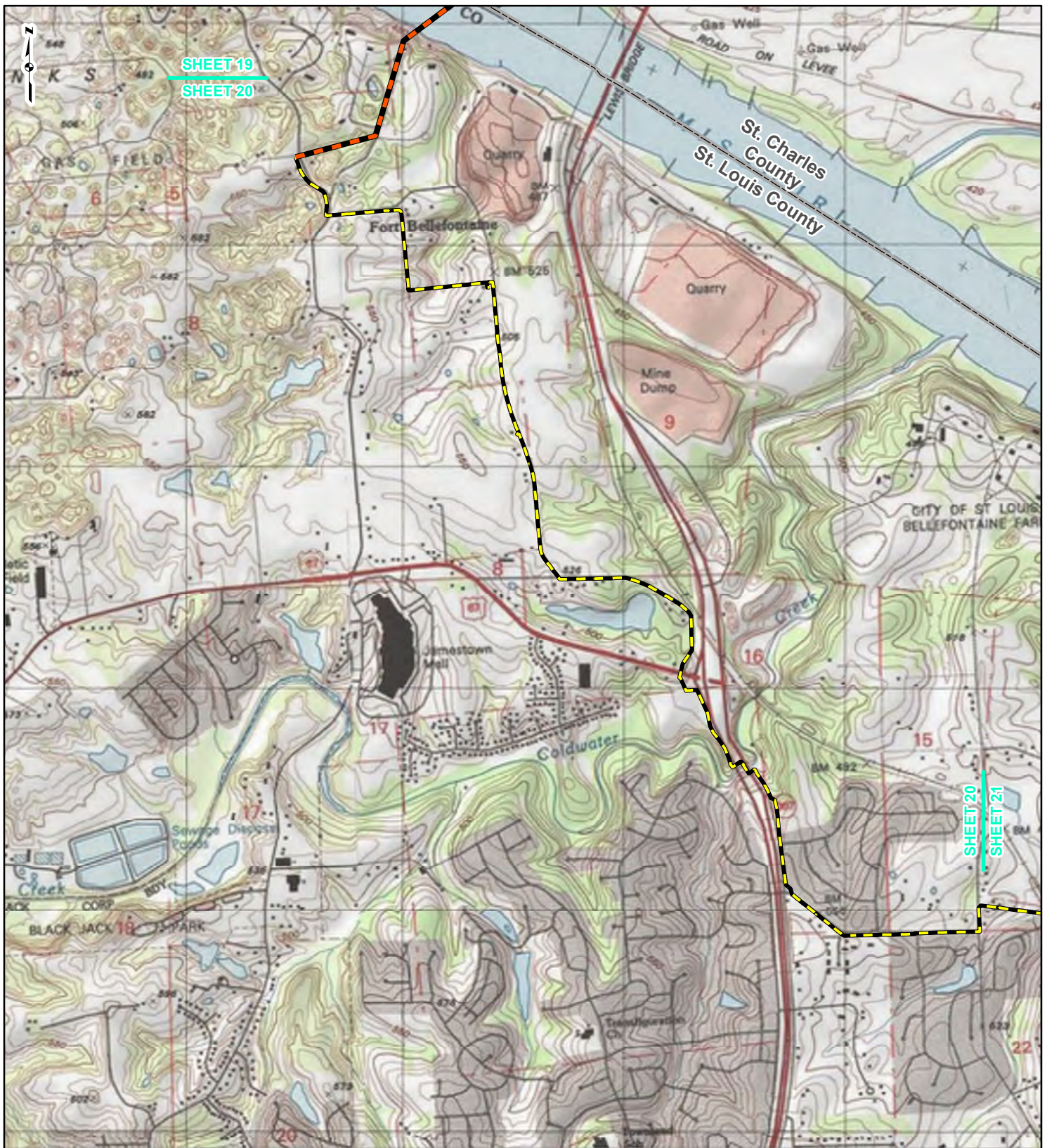
0 1,000 2,000 4,000
Feet

**FIGURE 1
LOCATION MAP
SHEET 19 OF 21**



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

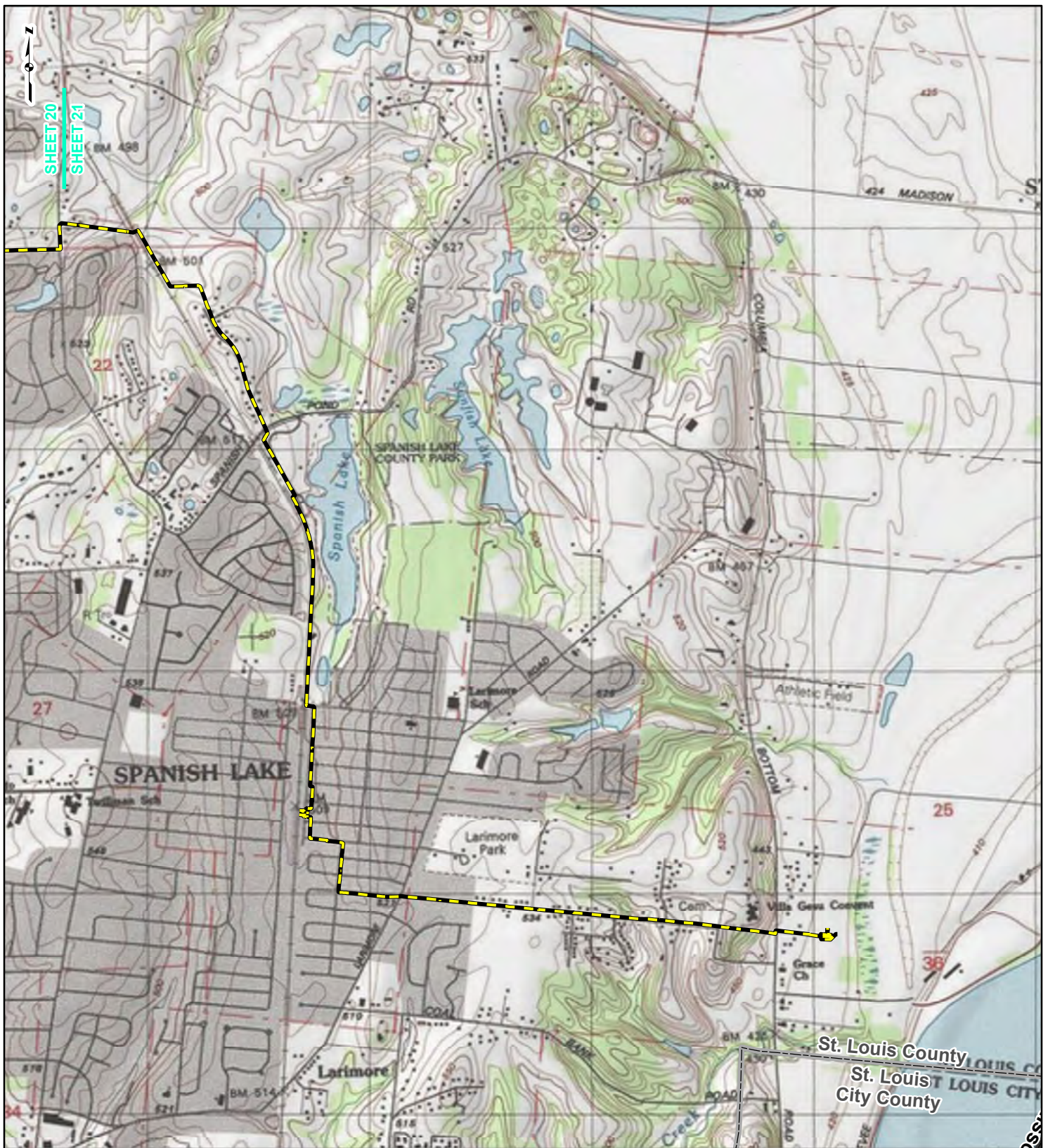
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 20 OF 21



DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 21 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



July 29, 2016

Mr. Mark J. Hague
Regional Administrator
United States Environmental
Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Hague:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Environmental Protection Agency - Region 7 to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



United States Department of Agriculture

Ali Trunzo

From: Ali Trunzo
Sent: Tuesday, January 24, 2017 12:36 PM
To: Ali Trunzo
Subject: FW: Spire STL Pipeline Project - Noxious Weeds/Invasive Plant Species Control
Attachments: 01-24-2017 Spire STL_Noxious Weed Plan.pdf

From: Ali Trunzo
Sent: Tuesday, January 24, 2017 12:35 PM
To: 'johanna.fuller@il.usda.gov' <johanna.fuller@il.usda.gov>
Cc: 'bradley.behyner@il.usda.gov' <bradley.behyner@il.usda.gov>; Lori Ferry <L.Ferry@gaiconsultants.com>
Subject: Spire STL Pipeline Project - Noxious Weeds/Invasive Plant Species Control

Ms. Fuller,

GAI Consultants, on behalf of Spire STL Pipeline LLC, had coordinated with the NRCS field offices for Scott, Jersey, and Greene County to develop noxious weed/invasive species control guidelines for the proposed Spire STL Pipeline Project. A brief description of the Project is below for reference.

During this coordination, NRCS requested to review the proposed guidelines. As a courtesy, a copy of the project-specific Noxious Weeds/Invasive Plant Species Control and Mitigation Plan is attached.

Should you have any comments or questions, please do not hesitate to call or email. GAI and Spire appreciate your assistance on this project.

Thank you,

Ali

Project Description

The proposed Spire STL Pipeline Project will consist of approximately 59 miles of new, greenfield, 24-inch diameter steel pipeline (referred to as the "24-inch pipeline" portion of the Project) 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 in St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River and ties 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"). As part of the proposed Project and subject to LGC's receipt of approval from the Missouri Public Service Commission ("MPSC"), Spire is proposing to purchase Line 880 from LGC and modify the pipeline before placing it into interstate service. Line 880 consists of approximately seven miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the 24-inch pipeline part of the Project to the Enable Mississippi River Transmission, LLC ("Enable MRT") pipeline along the western bank of the Mississippi River in St. Louis County, Missouri at the terminus of the Project. The total length of the Project pipelines will be approximately 66 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 will also include the construction of three new metering and regulating ("M&R") station interconnects with REX in Illinois and LGC and Enable MRT in Missouri and the construction of a new facility at an existing LGC site along Line 880.

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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**ENGINEERING,
PLANNING, AND
ENVIRONMENTAL
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Ali Trunzo

From: Andrea Halfhill
Sent: Friday, December 30, 2016 10:40 AM
To: Ali Trunzo
Subject: FW: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

From: Gibson, Connie - FSA, St. Peters, MO [<mailto:Connie.Gibson@mo.usda.gov>]
Sent: Tuesday, December 27, 2016 11:46 AM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

Andrea,

Sorry for the delay....lots of aerials to review! It appears there are no CRP acres included in the path of your pipeline.

If you have questions, let me know!

Connie

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]
Sent: Monday, December 05, 2016 2:02 PM
To: Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

Hi Connie,

Attached is the project mapping. We can provide the parcel APN's if it would assist with your review. The 300' corridor is a review area that we are requesting information on CRP lands. Our proposed construction area is generally 115' wide.

Thanks!
Andrea

From: Gibson, Connie - FSA, St. Peters, MO [<mailto:Connie.Gibson@mo.usda.gov>]
Sent: Friday, December 02, 2016 5:18 PM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

I'm not able to download...maybe maps would be better

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]
Sent: Friday, December 02, 2016 3:42 PM
To: Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

Ali Trunzo

Subject: FW: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry
Attachments: MO_Aerial_Map_2016_12_05_R.pdf

From: Andrea Halfhill
Sent: Monday, December 05, 2016 3:02 PM
To: 'Gibson, Connie - FSA, St. Peters, MO' <Connie.Gibson@mo.usda.gov>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

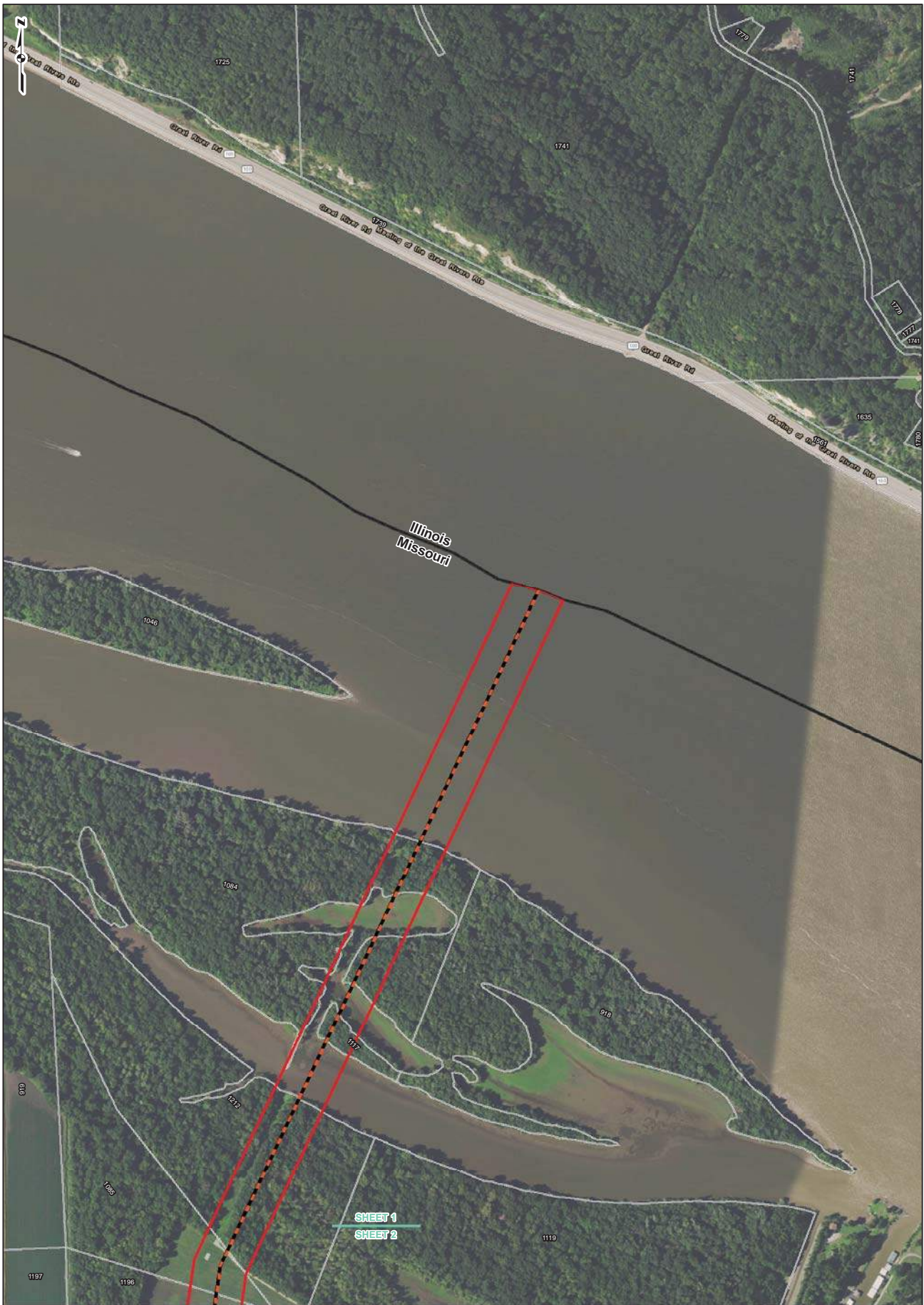
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Thanks!
Andrea

From: Gibson, Connie - FSA, St. Peters, MO [<mailto:Connie.Gibson@mo.usda.gov>]
Sent: Friday, December 02, 2016 5:18 PM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

I'm not able to download...maybe maps would be better



SHEET 1
SHEET 2



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

DRAFT

LEGEND

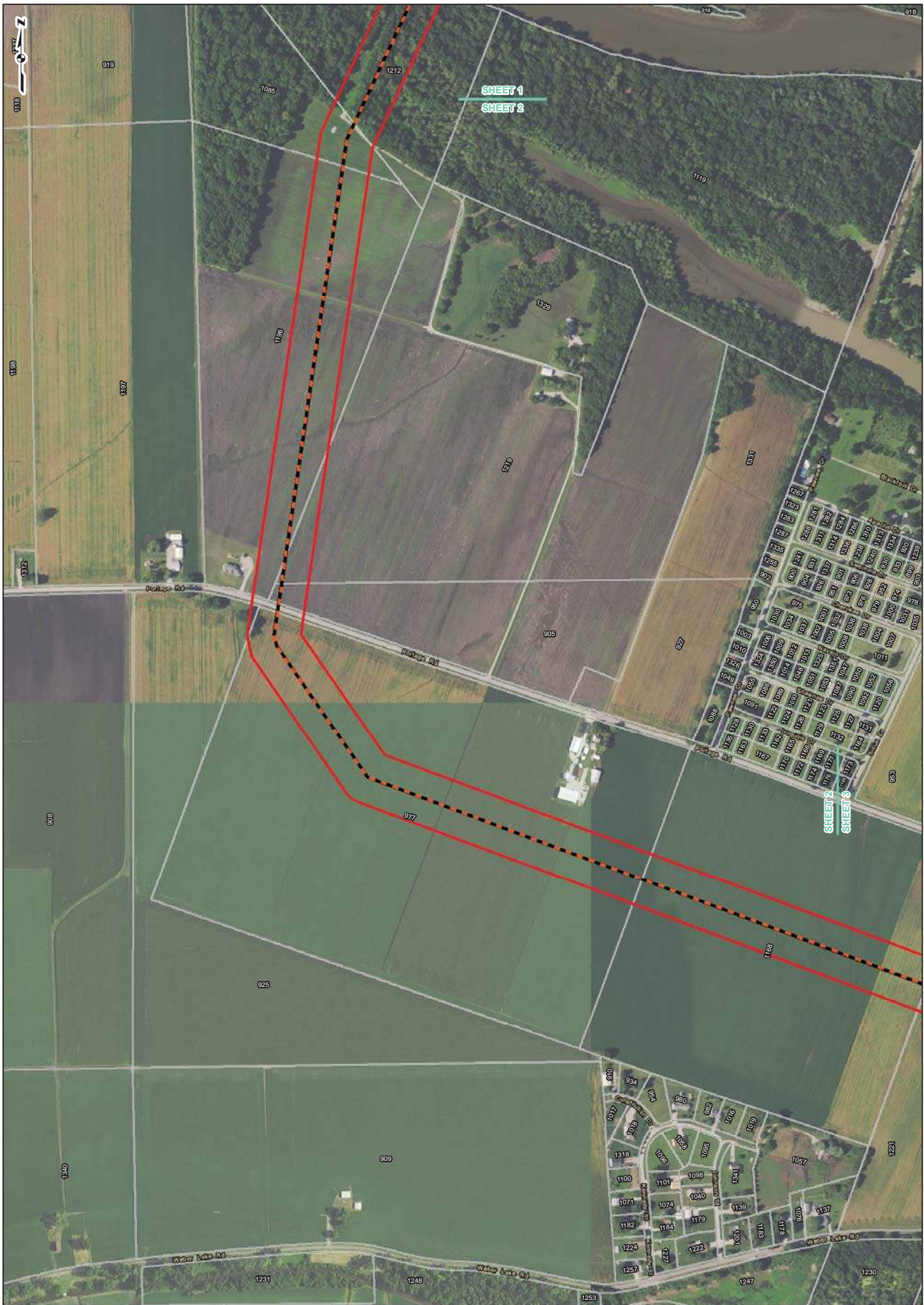
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- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP
SHEET 1 OF 18

SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



SHEET 1
SHEET 2

SHEET 2
SHEET 3



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

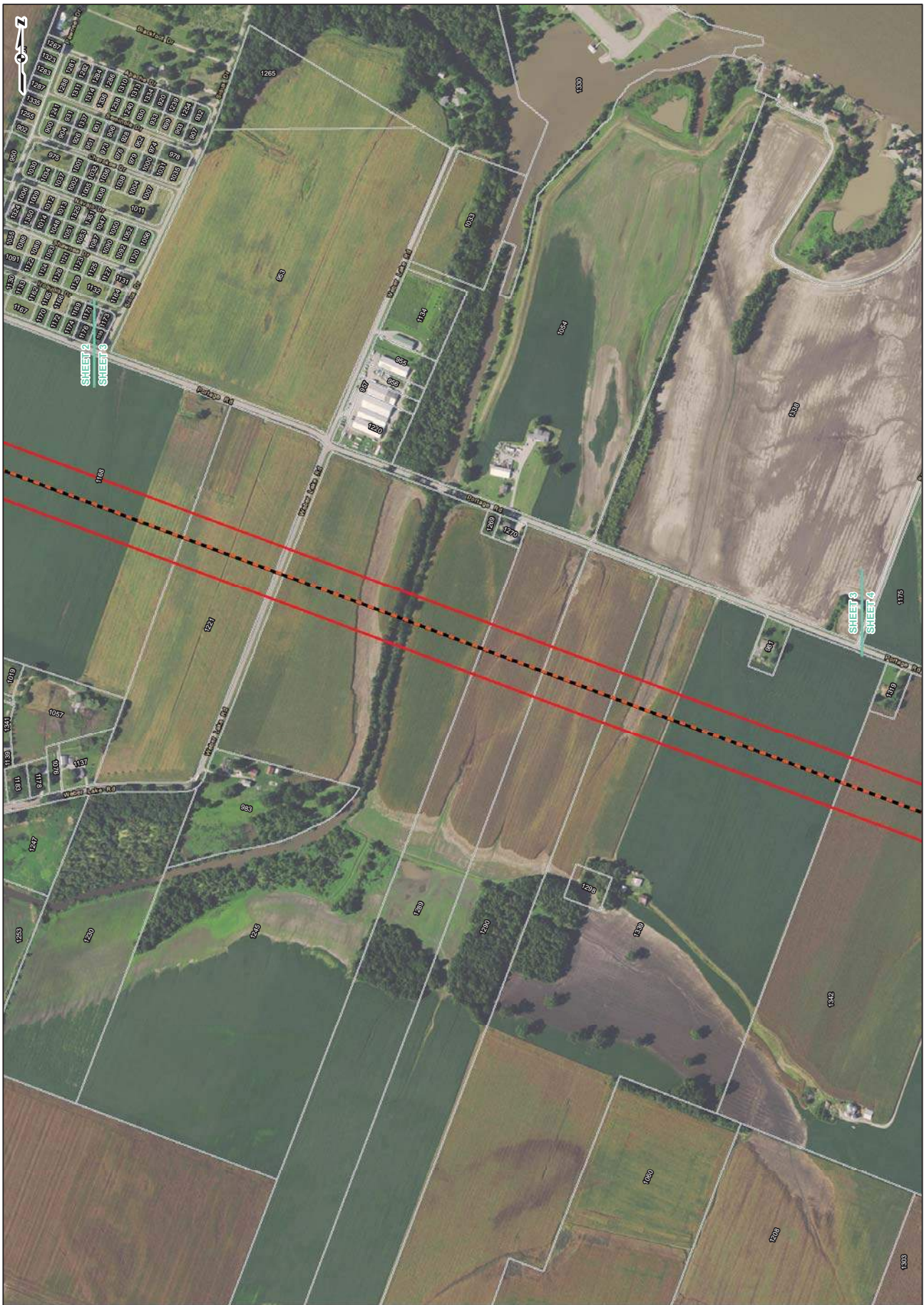
- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 2 OF 18**



DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

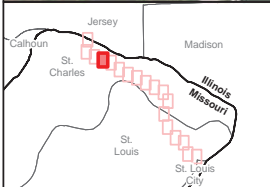
- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP
SHEET 3 OF 18

SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 4 OF 18**

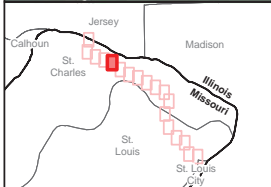
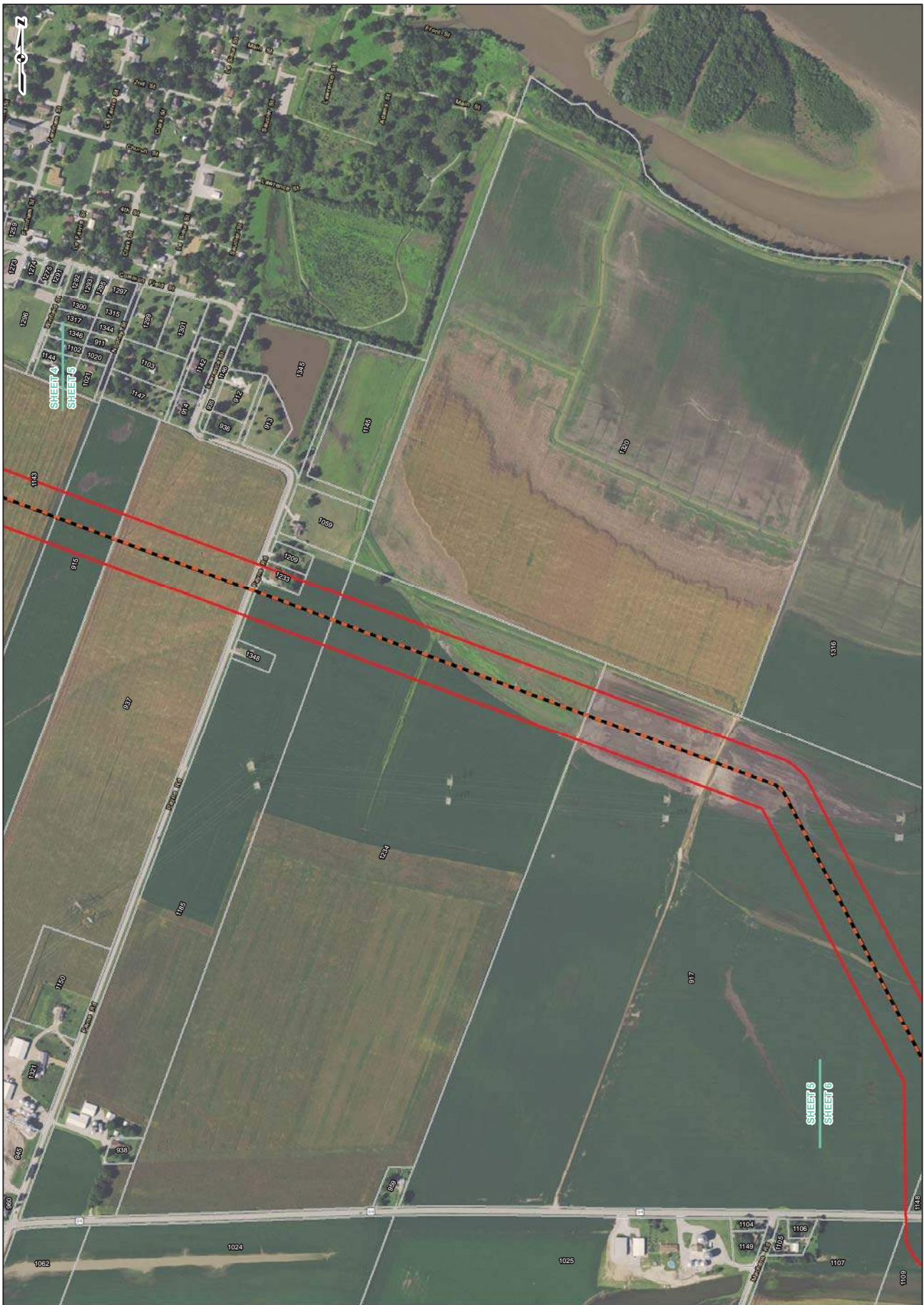


**SPIRE STL
PIPELINE
PROJECT**



DRAWN BY: PMH
CHECKED: EFJ

DATE: 12/5/2016
APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 5 OF 18**

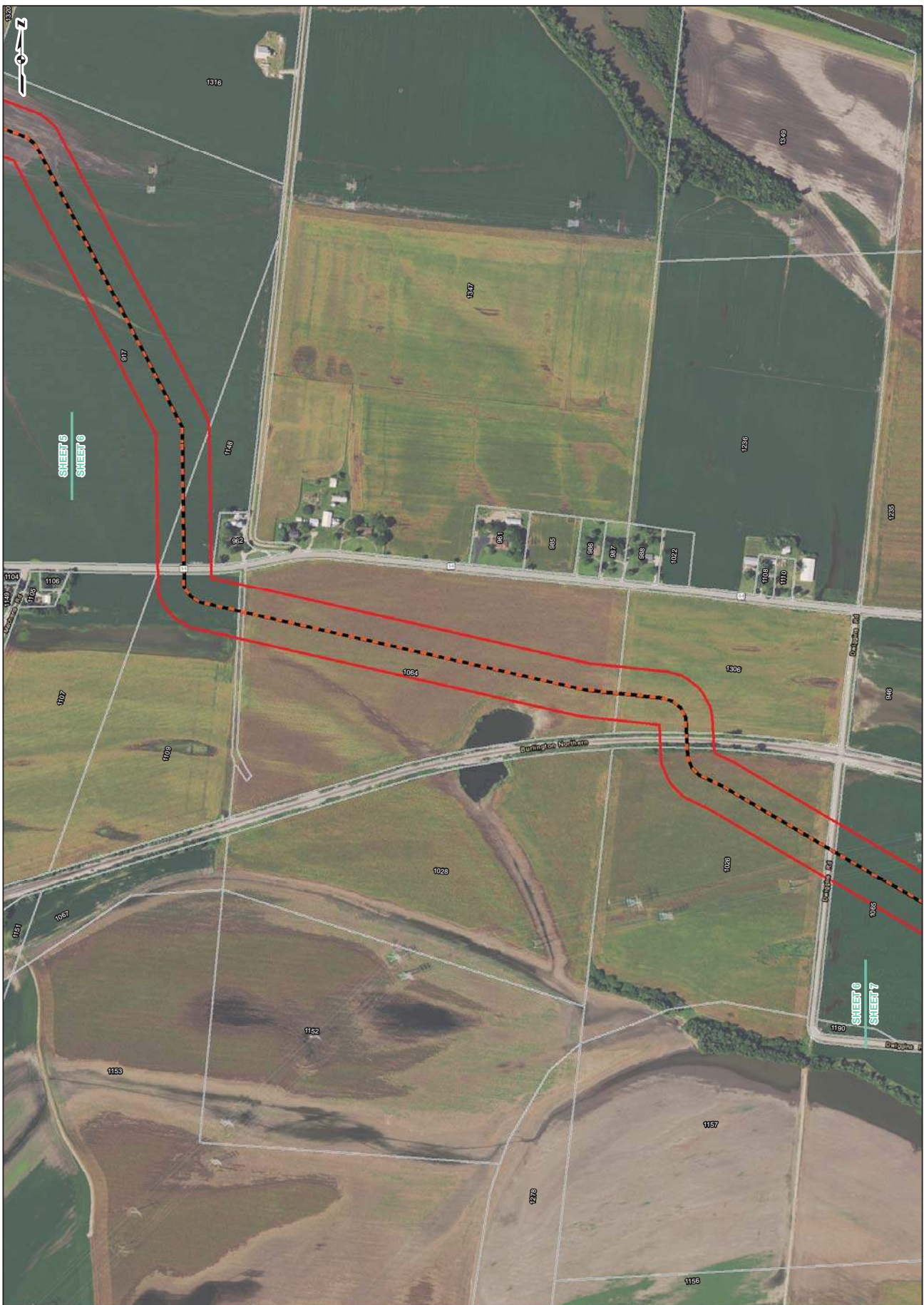


**SPIRE STL
PIPELINE
PROJECT**



DRAWN BY: PMH
CHECKED: EFJ

DATE: 12/5/2016
APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- ▭ PARCEL BOUNDARY
- ▭ COUNTY BOUNDARY
- ▭ STATE BOUNDARY

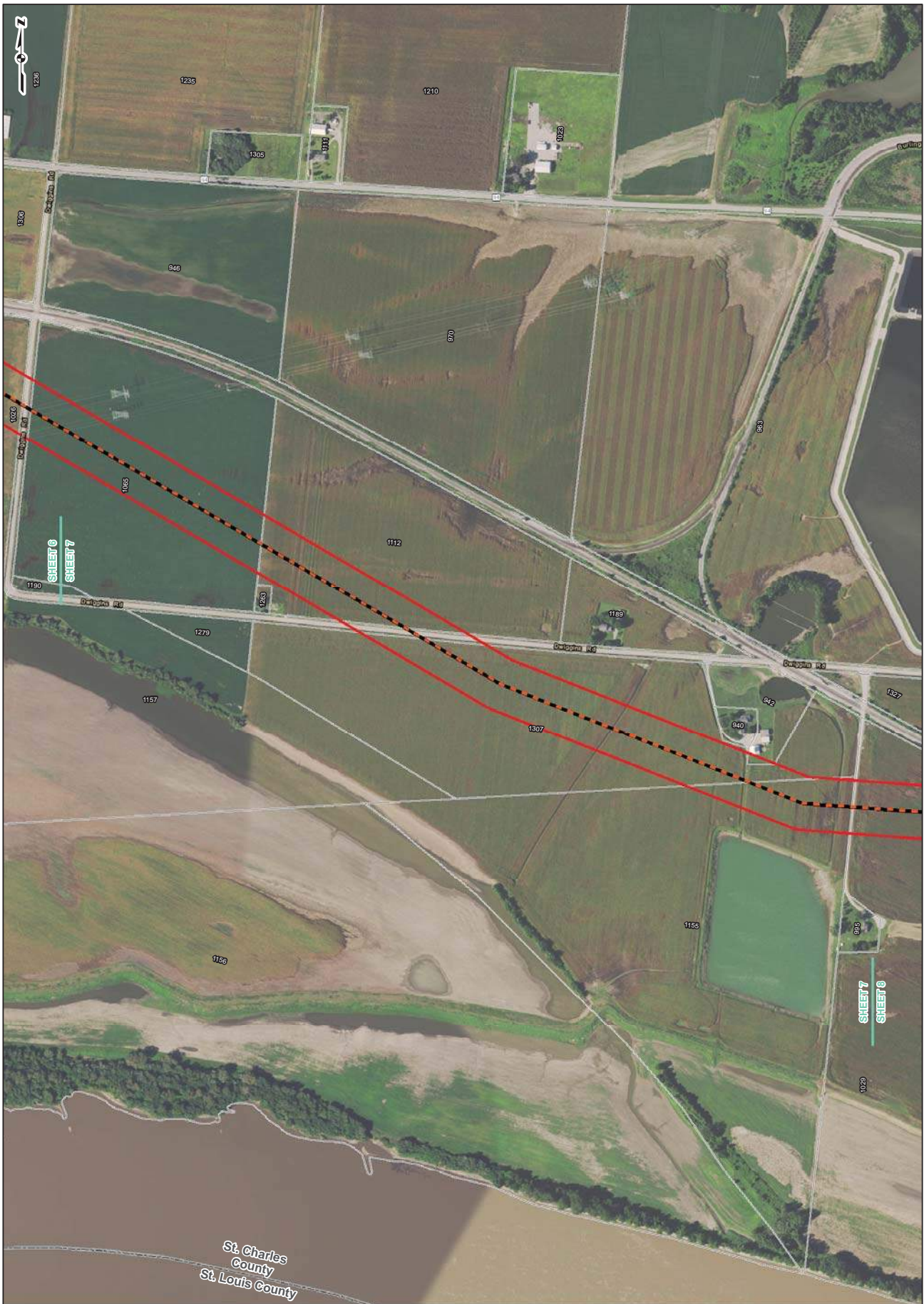
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PROJECT LOCATION MAP
SHEET 6 OF 18

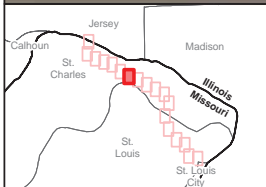
SPiRE STL PIPELINE PROJECT

igal consultants 

DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



St. Charles County
St. Louis County



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

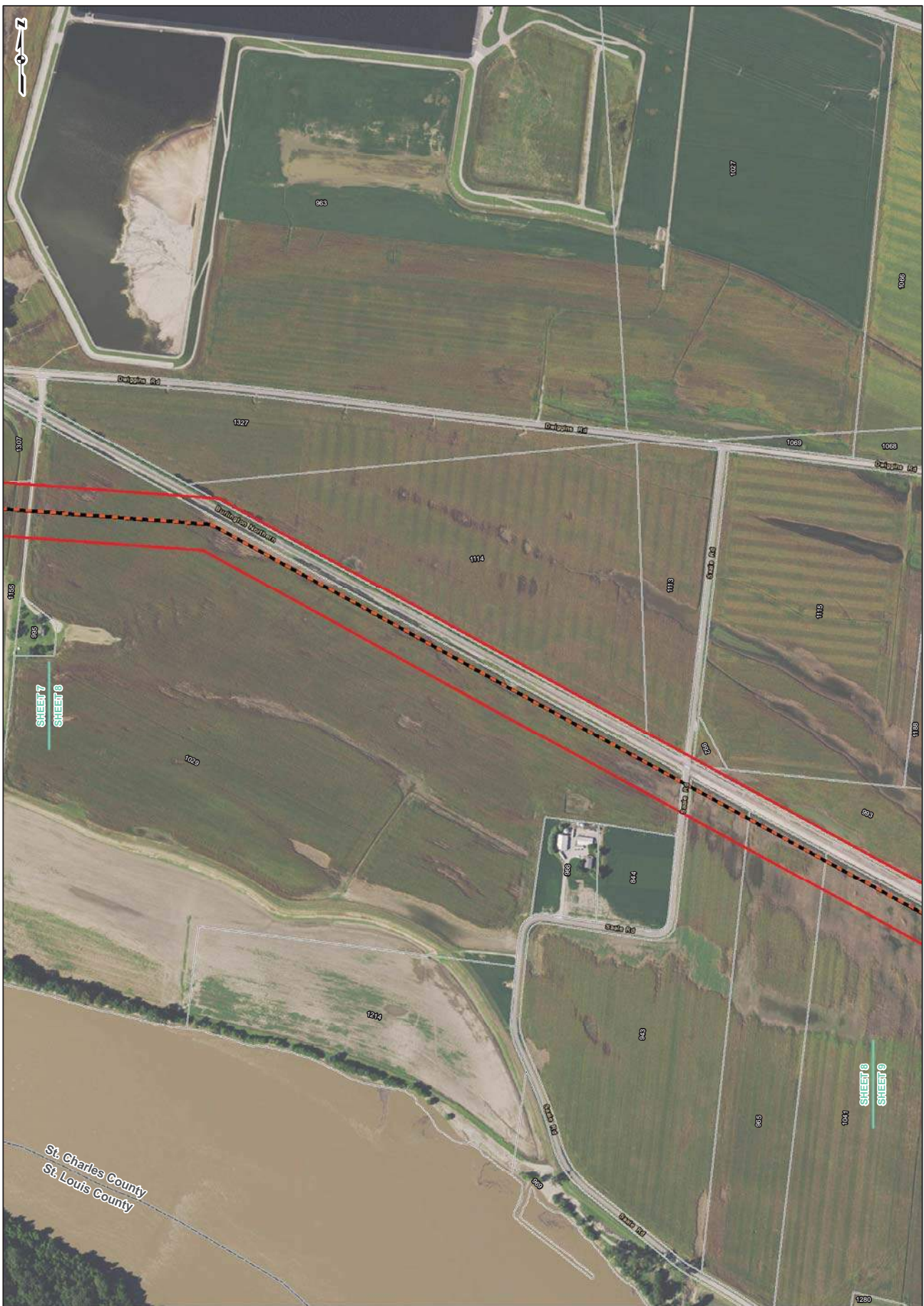
- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP
SHEET 7 OF 18

SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

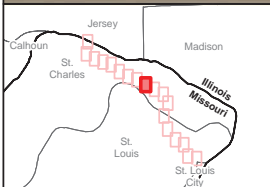
- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP
SHEET 8 OF 18

SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

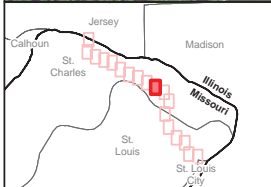
- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP SHEET 9 OF 18

SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
 CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

DRAFT

LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP
SHEET 10 OF 18

SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

DRAFT

LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP SHEET 11 OF 18

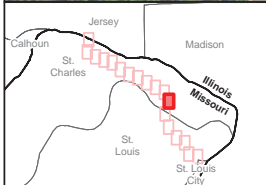
SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
 CHECKED: EFJ APPROVED:



SHEET 11
SHEET 12

SHEET 12
SHEET 13



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

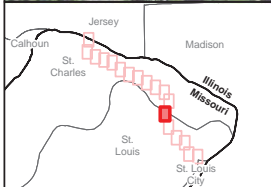
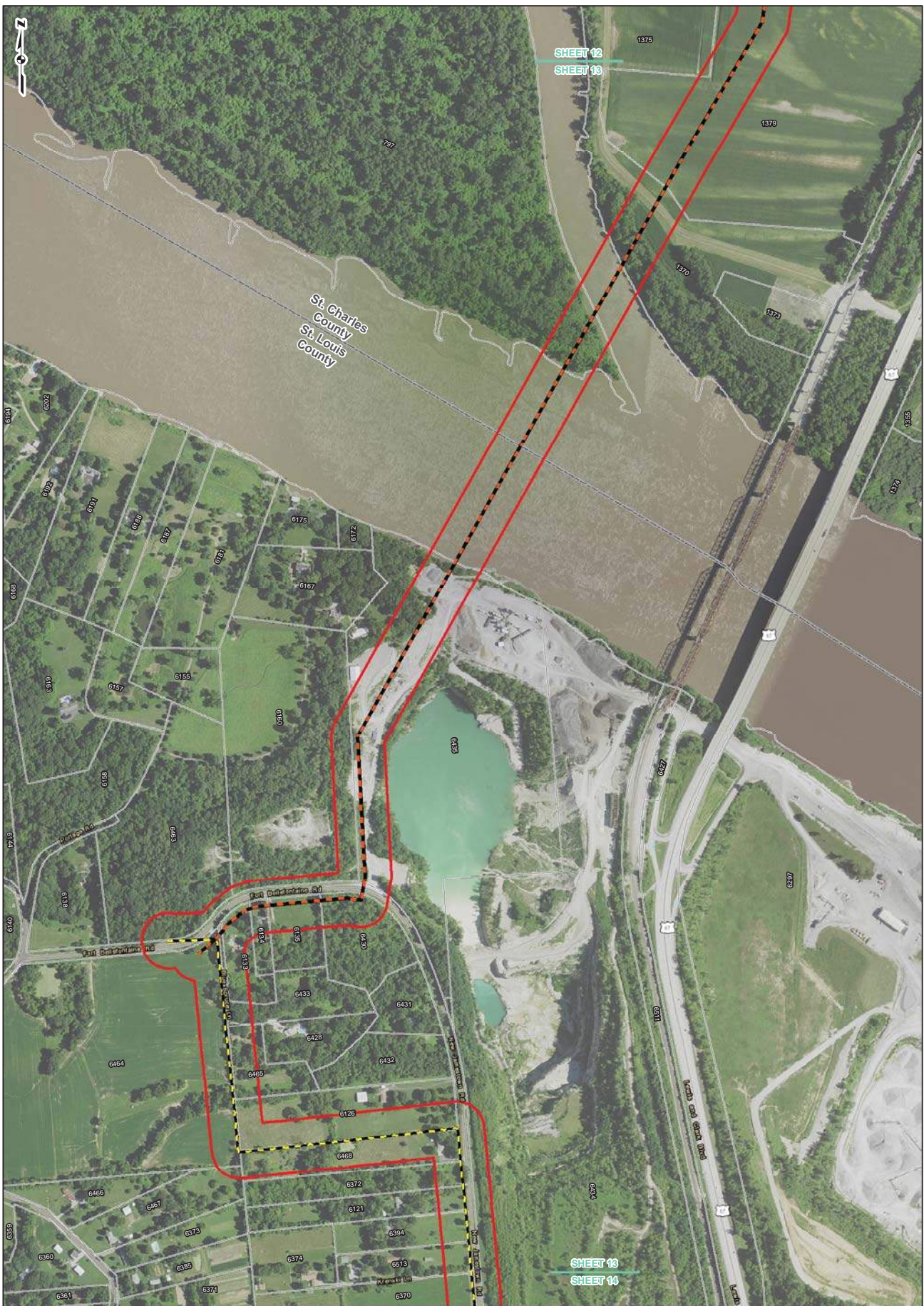
- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 12 OF 18**



DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

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LEGEND

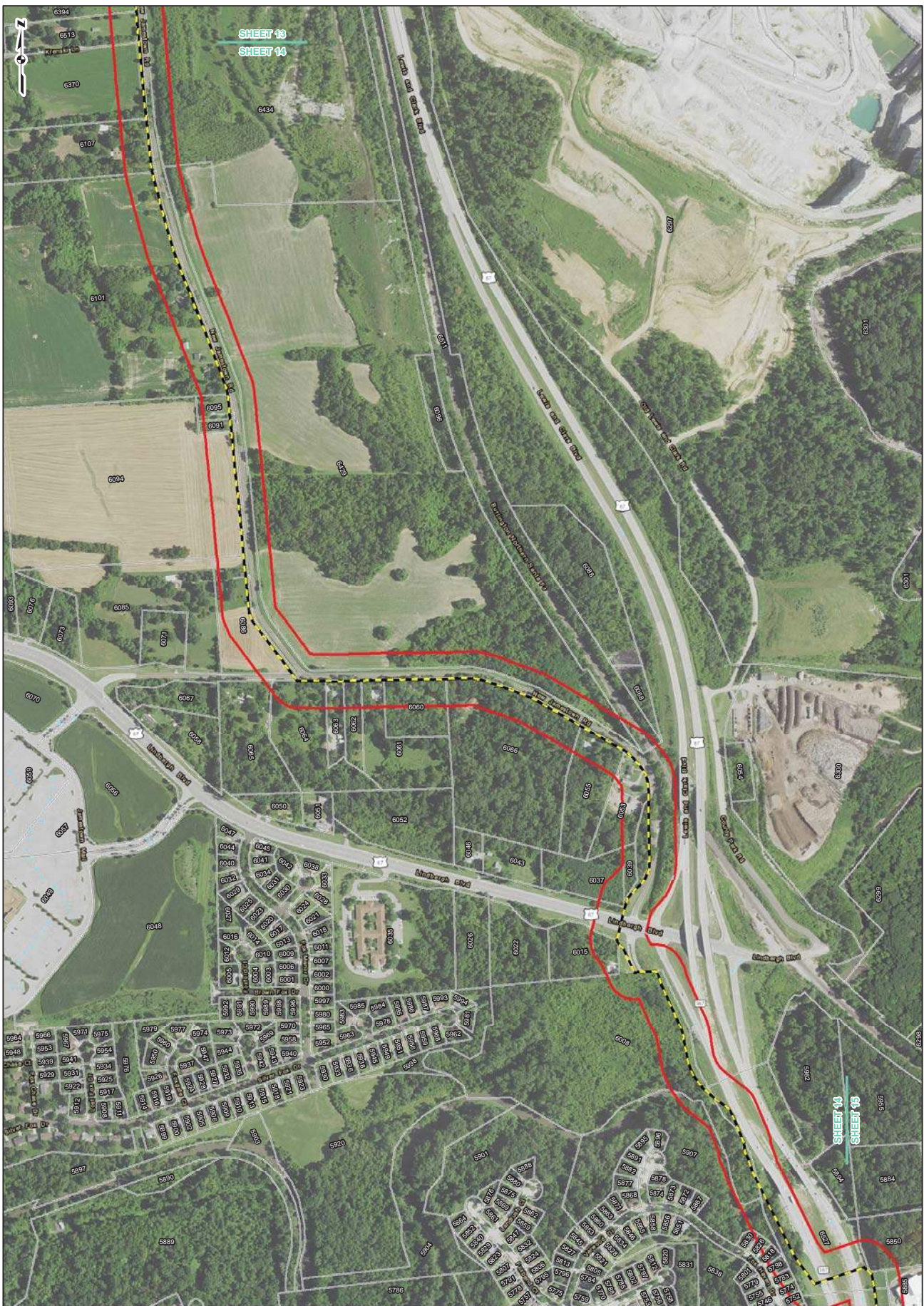
- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

PROJECT LOCATION MAP
SHEET 13 OF 18

SPIRE STL PIPELINE PROJECT

DRAWN BY: PMH DATE: 12/5/2016
CHECKED: EFJ APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/20/16.

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LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 14 OF 18**

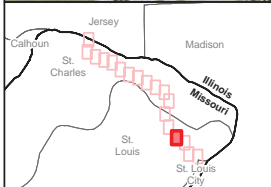
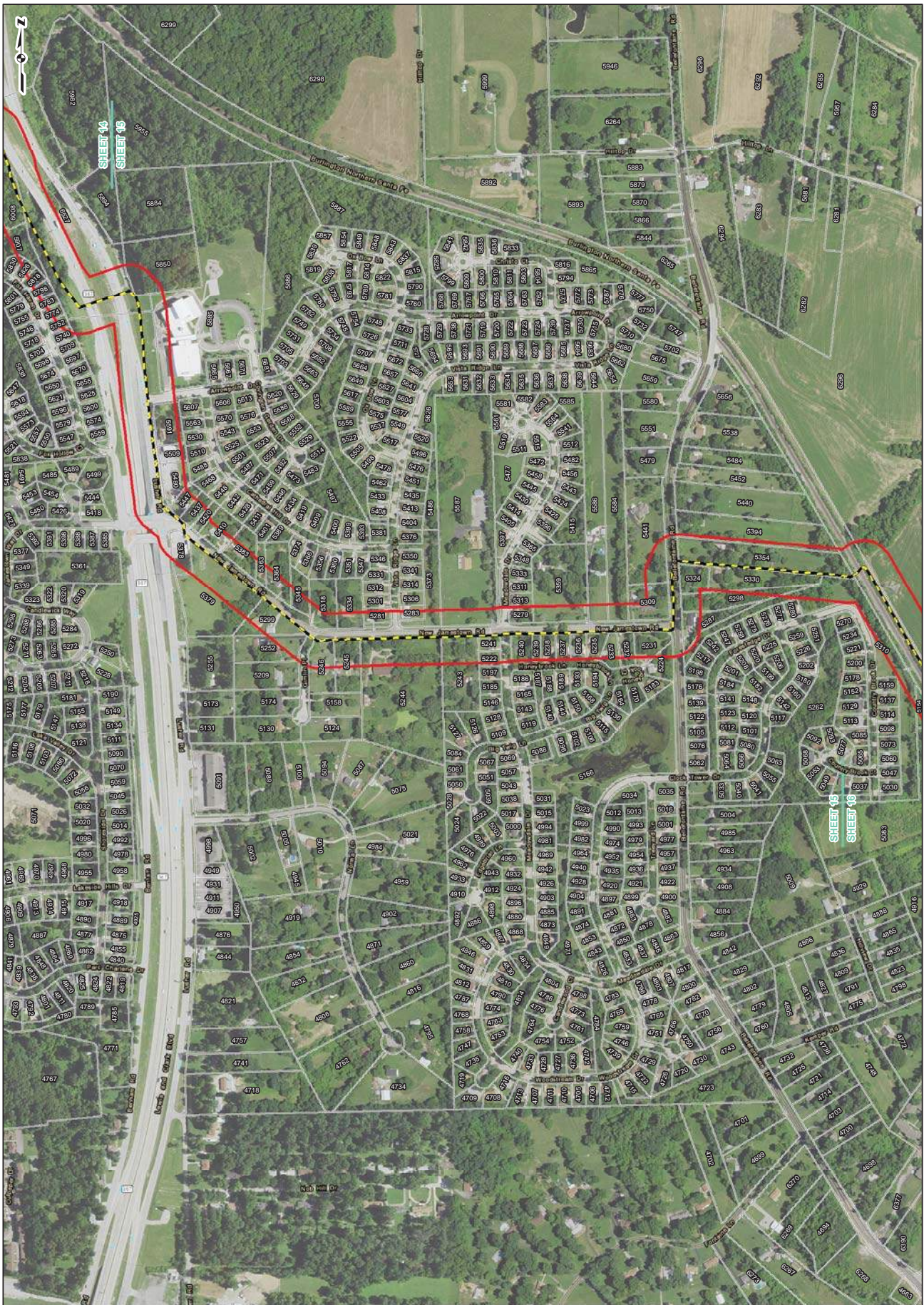


**SPIRE STL
PIPELINE
PROJECT**



DRAWN BY: PMH
CHECKED: EFJ

DATE: 12/5/2016
APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/2016.

DRAFT

LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 15 OF 18**

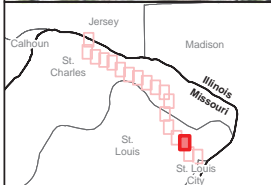


**SPIRE STL
PIPELINE
PROJECT**



DRAWN BY: PMH
CHECKED: EFJ

DATE: 12/5/2016
APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/20/16.

DRAFT

LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 16 OF 18**

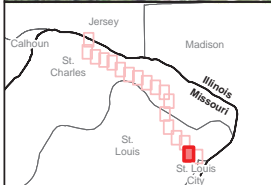
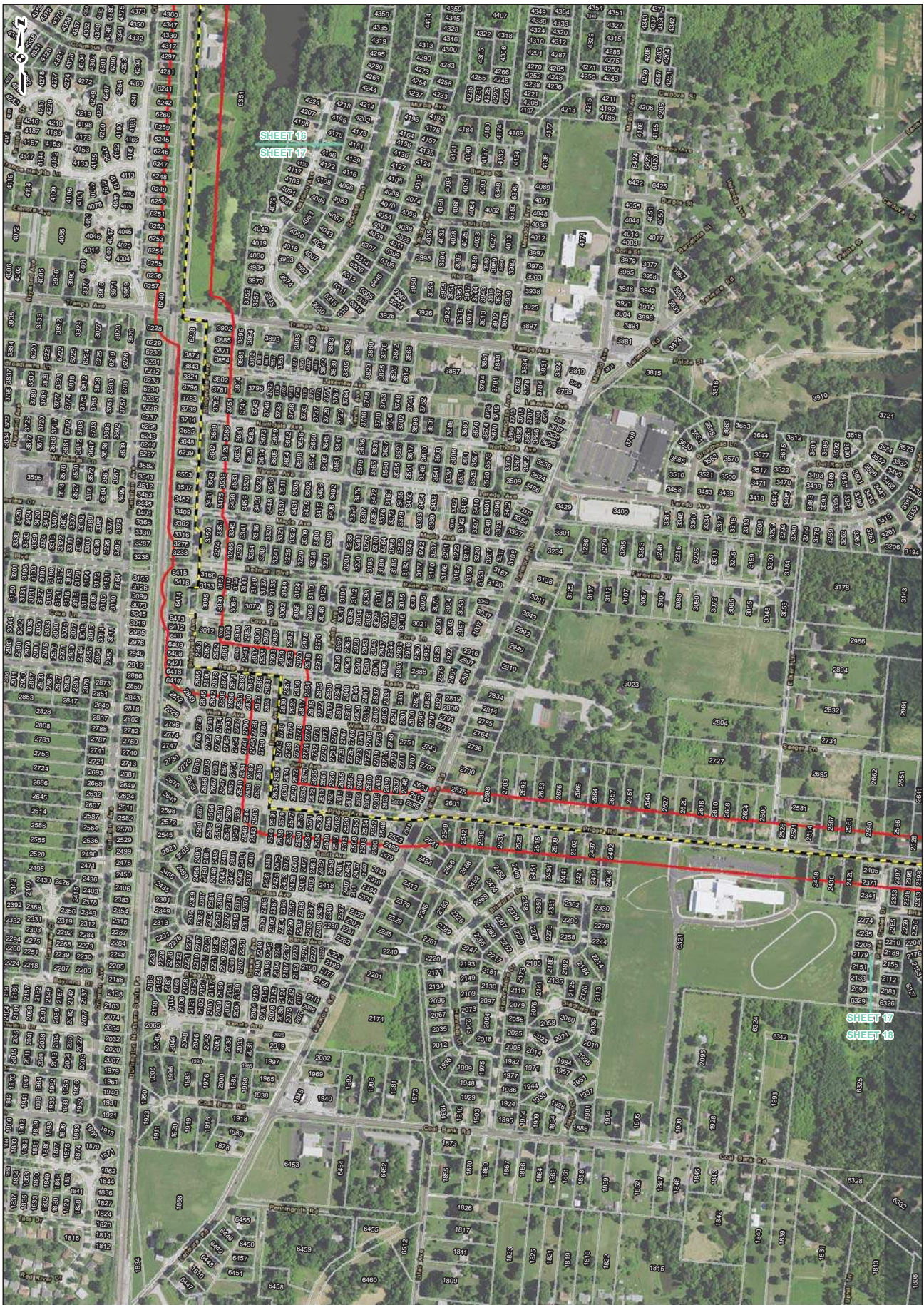


**SPIRE STL
PIPELINE
PROJECT**



DRAWN BY: PMH
CHECKED: EFJ

DATE: 12/5/2016
APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/20/16.

DRAFT

LEGEND

- LINE 880 MODIFICATIONS
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY

0 250 500 1,000 Feet

**PROJECT LOCATION MAP
SHEET 17 OF 18**

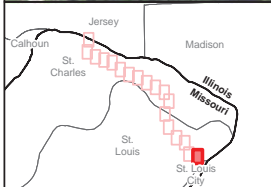
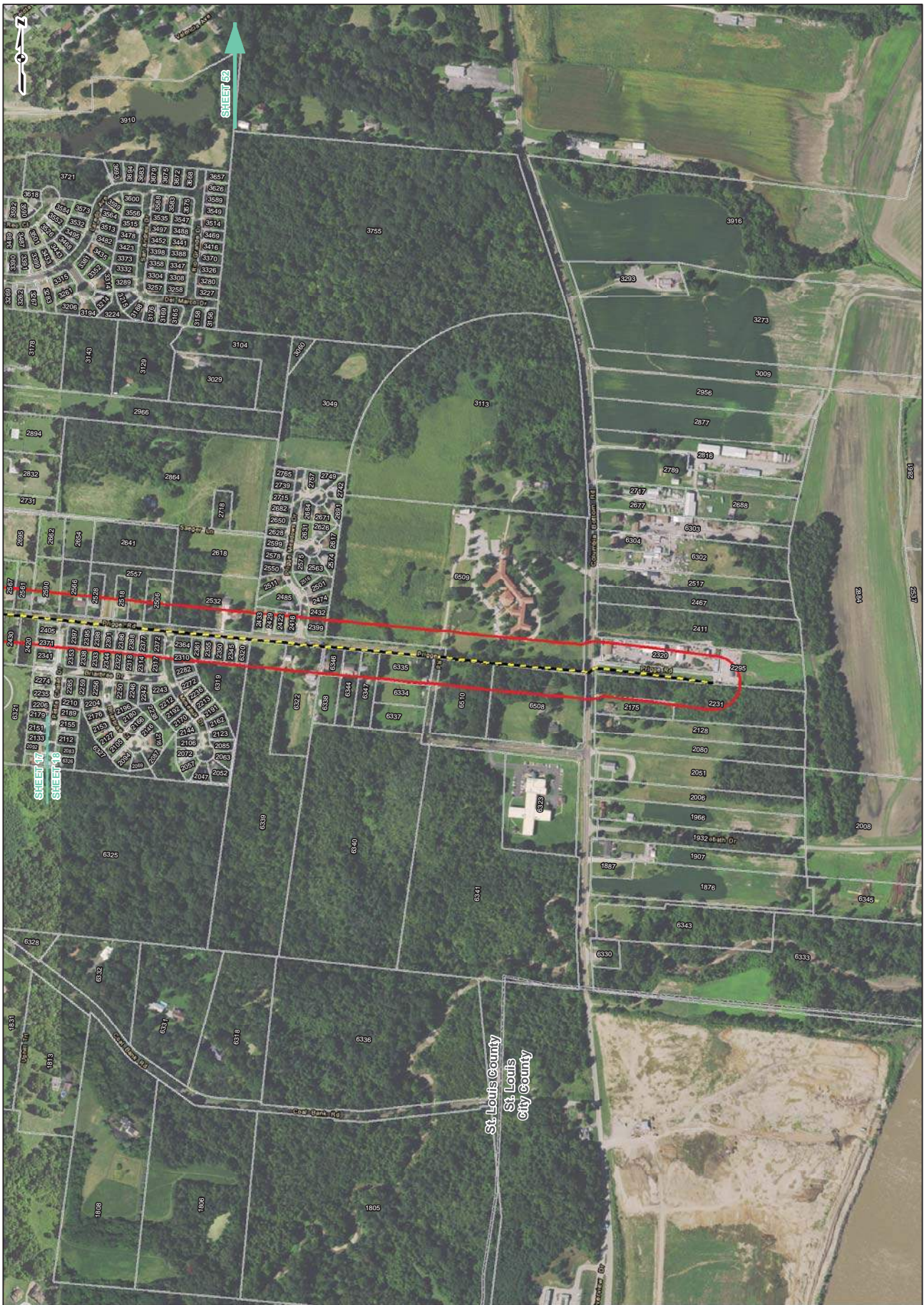


**SPIRE STL
PIPELINE
PROJECT**



DRAWN BY: PMH
CHECKED: EFJ

DATE: 12/5/2016
APPROVED:



REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2014, ACCESSED 12/20/16.

DRAFT

LEGEND

- LINE 880 MODIFICATIONS
- 24-INCH PIPELINE
- 300-FOOT WIDE CORRIDOR
- PARCEL BOUNDARY
- COUNTY BOUNDARY
- STATE BOUNDARY



**PROJECT LOCATION MAP
SHEET 18 OF 18**



**SPIRE STL
PIPELINE
PROJECT**



DRAWN BY: PMH
CHECKED: EFJ

DATE: 12/5/2016
APPROVED:

Ali Trunzo

From: Andrea Halfhill
Sent: Monday, December 05, 2016 10:31 AM
To: Ali Trunzo
Subject: FW: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry
Attachments: Current_300ft_Wide_Corridor_2016_12_01.zip

From: Andrea Halfhill
Sent: Friday, December 02, 2016 4:42 PM
To: 'Gibson, Connie - FSA, St. Peters, MO' <Connie.Gibson@mo.usda.gov>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

Here are the shapefiles, this shows the entire route through MO and IL. We had these already available, but let me know if mapping is easier and we can get our GIS person to create that.

Thanks so much!

Andrea

From: Gibson, Connie - FSA, St. Peters, MO [<mailto:Connie.Gibson@mo.usda.gov>]
Sent: Friday, December 02, 2016 4:40 PM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

Whatever is easiest for you.

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]
Sent: Friday, December 02, 2016 3:38 PM
To: Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

Ok great, thanks! Is it easiest to send shapefiles for you to take a look at?

From: Gibson, Connie - FSA, St. Peters, MO [<mailto:Connie.Gibson@mo.usda.gov>]
Sent: Friday, December 02, 2016 4:37 PM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Subject: RE: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

Hi Andrea,

We could tell you if the fields in question are in CRP; we can't give out dollar amounts or farm numbers, etc. It would then be up to you to contact the producers.

Let me know if you have additional questions.

Connie

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]
Sent: Friday, December 02, 2016 3:28 PM
To: Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>
Subject: [CAUTION: Suspicious Link]Spire pipeline project - CRP lands inquiry

PROCEED WITH CAUTION: This message triggered warnings of **potentially** malicious web content. Evaluate this email by considering whether you are expecting the message, along with inspection for suspicious links.

Questions: Spam.Abuse@wdc.usda.gov

Hi Connie,

I wanted to follow up on some information from the below email.

We wanted to see if the Missouri FSA could identify if our project crosses any CRP lands. We understand you may not be able to provide us with the producers names due to privacy laws.

We are also working with the Illinois FSA. They were able to take a look at our project shapefiles and then had the counties send the producers who had CRP contracts a letter with Spire project information and contact information from Spire.

Is this something the Missouri FSA can do as well, or is it best for Spire to contact the landowners? Please let me know. I can provide project shapefiles is that is something the FSA is willing to assist with.

We appreciate your help!

Andrea

From: Cook, Renee - NRCS, St. Peters, MO [<mailto:Renee.Cook@mo.usda.gov>]
Sent: Wednesday, September 28, 2016 11:45 PM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Cc: frankie.coleman@swcd.mo.gov; Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>
Subject: RE: FERC Pipeline Project Soil Information Request

Ms. Halfhill:

If you are crossing agricultural property, it would be recommended to consult with the landowner to see if they are participating in the Conservation Reserve Program (CRP) with Farm Service Agency, have an Environmental Quality Incentive Program (EQIP) or Conservation Stewardship Program (CSP) contract with the Natural Resources Conservation Service, or have a Wetland Reserve Program (WRP) Easement/Wetland Reserve Easement (WRE) with the Natural Resources Conservation Service. These programs and easements may have specific vegetation requirements that the landowner has agreed to implement and maintain. If the landowner is participating in one of the programs listed above or has an easement with NRCS they will need to contact the NRCS office and we will provide information directly to them and they can provide it to you.

In addition, it would be recommend that you consult with the landowner to see if they have a conservation easement with any other organization (Ducks Unlimited, land trusts, etc.) that may have specific requirements.

If the land that the pipeline will be extending through is agricultural land (cropland, pastureland, or hayland) and not urban land (residential/common ground, commercial, or industrial), it is recommended to consult with the landowner to determine their land use objectives, prior to seeding it to permanent vegetation.

The Natural Resources Conservation Service (NRCS) has an online Field Office Technical Guide that has agricultural land Conservation Practice Standards and Specifications for public use. Missouri NRCS and Illinois NRCS may have different conservation practice standards and specifications therefore, I would also recommend that you contact Illinois NRCS. According to the information that you provided, the Critical Area Treatment (342) Standard would be recommended for use in Missouri along with the Vegetation Establishment Herbaceous Seeding Specification (723).

Missouri NRCS also has a seeding calculator that is available online that you can fill in the acres to be seeded, select the county, select the site soil group, select the practice Critical Area Treatment (342), select the seeding situation, select fertilizer and lime – apply blanket rates on constructed fills and finish grades, select Blanket rates for constructed fills – choose grass type, Lime – 1000 for St. Charles County and 1500 for St. Louis County, select specie(s) based on erosion control rating, wet soil tolerance, drought tolerance, and you will also need to enter the practice adjustment factor and Critical Area Treatment (342) Exemption. When completed the seeding calculator will provide the seeding, fertilizer, and lime information that you requested. I would be happy to discuss this further with the person that will be responsible for the oversight of the seeding so they can generate the seeding, fertilizer, and lime information that is needed.

You can find the Critical Area Treatment (342) Standard, the Vegetation Establishment Herbaceous Seeding Specification (723), and the seeding calculator on the NRCS website at the following link:

<http://www.nrcs.usda.gov/wps/portal/nrcs/site/national/home/>

- Select Field Office Technical Guide on the right side of the screen
- Select “Go to Your States FOTG” on the right side of the screen
- Select MO or the state that you want
- Select St. Louis or St. Charles County in Missouri (the standards and specifications are the same for both counties)
- Select section IV from the drop down menu on the left side of the screen
- Select the Conservation Practices file
- Select Critical Area Planting (342) file and select the Critical Area Planting (342) Conservation Practice Standard. This is a .pdf file that can be saved where you would like. If you choose use the standard in the future, please check online to make sure that it has not been revised.

Still under Section IV from the drop down menu on the left side of the screen:

- Select the Practice Specification file
- Select the Vegetation Establishment File
- Select Vegetation Establishment, Herbaceous Seeding Specification (723). This is a .pdf file that can be saved where you would like. If you choose use the standard in the future, please check online to make sure that it has not been revised.

Still in the Vegetation Establishment File:

- Select the Excel Spreadsheet labelled “X MO Seeding Calculator”. This is a .xlsx file that can be saved where you would like. If you choose use the standard in the future, please check online to make sure that it has not been revised.

I am not sure what agricultural land erosion controls that you are looking for other than permanent seeding. From the USGS Topographic Map I received, it looks like the majority of the agricultural land that the pipeline will be extending through in St. Charles County is bottomland/floodplain. Landowners receiving USDA benefits are not required to implement erosion control measures on agricultural bottomland/floodplain which is considered Non Highly Erodible Land (NHEL). If there is any agricultural land in St. Louis County that is hill ground which is considered Highly Erodible Land (HEL) that has an annual grain crop planted on it and the landowner is receiving USDA benefits, the landowner needs to contact the NRCS office and we will work with them on potential erosion control measures.

I would recommend you contact St. Charles County Government, St. Louis County Government along with the municipalities that the pipeline extends through and the Department of Natural Resources to see if they have any land disturbance erosion control requirements or permits that need to be obtained.

If it is urban land (residential/common ground, commercial, or industrial) that the pipeline will be extending through, refer to the "Protecting Water Quality: A field guide to erosion, sediment and stormwater best management practices for development sites in Missouri and Kansas located on the Missouri Department of Natural Resources website at the link below:

<https://dnr.mo.gov/env/wpp/wpcp-guide.htm>

Noxious Weeds and Weed Controls can be found on the Missouri Department of Agriculture website at the link below:

<http://agriculture.mo.gov/plants/ipm/noxiousweeds.php>

Will you please notify Lori M. Ferry, Environmental Project Manager, that I am the Natural Resources Conservation Service contact at the USDA Service Center in St. Peters, MO. She mailed a letter to Connie Gibson addressed to Natural Resources Conservation Service. Connie is the Farm Service Agency County Executive Director. Connie did provide me the letter that Lori mailed her.

I will be out of the office Thursday, 9/29 through Friday, 9/30 and return on Monday 10/3.

Thank you,

Renee L. Cook
District Conservationist
USDA Natural Resources Conservation Service
St. Charles, St. Louis, Franklin, Jefferson, & Washington Counties

USDA Service Center
160 St. Peters Centre Blvd.
St. Peters, MO 63376
Cell Phone: (636)577-3016
Phone: (636)922-2833 Ext. 3
Fax: 1-855-863-7028
renee.cook@mo.usda.gov

Helping People Help The Land

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From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]
Sent: Wednesday, September 28, 2016 12:06 PM
To: Coleman, Frankie <frankie.coleman@swcd.mo.gov>
Cc: Cook, Renee - NRCS, St. Peters, MO <Renee.Cook@mo.usda.gov>
Subject: RE: FERC Pipeline Project Soil Information Request

Hi Frankie,

I just wanted to check in with you to see if you had any information.

Thanks for your time!

Andrea

From: Coleman, Frankie [<mailto:frankie.coleman@swcd.mo.gov>]
Sent: Friday, September 16, 2016 9:00 AM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Cc: 'Cook, Renee - NRCS, St. Peters, MO' <Renee.Cook@mo.usda.gov>
Subject: RE: FERC Pipeline Project Soil Information Request

Ms. Halfhill,

I apologize for not responding earlier. We are checking into whether or not the NRCS state office should handle the request. Hopefully, we will know something soon. I will keep you updated.

Regards,

Frankie Coleman

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]
Sent: Wednesday, September 07, 2016 1:50 PM
To: Coleman, Frankie
Subject: FERC Pipeline Project Soil Information Request

Good afternoon,

We are researching information on behalf of Spire STL Pipeline LLC, for the Spire STL Pipeline Project as described below. As part of the FERC application, we will be consulting with land management agencies and local soil conservation authorities to request any recommendations you may have for seed mixes, seeding dates, application rates for fertilizer and lime, erosion controls, and noxious weed controls. We are also looking for any specific restoration and/or seeding plans that may be required or recommended by your agency or any requirements for what species and fertilizers should be used on areas disturbed by construction to generate growth.

I have attached some preliminary mapping for your use in reviewing the project footprint.

Any information you can pass along is greatly appreciated!

Description of the Project:

Spire STL Pipeline LLC (“Spire”), a wholly owned subsidiary of Spire Inc., is seeking authorization from the Federal Energy Regulatory Commission (“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 Project as proposed will consist of approximately 57.4 miles of new build 24-inch-diameter steel pipeline (referred to as the “new build” portion of the Project) 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 in St. Charles County, Missouri. The new build then crosses the Missouri River and ties 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”). As part of the proposed Project and subject to LGC’s receipt of approval from the Missouri Public Service Commission (“MPSC”), Spire is proposing to purchase Line 880, including its appurtenant and ancillary facilities, from LGC and modify the pipeline before placing it in interstate service. Line 880 consists of approximately 7.6 miles of existing 20-inch-diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC (“Enable MRT”) pipeline along the western bank of the Mississippi River in St. Louis County, Missouri. The total length of the Project pipelines will be approximately 65.0 miles. The overall design capacity of the pipeline is expected to be 400,000 dekatherms per day (“Dth/d”). No compression will be required. The Project as proposed will include pipeline interconnects with REX in Illinois and LGC and Enable MRT in Missouri. The Project will also include the construction of minor aboveground facilities.

Thank you,

Andrea

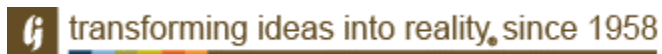
Andrea M. Halfhill, B.A, B.S.
Project Environmental Specialist

GAI Consultants

6000 Town Center Blvd., Suite 300, Canonsburg, PA 15317

T 724.873.3545 | D 412.399.5521 | M 724.344.0124 | gaiconsultants.com |     

* Please update your records with my new direct telephone number



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Ali Trunzo

Subject: FW: Spire STL Pipeline-IDNR CRP lands

From: Diebal, Jamie - FSA, Springfield, IL [<mailto:Jamie.Diebal@il.usda.gov>]

Sent: Monday, October 31, 2016 11:32 AM

To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>

Cc: Martin, Kimberly - FSA, Springfield, IL <Kimberly.Martin@il.usda.gov>; Bailey, Doug - FSA, Springfield, IL <Doug.Bailey@il.usda.gov>

Subject: RE: Spire STL Pipeline-IDNR CRP lands

Andrea,

I just wanted to update you to let you know that letters to all producers have been sent. You should start hearing from the producers very soon I would expect.

Here is a breakdown for you:

Greene – 7 contracts (6 producers)

Jersey – 7 contracts (7 producers)

Scott – 2 contracts (1 producer)

Please let us know if you have any questions.

Jamie Diebal

Conservation and Environmental Programs Division Specialist

USDA – Illinois State FSA Office

3500 Wabash Ave, Springfield, IL 62711

☎ ph. 217-331-6872 📠 fax. 855-800-1760

Ali Trunzo

Subject: FW: Spire STL Pipeline-IDNR CRP lands

From: Andrea Halfhill

Sent: Wednesday, October 19, 2016 8:31 AM

To: Diebal, Jamie - FSA, Springfield, IL <Jamie.Diebal@il.usda.gov>

Cc: Martin, Kimberly - FSA, Springfield, IL <Kimberly.Martin@il.usda.gov>; Bailey, Doug - FSA, Springfield, IL <Doug.Bailey@il.usda.gov>; Lori Ferry <L.Ferry@gaiconsultants.com>

Subject: RE: Spire STL Pipeline-IDNR CRP lands

Hi Jamie,

Thank you for the information!

The contact to use from Spire is:

Lori Komatar

lkomatar@mdmcorp.com

801-608-8460

Thank you!

Andrea

Ali Trunzo

To: Andrea Halfhill; Lori Ferry
Subject: RE: Spire STL Pipeline-IDNR CRP lands

From: "Diebal, Jamie - FSA, Springfield, IL" <Jamie.Diebal@il.usda.gov>

Date: October 17, 2016 at 5:56:17 PM EDT

To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>

Cc: "Martin, Kimberly - FSA, Springfield, IL" <Kimberly.Martin@il.usda.gov>, "Bailey, Doug - FSA, Springfield, IL" <Doug.Bailey@il.usda.gov>

Subject: RE: Spire STL Pipeline-IDNR CRP lands

Andrea,

We have been able to review the shapefiles and determined the proposed pipeline will cross a total of 17 CRP contracts in the three counties. As I stated previously, due to privacy laws we are not able to release producer names. In the past each county notifies the producers affected by the pipeline. In the letter, we include contact information or a representative from Spire STL Pipeline that producers may contact for more information. This way the producer is contacting you and FSA is not giving out their personal information.

I will be notifying the counties this week and asking them to send the producers affected by the pipeline a letter. Is there a certain contact from Spire we could include in this letter?

Thank you,

Jamie Diebal

Conservation and Environmental Programs Division Specialist
USDA – Illinois State FSA Office
3500 Wabash Ave, Springfield, IL 62711
☎ ph. 217-331-6872 📠 fax. 855-800-1760

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]

Sent: Wednesday, October 12, 2016 8:34 AM

To: Diebal, Jamie - FSA, Springfield, IL <Jamie.Diebal@il.usda.gov>

Cc: Martin, Kimberly - FSA, Springfield, IL <Kimberly.Martin@il.usda.gov>; Bailey, Doug - FSA, Springfield, IL <Doug.Bailey@il.usda.gov>

Subject: FW: Spire STL Pipeline-IDNR CRP lands

Hi Jamie,

Just wanted to followup with you and see if you had a chance to review the shapefiles for this project.

Thank you!

Andrea

From: Andrea Halfhill

Sent: Monday, September 26, 2016 3:47 PM

To: 'Diebal, Jamie - FSA, Springfield, IL' <Jamie.Diebal@il.usda.gov>

Cc: Martin, Kimberly - FSA, Springfield, IL <Kimberly.Martin@il.usda.gov>; Bailey, Doug - FSA, Springfield,

IL <Doug.Bailey@il.usda.gov>

Subject: RE: Spire STL Pipeline-IDNR CRP lands

Hi Jamie,

Attached are some preliminary shapefiles for the project. We appreciate any information/help you can provide.

Thank you!

Andrea

From: Diebal, Jamie - FSA, Springfield, IL [<mailto:Jamie.Diebal@il.usda.gov>]

Sent: Thursday, September 22, 2016 11:45 AM

To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>

Cc: Martin, Kimberly - FSA, Springfield, IL <Kimberly.Martin@il.usda.gov>; Bailey, Doug - FSA, Springfield, IL <Doug.Bailey@il.usda.gov>

Subject: FW: Spire STL Pipeline-IDNR CRP lands

Hi Andrea,

Due to privacy laws we are not able to release producers names. In the past we have identified those producers that may be affected and we work with the County Office's who then contact the producers with information about the pipeline and how it may affect their CRP contract. This allows us to notify the producer but also protect their personal information.

Do you have a shapefile you could send to us of the proposed route? Once we receive a shapefile we will know more about the impact this pipeline will have.

Thank you.

Jamie Diebal

Conservation and Environmental Programs Division Specialist

USDA – Illinois State FSA Office

3500 Wabash Ave, Springfield, IL 62711

☎ ph. 217-331-6872 📠 fax. 855-800-1760

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]

Sent: Wednesday, September 21, 2016 2:47 PM

To: Diebal, Jamie - FSA, Springfield, IL <Jamie.Diebal@il.usda.gov>; Martin, Kimberly - FSA, Springfield, IL <Kimberly.Martin@il.usda.gov>

Subject: Spire STL Pipeline-IDNR CRP lands

Hi Kimberly and Jamie,

We were forwarded your contact information from Luke Garver (per the email thread below).

We are researching information on behalf of Spire STL Pipeline LLC, for the Spire STL Pipeline Project as described below. As part of the FERC application, we will be consulting with the IDNR and FSAs to identify any CRP lands that may be crossed by the Project .

I have attached some preliminary mapping for your use in reviewing the project footprint.

Any information you can pass along is greatly appreciated!

Description of the Project:

Spire STL Pipeline LLC (“Spire”), a wholly owned subsidiary of Spire Inc., is seeking authorization from the Federal Energy Regulatory Commission (“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 Project as proposed will consist of approximately 57.4 miles of new build 24-inch-diameter steel pipeline (referred to as the “new build” portion of the Project) 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 in St. Charles County, Missouri. The new build then crosses the Missouri River and ties 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”). As part of the proposed Project and subject to LGC’s receipt of approval from the Missouri Public Service Commission (“MPSC”), Spire is proposing to purchase Line 880, including its appurtenant and ancillary facilities, from LGC and modify the pipeline before placing it in interstate service. Line 880 consists of approximately 7.6 miles of existing 20-inch-diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC (“Enable MRT”) pipeline along the western bank of the Mississippi River in St. Louis County, Missouri. The total length of the Project pipelines will be approximately 65.0 miles. The overall design capacity of the pipeline is expected to be 400,000 dekatherms per day (“Dth/d”). No compression will be required. The Project as proposed will include pipeline interconnects with REX in Illinois and LGC and Enable MRT in Missouri. The Project will also include the construction of minor aboveground facilities.

Thank you!

Andrea

Andrea M. Halfhill, B.A, B.S.
Project Environmental Specialist

GAI Consultants

6000 Town Center Blvd., Suite 300, Canonsburg, PA 15317

T 724.873.3545 | D 412.399.5521 | M 724.344.0124 | gaiconsultants.com |



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From: Garver, Luke [<mailto:Luke.Garver@illinois.gov>]

Sent: Friday, September 09, 2016 3:38 PM

To: Lori Ferry <L.Ferry@gaiconsultants.com>

Cc: Ali Trunzo <A.Trunzo@gaiconsultants.com>; DNR.CREP <DNR.CREP@Illinois.gov>; Chandler, Mike <Mike.Chandler@Illinois.gov>

Subject: RE: Spire STL Pipeline-IDNR Conservation Easements

Hello Lori,

Thank you for providing these shapefiles. I took a look at the pipeline route, and even with taking the 300 ft buffer into account, it does not cross any CREP Easements. The closest easements to the current route are approximately 2 miles away.

We have access to USDA-Farm Service Agency's (FSA) data layer on the Conservation Reserve Program (CRP), however, and I noticed several instances where the pipeline will potentially cross properties in that program. Have you spoke with representatives from FSA regarding CRP? If not, Jamie Diebal and Kim Martin are the contacts for that agency. Their emails are: Kimberly.Martin@il.usda.gov and Jamie.Diebal@il.usda.gov .

Thank you again for providing this information. We will keep your data request form on file for future projects or in the event this pipeline makes any major route changes.

Take care,

Luke Garver

CREP Program Coordinator
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, Illinois 62702-1721
(217) 524-3200

From: Lori Ferry [<mailto:L.Ferry@gaiconsultants.com>]
Sent: Friday, September 09, 2016 12:13 PM
To: Garver, Luke
Cc: Ali Trunzo
Subject: [External] Spire STL Pipeline-IDNR Conservation Easements

Hi Luke

Per our conversation yesterday, I've attached the Spire shapefiles and the conservation agreement for your review.

Please note that we are proposing to survey a 300-foot corridor on the Project in order to account for potential route changes that could occur so I've included this buffer in these files for you in order to capture all potential easements. Our anticipated construction right-of-way is approximately 115-feet. If we have any further route changes that locates the proposed route outside of this 300-foot corridor, we would re-consult with you to determine if additional easements may be crossed.

Please let me know if you have any difficulty reviewing these files. I appreciate your willingness to work with us! We look forward to receiving your data.

Thanks,
Lori

Lori Ferry
Environmental Manager-Energy Business Unit

GAI Consultants
Chicago Office | 1444 Farnsworth Avenue, Suite 303 Aurora, Illinois 60505



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Ali Trunzo

From: Andrea Halfhill
Sent: Thursday, October 13, 2016 10:26 AM
To: Ali Trunzo
Subject: FW: FERC Pipeline Project - Soil Information Request

From: Behymer, Bradley - NRCS, Carrollton, IL [mailto:Bradley.Behymer@il.usda.gov]
Sent: Thursday, October 13, 2016 9:46 AM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Subject: RE: FERC Pipeline Project - Soil Information Request

Andrea,

I would direct you to our Field Office Tech Guide under Section 4 for our critical area seeding specs which would give you our recommendations on Seed Mix/Seeding Dates and fertilizer/lime application rates. For any other areas that would have seeding plans like CRP that would be on a case by case basis with the landowners. For that information you would need for them to work with the Farm Service Agency to make sure that they are following their plans.

Please let me know if you need anything else.

Brad

From: Andrea Halfhill [mailto:A.Halfhill@gaiconsultants.com]
Sent: Wednesday, October 12, 2016 3:03 PM
To: Behymer, Bradley - NRCS, Carrollton, IL <Bradley.Behymer@il.usda.gov>
Subject: FW: FERC Pipeline Project - Soil Information Request

Hi Brad,

I just wanted to follow up with you and see if you had a chance to review our project area information.

Thanks!

Andrea

From: Andrea Halfhill
Sent: Wednesday, October 05, 2016 12:03 PM
To: 'bradley.behymer@il.usda.gov' <bradley.behymer@il.usda.gov>
Subject: FERC Pipeline Project - Soil Information Request

Hi Brad,

I just spoke with you on the phone. Here are some Project specifics and a little bit more information on what we are looking for:

We are researching information on behalf of Spire STL Pipeline LLC, for the Spire STL Pipeline Project. As part of the FERC application, we will be consulting with land management agencies and local soil conservation authorities to request **any recommendations you may have for seed mixes, seeding dates, application rates for fertilizer and lime, erosion controls, and noxious weed controls. We are also looking for any specific restoration and/or seeding plans that may**

be required or recommended by your agency or any requirements for what species and fertilizers should be used on areas disturbed by construction to generate growth.

I have attached some preliminary mapping for your use in reviewing the project footprint.

Any information you can pass along is greatly appreciated!

Thank you,

Andrea

Andrea M. Halfhill, B.A, B.S.
Project Environmental Specialist

GAI Consultants

6000 Town Center Blvd., Suite 300, Canonsburg, PA 15317

T 724.873.3545 | D 412.399.5521 | M 724.344.0124 | gaiconsultants.com |     

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Ali Trunzo

From: Andrea Halfhill
Sent: Wednesday, October 12, 2016 4:09 PM
To: Ali Trunzo
Cc: Lori Ferry
Subject: FW: FERC Pipeline Project Soil Information Request

From: Cook, Renee - NRCS, St. Peters, MO [mailto:Renee.Cook@mo.usda.gov]
Sent: Tuesday, October 11, 2016 5:43 PM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Cc: Keller, Shawn - NRCS, St. Peters, MO <Shawn.Keller@mo.usda.gov>; Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>
Subject: FW: FERC Pipeline Project Soil Information Request

Ms. Halfhill:

Shawn Keller, Resource Conservationist, works for the Natural Resources Conservation Service and is on my staff. The information that I emailed you on 9/28/2016 was the information available from the Natural Resources Conservation Service therefore, you will not be receiving information from Shawn Keller. I will forward my previous email dated 9/28/2016 and your response to you. If you have any questions about the information that was provided in that email don't hesitate to contact me.

Renee L. Cook
District Conservationist
USDA Natural Resources Conservation Service
St. Charles, St. Louis, Franklin, Jefferson, & Washington Counties

USDA Service Center
160 St. Peters Centre Blvd.
St. Peters, MO 63376
Cell Phone: (636)577-3016
Phone: (636)922-2833 Ext. 3
Fax: 1-855-863-7028
renee.cook@mo.usda.gov

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From: Gibson, Connie - FSA, St. Peters, MO
Sent: Tuesday, October 11, 2016 3:30 PM
To: Keller, Shawn - NRCS, St. Peters, MO <Shawn.Keller@mo.usda.gov>; Cook, Renee - NRCS, St. Peters, MO

<Renee.Cook@mo.usda.gov>

Subject: FW: FERC Pipeline Project Soil Information Request

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]

Sent: Tuesday, October 11, 2016 3:29 PM

To: Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>

Subject: RE: FERC Pipeline Project Soil Information Request

Hi Connie,

I haven't heard yet from Shawn. Could you send me her information so that I could check in with her?

Thanks so much,

Andrea

From: Andrea Halfhill

Sent: Wednesday, September 28, 2016 2:00 PM

To: 'Gibson, Connie - FSA, St. Peters, MO' <Connie.Gibson@mo.usda.gov>

Subject: RE: FERC Pipeline Project Soil Information Request

Great, thank you!

From: Gibson, Connie - FSA, St. Peters, MO [<mailto:Connie.Gibson@mo.usda.gov>]

Sent: Wednesday, September 28, 2016 1:59 PM

To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>

Subject: RE: FERC Pipeline Project Soil Information Request

I have forwarded this to Shawn Keller with Natural Resources Conservation Service. She will be following up with you.

From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]

Sent: Wednesday, September 28, 2016 12:04 PM

To: Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>

Subject: FW: FERC Pipeline Project Soil Information Request

Hi Connie,

I just wanted to follow up with you and see if you had a chance to take a look at this information. We also have shapefiles available that we could send if that would be helpful.

Thank you for your time!

Andrea

From: Andrea Halfhill

Sent: Wednesday, September 07, 2016 2:48 PM

To: 'Connie.Gibson@mo.usda.gov' <Connie.Gibson@mo.usda.gov>

Subject: FERC Pipeline Project Soil Information Request

Good afternoon,

We are researching information on behalf of Spire STL Pipeline LLC, for the Spire STL Pipeline Project as described below. As part of the FERC application, we will be consulting with land management agencies and local soil conservation authorities to request any recommendations you may have for seed mixes, seeding dates, application rates for fertilizer and lime, erosion controls, and noxious weed controls. We are also looking for any specific restoration and/or seeding plans that may be required or recommended by your agency or any requirements for what species and fertilizers should be used on areas disturbed by construction to generate growth.

I have attached some preliminary mapping for your use in reviewing the project footprint.

Any information you can pass along is greatly appreciated!

Description of the Project:

Spire STL Pipeline LLC (“Spire”), a wholly owned subsidiary of Spire Inc., is seeking authorization from the Federal Energy Regulatory Commission (“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 Project as proposed will consist of approximately 57.4 miles of new build 24-inch-diameter steel pipeline (referred to as the “new build” portion of the Project) 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 in St. Charles County, Missouri. The new build then crosses the Missouri River and ties 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”). As part of the proposed Project and subject to LGC’s receipt of approval from the Missouri Public Service Commission (“MPSC”), Spire is proposing to purchase Line 880, including its appurtenant and ancillary facilities, from LGC and modify the pipeline before placing it in interstate service. Line 880 consists of approximately 7.6 miles of existing 20-inch-diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC (“Enable MRT”) pipeline along the western bank of the Mississippi River in St. Louis County, Missouri. The total length of the Project pipelines will be approximately 65.0 miles. The overall design capacity of the pipeline is expected to be 400,000 dekatherms per day (“Dth/d”). No compression will be required. The Project as proposed will include pipeline interconnects with REX in Illinois and LGC and Enable MRT in Missouri. The Project will also include the construction of minor aboveground facilities.

Thank you,

Andrea

Andrea M. Halfhill, B.A, B.S.
Project Environmental Specialist

GAI Consultants

6000 Town Center Blvd., Suite 300, Canonsburg, PA 15317

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telephone log



gai consultants

Date: 10-5-16

Project / Admin. No.: E160438.00

Call From: Andrea Halfhill

Company: GAI Consultants

Phone No.: 412-399-5521

Call To: Brad Behymer

Company: NRCS

Phone No.: 217-942-5464, ext. 3

Subject: Seed mix recommendations

cc:

Summary of Discussion, Decisions, and Commitments:

Called to introduce the Project and request information regarding seed mix or other recommendations for restoration. Mr. Behymer requested an email and preliminary mapping to evaluate.

telephone log



gai consultants

Date: 10-3-2016

Project / Admin. No.: E160438.00

Call From: Erin Matthews

Company: GAI Consultants

Phone No.: 412-399-5251

Call To: Brad Behymer

Company: Jersey and Greene County NRCS Field Offices

Phone No.: 618-498-6836

Subject: Noxious and Invasive Weeds

cc:

Summary of Discussion, Decisions, and Commitments:

Called to discuss noxious and invasive species. Mr. Behymer explained the regulations. There are two species lists in Illinois, and the noxious weeds list is legally binding. Ragweed is only a noxious species inside incorporated areas. NRCS recommends measures to avoid seeds leaving the site, and to control those that are observed on the right-of-way. Mr. Behymer requested if NRCS biologist can review the draft noxious weed plan for the Illinois portion of the Project.

telephone log



gai consultants

Date: September 30, 2016

Project / Admin. No.: E160438.00

Call From: Erin Matthews

Company: GAI Consultants

Phone No.: 412-399-5251

Call To: Johanna Fuller District Conservationist

Company: USDA NRCS Scott County, Illinois

Phone No.: 217.742.9561

Subject: Noxious weeds

cc:

Summary of Discussion, Decisions, and Commitments:

I've spoken with the Scott County District Conservationist regarding noxious weed control and concerns for the construction of the Project. Johanna recommended spot treatment before construction, brushing off vehicles, and using NRCS certified seed mix

Ali Trunzo

From: Andrea Halfhill
Sent: Thursday, September 29, 2016 11:25 AM
To: Ali Trunzo; Lori Ferry
Subject: FW: FERC Pipeline Project Soil Information Request

From: Cook, Renee - NRCS, St. Peters, MO [mailto:Renee.Cook@mo.usda.gov]
Sent: Wednesday, September 28, 2016 11:45 PM
To: Andrea Halfhill <A.Halfhill@gaiconsultants.com>
Cc: frankie.coleman@swcd.mo.gov; Gibson, Connie - FSA, St. Peters, MO <Connie.Gibson@mo.usda.gov>
Subject: RE: FERC Pipeline Project Soil Information Request

Ms. Halfhill:

If you are crossing agricultural property, it would be recommended to consult with the landowner to see if they are participating in the Conservation Reserve Program (CRP) with Farm Service Agency, have an Environmental Quality Incentive Program (EQIP) or Conservation Stewardship Program (CSP) contract with the Natural Resources Conservation Service, or have a Wetland Reserve Program (WRP) Easement/Wetland Reserve Easement (WRE) with the Natural Resources Conservation Service. These programs and easements may have specific vegetation requirements that the landowner has agreed to implement and maintain. If the landowner is participating in one of the programs listed above or has an easement with NRCS they will need to contact the NRCS office and we will provide information directly to them and they can provide it to you.

In addition, it would be recommend that you consult with the landowner to see if they have a conservation easement with any other organization (Ducks Unlimited, land trusts, etc.) that may have specific requirements.

If the land that the pipeline will be extending through is agricultural land (cropland, pastureland, or hayland) and not urban land (residential/common ground, commercial, or industrial), it is recommended to consult with the landowner to determine their land use objectives, prior to seeding it to permanent vegetation.

The Natural Resources Conservation Service (NRCS) has an online Field Office Technical Guide that has agricultural land Conservation Practice Standards and Specifications for public use. Missouri NRCS and Illinois NRCS may have different conservation practice standards and specifications therefore, I would also recommend that you contact Illinois NRCS. According to the information that you provided, the Critical Area Treatment (342) Standard would be recommended for use in Missouri along with the Vegetation Establishment Herbaceous Seeding Specification (723).

Missouri NRCS also has a seeding calculator that is available online that you can fill in the acres to be seeded, select the county, select the site soil group, select the practice Critical Area Treatment (342), select the seeding situation, select fertilizer and lime – apply blanket rates on constructed fills and finish grades, select Blanket rates for constructed fills – choose grass type, Lime – 1000 for St. Charles County and 1500 for St. Louis County, select specie(s) based on erosion control rating, wet soil tolerance, drought tolerance, and you will also need to enter the practice adjustment factor and Critical Area Treatment (342) Exemption. When completed the seeding calculator will provide the seeding, fertilizer, and lime information that you requested. I would be happy to discuss this further with the person that will be responsible for the oversight of the seeding so they can generate the seeding, fertilizer, and lime information that is needed.

You can find the Critical Area Treatment (342) Standard, the Vegetation Establishment Herbaceous Seeding Specification (723), and the seeding calculator on the NRCS website at the following link:

<http://www.nrcs.usda.gov/wps/portal/nrcs/site/national/home/>

- Select Field Office Technical Guide on the right side of the screen
- Select “Go to Your States FOTG” on the right side of the screen
- Select MO or the state that you want
- Select St. Louis or St. Charles County in Missouri (the standards and specifications are the same for both counties)
- Select section IV from the drop down menu on the left side of the screen
- Select the Conservation Practices file
- Select Critical Area Planting (342) file and select the Critical Area Planting (342) Conservation Practice Standard. This is a .pdf file that can be saved where you would like. If you choose use the standard in the future, please check online to make sure that it has not been revised.

Still under Section IV from the drop down menu on the left side of the screen:

- Select the Practice Specification file
- Select the Vegetation Establishment File
- Select Vegetation Establishment, Herbaceous Seeding Specification (723). This is a .pdf file that can be saved where you would like. If you choose use the standard in the future, please check online to make sure that it has not been revised.

Still in the Vegetation Establishment File:

- Select the Excel Spreadsheet labelled “X MO Seeding Calculator”. This is a .xlsx file that can be saved where you would like. If you choose use the standard in the future, please check online to make sure that it has not been revised.

I am not sure what agricultural land erosion controls that you are looking for other than permanent seeding. From the USGS Topographic Map I received, it looks like the majority of the agricultural land that the pipeline will be extending through in St. Charles County is bottomland/floodplain. Landowners receiving USDA benefits are not required to implement erosion control measures on agricultural bottomland/floodplain which is considered Non Highly Erodible Land (NHLE). If there is any agricultural land in St. Louis County that is hill ground which is considered Highly Erodible Land (HEL) that has an annual grain crop planted on it and the landowner is receiving USDA benefits, the landowner needs to contact the NRCS office and we will work with them on potential erosion control measures.

I would recommend you contact St. Charles County Government, St. Louis County Government along with the municipalities that the pipeline extends through and the Department of Natural Resources to see if they have any land disturbance erosion control requirements or permits that need to be obtained.

If it is urban land (residential/common ground, commercial, or industrial) that the pipeline will be extending through, refer to the “Protecting Water Quality: A field guide to erosion, sediment and stormwater best management practices for development sites in Missouri and Kansas located on the Missouri Department of Natural Resources website at the link below:

<https://dnr.mo.gov/env/wpp/wpcp-guide.htm>

Noxious Weeds and Weed Controls can be found on the Missouri Department of Agriculture website at the link below:

<http://agriculture.mo.gov/plants/ipm/noxiousweeds.php>

Will you please notify Lori M. Ferry, Environmental Project Manager, that I am the Natural Resources Conservation Service contact at the USDA Service Center in St. Peters, MO. She mailed a letter to Connie Gibson addressed to Natural Resources Conservation Service. Connie is the Farm Service Agency County Executive Director. Connie did provide me the letter that Lori mailed her.

I will be out of the office Thursday, 9/29 through Friday, 9/30 and return on Monday 10/3.

Thank you,

Renee L. Cook
District Conservationist
USDA Natural Resources Conservation Service
St. Charles, St. Louis, Franklin, Jefferson, & Washington Counties

USDA Service Center
160 St. Peters Centre Blvd.
St. Peters, MO 63376
Cell Phone: (636)577-3016
Phone: (636)922-2833 Ext. 3
Fax: 1-855-863-7028
renee.cook@mo.usda.gov

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From: Andrea Halfhill [<mailto:A.Halfhill@gaiconsultants.com>]
Sent: Wednesday, September 28, 2016 12:06 PM
To: Coleman, Frankie <frankie.coleman@swcd.mo.gov>
Cc: Cook, Renee - NRCS, St. Peters, MO <Renee.Cook@mo.usda.gov>
Subject: RE: FERC Pipeline Project Soil Information Request

Hi Frankie,

I just wanted to check in with you to see if you had any information.

Thanks for your time!

Andrea

From: Coleman, Frankie [<mailto:frankie.coleman@swcd.mo.gov>]
Sent: Friday, September 16, 2016 9:00 AM



August 10, 2016

Scott Jaskowiak, Vice President
Spire STL Pipeline LLC
700 Market Street
St. Louis, MO 63101

RE: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Jaskowiak:

The USDA Natural Resources Conservation Service (NRCS) in Illinois has received your correspondence dated August 5, 2016 in regard to your proposal to develop and construct a new interstate natural gas pipeline in the Illinois counties of Scott, Greene and Jersey. The NRCS works in partnership with private landowners to address natural resource concerns. One tool NRCS utilizes to address these natural resource concerns is long-term conservation easements. We have a portfolio of reserved conservation easements on over 100,000 acres in Illinois and we maintain a GIS layer of these conservation easements. In comparing the maps you provided with our GIS layer it does not appear that the proposed natural gas pipeline will impact our conservation easements. The maps you provided are a general overview of the proposed pipeline route. Should the pipeline route deviate from this proposal, please give the Illinois NRCS another opportunity to review the new route.

If you have any questions feel free to contact Ron Collman, State Soil Scientist at (217) 353-6643.

Sincerely,

IVAN DOZIER
State Conservationist

cc:

Dave Hiatt, Acting Assistant State Conservationist (Easements), NRCS, Champaign, IL
Ron Collman, State Soil Scientist, NRCS, Champaign, IL

Natural Resources Conservation Service
2118 W. Park Court, Champaign, Illinois 61821
Voice (217) 353-6600 -- FAX/mail (855) 668-0602

Helping People Help The Land.



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Ms. Connie Gibson
County Executive Director United States Department of Agriculture - Farm Service Agency - St
Louis County
160 Saint Peters Centre Blvd
St. Peters, MO 63376

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Ms. Gibson,

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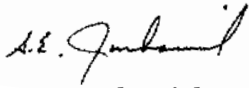
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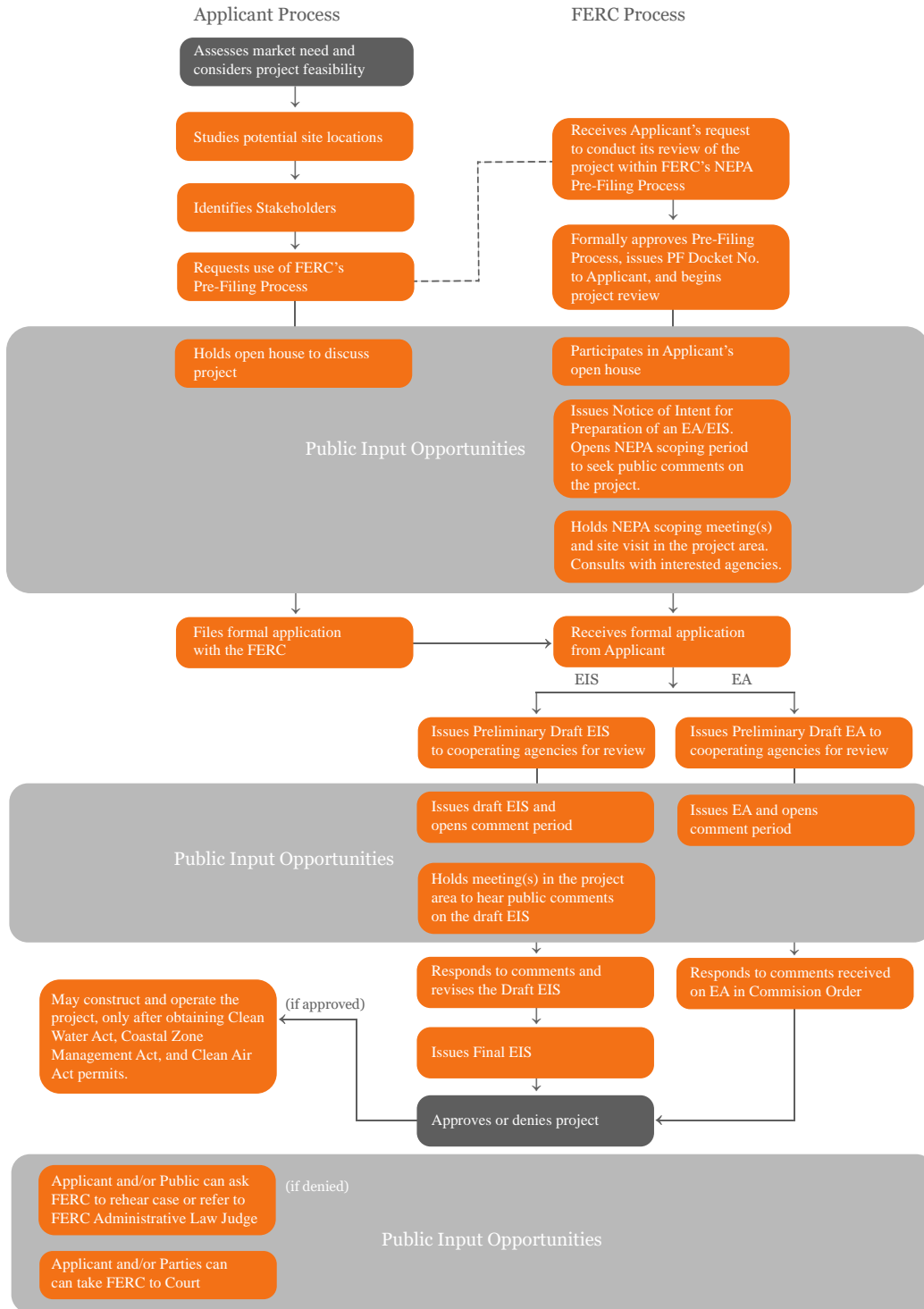


Scott Jaskowiak
Vice President
Spire STL Pipeline LLC

Project Map



FERC Pre-Filing Process





Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Ms. Rebecca Walls
County Executive Director United States Department of Agriculture - Farm Service Agency -
Scott County
656 North Main St
Winchester, IL 62694

Re: Spire STL Pipeline
FERC Docket No. PF16-9

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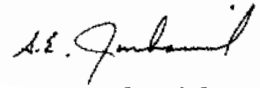
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We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

United States Department of Agriculture - Farm Service Agency - Jerseyville Service Center
604 E Franklin
Jerseyville, IL 62052

Re: Spire STL Pipeline
FERC Docket No. PF16-9

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Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

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United States Department of Agriculture - Farm Service Agency - Carrollton Service Center
Route 267 North
Carrollton, IL 62016

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County Executive Director Natural Resources Conservation Service - Service Center Office
160 Saint Peters Centre Blvd
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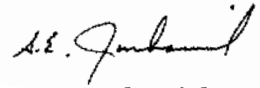
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700 Market Street
Saint Louis, MO 63101

August 5, 2016

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160 Saint Peters Centre Blvd
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Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Brad Behyner
District Conservationist Natural Resources Conservation Service - Jersey County/Jerseyville
Lincoln Field Office
604 East Franklin
Jerseyville, IL 62052

Re: Spire STL Pipeline
FERC Docket No. PF16-9

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700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. J.R. Flores
State Conservationist Natural Resources Conservation Service - Missouri State Office
Parkade Center
601 Business Loop 70 West Suite 250
Columbia, MO 65203

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FERC Docket No. PF16-9

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700 Market Street
Saint Louis, MO 63101

August 5, 2016

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District Conservationist Natural Resources Conservation Service - Scott County/Winchester
Field Office
656 North Main
Winchester, IL 62694

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At the open houses, more detailed maps will be available to show where the proposed pipeline may be located relative to your property. We want you to come, ask questions and provide feedback. Representatives of the Federal Energy Regulatory Commission (FERC) will also be there to answer questions about the FERC process for natural gas pipelines.

Spire STL Pipeline open house schedule

Tuesday August 16, 2016 5 p.m. – 7:30 p.m.	Wednesday August 17, 2016 5 p.m. – 7:30 p.m.	Thursday August 18, 2016 5 p.m.– 7:30 p.m.	Tuesday August 23, 2016 5 p.m.– 7:30 p.m.	Wednesday August 24, 2016 5 p.m. – 7:30 p.m.
Scott County, Illinois	Jersey County, Illinois	St. Louis County, Missouri	St. Charles County, Missouri	Greene County, Illinois
Scott County Fairgrounds 401 North Walnut Winchester, IL 62694	Jerseyville Recreation Center 401 Mound Street Jerseyville, IL 62052	Hazelwood Civic Center East 8969 Dunn Road Hazelwood, MO 63042	American Legion Post 312 2500 Raymond Drive St Charles, MO 63301	Knights of Columbus Hall U.S. HWY 67 Carrollton, IL 62016

Check out more information on our website at www.SpireSTLPipeline.com. If you have any questions, please do not hesitate to contact us toll-free at 1 844-885-7234 or at STLPipelineInfo@SpireEnergy.com.

We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Brad Behyner
District Conservationist Natural Resources Conservation Service - Greene County/Carrollton
Field Office
R.R. 3, Box 129 Route 267 North
Carrollton, IL 62016

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Behyner,

At Spire, formerly The Laclede Group, we never stop looking for better ways to provide energy now and for the future. That's why Spire STL Pipeline LLC, a wholly owned subsidiary of Spire Inc., is proposing to develop and construct a new interstate natural gas pipeline that will bring an efficient energy source to southwest Illinois and the St. Louis region. As a member of the community, we want you to be informed about our proposed project and we want you to hear from us first.

We are proposing to construct 60 miles of new build pipeline and upgrade nine miles of existing underground pipeline to further improve reliability and better serve homes and businesses across Illinois and Missouri. The planned route runs through Scott, Greene and Jersey counties in Illinois and St. Charles and St. Louis counties in Missouri.

You are receiving this letter because your property is located on or near our currently proposed route.

Spire STL Pipeline LLC has started the pre-filing application process for developing interstate natural gas pipelines by the Federal Energy Regulatory Commission ("FERC") pursuant to 18 C.F.R. § 157.21. FERC staff recently started a pre-filing environmental review process, which encourages early involvement by citizens, governmental entities and other interested parties. You can find more information about this pre-filing process at www.ferc.gov. You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

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We look forward to working with you.

Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



Spire STL Pipeline LLC
700 Market Street
Saint Louis, MO 63101

August 5, 2016

Mr. Ivan Dozier
State Conservationist Natural Resources Conservation Service - Illinois State Office
2118 W. Park Court
Champaign, IL 61821

Re: Spire STL Pipeline
FERC Docket No. PF16-9

Dear Mr. Dozier,

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Sincerely,



Scott Jaskowiak
Vice President
Spire STL Pipeline LLC



July 29, 2016

Mr. Ivan Dozier
State Conservationist
Natural Resources Conservation
Service, Illinois State Office
2118 West Park Court
Champaign, IL 61821

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Dozier:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the Natural Resources Conservation Service - Illinois State Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

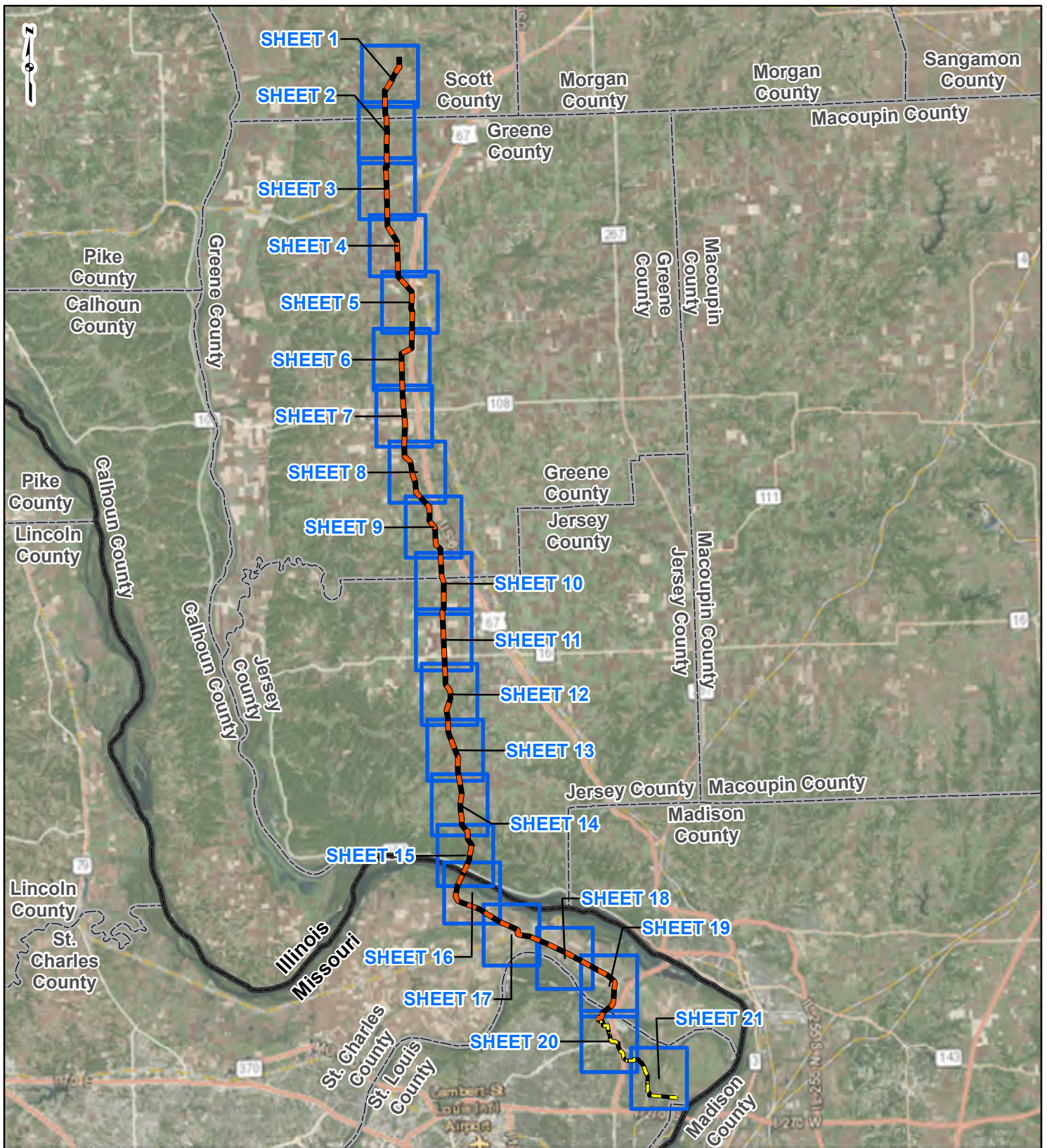
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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

ATTACHMENT
USGS TOPOGRAPHIC MAP (FIGURE 1)



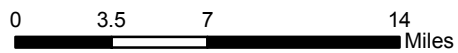
PROJECT LOCATION



SCOTT, GREENE
AND JERSEY
COUNTIES, ILLINOIS
AND ST. CHARLES AND
ST. LOUIS COUNTIES, MISSOURI

LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- COUNTY BOUNDARY
- STATE BOUNDARY
- SHEET INDEX

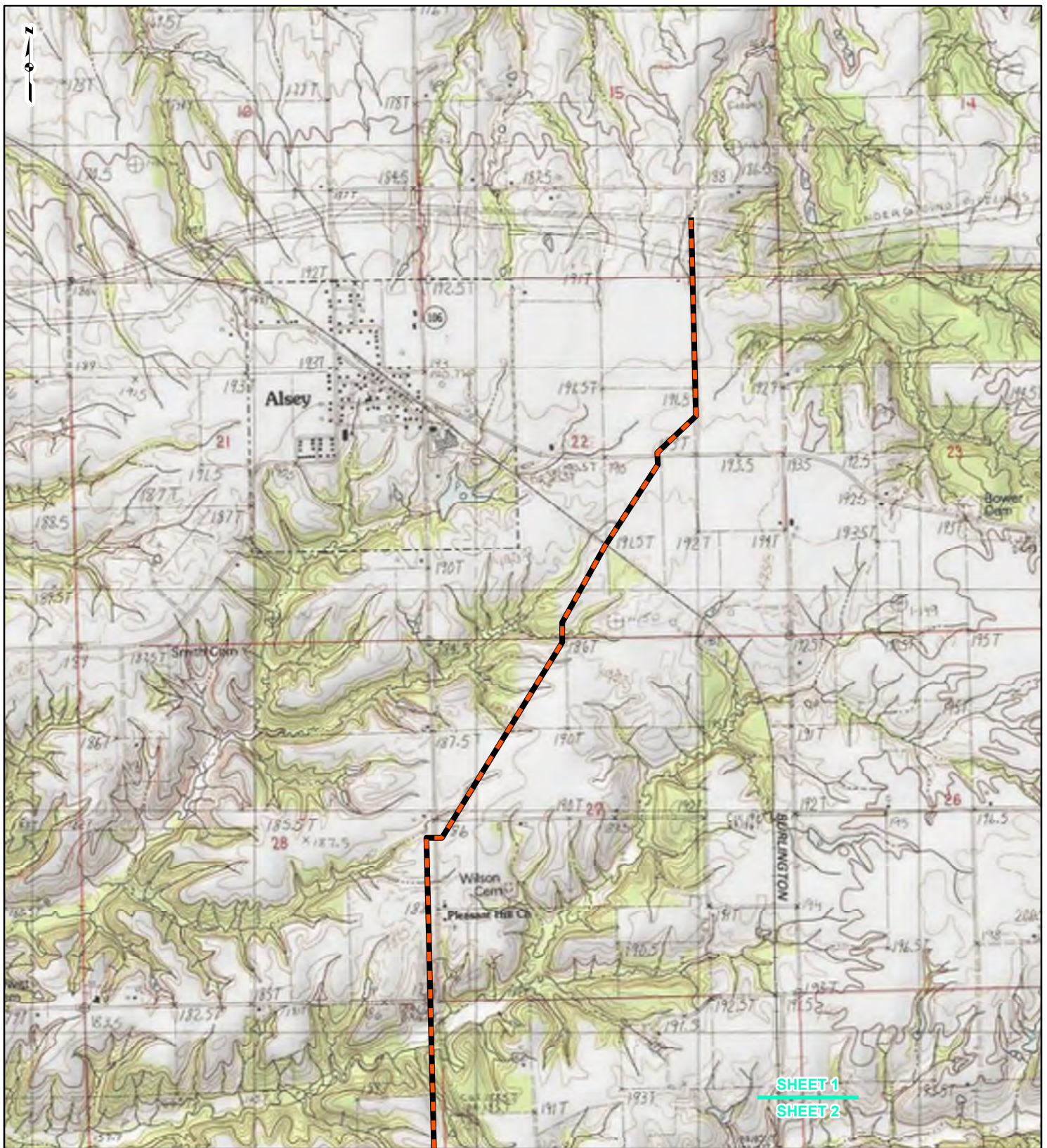


**FIGURE 1
LOCATION MAP
SHEET INDEX**

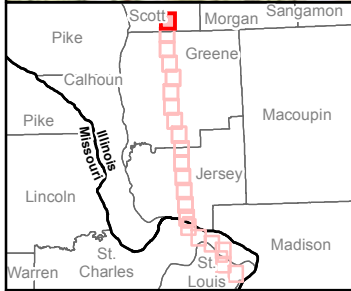


DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: ESRI WORLD IMAGERY AND TRANSPORTATION, NAIP, USDA FSA, 2015, ACCESSED 07/2016.



SHEET 1
SHEET 2



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 1 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.

SHEET 1
SHEET 2

Scott
County
Greene
County

SHEET 2
SHEET 3



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 2 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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SHEET 2





SHEET 3

SHEET 3

SHEET 4



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

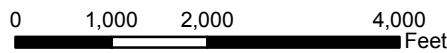
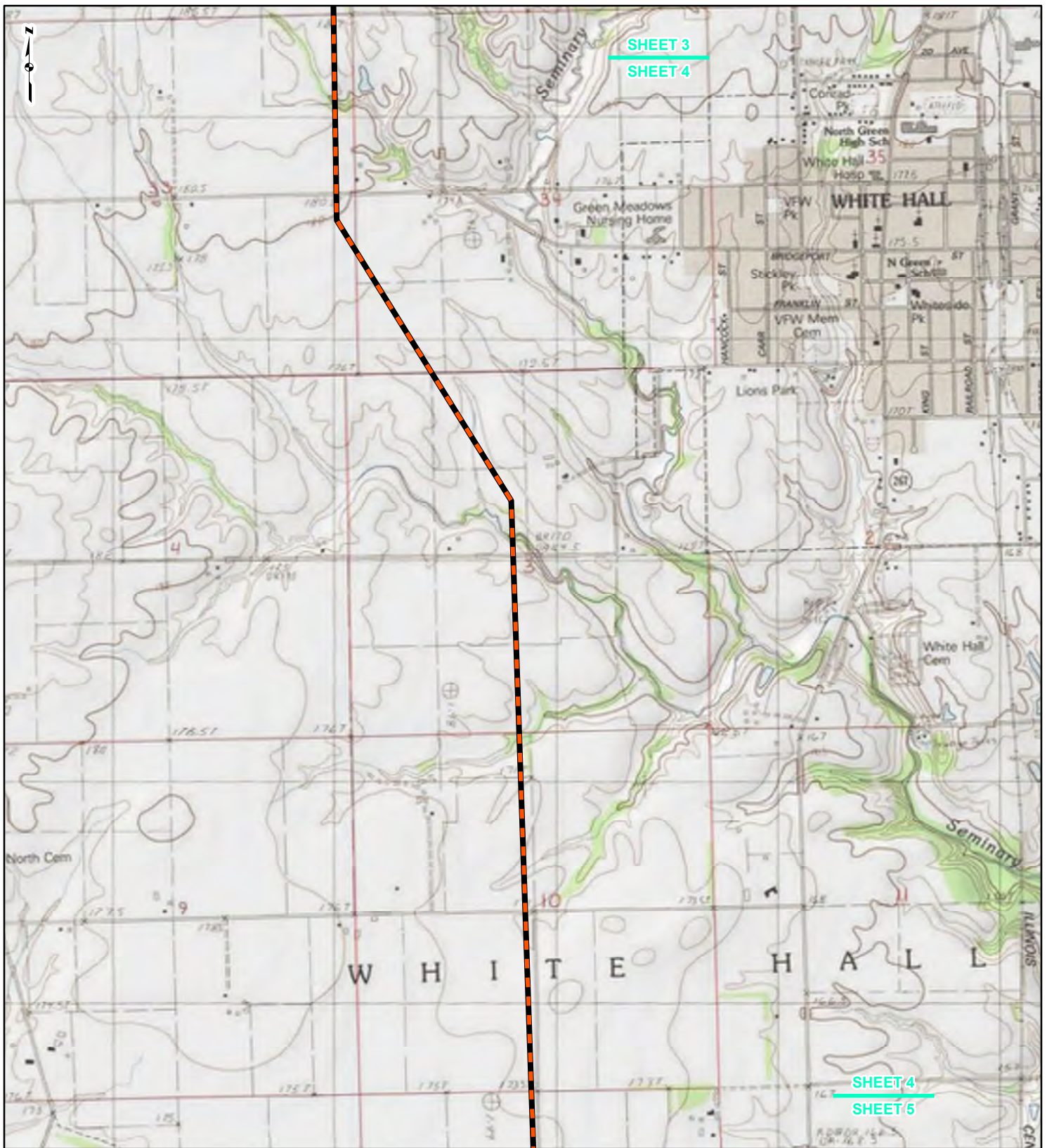


FIGURE 1
LOCATION MAP
SHEET 3 OF 21



DRAWN BY: PMH DATE: 7/28/2016
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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

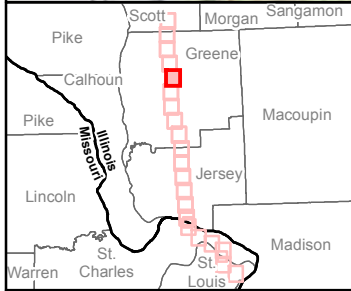
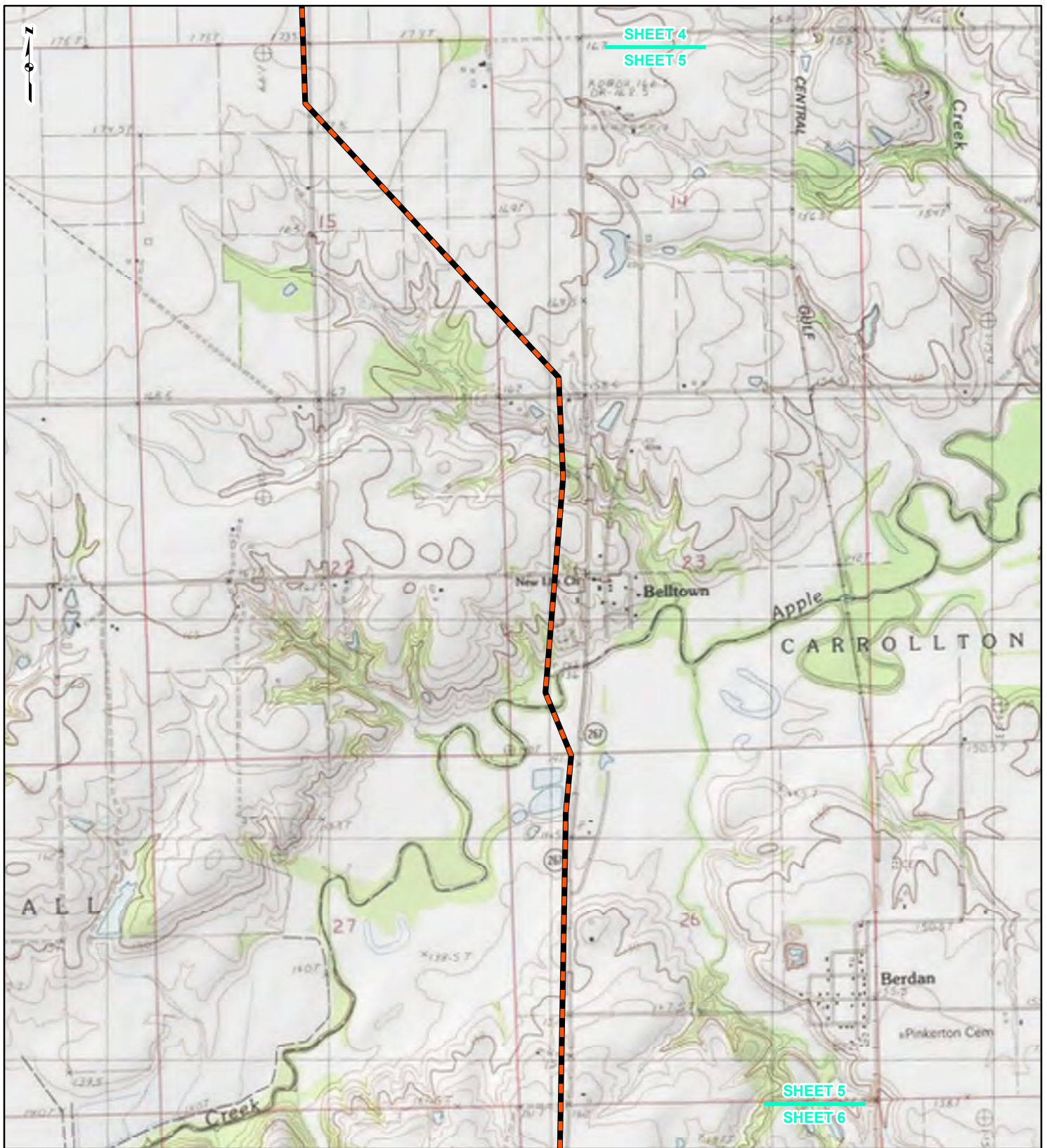
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Feet

FIGURE 1
LOCATION MAP
SHEET 4 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

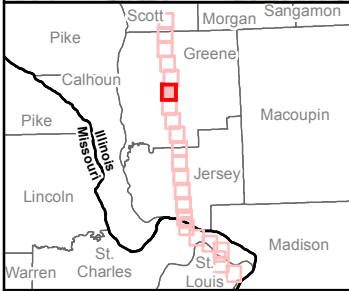
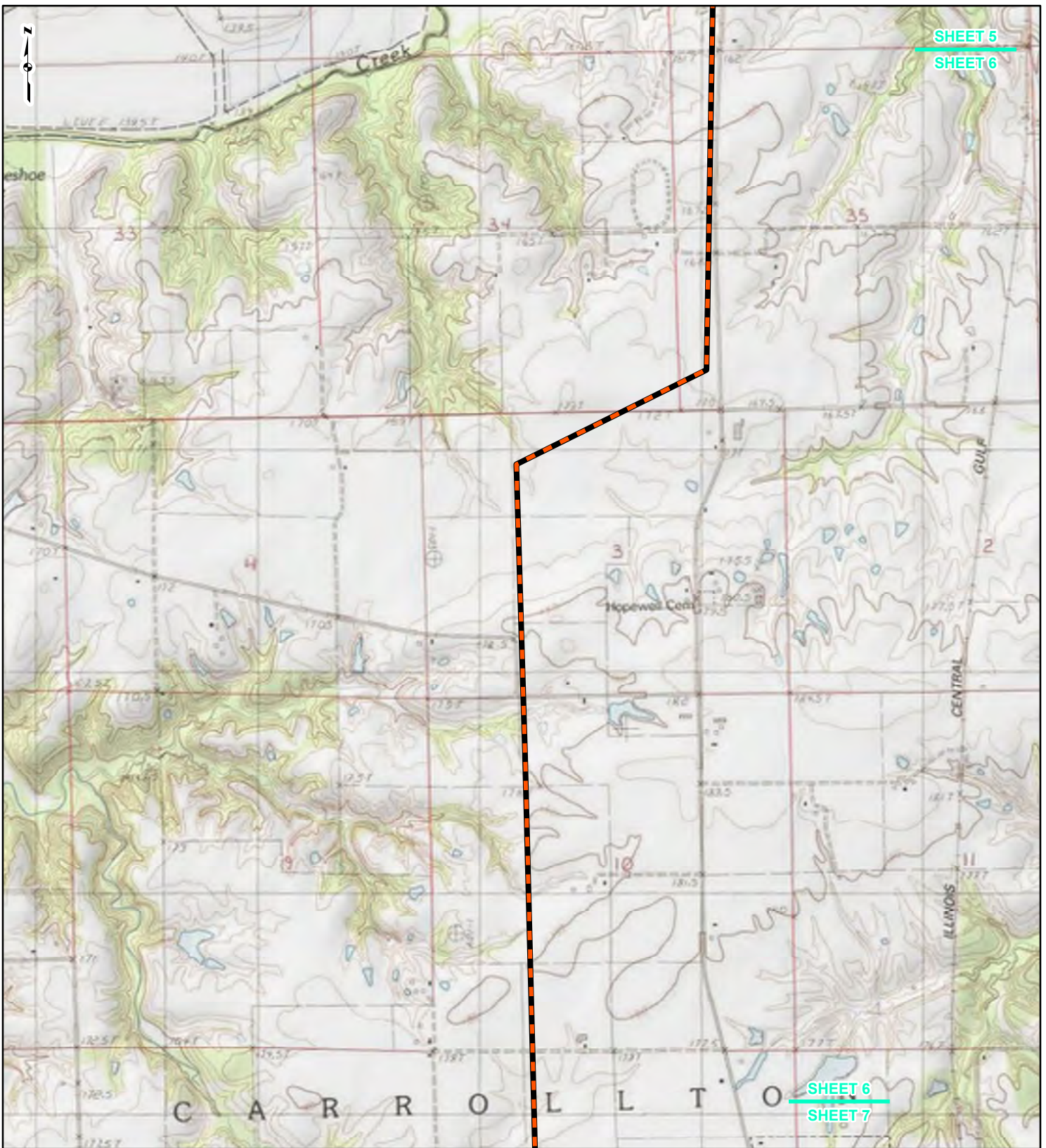
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FIGURE 1
LOCATION MAP
SHEET 5 OF 21



DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

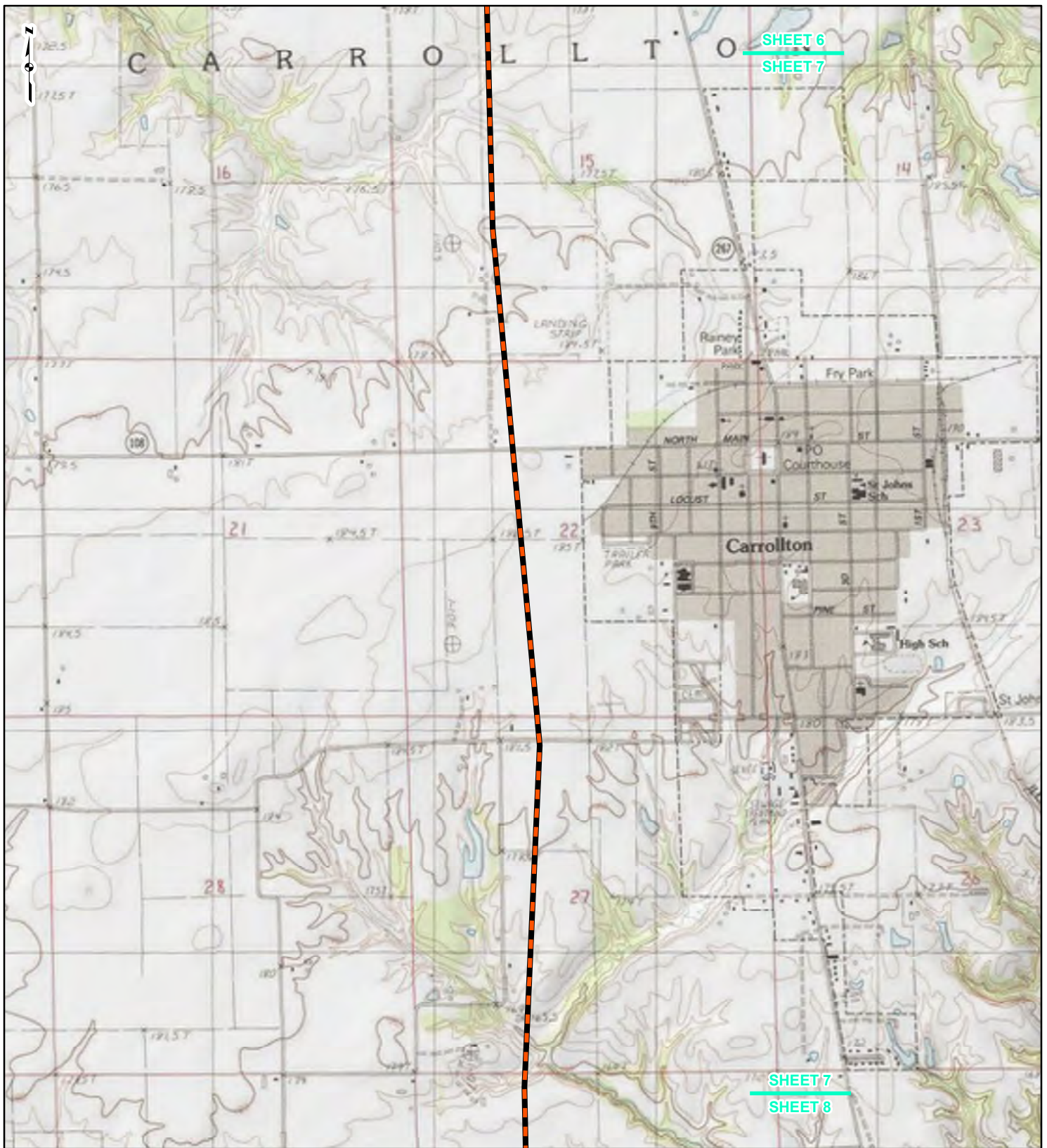
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FIGURE 1
LOCATION MAP
SHEET 6 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
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LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

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FIGURE 1
LOCATION MAP
SHEET 7 OF 21

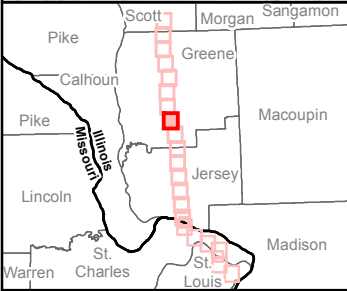
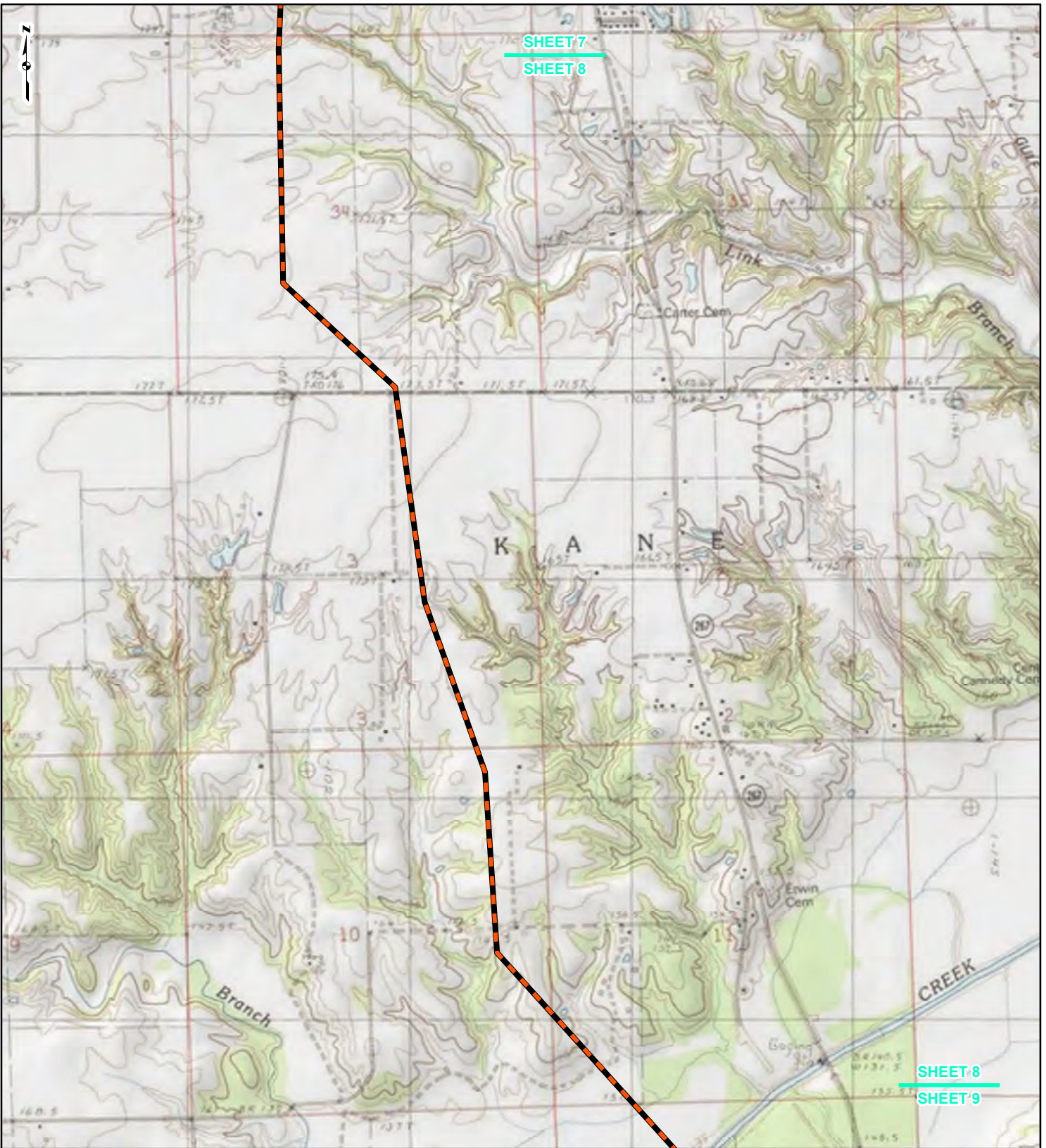
Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
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SHEET 7
SHEET 8

SHEET 8
SHEET 9



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

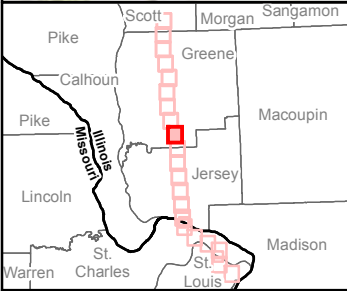
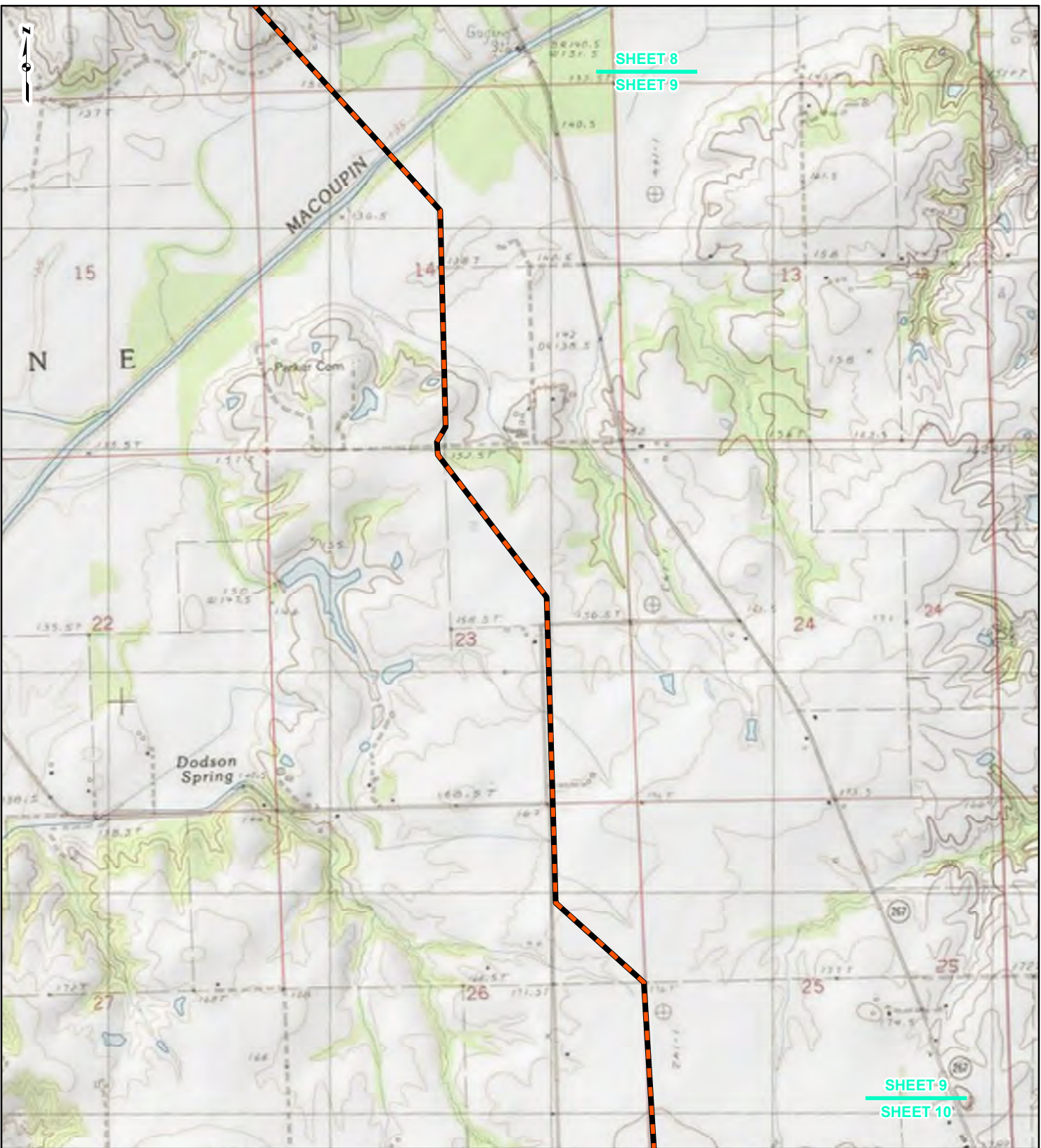
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Feet

FIGURE 1
LOCATION MAP
SHEET 8 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

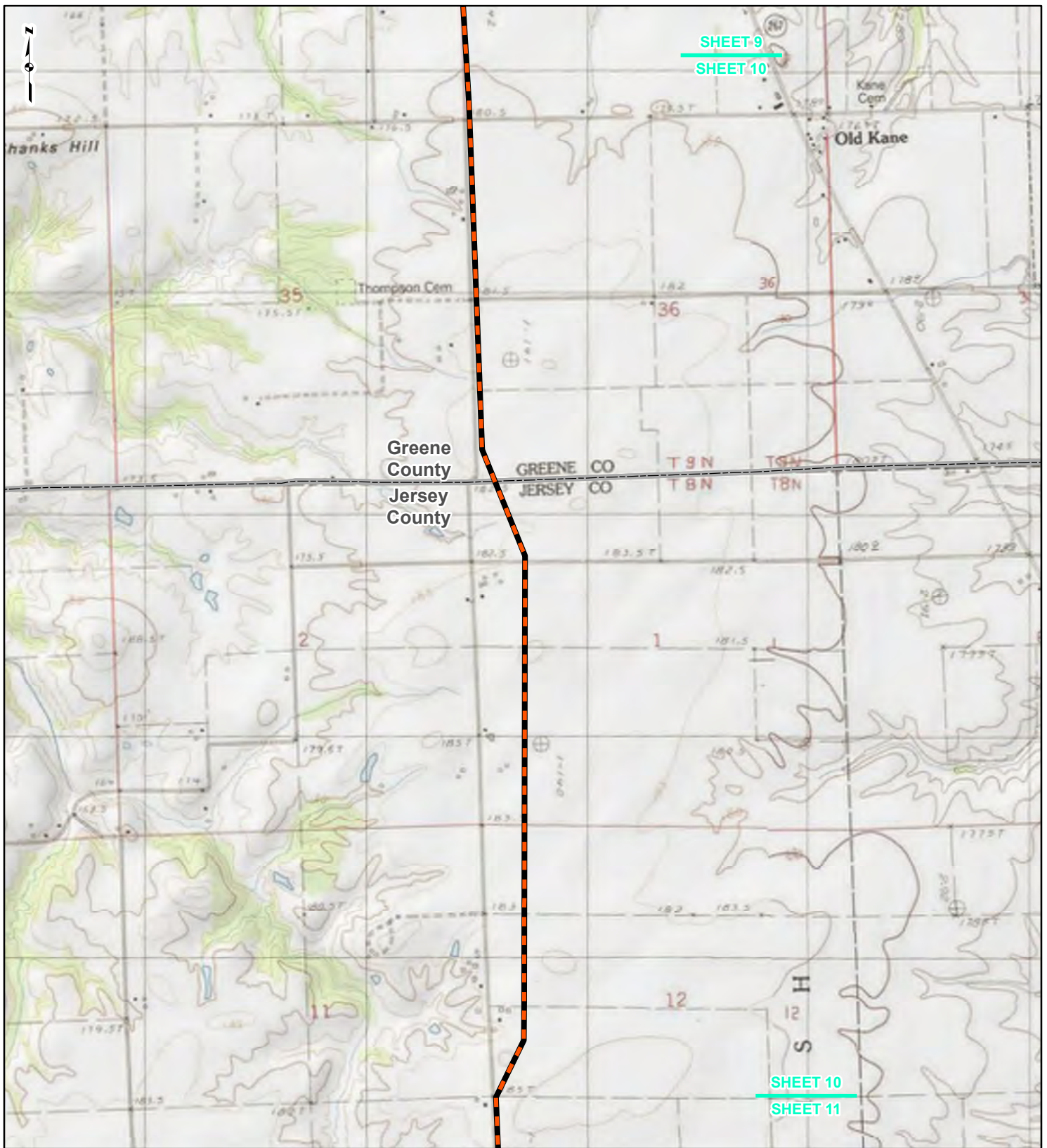
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FIGURE 1
LOCATION MAP
SHEET 9 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.

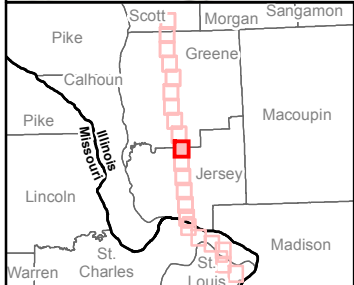


SHEET 9
SHEET 10





SHEET 10
SHEET 11

Greene
County
Jersey
County

GREENE CO T9N T8N
JERSEY CO T8N T7N



LEGEND

-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  LINE 880 MODIFICATIONS
-  STATE BOUNDARY
-  COUNTY BOUNDARY

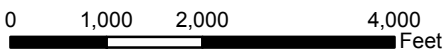
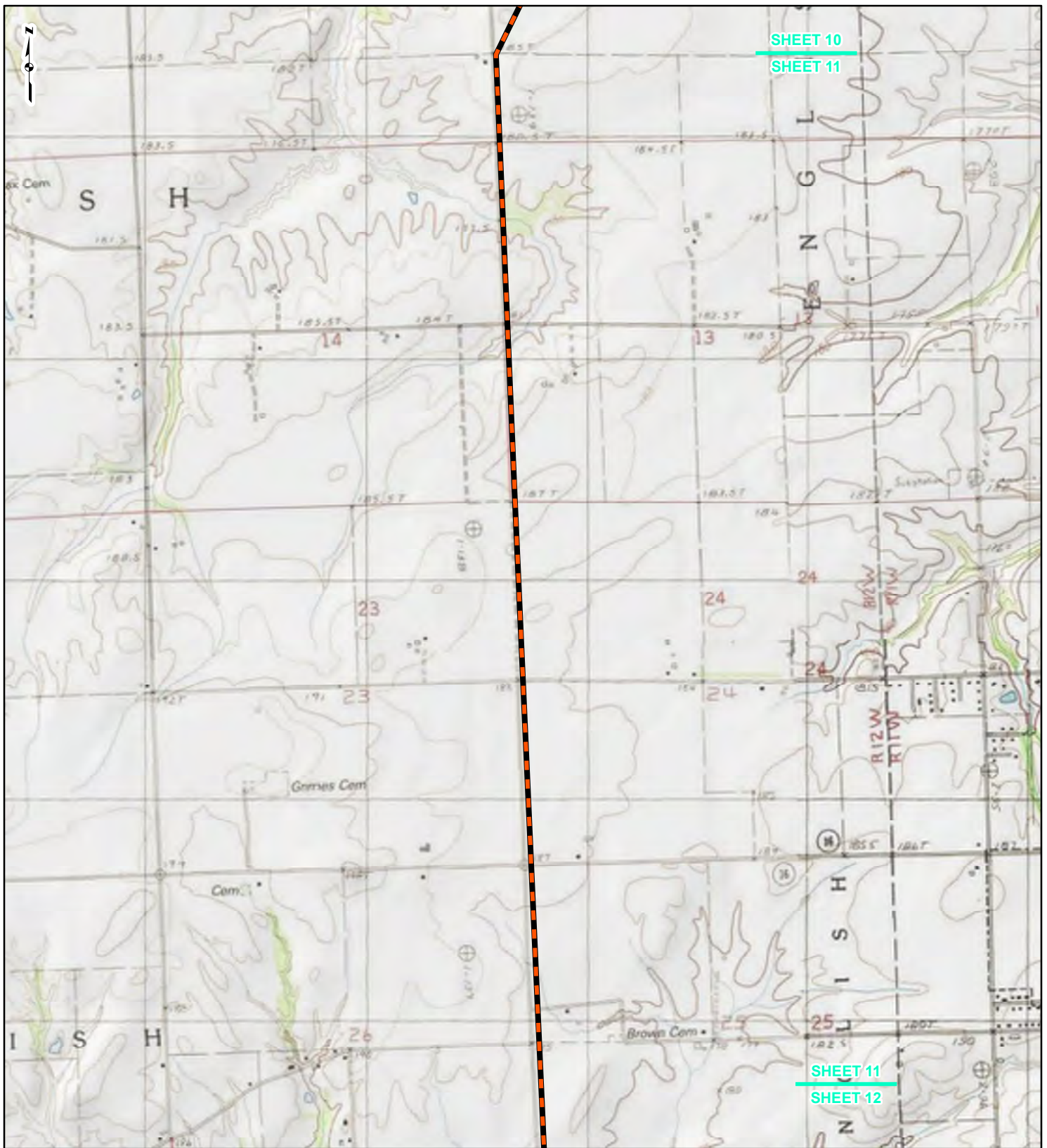


FIGURE 1
LOCATION MAP
SHEET 10 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 10
SHEET 11

SHEET 11
SHEET 12



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

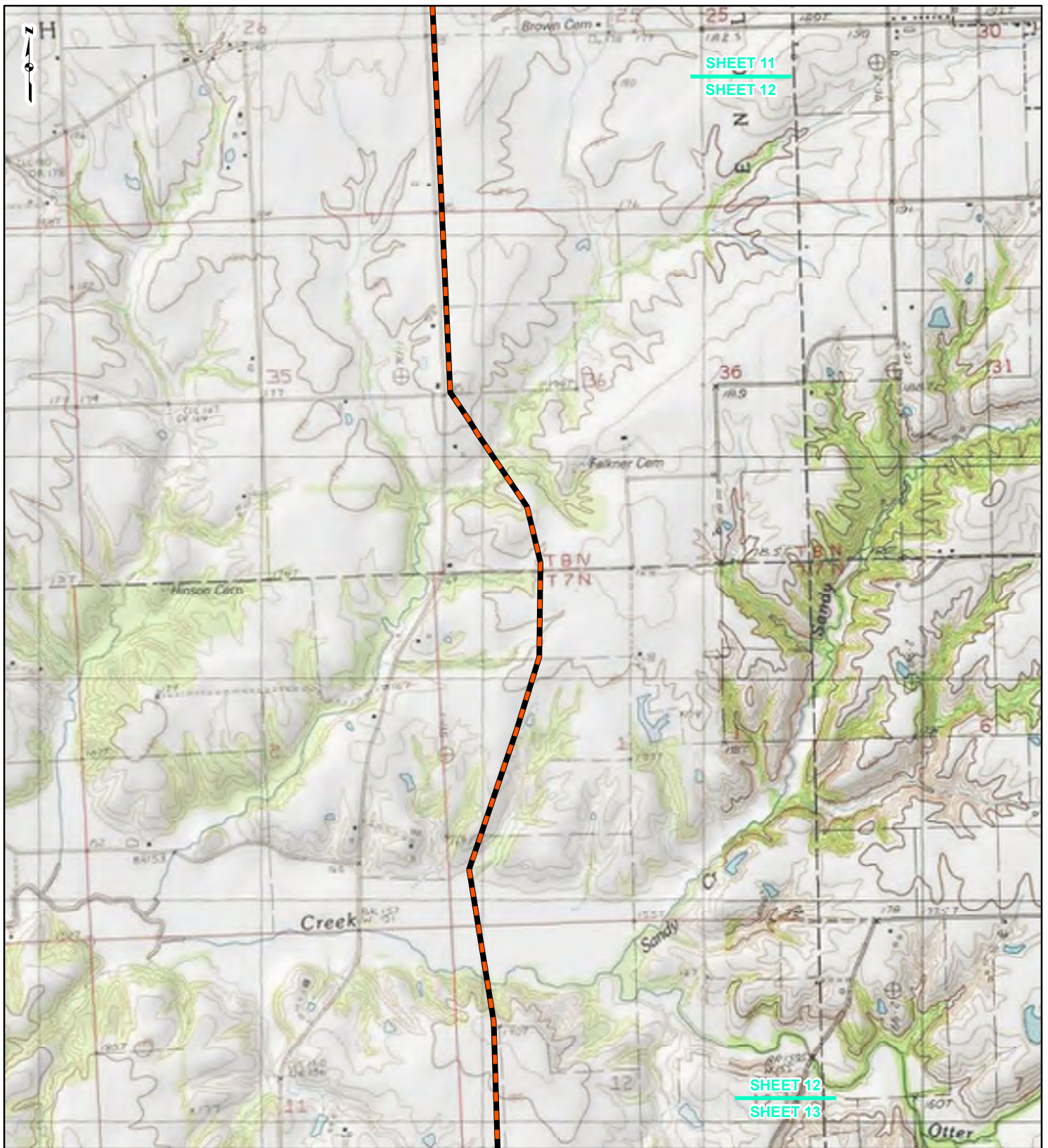
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FIGURE 1
LOCATION MAP
SHEET 11 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



SHEET 11
SHEET 12

SHEET 12
SHEET 13



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

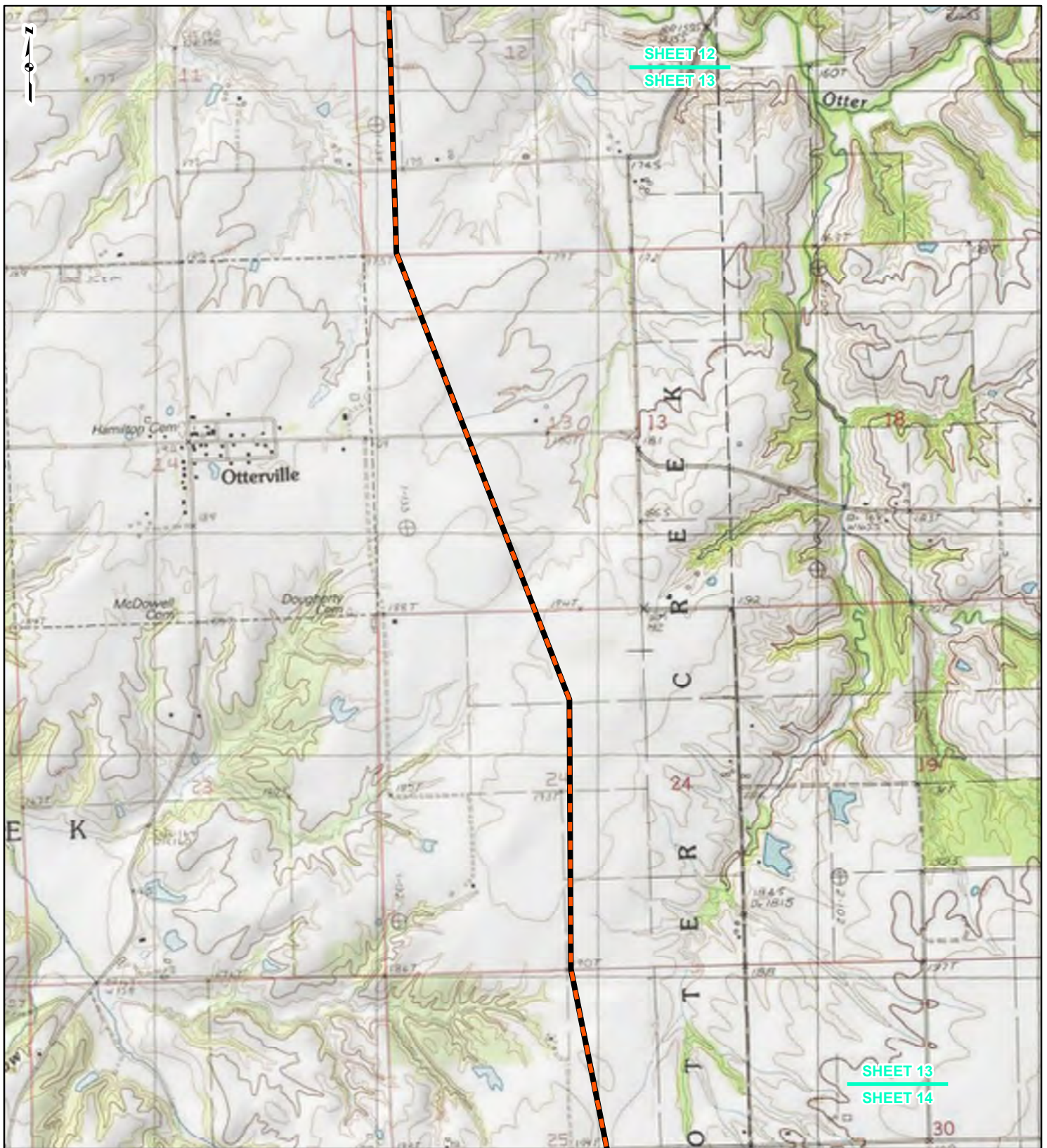
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FIGURE 1
LOCATION MAP
SHEET 12 OF 21

Spire STL Pipeline

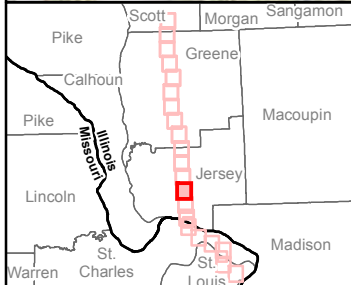
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 12
SHEET 13

SHEET 13
SHEET 14



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

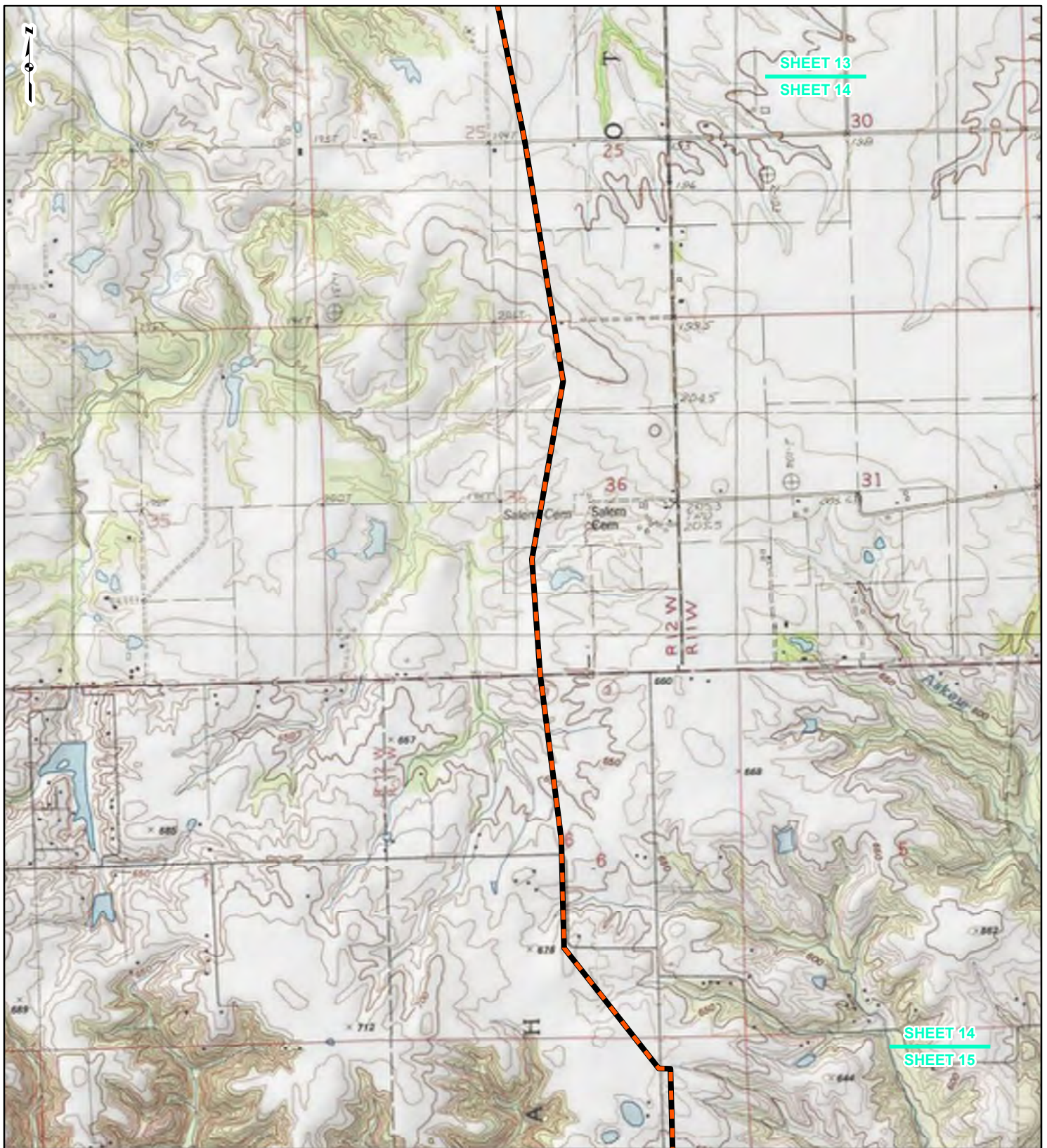
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Feet

FIGURE 1
LOCATION MAP
SHEET 13 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

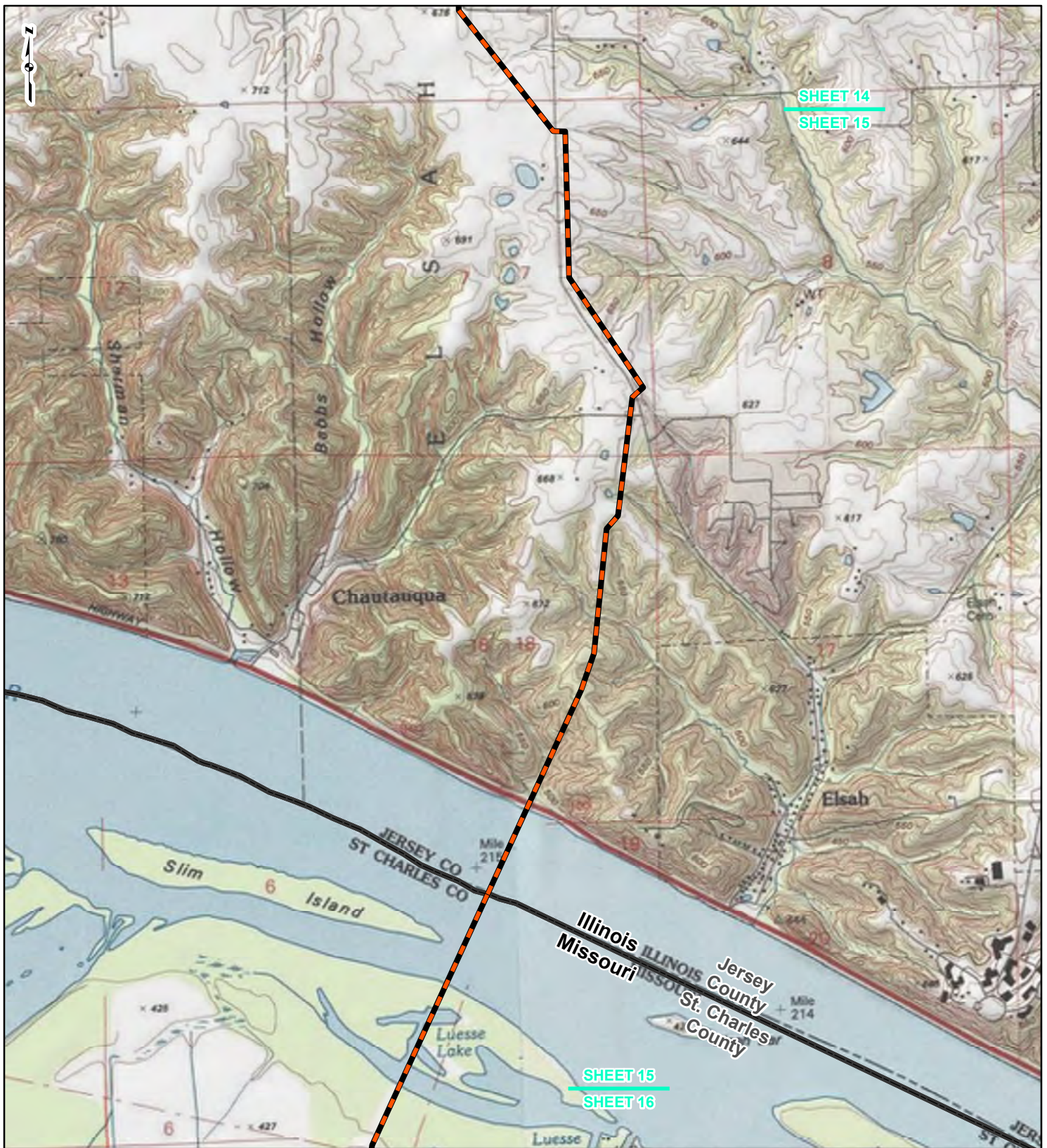
0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 14 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 14
SHEET 15

SHEET 15
SHEET 16



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

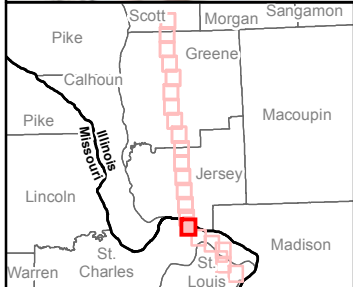
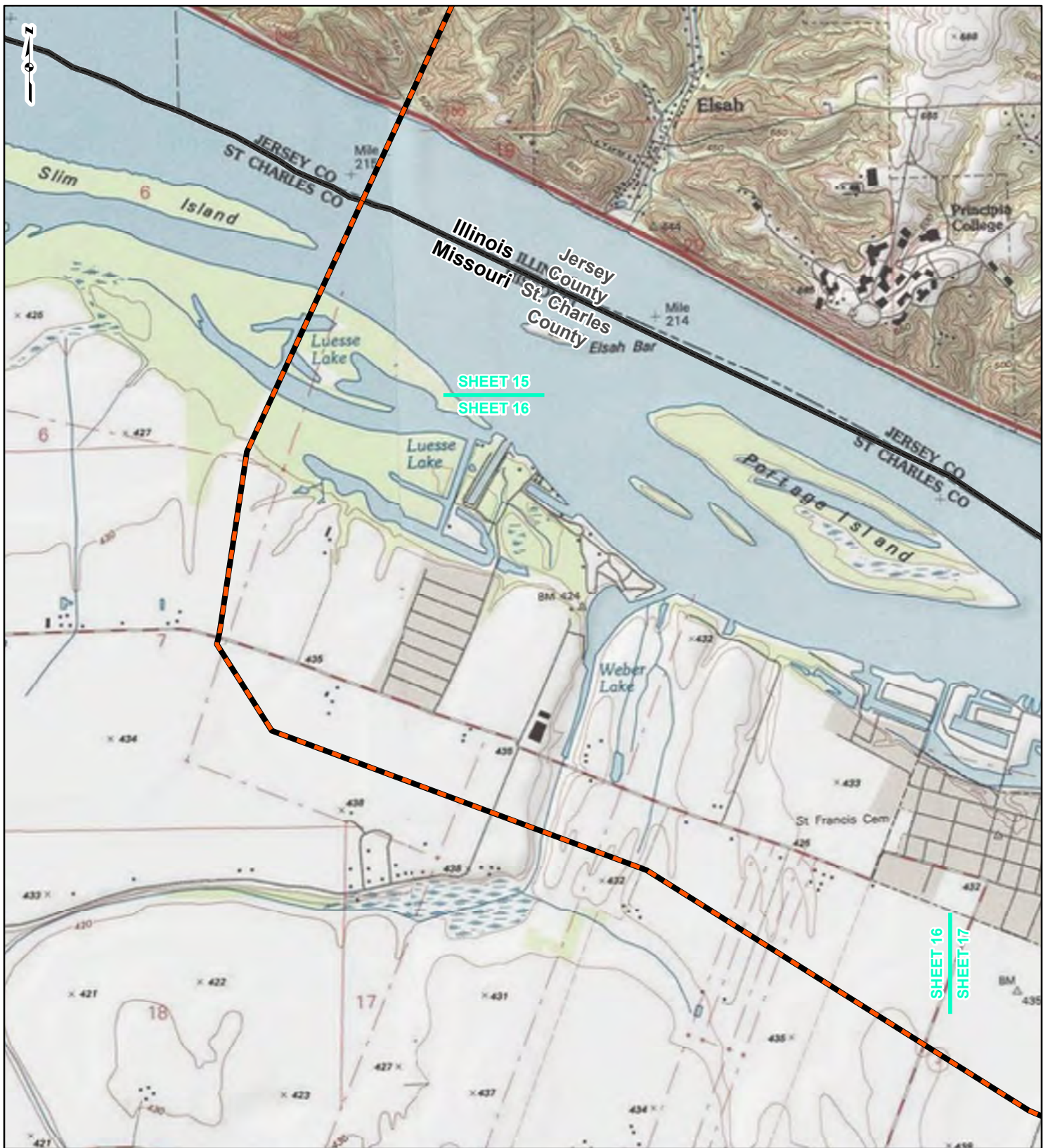
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Feet

FIGURE 1
LOCATION MAP
SHEET 15 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983), AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/20/16.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

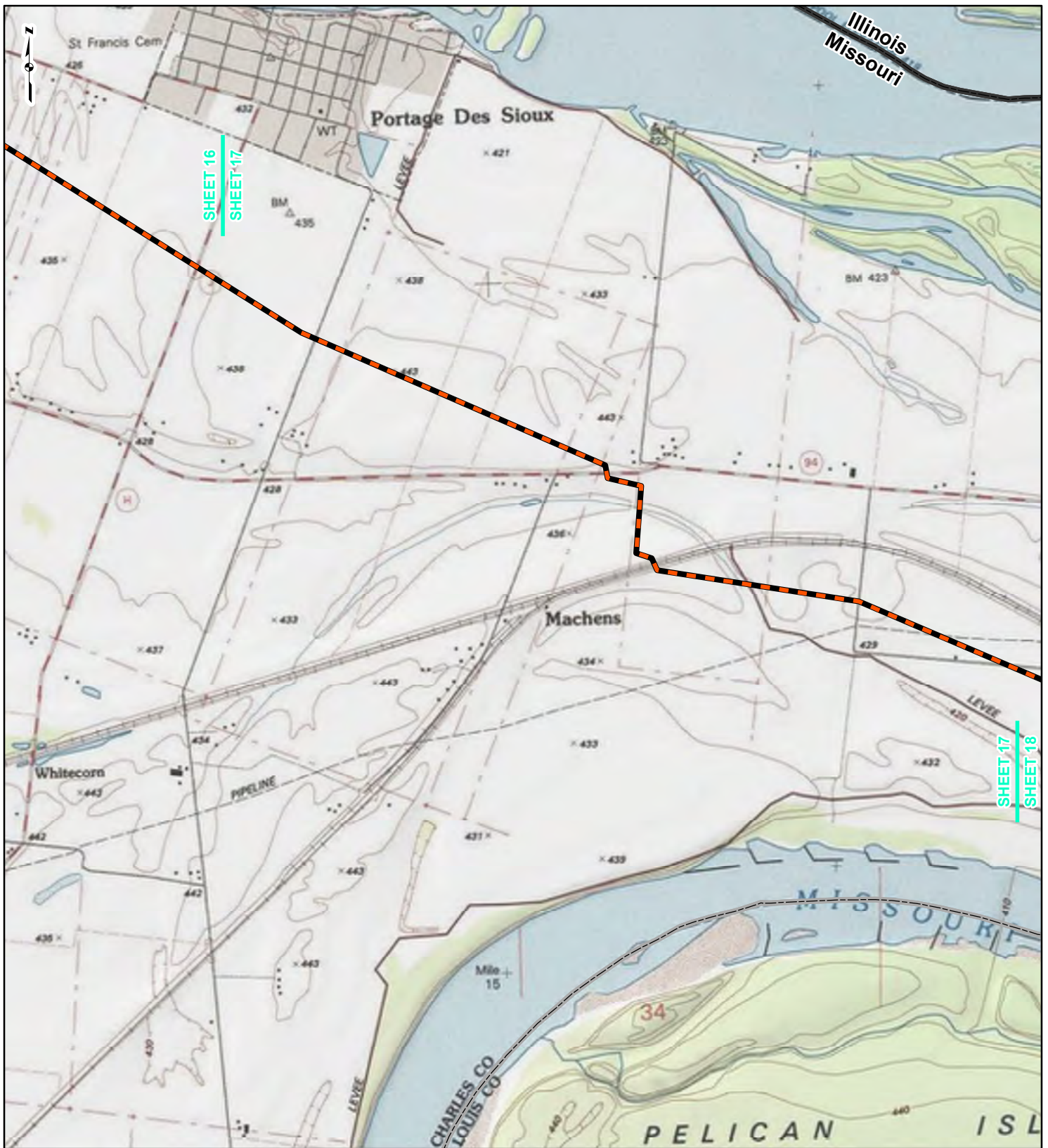
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FIGURE 1
LOCATION MAP
SHEET 16 OF 21



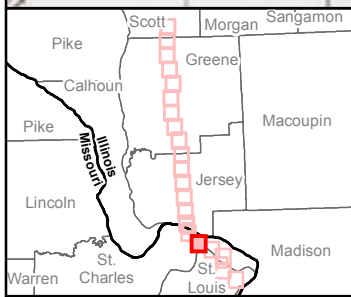
DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 16
SHEET 17

SHEET 17
SHEET 18



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

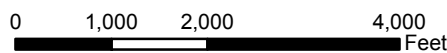


FIGURE 1
LOCATION MAP
SHEET 17 OF 21



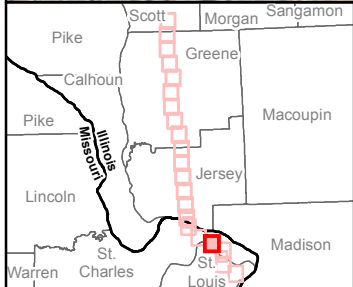
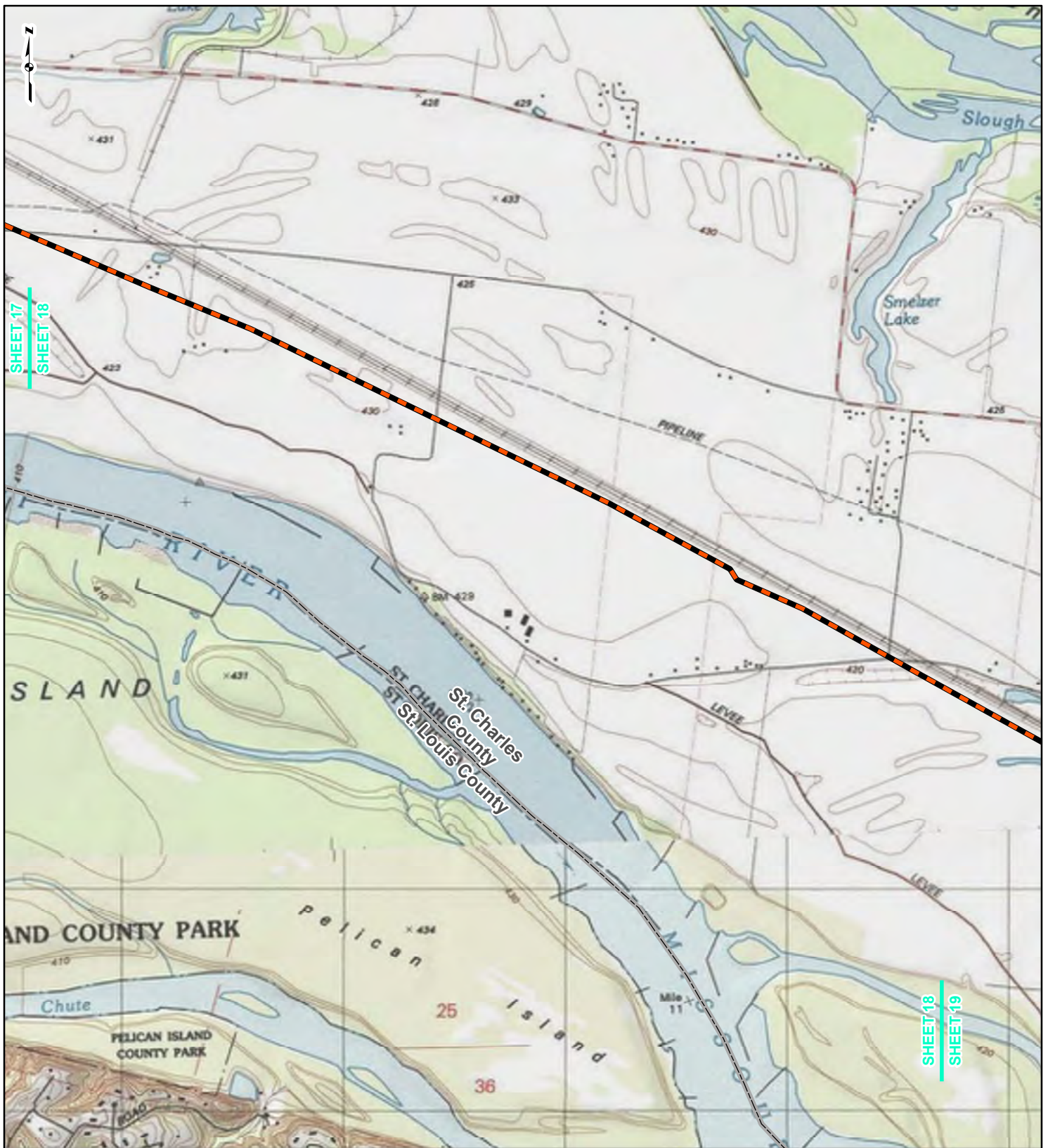
Spire STL
Pipeline



DRAWN BY: PMH
CHECKED: SWW

DATE: 7/28/2016
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

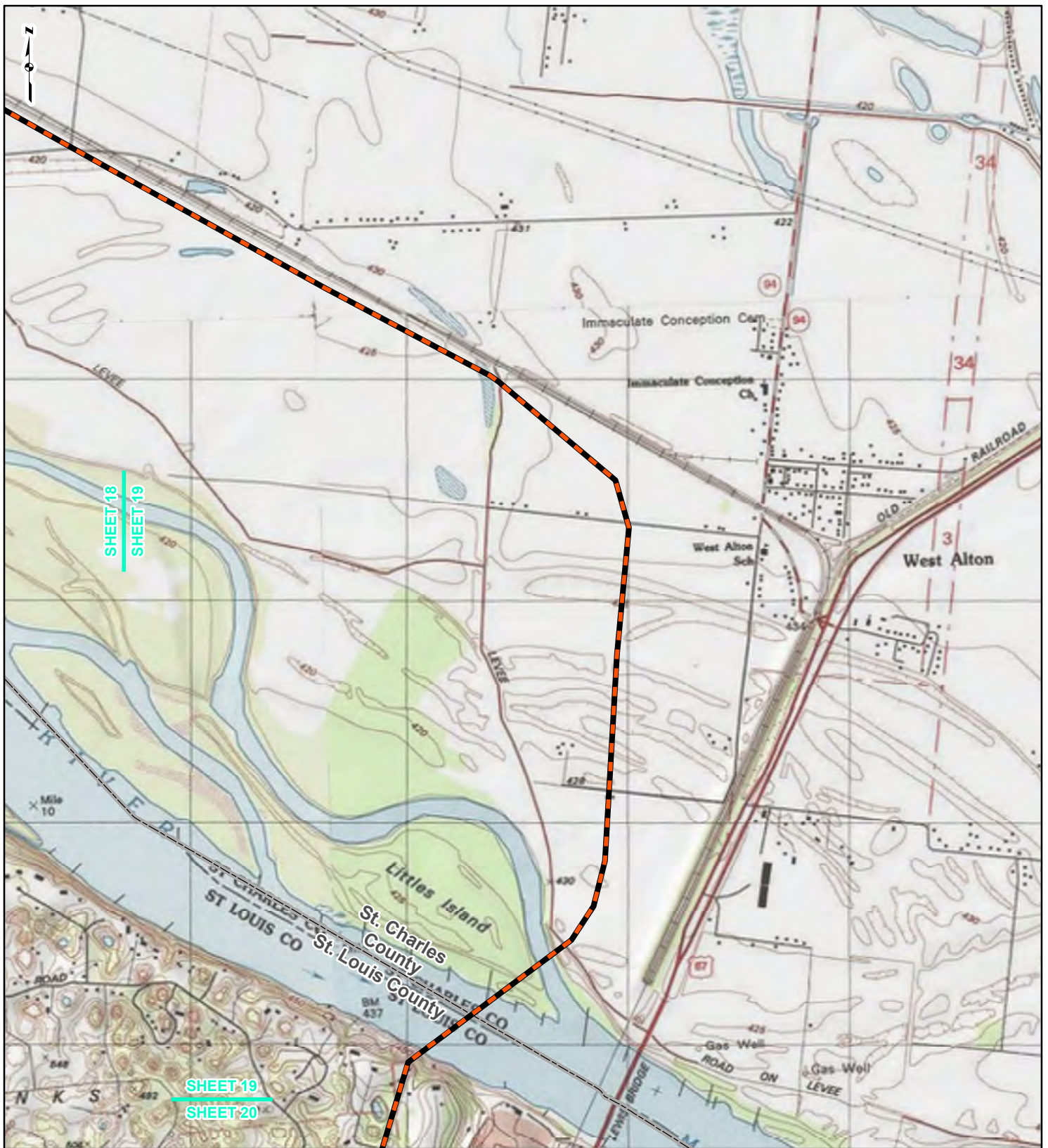
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FIGURE 1
LOCATION MAP
SHEET 18 OF 21

Spire STL Pipeline

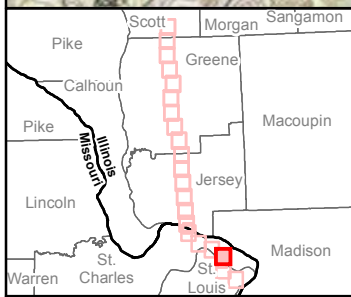
DRAWN BY: PMH DATE: 7/28/2016
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



SHEET 18
SHEET 19

SHEET 19
SHEET 20



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

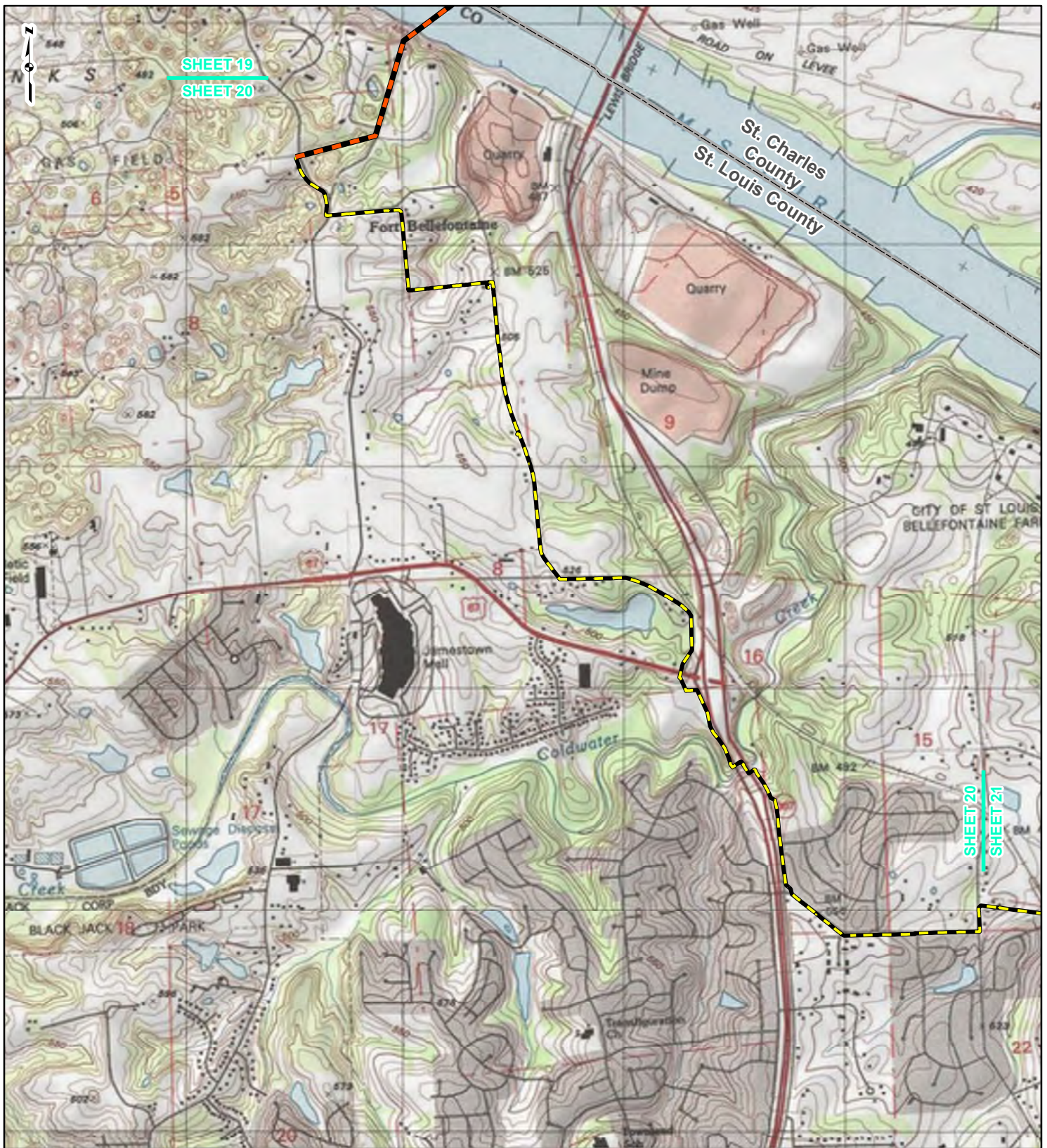
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FIGURE 1
LOCATION MAP
SHEET 19 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- NEW BUILD 24-INCH DIAMETER PIPELINE
- LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

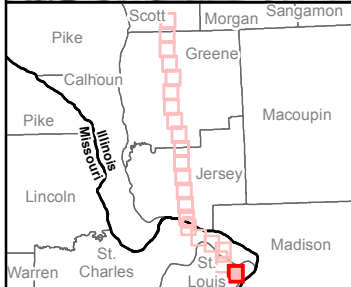
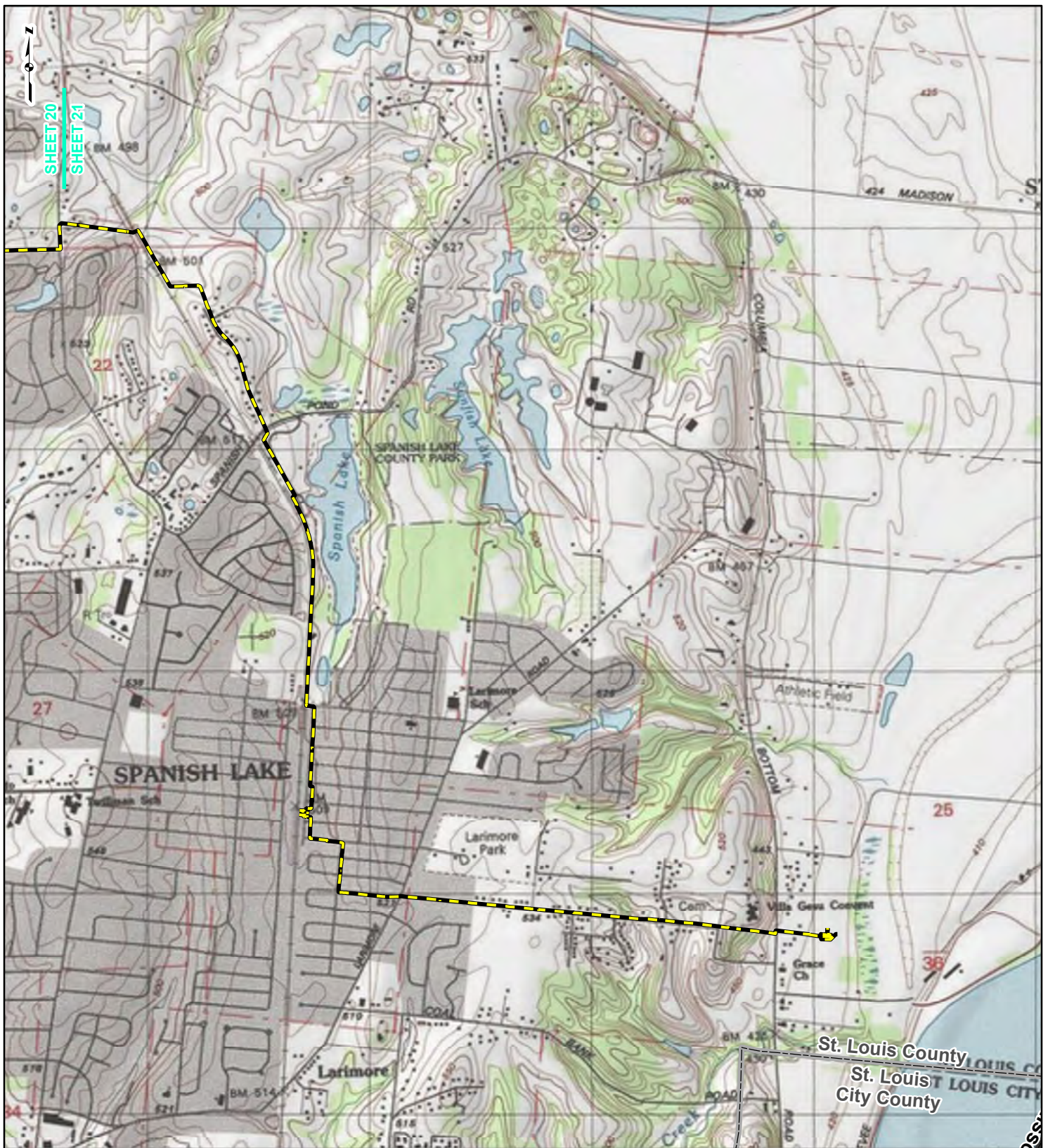
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Feet

FIGURE 1
LOCATION MAP
SHEET 20 OF 21



DRAWN BY: PMH DATE: 7/28/2016
CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



LEGEND

- - - NEW BUILD 24-INCH DIAMETER PIPELINE
- - - LINE 880 MODIFICATIONS
- STATE BOUNDARY
- COUNTY BOUNDARY

0 1,000 2,000 4,000
Feet

FIGURE 1
LOCATION MAP
SHEET 21 OF 21

Spire STL Pipeline

DRAWN BY: PMH DATE: 7/28/2016
 CHECKED: SWW APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSA (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.



July 29, 2016

Ms. Johanna Fuller
District Conservationist
Natural Resources Conservation Service
Scott County/Winchester Field Office
656 North Main
Winchester, IL 62694

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Ms. Fuller:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the Natural Resources Conservation Service - Scott County/Winchester Field Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive style with a large, stylized "L" and "F".

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Mr. Brad Behyner
District Conservationist
Natural Resources Conservation Service
Greene County/Carrollton Field Office
R.R. 3, Box 129, Route 267 North
Carrollton, IL 62016

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Behyner:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

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- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the Natural Resources Conservation Service - Greene County/Carrollton Field Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive style with a large, stylized "L" and "F".

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Mr. Brad Behyner
District Conservationist
Natural Resources Conservation Service
Jersey County/Jerseyville Lincoln Field Office
604 East Franklin
Jerseyville, IL 62052

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Behyner:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

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- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the Natural Resources Conservation Service - Jersey County/Jerseyville Lincoln Field Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

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GAI Consultants, Inc.

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Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Mr. J.R. Flores
State Conservationist
Natural Resources Conservation Service - Missouri State Office
Parkade Center
601 Business Loop 70 West, Suite 250
Columbia, MO 65203-2546

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Mr. Flores:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

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- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the Natural Resources Conservation Service - Missouri State Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

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Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Ms. Connie Gibson
County Executive Director
Natural Resources Conservation
Service, Service Center Office
160 Saint Peters Centre Blvd
St. Peters, MO 63376

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Ms. Gibson:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

- July 22, 2016 - Commission acceptance into pre-filing; commencement of the NEPA process (pre-filing docket no. PF16-9-000);
- August 2016 (Anticipated) - biological and cultural resource surveys;
- January 2017 (Anticipated) - file final application with Commission;
- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the Natural Resources Conservation Service - Service Center Office to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Ms. Connie Gibson
County Executive Director
United States Department of Agriculture
Farm Service Agency, St. Charles County
160 Saint Peters Centre Boulevard
St. Peters, MO 63376

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Ms. Gibson:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

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- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Department of Agriculture - Farm Service Agency - St Charles County to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

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Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Ms. Rebecca D. Walls
County Executive Director
United States Department of Agriculture
Farm Service Agency - Scott County
656 North Main Street
Winchester, IL 62694-3611

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Ms. Walls:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies. Spire intends to utilize the Commission's pre-filing process detailed in Section 157.21 of the Commission's regulations, which allows the Commission and other agencies to initiate National Environmental Policy Act ("NEPA") review prior to Spire filing an application to the Commission. The Commission would need to issue Spire a Certificate of Public Convenience and Necessity to enable construction and operation of the proposed pipeline. The preliminary Project schedule includes the following target dates:

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- August 2017 (Anticipated) - NEPA document published;
- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Department of Agriculture - Farm Service Agency - Scott County to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

Please note the intent of this letter is solely for the purpose of inviting you to participate in the Commission's NEPA pre-filing process. The Commission will also reach out to you requesting your agency to be a cooperating agency. Specific and necessary consultations and/or applicable permit applications will be addressed to you under separate cover.

If you have any questions or would like additional information, please feel free to contact me at 331.301.2002 or by e-mail at L.Ferry@gaiconsultants.com.

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Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

Ms. Connie Gibson
County Executive Director
United States Department of Agriculture
Farm Service Agency, St. Louis County
160 Saint Peters Centre Boulevard
St. Peters, MO 63376

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Ms. Gibson:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

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On behalf of Spire, GAI would like to take this opportunity to invite the United States Department of Agriculture - Farm Service Agency - St Louis County to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

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Lori M. Ferry
Environmental Project Manager

LMF/gmg

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



July 29, 2016

United States Department of Agriculture
Farm Service Agency
Carrollton Service Center
Route 267 North
Carrollton, IL 62016-9545

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Sir or Madam:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

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- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Department of Agriculture - Farm Service Agency - Carrollton Service Center to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

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Environmental Project Manager

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July 29, 2016

United States Department of Agriculture
Farm Service Agency
Jerseyville Service Center
604 East Franklin
Jerseyville, IL 62052-2400

**Re: Notice of Use of Pre-Filing Process
Spire STL Pipeline
Scott, Greene, and Jersey Counties, IL
St. Charles and St. Louis Counties, MO**

Dear Sir or Madam:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"). As proposed, the Project will serve the energy needs of residential, commercial and industrial customers in the eastern portion of Missouri, including the St. Louis metropolitan area and surrounding counties. The Project as proposed will consist of approximately 60 miles of new build 24-inch diameter steel pipeline (referred to as the "new build" portion of the Project) originating at an interconnection with 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 in St. Charles County, Missouri until crossing the Missouri river and tying into an existing 20-inch diameter steel transmission pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Spire plans to purchase Line 880 from LGC and modify approximately nine miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the new build part of the Project to the Enable Mississippi River Transmission, LLC ("MRT") pipeline along the western bank of the Mississippi river in St. Louis County, Missouri. The total length of the entire Project will be approximately 70 miles.

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- November 2017 (Anticipated) - Commission decision on application; and
- February 2018 (Anticipated) - commence construction activities.

On behalf of Spire, GAI would like to take this opportunity to invite the United States Department of Agriculture - Farm Service Agency - Jerseyville Service Center to participate in the review of this Project as a cooperating agency during the Commission's pre-filing process. We look forward to your involvement in the review of this important Project and appreciate your cooperation.

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