



## **Illinois Department of Natural Resources**

# telephone log



gai consultants

Date: 1/19/2017

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Project / Admin. No.: E160438.00

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Call From: Jason Duffey

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Company: GAI Consultants

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Phone No.:

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Call To: Jenny Skufca

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Company: Illinois Department of Natural Resources

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Phone No.: (217)557-8243

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Subject: Spire STL Pipeline-State List Species / Habitat Conservation Plan

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cc:

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## **Summary of Discussion, Decisions, and Commitments:**

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On January 18, 2017, Jason Duffey left a voice message for Jenny Skufca, Illinois Department of Natural Resources Incidental Take Authorization Coordinator. Jenny Skufca returned the call on January 19, 2017.

Jenny Skufca indicated the following during the conversation:

- She is not normally involved in the Incidental Take Authorization (ITA) process until a habitat conservation plan (HCP) has been prepared and/or a project proponent has been referred up to her from Impact Assessment (Keith Shank). GAI should continue to coordinate with Keith Shank until such time that it is determined that an HCP will be prepared.
  - She can complete preliminary reviews prior to submitting the final HCP, and while IDNR cannot authorize take of species that are also federally-listed until USFWS makes a determination those species, the HCP process can continue in the meantime.
  - She indicated that because the HCP process is optional, Spire should determine whether or not the Project will affect state-listed species (with the assistance of IDNR Impact Assessment), and take the appropriate course of action. In the case of a negative mist net survey for northern long-eared bats, Spire should determine if an HCP for that species is still necessary.
  - She indicated that she was not currently aware of recent cases where the INDR had authorized take on private lands without the landowner's consent, i.e. through an easement rather than a condemnation.
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However, she was not sure if INDR had the authority for such an authorization or not.

**Follow up Items**

- GAI should contact Keith Shank for further coordination
  - GAI may follow up with Jenny Skufca when reviews of the draft HCP are needed
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## Ali Trunzo

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**To:** Kieninger, Tara  
**Cc:** Lori Ferry; Jayme Fuller  
**Subject:** RE: Timber Rattlesnake data - Principia

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**From:** Kieninger, Tara [mailto:Tara.Kieninger@Illinois.gov]  
**Sent:** Thursday, January 05, 2017 11:38 AM  
**To:** Ali Trunzo <A.Trunzo@gaiconsultants.com>  
**Cc:** Lori Ferry <L.Ferry@gaiconsultants.com>; Jayme Fuller <J.Fuller@gaiconsultants.com>  
**Subject:** RE: Timber Rattlesnake data - Principia

Dear Ali –

I have attached the GIS data as per your request. Please adhere to the terms of the Data License Agreement. Should you have questions about those terms, don't hesitate to ask. Note that your data license expires in 1 year. It is your responsibility to request a data license renewal and data refresh before that deadline. Some of our data requestors find it helpful to put a reminder in their electronic calendar.

Projected Coordinate System: Illinois State Transverse\_Mercator  
Projection: Transverse\_Mercator  
False\_Easting: 3280833.33333330  
False\_Northing: 3937000.00000000  
Central\_Meridian: -89.50000000  
Scale\_Factor: 0.99985294  
Latitude\_Of\_Origin: 36.66666667  
Linear Unit: Foot\_US

The **IDNRetspecies dataset** contains locations of state and federal endangered and threatened species (except timber rattlesnakes, see below) within 1 mile of the project area.

The **IDNRtimberrattlesnakes** dataset contains locations of timber rattlesnakes within 1 mile of the project area.

The **IDNRMussels** dataset contains locations of endangered & threatened mussels within Green, Jersey, & Scott Counties.

Attribute Field	Description
FID, Shape, FEATURE_ID, EO_ID, SHAPE_ID, ELCODE	Database tracking codes
EO_NUM	Tracking number for a particular species (i.e. tyto alba #1, tyto alba #2, tyto alba #3, etc.)
SNAME	Scientific name or community name
SCOMNAME	Common name or descriptive community name
EST_REP_AC	Estimated Representation Accuracy: Level of accuracy associated with the EOREP. The area observed to be occupied by the EOREP relative to the area contained within the footprint of the EOREP. Differences in these two values result from including additional area within the EOREP boundary to incorporate associated <a href="#">locational uncertainty</a> . Data provided with detailed location information (i.e. GPS coordinates) are given a small (if any) buffer to account for minimal locational uncertainty and the EST REP AC value would be high. Data

	with less precise location information are given a larger buffer to account for larger locational uncertainty and the EST REP AC value would be low.
CONFIDENCE	Confidence Extent: Indicates whether the full extent of the Element is known (i.e., has been determined through field survey) at that location and, therefore, is represented by the Element Occurrence (EO).
LAST_OBS_D	Date last observed
SURVEY_DAT	Date last surveyed
S_PROTECTI	State Protection Status: LE – listed as endangered, LT – listed as threatened, RT – removed from threatened species list
COUNTIES	Counties in which the EO occurs
Elcode_bcd	General Code: Major taxa and other resources grouped by starting letter of this code: <ul style="list-style-type: none"> <li>• <b>A</b> = vertebrate animals (AA=amphibians/AB=birds/AF=fish/AM=mammals/AR=reptiles)</li> <li>• <b>C</b> = high-quality natural communities</li> <li>• <b>G</b> = significant geological features</li> <li>• <b>I</b> = invertebrate animals (IC=crustaceans/II=insects/IM=mussels)</li> <li>• <b>O</b> = other (OU=unusual flora &amp; fauna concentrations/OW=rookeries)</li> <li>• <b>N</b> = non-vascular plants</li> <li>• <b>P</b> = vascular plants</li> </ul>
Name_catg	General species category

The **IDNRinai dataset** contains locations of Illinois Natural Areas Inventory (INAI) sites within 1 mile of the project area.

Attribute Field	Description
FID, Shape, FEATURE_ID, SHAPE_ID	Database tracking codes
SITE_NAME	INAI site name
CATEGORIES	Categories under which a site qualifies for inclusion on the INAI: <ul style="list-style-type: none"> <li>• Cat. I = High quality natural community and natural community restorations</li> <li>• Cat. II = Specific suitable habitat for state-listed species or species relocations</li> <li>• Cat. III = State dedicated Nature Preserves, Land and Water Reserves, and Natural Heritage Landmarks</li> <li>• Cat. IV = Outstanding geological features</li> <li>• Cat. V = (Not used at this time)</li> <li>• Cat. VI = Unusual concentrations of flora or fauna and high quality streams</li> </ul>
NAINUM	INAI number

The **IDNRinpc dataset** contains locations of lands enrolled in Illinois Nature Preserves Commission (INPC) land protection programs including Nature Preserves and Land and Water Reserves, as well as Natural Heritage Landmarks, in the project area. To learn more about INPC programs, visit: <http://dnr.state.il.us/inpc/>.

Attribute Field	Description
FID, Shape, FEATURE_ID, SHAPE_ID	Database tracking codes
INPC_NUMBE	INPC number
Ma_name	INPC site name

## **Payment of Fees**

Fees for this request have been waived as there is a small number of tracked resources concentrated generally in one small area of the project corridor.

## **Disclaimers**

Please be aware that the Natural Heritage Database cannot provide a conclusive statement on the presence, absence, or condition of significant natural features in Illinois. The Department of Natural Resources can only summarize the existing information known to us at the time of the request. This report should not be regarded as a final statement on the area being considered, nor should it substitute for field surveys required for environmental assessments.

This letter is separate from the Illinois Department of Natural Resources consultation requirement under the Illinois Endangered Species Act (530 ILCS 10/11) and the Illinois Natural Areas Preservation Act (525 ILCS 30/17). For more information on this process, please contact the Illinois Department of Natural Resources, Division of Ecosystems and Environment, at One Natural Resources Way, Springfield, Illinois 62702-1271 or by telephone at (217)785-5500.

**Note:** data from the Illinois Natural Heritage Database is updated with new information on a daily to quarterly basis depending on the dataset involved. It is your responsibility to request data updates should your project's timeline warrant it. The majority of requests are answered within 2 weeks of their receipt. Please plan ahead to allow ample time for receipt of the data.

### **For Future Note:**

Information related to natural resources in the vicinity of a project site can be elicited from the EcoCAT (Ecological Compliance Assessment Tool) public website by submitting an "Information Request" or by initiating the Endangered Species Consultation Process there. Results are instantaneous. EcoCAT can be used to discover if known records of endangered or threatened species, Illinois Natural Areas Inventory (INAI) Sites, dedicated Illinois Nature Preserves, or registered Land & Water Reserves exist "in the vicinity." A report will be generated that summarizes those sensitive resources. Note that there is a \$500 fee if you choose the Consultation option with this tool.

Go to the IDNR EcoCAT web page: <http://dnr.illinois.gov/EcoPublic/> and follow the instructions on-screen. EcoCAT will not provide exact locations for sensitive resources, but it will inform you if any of these resources are in the vicinity, either within or just outside the footprint of the project site that you draw.

Lists of endangered or threatened species, Illinois Natural Areas Inventory (INAI) sites, and lands protected by the Illinois Nature Preserves Commission (INPC) for each county are provided on our webpage: <http://www.dnr.illinois.gov/conservation/NaturalHeritage/Pages/NaturalHeritageDatabase.aspx>. Be sure to check back quarterly for updates to this list.

Let me know if you have any questions.

### ***Tara Kieninger***

Heritage Database Program Manager  
Illinois Dept of Natural Resources - ORC  
One Natural Resources Way  
Springfield, IL 62711  
(217)782-2685 (phone) / (217)785-2438 (fax)  
[tara.kieninger@illinois.gov](mailto:tara.kieninger@illinois.gov)

## Ali Trunzo

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**Subject:** RE: Timber Rattlesnake data - Principia

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**From:** Ali Trunzo

**Sent:** Thursday, December 29, 2016 2:34 PM

**To:** 'Kieninger, Tara' <Tara.Kieninger@Illinois.gov>

**Cc:** Lori Ferry <L.Ferry@gaiconsultants.com>; Jayme Fuller <J.Fuller@gaiconsultants.com>

**Subject:** RE: Timber Rattlesnake data - Principia

Tara,

Attached is the signed data request agreement. As recommended by IDNR, in addition to the Timber Rattlesnake data we would also like to request any additional T&E species locations within the Project area (see attached shapefile), as well as listed and nonlisted mussel species locations within the counties crossed by the Project.

We would prefer to receive shapefiles of the Timber Rattlesnake data in particular. Would there be an additional cost to receive shapefiles for the mussels and other T&E?

Thank you,

Ali

## Data License Agreement (License)

for use of Natural Heritage Database Data  
provided by the Illinois Department of Natural Resources in cooperation with the  
Illinois Nature Preserves Commission & the Illinois Endangered Species Protection Board

The Illinois Department of Natural Resources (IDNR) hereby grants a revocable License to **Lori Ferry** of **GAI Consultants** (Licensee) for use of the following Natural Heritage Database (NHD) data: **Listed and non-listed mussel species locations in Scott, Greene and Jersey Counties; Timber rattlesnake locations near Principia College campus and West Farm Area; and Threatened and Endangered Species locations within the Project review buffer.** IDNR retains the ownership of this data, allowing use by the Licensee for: **planning purposes.**

### USE OF THE DATA IS SUBJECT TO THE FOLLOWING CONDITIONS:


1. The License is revocable at any time if Licensee fails to comply with its conditions.
2. This License is non-transferable and cannot be provided to third parties by the licensee. Licensees such as consultants or subcontractors may not provide the data to third parties such as a client or contractor. If the third party needs the data for a project, then the third party must also pay the fee and sign a Data License Agreement. Any and all requests for data access from third parties shall be directed to the NHD Program.
3. Licensee understands and acknowledges that the accuracy of this data is time-limited, as the data is updated on a daily to quarterly basis. Licensee agrees to use NHD data only for the term specified, and to request data updates as the project time period dictates. By the following date: **December 27, 2017** (which shall be no later than one year following the issuance of this License), the licensee will either:
  - a. Destroy all copies of these data, or
  - b. Arrange for License renewal and data update.
4. Licensee acknowledges that the data provided are considered exempt from the Illinois FOIA and agrees not to voluntarily release or distribute the data to parties not covered by this License. Any and all requests for data access from third parties shall be directed to NHD. This License is subject to the condition that the Licensee has the authority to deny access to the data. If the Licensee is forced to release the data by a court order, IDNR must be notified and this License will be considered breach.
5. If the licensee is a governmental or private entity, the licensee shall ensure that internal access to the data is limited to those individuals with such entities who require access to the data for the stated project and purpose of the Data License Agreement. The licensee is responsible for ensuring that all such individuals understand and adhere to the terms of the Data License Agreement.
6. Licensee agrees to abide by the NHD fee schedule and payment policy, unless a separate agreement is in place. This License may be terminated, revoked, or denied for all present and future uses of the data if payment or other mutually agreed compensation is overdue.
7. Licensee understands and acknowledges that release of precise species locations may threaten natural heritage resources. Licensee shall take reasonable precautions to ensure the confidentiality of species locations. When precise species locations need to be displayed in publically-accessible documents or websites, species locations should be generalized to a less precise boundary or displayed without the species name when possible.

8. Licensee shall identify "Illinois Department of Natural Resources, Illinois Nature Preserves Commission, Illinois Endangered Species Protection Board, and the Natural Heritage Database" as the data source on any map or publication and will include the release date of the data.
9. Licensee must provide the NHD with any endangered & threatened species information that is collected during the term of the Data License Agreement so as to keep the NHD current. This information includes species location, date observed, names of and contact information for observers, and number of individuals observed.
10. Licensee understands and acknowledges that the data is being provided for planning and assessment purposes only. Receipt of the data does not constitute Department, Commission, or Board review or authorization of any proposed project, and does not exempt the licensee from securing necessary permits and approvals from the Department, Commission, Board, or other regulatory agency.
11. Data maintained by the NHD Program is gained from the best and most recent information available and undergoes quality control and quality assurance. Because environmental conditions change daily, the NHD Program cannot provide a conclusive statement on the presence, absence, or condition of significant natural features identified in the Database and can only summarize the information known to us at the time of each agreement. An executed Data License Agreement shall not constitute Department, Commission, or Board validation of the licensee's interpretation of the data.
12. Licensee understands that the electronic portion of the data is only a representation of the more extensive information available in manual files and other electronic files.

By signature on the License, the Licensee hereby accepts all the terms and conditions of this License without exception, deletion or alteration. The Licensee recognizes that any use or release of the data not authorized by this License or failure to return the agreement will be considered a breach of this License. Upon breach, the Licensee shall immediately delete all data for this License shall be null and void and use of the data shall be unlawful and constitute unauthorized use.

Return this License Agreement and address all correspondence to:

Tara Kieninger  
 IDNR – Heritage Database Program, One Natural Resources Way, Springfield, IL 62702  
 (217)782-2685 / (217)785-2438 – fax  
[tara.kieninger@illinois.gov](mailto:tara.kieninger@illinois.gov)

	12/29/2016	
Signature of Licensees	Date	
Agency	Title	Project Manager
Address 1444 Farnsworth Avenue, Suite 303	City/State/Zip Code	Aurora, IL 60505
Phone Number 630-605-5255	E-mail	I.ferry@gaiconsultants.com

# telephone log



gai consultants

Date: 12-27-2016

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Project / Admin. No.: E160438.00

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Call From: Ali Trunzo

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Company: GAI Consultants

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Phone No.: 412-399-5096

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Call To: Tara Kieninger

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Company: IDNR –Heritage Database Program Manager

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Phone No.: 217-782-2685

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Subject: Natural Heritage Database Information

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cc:

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## **Summary of Discussion, Decisions, and Commitments:**

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Spoke with Mr. Kieninger regarding data available for the Project area in the Natural Heritage Database information. Timber rattlesnake survey data within the Principia area is available with the data agreement.

Also discussed the presence of mussel species, particularly Greene County. No records for listed mussels were noted, however there are locations with unusual concentrations (10 or more live native species).



## Ali Trunzo

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**From:** Kieninger, Tara <Tara.Kieninger@Illinois.gov>  
**Sent:** Tuesday, December 27, 2016 2:39 PM  
**To:** Ali Trunzo  
**Subject:** RE: Timber Rattlesnake data - Principia  
**Attachments:** trunzo\_Data License Agreement\_dec2016.doc

Hi Ms. Trunzo,

I can provide you with the requested data. Note that we have received extensive detailed timber rattlesnake locations from Principia researchers in the past couple of months. As such, I will need to have you sign a Data License Agreement prior to sending the data. Please fill out the attached agreement and return it to me via fax or email.

As for the data, I can send you a map of the timber rattlesnake locations free of charge, or I can send you Geographic Information System (GIS) shapefiles for a \$75 fee. Let me know which you'd prefer.

### ***Tara Kieninger***

Heritage Database Program Manager  
Illinois Dept of Natural Resources - ORC  
One Natural Resources Way  
Springfield, IL 62711  
(217)782-2685 (phone) / (217)785-2438 (fax)  
[tara.kieninger@illinois.gov](mailto:tara.kieninger@illinois.gov)

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**From:** Ali Trunzo [mailto:A.Trunzo@gaiconsultants.com]  
**Sent:** Friday, December 23, 2016 9:46 AM  
**To:** Kieninger, Tara  
**Cc:** Lori Ferry; Jayme Fuller  
**Subject:** [External] Timber Rattlesnake data - Principia

Tara,

As described in my voicemail, we understand that 2016 Timber Rattlesnake data is available for the Principia area crossed by Spire's STL Pipeline Project in Jersey County, Illinois.

We discussed the Project with Jenny Skufka and Brent Krebs of IDNR on Monday, and they suggested that we contact you for the data. Would you be able to provide this?

Thank you, and happy holidays,

Ali

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**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](mailto:a.trunzo@gaiconsultants.com) | [gaiconsultants.com](http://gaiconsultants.com)     

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## Ali Trunzo

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**Subject:** RE: Spire STL Pipeline\_Department support

**From:** Skufca, Jenny [<mailto:Jenny.Skufca@Illinois.gov>]

**Sent:** Monday, December 19, 2016 1:27 PM

**To:** Lori Ferry <[L.Ferry@gaiconsultants.com](mailto:L.Ferry@gaiconsultants.com)>

**Cc:** Krebs, Brent <[Brent.Krebs@illinois.gov](mailto:Brent.Krebs@illinois.gov)>; Kath, Joe <[Joe.Kath@Illinois.gov](mailto:Joe.Kath@Illinois.gov)>; Rogers, Nancy S <[Nancy.S.Rogers@Illinois.gov](mailto:Nancy.S.Rogers@Illinois.gov)>; Kieninger, Tara <[Tara.Kieninger@Illinois.gov](mailto:Tara.Kieninger@Illinois.gov)>; Shank, Keith <[Keith.Shank@Illinois.gov](mailto:Keith.Shank@Illinois.gov)>

**Subject:** Spire STL Pipeline\_Department support

Lori,

Thank you for the informative call this morning. As we discussed, please find attached a template for your use for development of a Conservation Plan as application for Incidental Take Authorization (ITA). I have also attached Administrative Code 1080, so that you can see the how the review will proceed. Here is a link to all of the Conservation Plans and ITAs – see #138 to Dakota Pipeline for an idea of how an ITA to a pipeline has looked in the past: <https://www.dnr.illinois.gov/conservation/NaturalHeritage/Pages/Incidental-Take-Authorizations.aspx>

I have copied Joe Kath, Endangered Species Program Manager; he can assist with getting an Endangered and Threatened Species research permit for conducting your surveys. Here's a link to the application: <https://www.dnr.illinois.gov/conservation/NaturalHeritage/Documents/ApplicationforETPossession.pdf>

I have copied Nancy Rogers; she can assist with seeking a Scientific Collector's permit for the potential taking of non-listed species. That application can be found here: <https://www.dnr.illinois.gov/conservation/NaturalHeritage/Documents/Scientific%20permit.pdf>

I have copied Tara Kieninger, Natural Heritage Database Manager; she can assist you with obtaining an updated version of the Endangered and Threatened Species data for your project location.

Finally, I have also copied Keith Shank; he oversees the Impact Assessment Section and can assist you with determining the status of your consultation with the Department.

I look forward to working with you. Please let me know if you need assistance with your Conservation Plan. Thanks.

Jenny

Jenny Skufca  
Incidental Take Authorization Coordinator  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield, IL 62702  
(217)557-8243

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**Illinois Department of Natural Resources**  
**CONSERVATION PLAN**

*(Application for an Incidental Take Authorization)*

Per 520 ILCS 10/5.5 and 17 Ill. Adm. Code 1080

**150-day minimum required for public review, biological and legal analysis, and permitting**

PROJECT APPLICANT:

PROJECT NAME:

COUNTY:

AREA OF IMPACT:

The incidental taking of endangered and threatened species shall be authorized by the Illinois Department of Natural Resources (IDNR) only if an applicant submits a conservation plan to the IDNR Incidental Take Coordinator that meets the following criteria:

1. A **description of the impact likely to result** from the proposed taking of the species that would be covered by the authorization, including but not limited to -

A) identification of the **area to be affected by the proposed action**, include a legal description and a detailed description including street address, map(s), and **GIS shapefile**. Include an indication of ownership or control of affected property. Attach photos of the project area.

B) **biological data** on the affected species including life history needs and habitat characteristics. **Attach all biological survey reports.**

C) **description of project activities** that will result in taking of an endangered or threatened species, including practices to be used, a **timeline** of proposed activities, and any permitting reviews, such as a USFWS biological opinion or USACE wetland review. Please consider all potential impacts such as noise, vibration, light, predator/prey alterations, habitat alterations, increased traffic, etc.

D) explanation of the anticipated **adverse effects on listed species**; how will the applicant's proposed actions impact each of the species' life cycle stages.

2) Measures the applicant will take to **minimize and mitigate** that impact and the **funding** that will be available to undertake those measures, including, but not limited to -

A) plans to **minimize the area affected** by the proposed action, the estimated **number of individuals** of each endangered or threatened species that will be taken, and the **amount of habitat** affected (please provide an estimate of area by habitat type for each species).

B) **plans for management of the area** affected by the proposed action that will **enable continued use** of the area by endangered or threatened species by maintaining/re-establishing suitable habitat (for example, native species planting, invasive species control, use of other best management practices, restored hydrology, etc.).

C) description of **all measures to be implemented to avoid, minimize, and mitigate** the effects of the proposed action on endangered or threatened species.

- Avoidance measures include working outside the species' habitat.
- Minimization measures include timing work when species is less sensitive or reducing the project footprint.
- Mitigation is additional beneficial actions that will be taken for the species such as needed research, conservation easements, propagation, habitat work, or recovery planning.
- It is the **applicant's responsibility to propose mitigation measures**. IDNR expects applicants to provide species conservation benefits 5.5 times larger than their adverse impact.

D) plans for **monitoring** the effects of the proposed actions on endangered or threatened species, such as **species and habitat monitoring** before and after construction, include a plan for follow-up **reporting to IDNR**.

E) **adaptive management practices** that will be used to deal with changed or unforeseen circumstances that affect on endangered or threatened species. Consider environmental variables such as flooding, drought, and species dynamics as well as other catastrophes. Management practices should include contingencies and specific triggers. Note: Not foreseeing any changes does not qualify as an adaptive management plan.

F) **verification that adequate funding exists** to support and implement all mitigation activities described in the conservation plan. This may be in the form of bonds, certificates of insurance, escrow accounts or other financial instruments adequate to carry out all aspects of the conservation plan.

3) A **description of alternative actions** the applicant considered that would reduce take, and the reasons that each of those alternatives was not selected. A **“no-action” alternative** shall be included in this description of alternatives. Please, describe the economic, social, and ecological tradeoffs of each action.

4) Data and information to indicate that the proposed taking **will not reduce the likelihood of the survival** of the endangered or threatened species in the wild within the State of Illinois, the biotic community of which the species is a part, or the habitat essential to the species existence in Illinois.

5) An **implementing agreement**, which shall include, but not be limited to (on a separate piece of paper containing signatures):

- A) the names and signatures of all participants in the execution of the conservation plan;
- B) the obligations and responsibilities of each of the identified participants with schedules and deadlines for completion of activities included in the conservation plan and a schedule for preparation of progress reports to be provided to the IDNR;
- C) certification that each participant in the execution of the conservation plan has the legal authority to carry out their respective obligations and responsibilities under the conservation plan;
- D) assurance of compliance with all other federal, State and local regulations pertinent to the proposed action and to execution of the conservation plan;
- E) **copies of any final federal authorizations for a taking already issued to the applicant**, if any.

**PLEASE SUBMIT TO: Incidental Take Authorization Coordinator, Illinois Department of Natural Resources, Division of Natural Heritage, One Natural Resources Way, Springfield, IL, 62702 OR [DNR.ITAcoordinator@illinois.gov](mailto:DNR.ITAcoordinator@illinois.gov)**

October 2015



TITLE 17: CONSERVATION  
CHAPTER I: DEPARTMENT OF NATURAL RESOURCES  
SUBCHAPTER c: ENDANGERED SPECIES

PART 1080  
INCIDENTAL TAKING OF ENDANGERED OR THREATENED SPECIES

Section	
1080.10	Conservation Plan
1080.20	Notice and Review of Conservation Plans
1080.30	Comments
1080.40	Final Review
1080.50	Notice of Decision
1080.60	Effective Date, Term
1080.70	Separability, Exclusions
1080.80	Appeal, Revocation

AUTHORITY: Implementing and authorized by Section 5.5 of the Illinois Endangered Species Protection Act [520 ILCS 10/5.5].

SOURCE: Adopted at 25 Ill. Reg. 9877, effective July 17, 2001.

**Section 1080.10 Conservation Plan**

Incidental taking of endangered and threatened species shall be authorized by the Department of Natural Resources (Department) only if the applicant submits to the Department a conservation plan that satisfies all criteria established in this Part.

- a) A conservation plan submitted to the Department's Office of Resource Conservation as the application for authorization for incidental taking of an endangered or threatened species shall, at a minimum, include:
  - 1) A description of the impact likely to result from the proposed taking of the species that would be covered by the authorization, including but not limited to:
    - A) legal description, if available, or detailed description including street address and map of the area to be affected by the proposed action and indicia of ownership or control of affected property;
    - B) biological data on the affected species; on

request of the applicant, the Department shall provide biological data in the Department's possession on the affected species;

- C) description of the activities that will result in taking of an endangered or threatened species; and
  - D) explanation of the anticipated adverse effects on listed species.
- 2) Measures the applicant will take to minimize and mitigate that impact and the funding that will be available to undertake those measures, including, but not limited to:
- A) plans to minimize the area affected by the proposed action, the estimated number of individuals of an endangered or threatened species that will be taken and the amount of habitat affected;
  - B) plans for management of the area affected by the proposed action that will enable continued use of the area by endangered or threatened species;
  - C) description of all measures to be implemented to minimize or mitigate the effects of the proposed action on endangered or threatened species;
  - D) plans for monitoring the effects of measures implemented to minimize or mitigate the effects of the proposed action on endangered or threatened species;
  - E) adaptive management practices that will be used to deal with changed or unforeseen circumstances that affect the effectiveness of measures instituted to minimize or mitigate the effects of the proposed action on endangered or threatened species; and
  - F) verification that adequate funding exists to support and implement all mitigation

activities described in the conservation plan. This may be in the form of bonds, certificates of insurance, escrow accounts or other financial instruments adequate to carry out all aspects of the conservation plan.

- 3) A description of alternative actions the applicant considered that would not result in take, and the reasons that each of those alternatives was not selected. A "no-action" alternative shall be included in this description of alternatives.
- 4) Data and information to indicate that the proposed taking will not reduce the likelihood of the survival of the endangered or threatened species in the wild within the State of Illinois, the biotic community of which the species is a part or the habitat essential to the species existence in Illinois.
- 5) An implementing agreement, which shall include, but not be limited to:
  - A) the names and signatures of all participants in the execution of the conservation plan;
  - B) the obligations and responsibilities of each of the identified participants with schedules and deadlines for completion of activities included in the conservation plan and a schedule for preparation of progress reports to be provided to the Department;
  - C) certification that each participant in the execution of the conservation plan has the legal authority to carry out their respective obligations and responsibilities under the conservation plan;
  - D) assurance of compliance with all other federal, State and local regulations pertinent to the proposed action and to execution of the conservation plan; and
  - E) copies of any final federal authorizations for a taking already issued to the applicant, if

any.

- b) The Department, after review and public comment, may require additional measures as necessary or appropriate to the success of the conservation plan. Requirements for additional measures shall be based on the life history needs of the species involved.
- c) A Habitat Conservation Plan approved by the U.S. Fish and Wildlife Service pursuant to Section 10 of the Endangered Species Act of 1973 [26 USC 1539], and amendments thereto, may be submitted in lieu of the conservation plan described in this Section.
- d) Authorization to take an endangered or threatened species under the terms of a biological opinion issued by the U.S. Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act of 1973 [26 USC 1536], and amendments thereto, or regulations implementing Section 7 [50 CFR 402] may be submitted in lieu of the conservation plan described in this Section.

**Section 1080.20 Notice and Review of Conservation Plans**

- a) After receipt of a conservation plan, the Department shall, within 30 days, review the conservation plan to determine if all required information has been provided by the applicant and:
  - 1) acknowledge receipt of the complete conservation plan in writing; or
  - 2) notify the applicant in writing of any deficiencies in the conservation plan and provide the applicant an opportunity to supply additional information to the Department. Any late-breaking or additional information will be considered part of the conservation plan for purposes of this Part.
- b) When the applicant is notified by the Department that the conservation plan is complete as defined in this Part, the applicant shall place a notice in a local newspaper of general circulation in the locality of the proposed action at least once a week for 3 consecutive weeks. At least 14 days shall elapse between the first and last publications of the notice. The notice shall also be

published one time in the official State newspaper, concurrent with the first publication in a local newspaper of general circulation. A copy of the notice as it will appear in the newspaper shall be submitted to the Department for approval before the first publication. The notice shall include, at a minimum, the following:

- 1) the name and mailing address of the applicant;
  - 2) a map or description that clearly shows or describes the precise location and boundaries of both the area to be affected by the proposed project and any areas to be affected by provisions of the conservation plan and is sufficient to enable local residents to readily identify the subject areas. It must include towns, bodies of water, local landmarks, or any other information that would identify the subject areas. If a map is used, it shall indicate the north direction;
  - 3) a summary of the incidental taking for which authorization is being requested;
  - 4) a summary of the measures that will be instituted to minimize and mitigate the effects of the proposed incidental taking;
  - 5) the location where a copy of the conservation plan is available for inspection;
  - 6) the street and e-mail address of the office of the Department to which comments on the conservation plan may be submitted; and
  - 7) the closing date for receipt of written comments on the conservation plan.
- c) The applicant shall:
- 1) provide copies of the conservation plan to be available for review at the nearest public library in the county or counties in which the proposed action will occur. Copies distributed for public review shall not include any trade secrets as defined by the Illinois Trade Secrets Act [765 ILCS 1065/2(d)]; and

- 2) provide copies of the conservation plan to the Executive Director of the Illinois Endangered Species Protection Board (Board).
- d) After the applicant's public notice is approved by the Department, the Department shall provide notice of the receipt of the conservation plan to any person who has requested notice. The Department shall maintain a permanent list of those persons or organizations that wish to be notified of all conservation plans it receives.

#### **Section 1080.30      Comments**

Written comments on a conservation plan may be submitted to the Department by any person within 30 days after the last publication of the notice required by Section 1080.20(b). Comments will be accepted by electronic mail upon confirmation of authorship. The Department shall, upon receipt of written comments, transmit a copy of the comments to the applicant. The applicant shall evaluate the public comments received from the Department and shall submit an analysis of the comments no later than 10 days after the close of the public comment period. The analysis shall include a list of all persons or organizations making comment; a list of the criticisms, suggestions and comments raised; and the applicant's analysis of each criticism, suggestion or comment. The analysis shall also include a description of any revision to the Conservation Plan that the applicant is making in response to public comment. The comments and the applicant's analysis may be used by the Department pursuant to Section 1080.30 to support any additional measures that may be necessary or appropriate to assure the success of the Conservation Plan.

#### **Section 1080.40      Final Review**

- a) The Department's Office of Resource Conservation shall coordinate and perform the review of the conservation plan and issue the incidental take authorization pursuant to this Part. The Department shall complete its review of the conservation plan within 120 days after the first publication of the notice required in Section 1080.20(b). After reviewing the conservation plan, the Department may authorize the incidental taking if the Department finds that the taking will meet all of the following requirements:

- 1) the taking will not be the purpose of, but will be only incidental to, the carrying out of an otherwise lawful activity;
  - 2) the parties to the conservation plan will, to the maximum extent practicable, minimize and mitigate the impact caused by the taking;
  - 3) the parties to the conservation plan will ensure that adequate funding for the conservation plan will be provided as described in Section 1080.10(a)(2)(F);
  - 4) based on the best available scientific data, the Department has determined that the taking will not reduce the likelihood of the survival of the endangered species or threatened species in the wild within the State of Illinois, the biotic community of which the species is a part, or the habitat essential to the species' existence in Illinois;
  - 5) any additional measures, based upon the life history needs of the species involved, that the Department may require as necessary or appropriate for the purposes of the conservation plan will be performed;
  - 6) the public has received notice of the availability of the conservation plan and has had the opportunity to comment before the Department made any decision regarding the authorization of incidental take; and
  - 7) the Department has sought the advice of the Board and provided written response to any Board comments regarding the issuance of authorization for incidental taking and on the terms of any authorization to be issued.
- b) If the Department finds that the conservation plan does not meet the above requirements, the Department may require that a party to the conservation plan make additional assurances or agree to additional terms and conditions that the Department finds necessary to assure

that the requirements in subsections (a)(1) through (a)(6) will be met before authorizing incidental taking. Requirements for inclusion of additional assurances in a conservation plan shall be based on the life history needs of the species involved. The Department shall deny an authorization for incidental taking if the conservation plan does not meet the requirements of subsection (a) and the applicant refuses to accept the additional terms and conditions or refuses to make additional assurances determined necessary by the Department.

**Section 1080.50 Notice of Decision**

- a) The Department shall provide written notice to the applicant of the approval or denial of authorization for incidental taking. The written notice shall constitute the authorization for incidental taking or the denial of the authorization for incidental taking is effective as of the date of execution by the Director of the Department's Office of Resource Conservation.
- b) The Department shall make available to any person who requests it a copy of any written notice authorizing incidental taking.

**Section 1080.60 Effective Date, Term**

Any authorization for incidental take issued pursuant to 520 ILCS 10/5.5 and this Part shall have an effective date and term. The term of the authorization for incidental take shall be sufficient to assure that the terms and conditions of the authorization and the measures described in the conservation plan may be fully executed and that monitoring of the effects of those measures can be carried out for a length of time that will determine their adequacy for protection and enhancement of the endangered or threatened species.

**Section 1080.70 Separability, Exclusions**

- a) Authorization for incidental taking shall be separate and distinct from any other action of the Department. Issuance of any permit, license or authorization by the Department under any authority other than that granted in Section 5.5 of the Illinois Endangered Species Protection Act shall not constitute authorization for incidental



take. Issuance of any permit, license or authorization by the Department under any authority other than that granted in Section 5.5 of the Illinois Endangered Species Protection Act shall not be interpreted as an assurance that incidental take authorization will be issued.

- b) Certain activities that are planned, designed and executed for the benefit of one or more endangered or threatened species and may result in the incidental take of individuals of those species are exempt from the provisions of this Section. Exempt activities shall be those listed in 17 Ill. Adm. Code 1075.30(c). The Department shall have the right to require persons carrying out such activities to submit information to justify the claimed exemption from this Section.

**Section 1080.80      Appeal, Revocation**

- a) The applicant may appeal a denial of authorization for incidental taking. Such appeal shall be heard pursuant to Subpart C of 17 Ill. Adm. Code 2530 - Department Formal Hearings for Rulemaking and Contested Cases.
- b) Authorization issued under this Part may be revoked by the Department for failure to implement any provision of the conservation plan. The Department shall issue notice of the revocation and, if requested by the permittee, may conduct a hearing on the revocation pursuant to Subpart C of 17 Ill. Adm. Code 2530 - Department Formal Hearings Conducted for Rulemaking and Contested Cases. Revocation of a permit may subject the permittee to criminal penalties as provided in the Endangered Species Protection Act if a taking is found subsequent to the revocation or if the taking is proximate to the failure to implement the conservation plan.

# telephone log



gai consultants

Date: 12/19/2016

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Project / Admin. No.: E160438.00

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Call From: Lori Ferry, Jayme Fuller

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Company: GAI Consultants

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Phone No.:

---

Call To: Brent Krebs, Jenny Skufca

---

Company: Illinois Department of Natural Resources

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Phone No.:

---

Subject: Spire STL Pipeline-State List Species

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cc:

## **Summary of Discussion, Decisions, and Commitments:**

As a follow up to the meeting that Spire had with the Illinois agencies last week, Spire held a separate conference call with the Illinois Department of Natural Resources, Incidental Take Authorization coordinator (Jenny Skufca) and the Chief of Staff (Brent Krebs).

Spire requested additional consultation information for the following state listed species:

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### **Timber rattlesnake**

- IDNR has received the data from Principia College for the 2016 timber rattlesnake surveys. IDNR has not yet shared this information with Spire but can (GAI to follow up separately). The data indicates that there were dens located on either side of the proposed pipeline right-of-way on the bluffs.
  - It is recommended that an Incidental Take Authorization be obtained through this area. IDNR asked if there were construction measures that could be implemented to minimize impacts to the species. GAI indicated that there were ways to avoid/minimize the dens depending on the locations which would be reviewed upon receipt of the data.
  - Obtaining an Incidental Take Authorization involves the development of a Conservation Plan. Once a Conservation Plan is received by the Department, they have 30 days to review it and make sure that it is complete. Once it is considered complete, the Applicant must publish notices in local and state newspapers that the conservation plan has been submitted to the Department.
  - GAI confirmed that the Conservation Plan can incorporate the data obtained from Principia College as GAI does not currently have survey permission to conduct surveys at this location.
  - Applying for an Incidental Take Authorization would assume the presence of snakes through this area.
-

- The Department has 120 days to review the Conservation Plan and authorize or deny the permit. Denial would have to be based on the action reducing the survival of the endangered species.
- IDNR could not speak to the legality of approving an Incidental Take Authorization on a property that Spire does not have an easement with.

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**Plants**

- State listed plants are owned by the landowner and taking of plant would require written permission from the landowner.
- Federal listed plants are also state listed in Illinois.
- Plants species potentially occurring: Eastern prairie fringed orchid, Decurrent false aster, mead's milkweed. GAI is currently reviewing the Project areas for potential habitat for these species based on the results of field surveys.

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**Bats**

- GAI indicated that bats were not brought up in the EcoCat review. IDNR indicated that the consultation lead should be contacted for further information.
- Bat species likely in the Project area are Indiana bat and Northern long-eared bat.
- For Indiana bat, IDNR would defer to the USFWS on potential impacts to Indiana bat.
- IDNR indicated that an Incidental Take Authorization cannot be issued for species that are also federally listed until the federal consultation on those species is complete.
- IDNR does not recognize the 4(d) rule in state law.
- IDNR indicated that a Conservation Plan and subsequent Incidental Take Authorization should be developed on a project level, and include all state-listed species for which Incidental Take Authorization is required, rather than develop separate Conservation Plans and Incidental Take Authorizations for each species.
- IDNR indicated that if the Project implements the tree clearing restriction, no additional coordination would be necessary to avoid impact to Northern long eared bats.
- IDNR would consider tree clearing along the entire Project, not just near the Mississippi River where the majority of the tree clearing would need to occur.

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**Mussels**

- The issue of the mussel surveys came up as part of the IDNR meeting last week. IDNR may request mussel surveys as part of its review of the 404 permit.
  - GAI requested clarification of the recommendation of mussel surveys on other rivers crossed by the Project (Apple, Macoupin Creek) since mussel species were not identified as part of the IDNR's EcoCat review.
  - IDNR indicated that if EcoCat did not include mussel species in those counties, they shouldn't be
-

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needed but would defer to the new consultation contact who will be taking over the Project now that Pat Malone has retired.

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**Follow up Items**

- IDNR to send GAI information regarding the development of the Conservation Plan
- IDNR to send GAI the 2016 timber rattlesnake data.

## Ali Trunzo

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**From:** Andrea Halfhill  
**Sent:** Tuesday, December 06, 2016 4:51 PM  
**To:** Lori Ferry; Ali Trunzo  
**Subject:** FW: Spire STL Pipeline-IDNR Conservation Easements

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**From:** DNR.CREP [mailto:DNR.CREP@Illinois.gov]  
**Sent:** Tuesday, December 06, 2016 4:02 PM  
**To:** Andrea Halfhill <A.Halfhill@gaiconsultants.com>  
**Cc:** DNR.CREP <DNR.CREP@Illinois.gov>; Chandler, Mike <Mike.Chandler@Illinois.gov>  
**Subject:** RE: Spire STL Pipeline-IDNR Conservation Easements

Hello Andrea,

I wanted to let you know that Luke Garver has moved on to a new position from the CREP program, but is still with IDNR.

Luke went ahead and reviewed your data, and it appears that the proposed Spire-STL Pipeline will not interfere with any parcels that have CREP easements.

Please let us know if anything should change, additionally, we have your current data and should an easement be considered within or near the boundaries of the pipeline we will get in contact with you.

I have attached a screen shot showing the CREP easements currently within the area of the proposed pipeline. Please let me know if I or anyone here at IDNR can be of further assistance.

Best Regards,

Robert Bedient  
Administrative Assistant  
Conservation Reserve Enhancement Program  
Illinois Department of Natural Resources  
1 Natural Resources Way  
Springfield, IL 62702  
(217) 557-6525



## Ali Trunzo

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**From:** Andrea Halfhill  
**Sent:** Friday, December 02, 2016 9:55 AM  
**To:** luke.garver@illinois.gov  
**Cc:** Lori Ferry; Ali Trunzo  
**Subject:** Spire STL Pipeline-IDNR Conservation Easements  
**Attachments:** IDNR Conservation easement agreement.pdf; Current\_300ft\_Wide\_Corridor\_2016\_12\_01.zip

Hi Luke,

I just left you a voicemail a few moments ago, but wanted to follow up via email - We wanted to re-consult with you regarding CREP lands crossed by the Spire STL project in Illinois. There have been some minor changes to the route we had previously sent you for review. There are several areas where this updated route goes outside of the original 300-foot review corridor we requested and we wanted to check with you to determine whether additional easements may be crossed. A copy of the previously signed data agreement is attached.

Attached are the shapefiles for the current 300' wide corridor. Our anticipated construction right-of-way is approximately 115-feet.

Please let us know if you have any difficulty with these files. We appreciate your help!

Thank you,

Andrea

**Andrea M. Halfhill, B.A, B.S.**  
Project Environmental Specialist

**GAI Consultants - Murrysville**  
4200 Triangle Lane, Export, PA 15632

T 724.387.2170 | D 412.399.5521 | M 724.344.0124 | [gaiconsultants.com](http://gaiconsultants.com) |     

\* Please update your records with my new direct telephone number



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## Ali Trunzo

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**Subject:** FW: Principia College West Farm timber rattlesnake survey - CORRECTION

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**From:** Malone, Pat [<mailto:Pat.Malone@Illinois.gov>]

**Sent:** Wednesday, October 26, 2016 2:49 PM

**To:** Lori Ferry <[L.Ferry@gaiconsultants.com](mailto:L.Ferry@gaiconsultants.com)>

**Subject:** FW: Principia College West Farm timber rattlesnake survey - CORRECTION

Lori, Here is an unfiltered version of the map. Please note the location in the upper left corner.

---

**From:** Kieninger, Tara

**Sent:** Wednesday, October 26, 2016 2:44 PM

**To:** Shank, Keith

**Cc:** Malone, Pat; Skufca, Jenny

**Subject:** RE: Principia College West Farm timber rattlesnake survey - CORRECTION

My mistake – I had part of the data filtered when I did the screenshot. Here are the 2013 & 2015 rattlesnake locations & dens at Principia from Eckert.

## Ali Trunzo

---

**From:** Jason Duffey  
**Sent:** Friday, October 14, 2016 12:02 PM  
**To:** Malone, Pat  
**Cc:** Shank, Keith; Lori Ferry  
**Subject:** RE: Spire Northern Long-eared Bat Recommendations

Thanks Pat! We will confirm prior to the 25<sup>th</sup> at 10 AM.

---

**From:** Malone, Pat [<mailto:Pat.Malone@Illinois.gov>]  
**Sent:** Friday, October 14, 2016 11:59 AM  
**To:** Jason Duffey <[J.Duffey@gaiconsultants.com](mailto:J.Duffey@gaiconsultants.com)>  
**Cc:** Shank, Keith <[Keith.Shank@Illinois.gov](mailto:Keith.Shank@Illinois.gov)>  
**Subject:** RE: Spire Northern Long-eared Bat Recommendations

We will schedule the 25<sup>th</sup> at ten AM. Lori is welcome to join us either by phone or at our office depending on her schedule. Just let me know.

---

**From:** Jason Duffey [<mailto:J.Duffey@gaiconsultants.com>]  
**Sent:** Friday, October 14, 2016 10:48 AM  
**To:** Malone, Pat  
**Cc:** Shank, Keith; Lori Ferry  
**Subject:** [External] RE: Spire Northern Long-eared Bat Recommendations

Thanks Pat!

Lori and I are available either day, so unless you have a preference, let's go with the October 25<sup>th</sup> option.

In addition, because Lori is local to IL, she is able to attend the meeting in-person, rather than just having us both on the phone, if you prefer.

If this date works for you, we will set up the call and send you the call-in info. Just let us know your thoughts on having Lori attend in-person.

Thanks again,

Jason

---

**From:** Malone, Pat [<mailto:Pat.Malone@Illinois.gov>]  
**Sent:** Friday, October 14, 2016 9:52 AM  
**To:** Jason Duffey <[J.Duffey@gaiconsultants.com](mailto:J.Duffey@gaiconsultants.com)>  
**Cc:** Shank, Keith <[Keith.Shank@Illinois.gov](mailto:Keith.Shank@Illinois.gov)>  
**Subject:** RE: Spire Northern Long-eared Bat Recommendations

Jason,

The following times are available for us to discuss the bat issues. October 25 and 28 at 10AM. Please let me know if one of these will work.



Pat

---

**From:** Jason Duffey [<mailto:J.Duffey@gaiconsultants.com>]  
**Sent:** Wednesday, October 05, 2016 12:16 PM  
**To:** Malone, Pat  
**Cc:** Lori Ferry  
**Subject:** [External] Spire Northern Long-eared Bat Recommendations

Hi Pat,

Per our conversation today, GAI would like to invite you and Keith to participate in an informal conference call with a few of our folks. The purpose of the call will be to discuss IDNR recommendations and options for Project tree clearing in the likely event that the timeline for the final permits (FERC certificate and subsequent USACE permit) will not allow tree clearing to begin until we are outside of the winter-tree clearing window.

If you are able to provide a few days and times when you and Keith are available, we should be able to get the call set up.

Thanks,

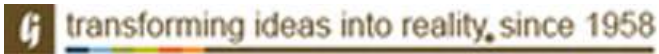
**Jason A. Duffey**  
Senior Project Environmental Specialist

**GAI Consultants**

1830 Airport Exchange Blvd, Suite 220, Erlanger, KY 41018

T 859.647.6647 | D 859.692.4152 | M 937.554.8488 | [gaiconsultants.com](http://gaiconsultants.com) |    

\* Please update your records with my new direct telephone number



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# telephone log



gai consultants

Date: 10/7/2016

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Project / Admin. No.: E160438.00

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Call From: Erin Matthews

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Company: GAI Consultants

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Phone No.: 412-399-5251

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Call To: Nathan Grider

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Company: Illinois DNR

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Phone No.: 217-524-0501

---

Subject: Stream crossings

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cc:

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## **Summary of Discussion, Decisions, and Commitments:**

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Called to discuss seasonal crossing restrictions of streams. Mr. Grider stated that stream crossing restrictions could be based off of the required administrative rule 10-75. Seasonal restrictions could be required for RTE waters or discharge permits.

He suggested submitting a formal request through Illinois' Ecocat tool. If the project is too big for the search, the ecocat can be submitted in sections by county. A lead agency needs to be selected to trigger a formal response and review of the impact from their department.

# telephone log



gai consultants

Date: October 5, 2016

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Project / Admin. No.: E160438.00

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Call From: Jason Duffey

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Company: GAI Consultants

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Phone No.: 859-692-4152

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Call To: Pat Malone

---

Company: Illinois Department of Natural Resources (IDNR)

---

Phone No.: 217-785-5500

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Subject: Northern Long-eared Bat Recommendations

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cc:

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## Summary of Discussion, Decisions, and Commitments:

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Jason Duffey contacted Mr. Pat Malone of IDNR on October 5, 2016, to discuss options for Project tree clearing in the likely event that the timeline for the final permits (FERC certificate and subsequent USACE permit) will not allow tree clearing to begin until we are outside of the winter-tree clearing window. Jason Duffey asked:

- 1) Whether IDNR would consider issuing an Incidental Take Authorization (ITA) for northern long-eared bats (NLEB) prior to conducting the mist net survey being required by the U.S. Fish and Wildlife Service (USFWS),
- 2) If an ITA for NLEB or other species would be required should they be captured during the mist net survey being required by the USFWS, and
- 3) Would IDNR be available to discuss these and other various options via a conference call with GAI

Mr. Malone indicated that because NLEB is a state-threatened species, and based on the species' biology, IDNR recommends that only off-season clearing will avoid impacts to the species. Mr. Malone indicated that he would discuss ITA options with his section's supervisor, Mr. Keith Shank, and follow up via phone.

Mr. Malone called Jason Duffey back on October 5, 2016, and confirmed that any ITA from IDNR could only be completed following a final determination or final concurrence from the USFWS. Mr. Malone confirmed that IDNR would discuss these and other options with GAI via a conference call.

# telephone log



gai consultants

Date: September 28, 2016

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Project / Admin. No.: E160438.00

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Call From: Erin Matthews

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Company: GAI Consultants

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Phone No.: 412-399-5251

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Call To: Mike Diedrichson

---

Company: IDNR

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Phone No.: 217-782-4426

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Subject: IL Water Quality Classifications

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cc:

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## **Summary of Discussion, Decisions, and Commitments:**

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Mike explained that the streams listed under statewide permit 8 are considered the list of high quality streams. If crossed they would need to be directionally drilled or individual permit certification would need to be received in order to open cut the streams. Our project does not cross any of the streams on the list

Streams listed under the 3704 rules in appendix A are considered navigable public water bodies and the same crossing restrictions would apply as above. Macoupin and Otter Creeks are on the list, but it looks like our project is outside of their designated reach. However, Macoupin Creek is listed as a section 10 federal water.

<https://www.dnr.illinois.gov/WaterResources/Pages/PublicWaters.aspx>

# telephone log



gai consultants

Date: September 26 and 27, 2016

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Project / Admin. No.: E160438.00

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Call From: Jason Duffey

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Company: GAI Consultants

---

Phone No.: 859-692-4152

---

Call To: Pat Malone

---

Company: Illinois Department of Natural Resources (IDNR)

---

Phone No.: 217-785-5500

---

Subject: Northern Long-eared Bat Recommendations

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cc:

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## **Summary of Discussion, Decisions, and Commitments:**

---

Jason Duffey contacted Mr. Pat Malone of IDNR on September 26, 2016, to discuss options for Project tree clearing in the likely event that the timeline for the final permits (FERC certificate and subsequent USACE permit) will not allow tree clearing to begin until we are outside of the winter-tree clearing window. Jason Duffey asked whether IDNR would accept a negative mist net survey, bats tracked to roosts outside the Project footprint, emergence counts prior to tree clearing, or any other methods other than offseason clearing as a measure to avoid impacts to northern long-eared bats (NLEB).

Mr. Malone indicated that because NLEB is a state-threatened species, and based on the species' biology, IDNR recommends that only off-season clearing will avoid impacts to the species. Mr. Malone indicated that he would discuss some of the presented options with his section's supervisor, Mr. Keith Shank, and follow up via phone.

Mr. Malone called Jason Duffey back on September 27, 2016, and confirmed that the IDNR recommends that only off-season clearing will avoid impacts to the species.

## Ali Trunzo

---

**From:** Garver, Luke <Luke.Garver@illinois.gov>  
**Sent:** Friday, September 09, 2016 5:00 PM  
**To:** Lori Ferry  
**Cc:** Ali Trunzo; DNR.CREP; Chandler, Mike  
**Subject:** RE: Spire STL Pipeline-IDNR Conservation Easements

Unfortunately we do not have the authority to give out FSA's data layer.

---

**From:** Lori Ferry [mailto:L.Ferry@gaiconsultants.com]  
**Sent:** Friday, September 09, 2016 3:54 PM  
**To:** Garver, Luke  
**Cc:** Ali Trunzo; DNR.CREP; Chandler, Mike  
**Subject:** [External] RE: Spire STL Pipeline-IDNR Conservation Easements

Thank you so much for your quick reply!

Are you able to provide us with the CRP information per the agreement? Either way, we will also reach out further with the FSA's to follow up and confirm if we are crossing any other easements.

Thanks again,  
Lori

---

**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](mailto:Kimberly.Martin@il.usda.gov) and [Jamie.Diebal@il.usda.gov](mailto: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  
T 331.301.2002 M 630.605.5255 | [gaiconsultants.com](http://gaiconsultants.com) |      
[l.ferry@gaiconsultants.com](mailto:l.ferry@gaiconsultants.com)



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# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
www.dnr.illinois.gov

Bruce Rauner, Governor

Wayne A. Rosethal, Director

## Certification for Access to USDA Section 1619 Protected Information under Illinois Department of Natural Resources Memorandum of Understanding with USDA Farm Service Agency

I, Lori M Ferry of GAI Consultants, Inc. hereby  
(Print full name) (Print Name of Organization)

certify that I have read, understand, and will fully comply with the restrictions and limitations for USDA Section 1619 Protected Information per the Memorandum of Understanding (MOU) between the IDNR and the USDA Farm Service Agency executed on July 15, 2016.

I understand and agree that:

1. IDNR as a certified USDA Section 1619 Cooperator has authorized me to access otherwise protected agricultural information to provide: Information on location and vegetation cover of potential easements under the authority of the USDA and IDNR that will be crossed by the construction of the Spire STL Pipeline Project located in Scott, Greene and Jersey Counties, Illinois.

(Describe nature of work such as technical assistance or monitoring.)

for the following USDA Conservation Programs (check programs included in IDNR contract):

- Conservation Reserve Program (CRP)
- Illinois Conservation Reserve Enhancement Program (CREP)
- Emergency Conservation Program (ECP)
- Emergency Forest Restoration Program (EFRP)
- Farmable Wetland Program (FWP)
- Grassland Reserve Program (GRP)
- Source Water Protection Program (SWPP)

2. I will only access information that is directly related to technical assistance activities, monitoring and reporting for the USDA Conservation Programs per my organization's contract with IDNR. Use of protected information that is not directly connected to USDA Conservation Programs in my contract is expressly prohibited. Section 1619 Protected Information may include, but is not limited to:

- State identification and county numbers;
- Producer/land owner and business entity name, full address, phone number, and identification type;
- Production information or Farm Serial Number;
- Aerial photographs that depict restricted information;
- Farm, tract, field, and contract numbers;
- Acreage information including crop code;
- Practice code;
- Attributes for Common Land Units (CLUs) in USDA's Geospatial Information System; and
- Producer Social Security Numbers (SSNs) and tax identification numbers.



3. I will not share, distribute, use or otherwise disclose any Section 1619 Protected Information or data types identified above or in Exhibit 1 of the MOU to any individual or organization not directly covered by the MOU between USDA Farm Service Agency and IDNR.
4. I will not share, distribute, use or otherwise disclose any Section 1619 Protected Information for personal or economic gain.
5. Section 1619 Protected Information is not subject to the Freedom of Information Act (FOIA). All FOIA requests must be submitted to IDNR Legal Department's FOIA Officer. I understand I do not have the authority to disclose Section 1619 Protected Information for any FOIA requests I receive.
6. I agree to use Section 1619 Protected Information solely for the purposes stated above. I agree to return all data upon completion of work requiring the data or by July 31, 2019, whichever occurs first.
7. The MOU between the USDA Farm Service Agency and the IDNR is a legally binding document and any misuse of Section 1619 Protected Information may result in termination of my contractual obligations and could result in termination of my organization's contract with IDNR.

Environmental Manager  
(Job Title)

l.ferry@gaiconsultants.com 630-605-5255  
(E-mail) (Phone number)

 9/8/2016  
(Signature) (Date)

\_\_\_\_\_  
Mike Chandler  
CREP Program Manager (Date)

\_\_\_\_\_  
Lisa Beja  
GIS Technician (Date)

## Ali Trunzo

---

**From:** Lori Ferry  
**Sent:** Monday, August 15, 2016 4:19 PM  
**To:** Ali Trunzo  
**Subject:** FW: Spire STL Pipeline-Consultation Letter

---

**From:** Malone, Pat [mailto:Pat.Malone@Illinois.gov]  
**Sent:** Monday, August 15, 2016 2:53 PM  
**To:** Lori Ferry <L.Ferry@gaiconsultants.com>  
**Subject:** RE: Spire STL Pipeline-Consultation Letter

Hi Lori,

I just received it about ten minutes ago. I haven't identified any issues with ET's other than the INAI site and there is an easement through that area. I asked Heritage if they had any issues and they said no since there was an existing easement but I'm going to follow up on that to confirm their position. Any tree removal should be done during the clearing dates (October 16-April 1) to avoid bat issues. I'm in today but out till next Monday.

Pat






---


**From:** Lori Ferry [mailto:L.Ferry@gaiconsultants.com]  
**Sent:** Monday, August 15, 2016 1:27 PM  
**To:** Malone, Pat  
**Subject:** Spire STL Pipeline-Consultation Letter

Hi Pat,  
Not sure if you received this information yet but we sent you the follow up letter on Friday. Just wanted to email it to you as we discussed so you could begin your review and let us know of any comments.

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](mailto:l.ferry@gaiconsultants.com)

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August 12, 2016

Mr. Mike Diedrichson, PE  
Downstate Regulatory Program  
Water Resources  
Illinois Department of Natural Resources  
One Springfield Way  
Springfield, Illinois 62702-1271

**Re: Project Permitting Coordination  
Spire STL Pipeline LLC  
Spire STL Pipeline  
Scott, Greene, and Jersey Counties, Illinois**

Dear Mr. Diedrichson:

GAI Consultants, Inc. ("GAI") is submitting this information request on behalf of Spire STL Pipeline LLC ("Spire"), for the portion of the Spire STL Pipeline ("Project") in Scott, Jersey and Greene Counties, Illinois. Representatives from Spire and GAI met with your office on June 21, 2016 to introduce the Project. GAI is submitting information to coordinate anticipated reviews 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") 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 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.

### Site Description

The Illinois portion of the Project is located in Scott, Greene, and Jersey Counties, Illinois, and is depicted on the attached portions of the Alsey (1983), Roodhouse West (1983), Carrolton (1985), Boyer Creek (1983), Otterville (1983), Elsay (1979), and Grafton (1995), Illinois USGS 7.5-minute series topographic maps (Figure 1).

The majority of the pipeline is greenfield and crosses primarily agricultural landscapes with some areas of forest. 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), and Marais Temps Clair-Mississippi River (HUC #071100090401) watersheds.

The Project is not anticipated to cross public waters of the state. GAI understands that stream crossings of non-public waters and floodplains should be evaluated for coverage under the Statewide Permits. Should the Project be unable to adhere to the general conditions of the Statewide Permits, Spire will coordinate with the Illinois Department of Natural Resources to apply for an Individual Permit.

Spire will further evaluate the proposed crossings of Apple and Macoupin Creeks to determine if boring is feasible.

**GAI would appreciate your continued assistance on this Project to address the permits described above. In addition, GAI would appreciate the identification of any additional concerns based on the current Project route, as shown on Figure 1.**

Please note the intent of this letter is solely for the purpose of formally initiating consultation and/or applicable Project reviews. 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.**

A handwritten signature in blue ink, appearing to read 'Jayme L. Fuller', written in a cursive style.

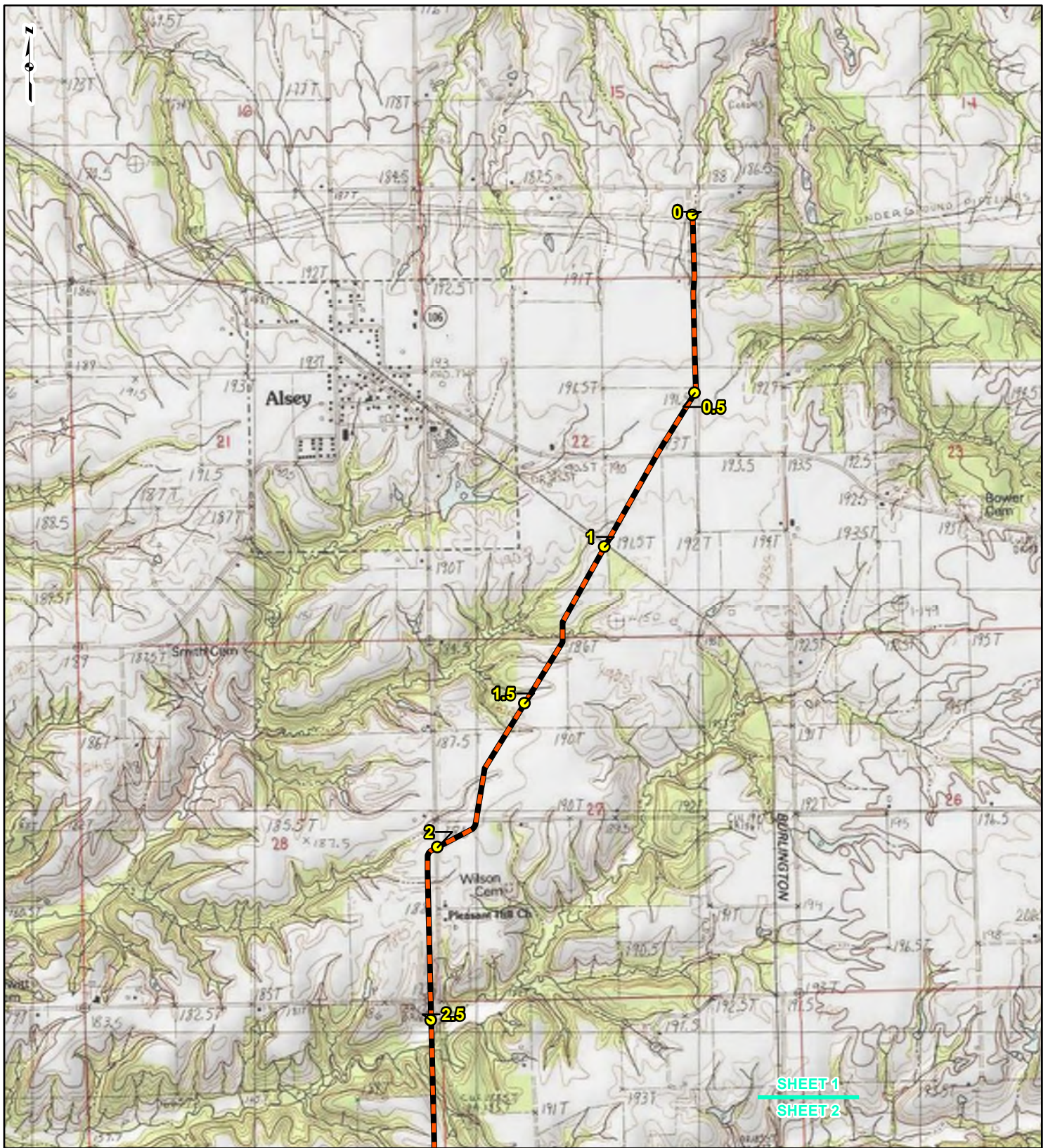
Jayne L. Fuller  
Environmental Manager

JLF/jbm





Attachment: USGS Topographic Map with Illinois Natural Heritage Program Data (Figure 1)

**ATTACHMENT**  
**USGS TOPOGRAPHIC MAP (FIGURE 1)**






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

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

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

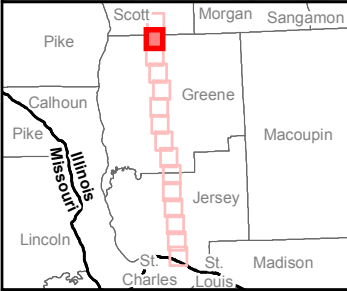
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SHEET 1  
SHEET 2

SHEET 2  
SHEET 3



**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

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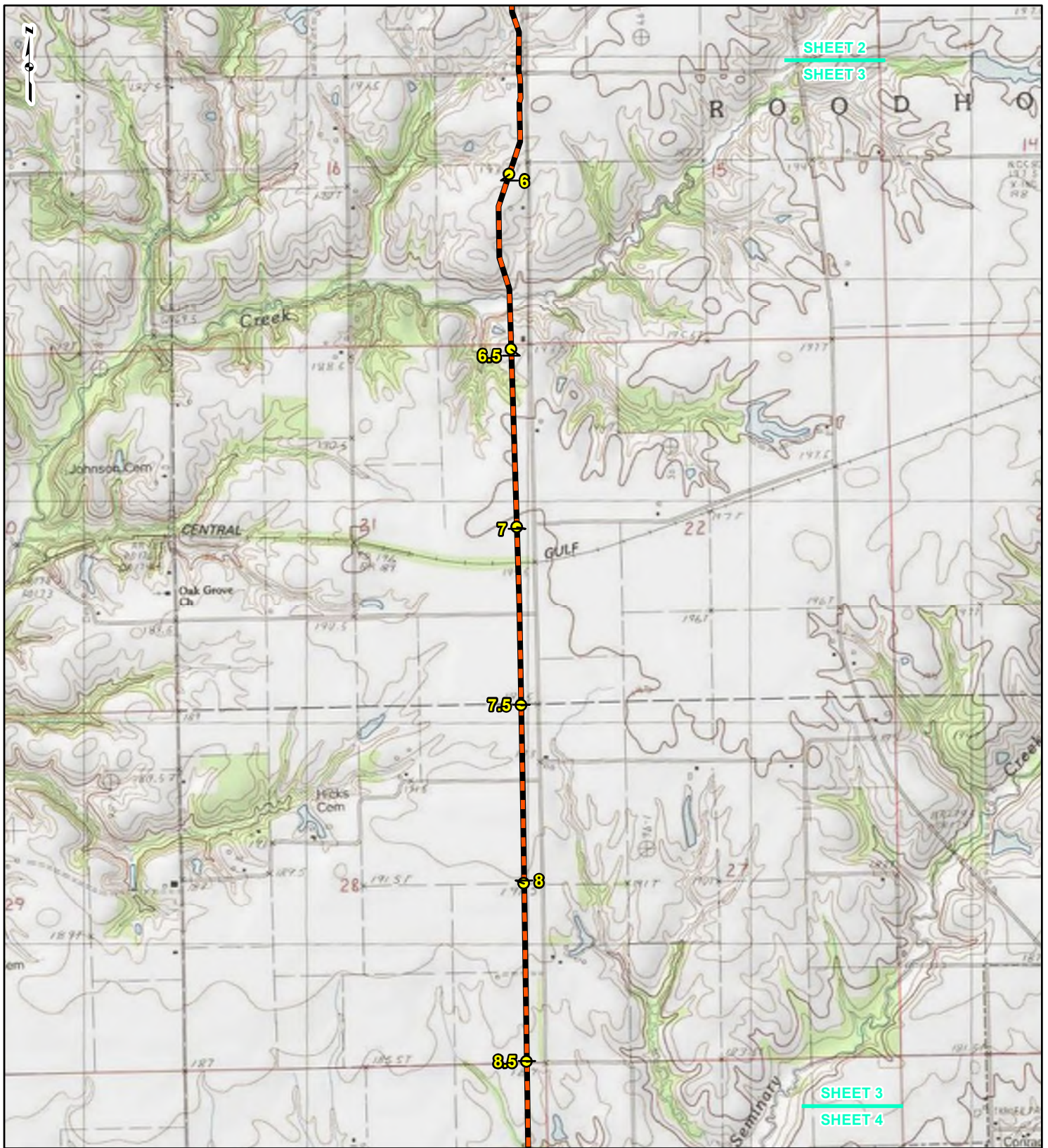
**FIGURE 1  
LOCATION MAP  
SHEET 2 OF 15**

**Spire STL Pipeline**





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**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

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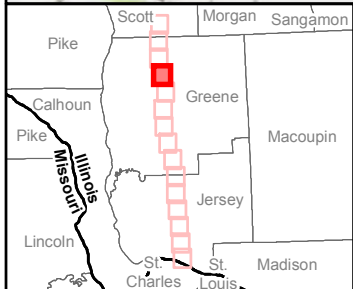
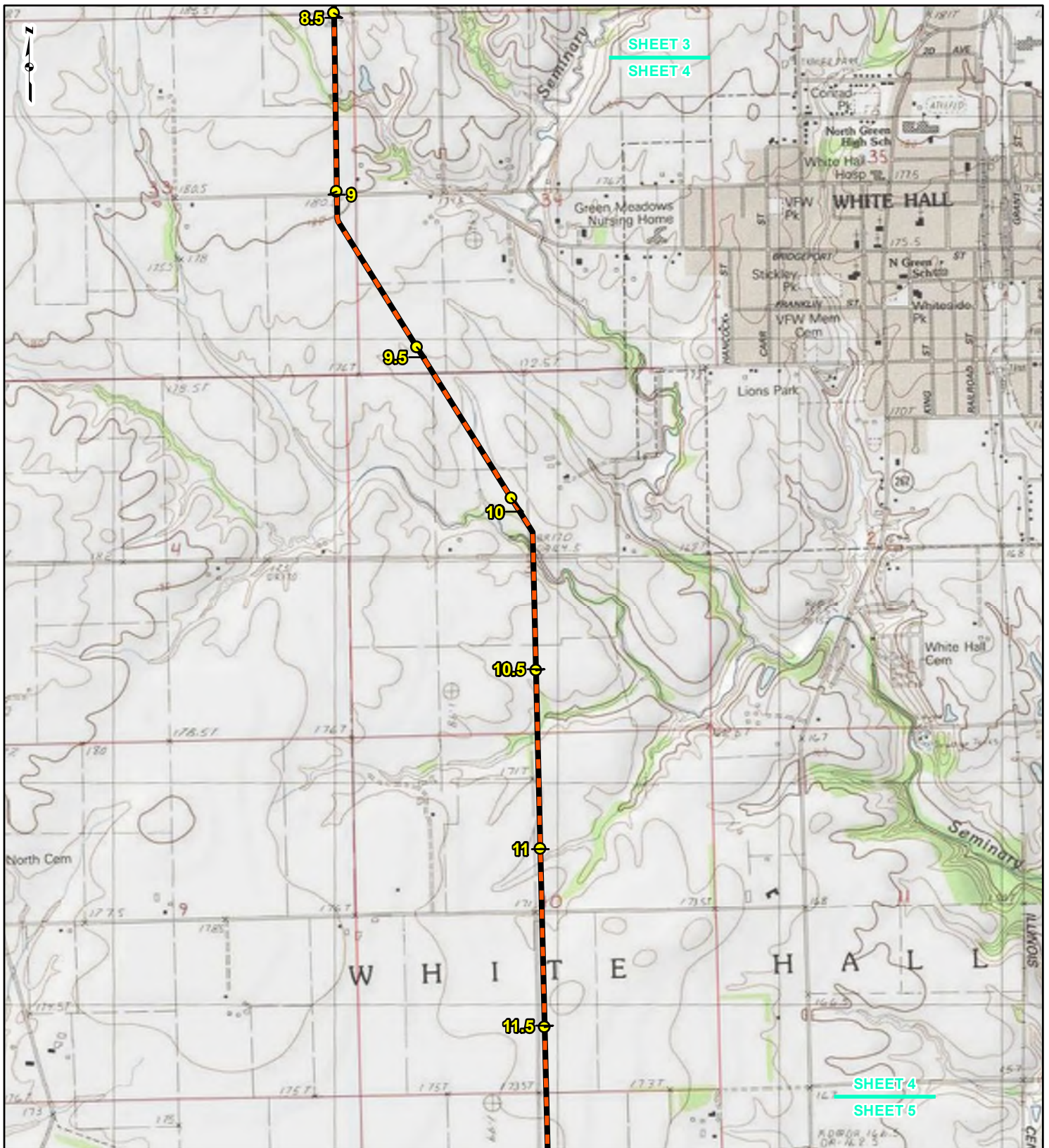
**FIGURE 1  
LOCATION MAP  
SHEET 3 OF 15**

**Spire STL Pipeline** 





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**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

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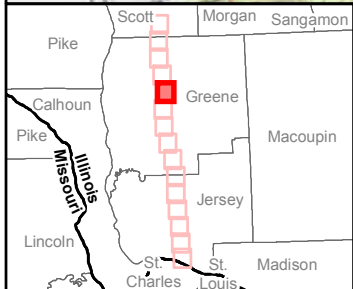
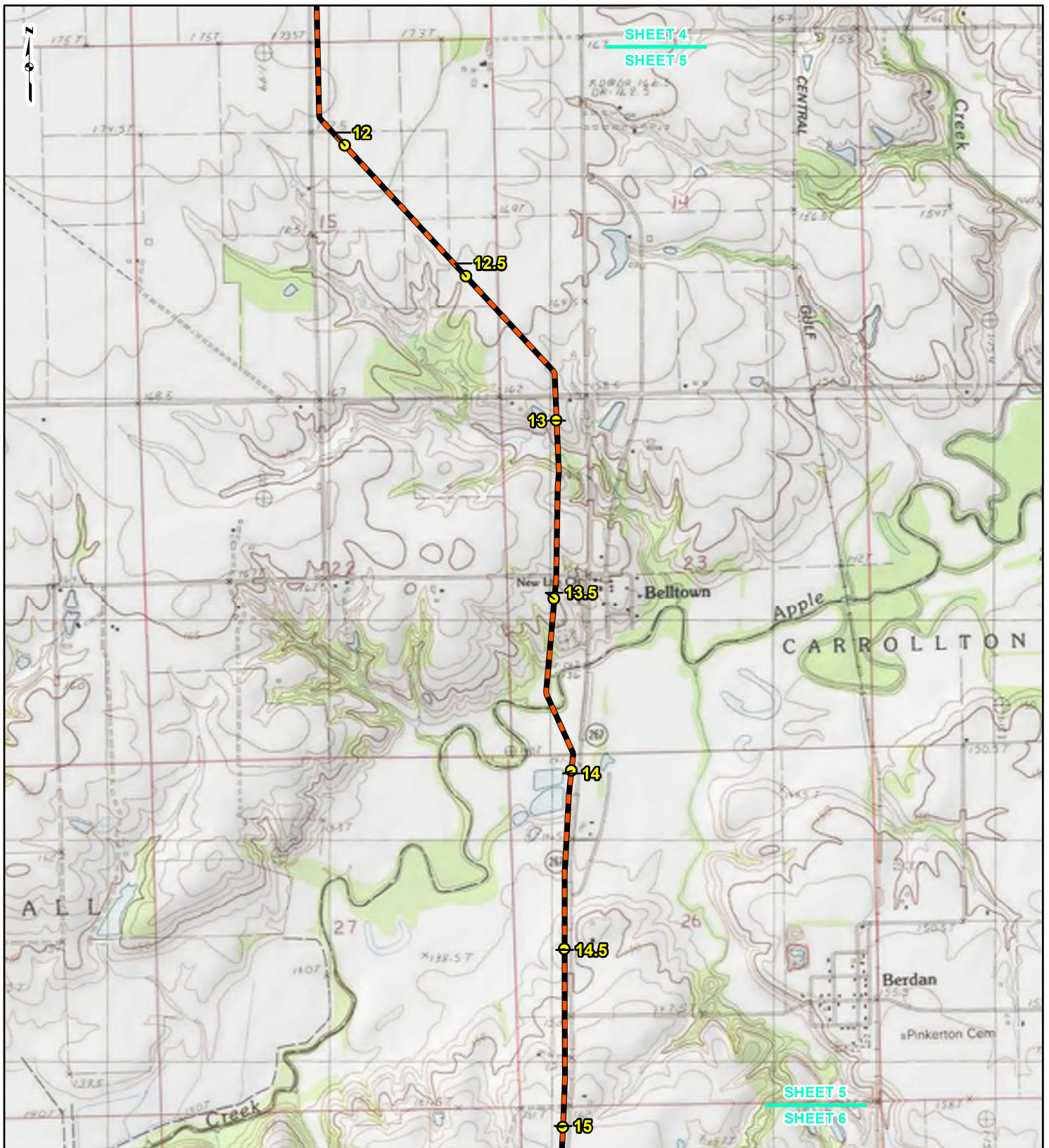
**FIGURE 1  
LOCATION MAP  
SHEET 4 OF 15**

**Spire STL Pipeline** 





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**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

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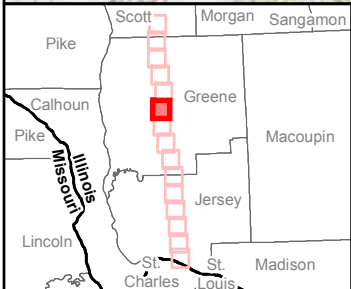
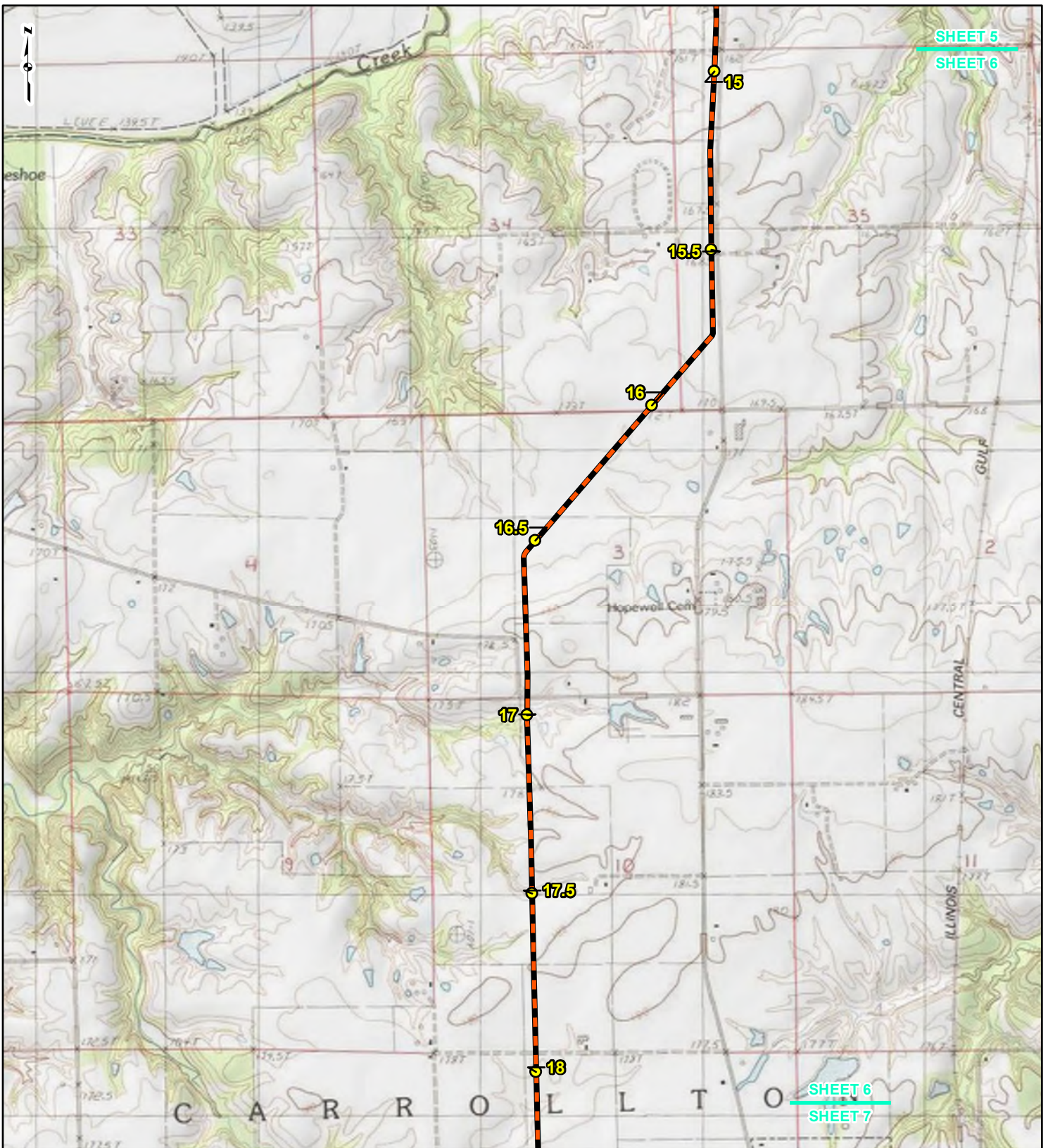
**FIGURE 1  
LOCATION MAP  
SHEET 5 OF 15**

**Spire STL Pipeline** 





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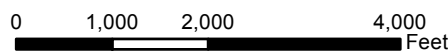
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**LEGEND**

-  NEW BUILD MILEPOST
-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  COUNTY BOUNDARY
-  STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 6 OF 15**



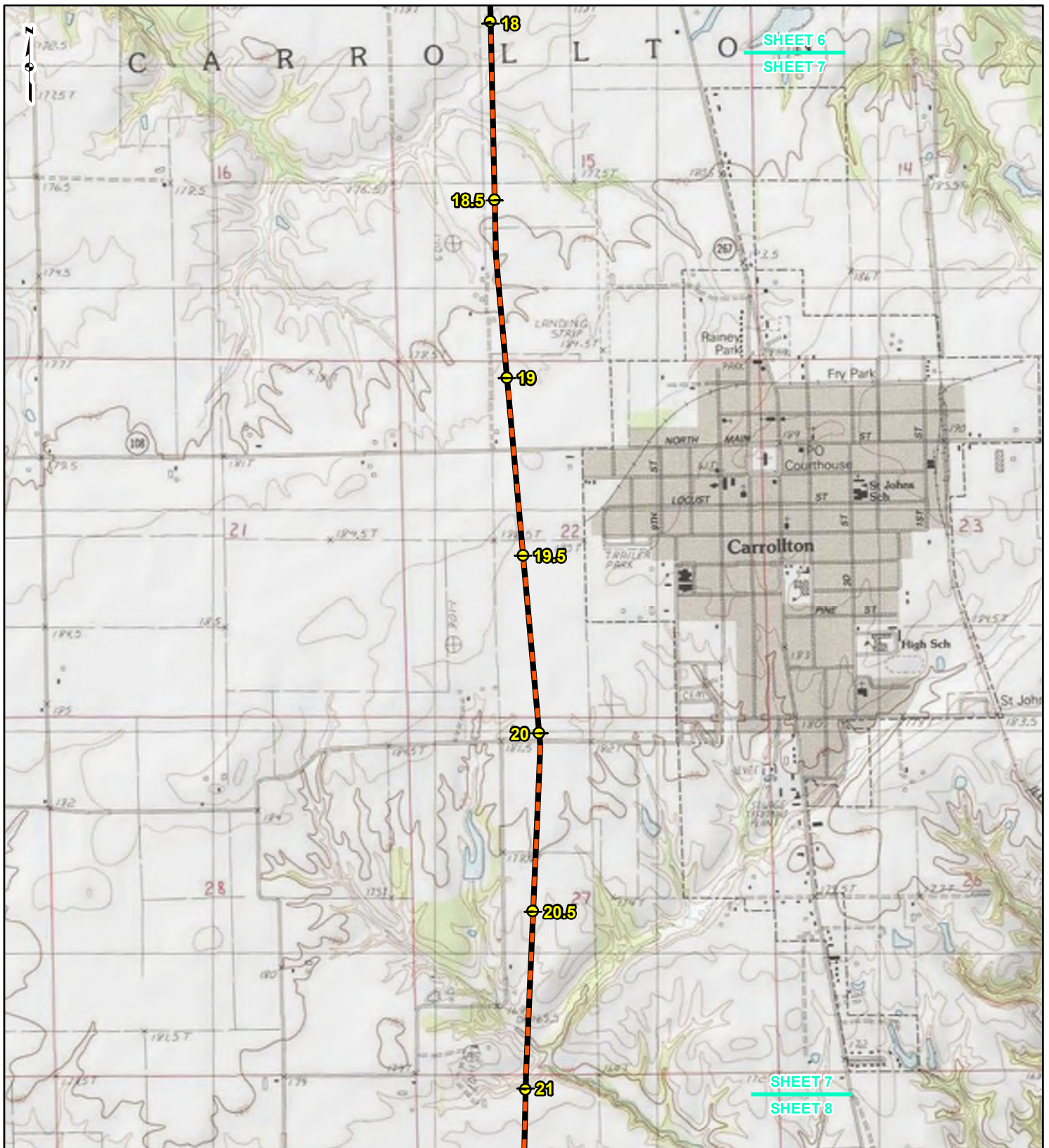
**Spire STL Pipeline**



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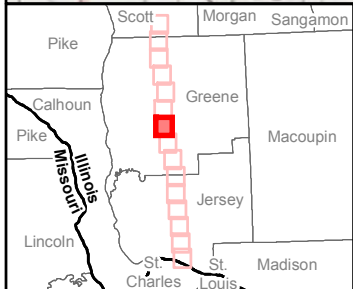
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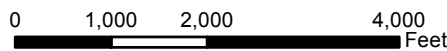
SHEET 6  
SHEET 7

SHEET 7  
SHEET 8



**LEGEND**

-  NEW BUILD MILEPOST
-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  COUNTY BOUNDARY
-  STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 7 OF 15**



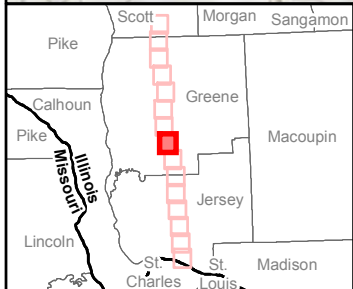
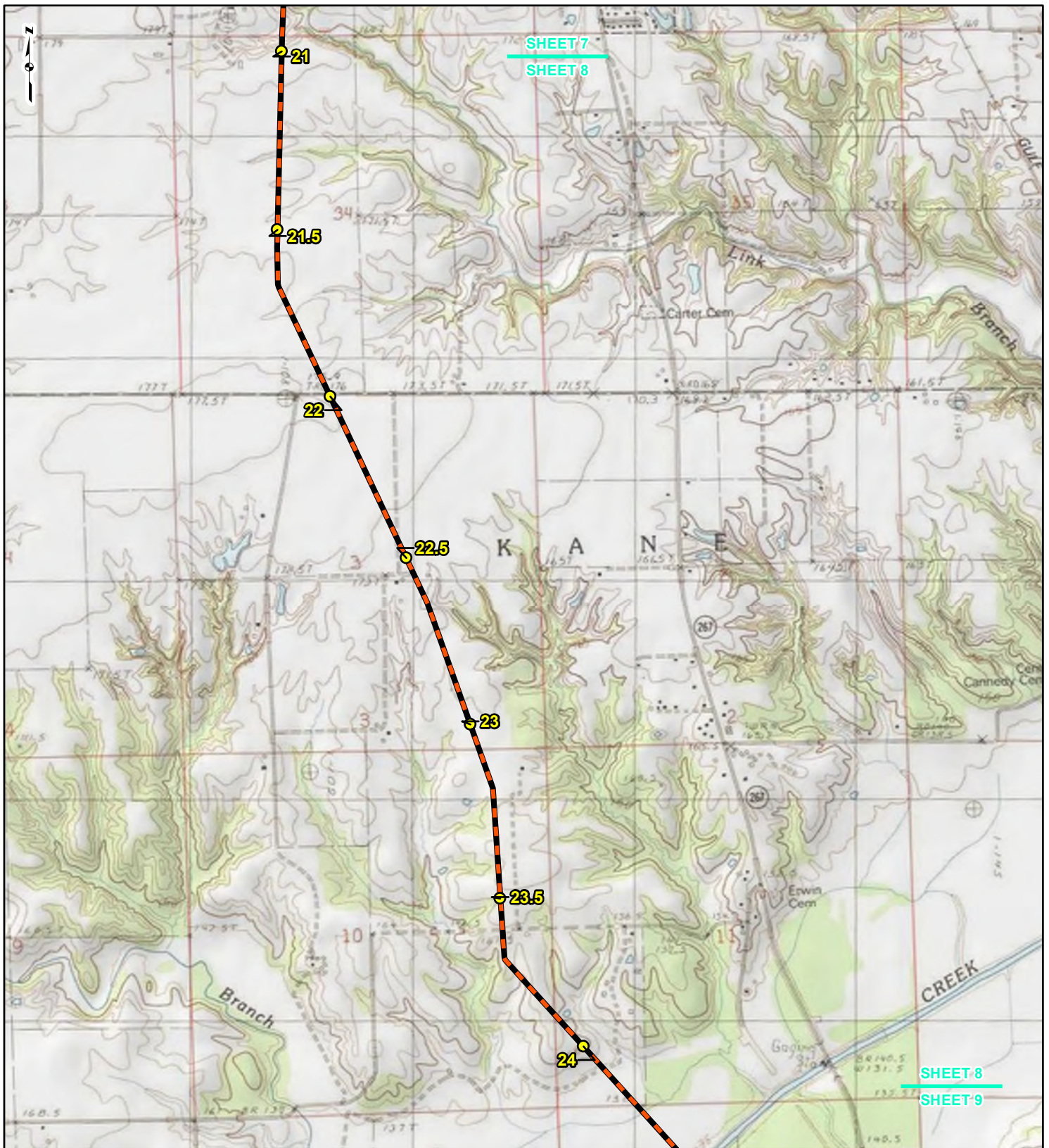
**Spire STL Pipeline**







DRAWN BY: PMH      DATE: 8/12/2016  
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

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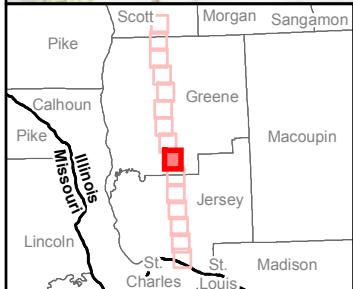
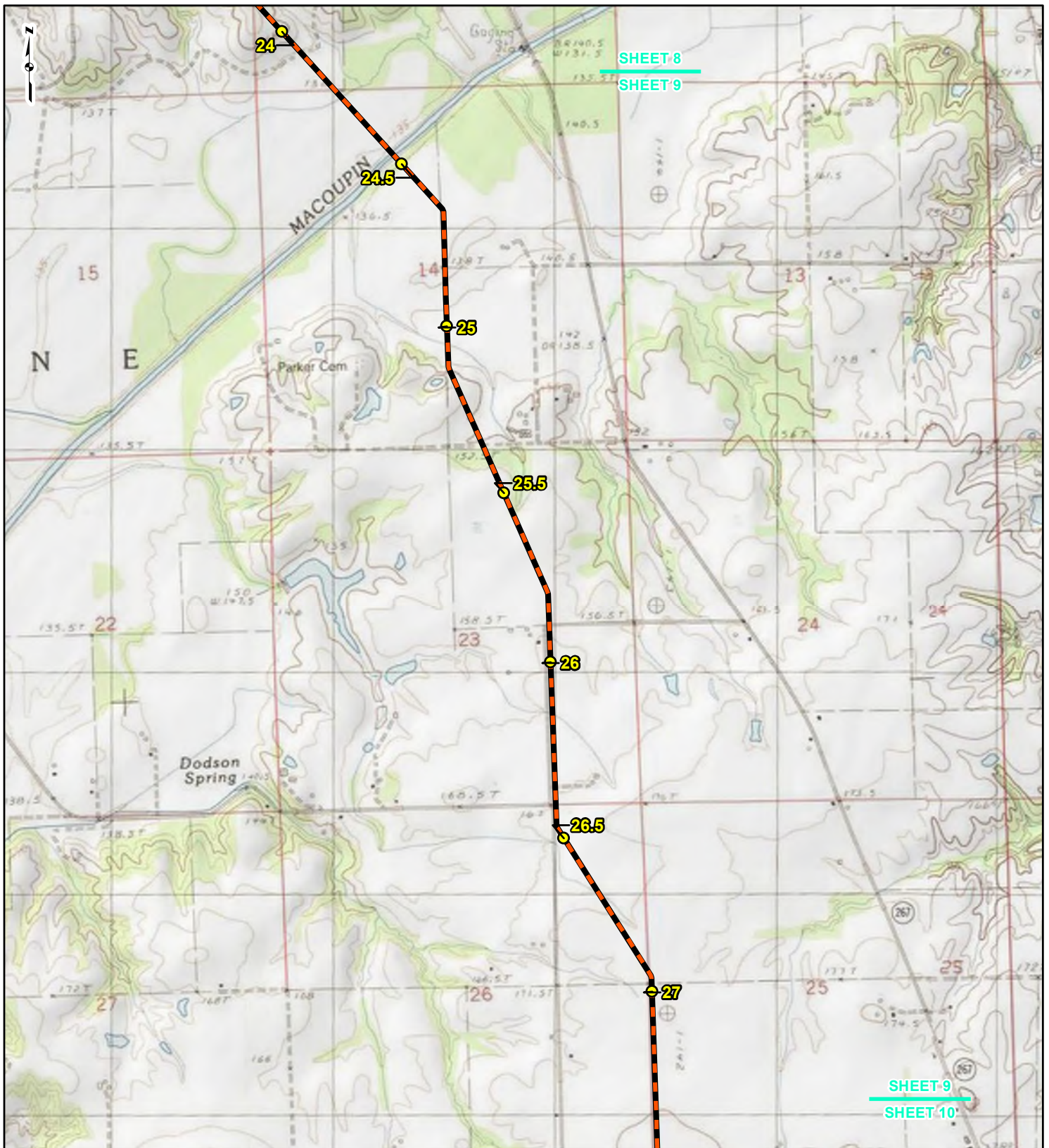
**FIGURE 1  
LOCATION MAP  
SHEET 8 OF 15**

**Spire STL Pipeline** 





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**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

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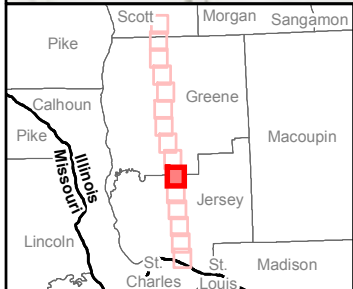
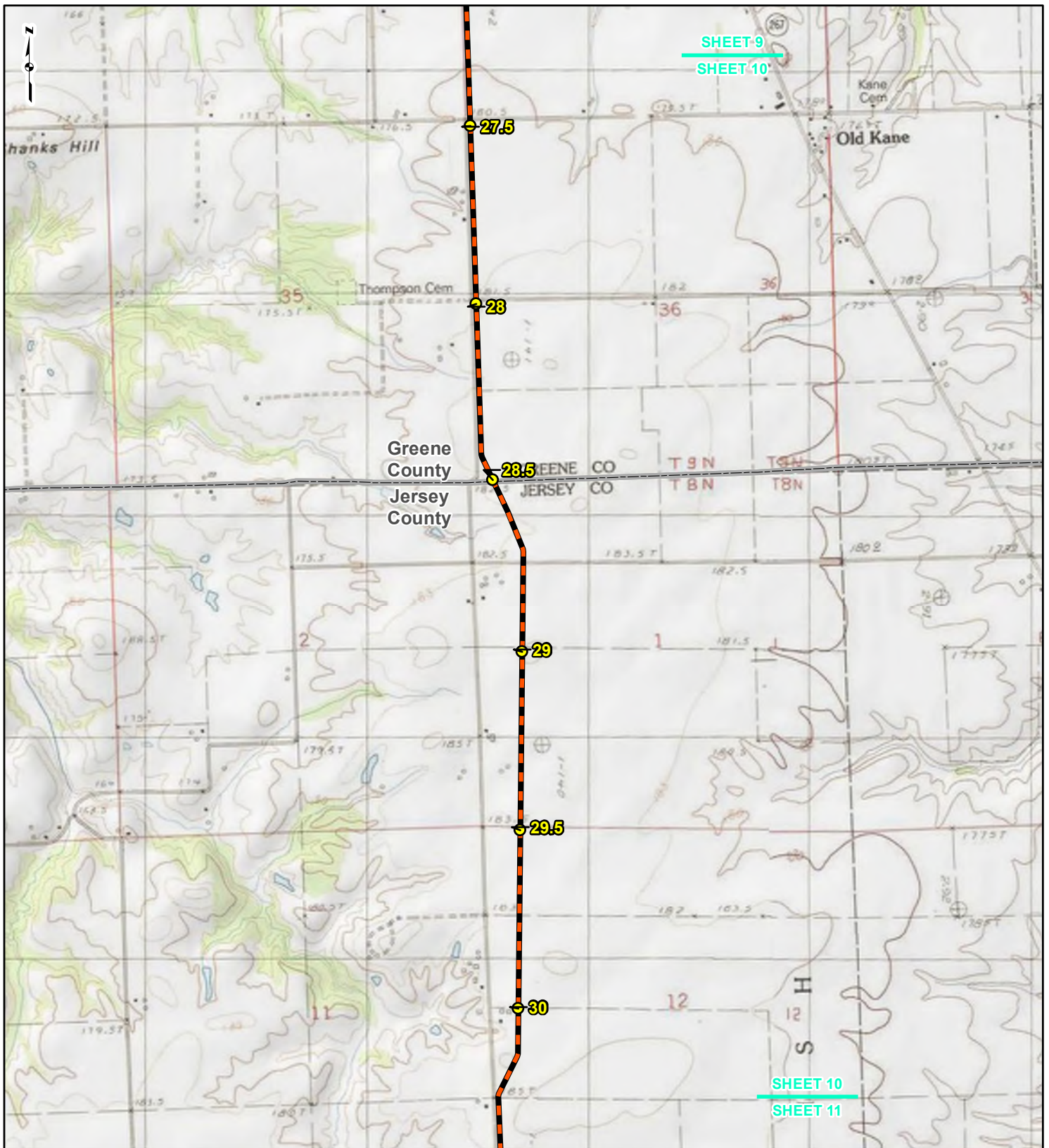
**FIGURE 1  
LOCATION MAP  
SHEET 9 OF 15**

**Spire STL Pipeline** 





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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

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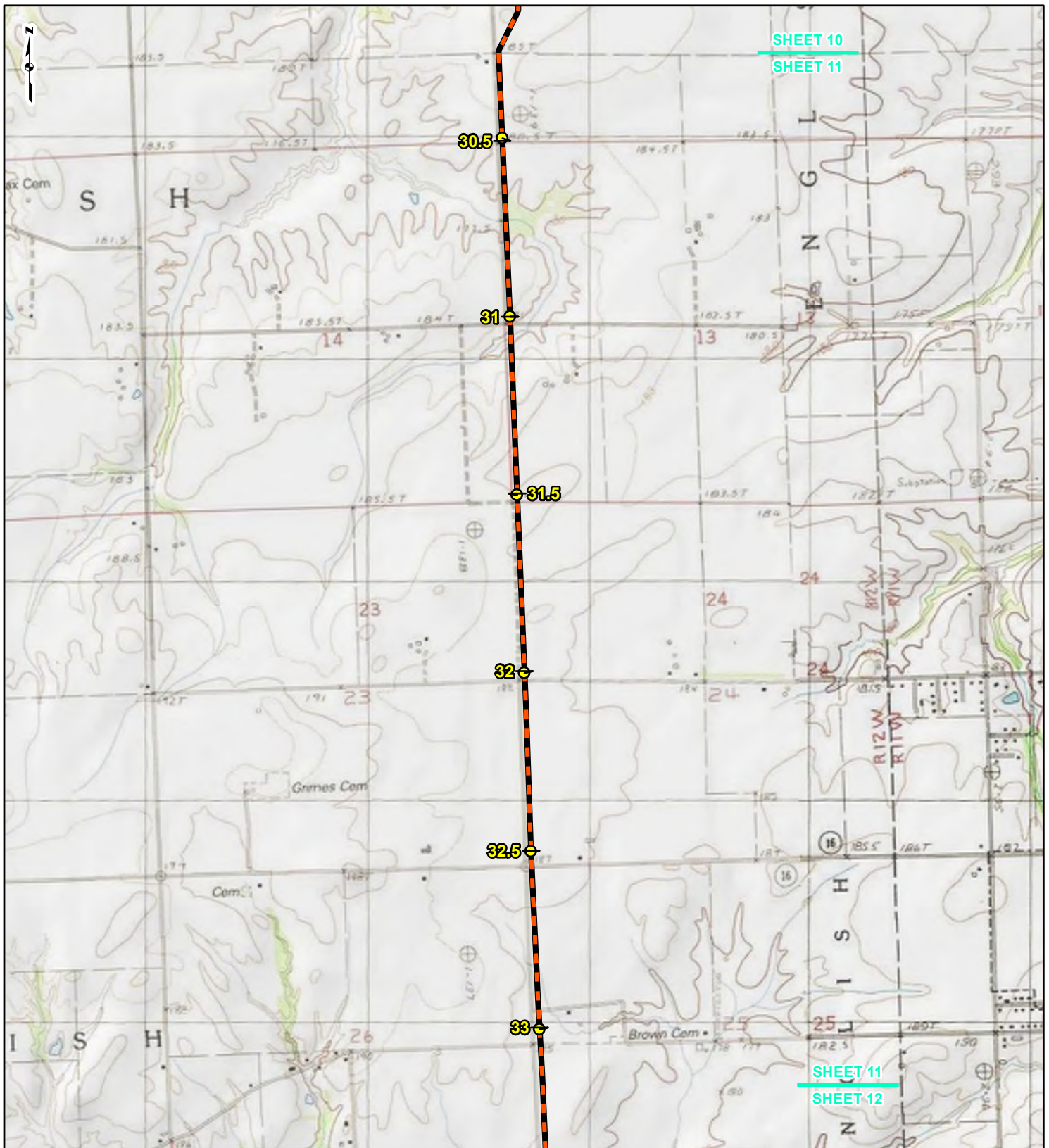
**FIGURE 1  
LOCATION MAP  
SHEET 10 OF 15**

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

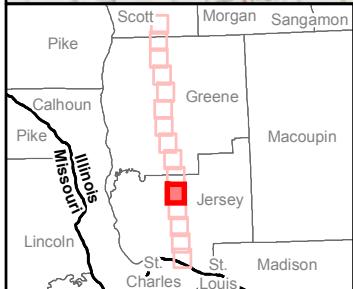
REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.









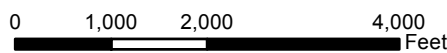
SHEET 10  
SHEET 11

SHEET 11  
SHEET 12



**LEGEND**

-  NEW BUILD MILEPOST
-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  COUNTY BOUNDARY
-  STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 11 OF 15**



**Spire STL Pipeline**

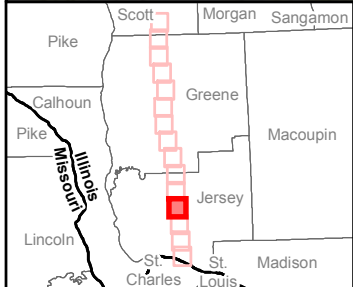
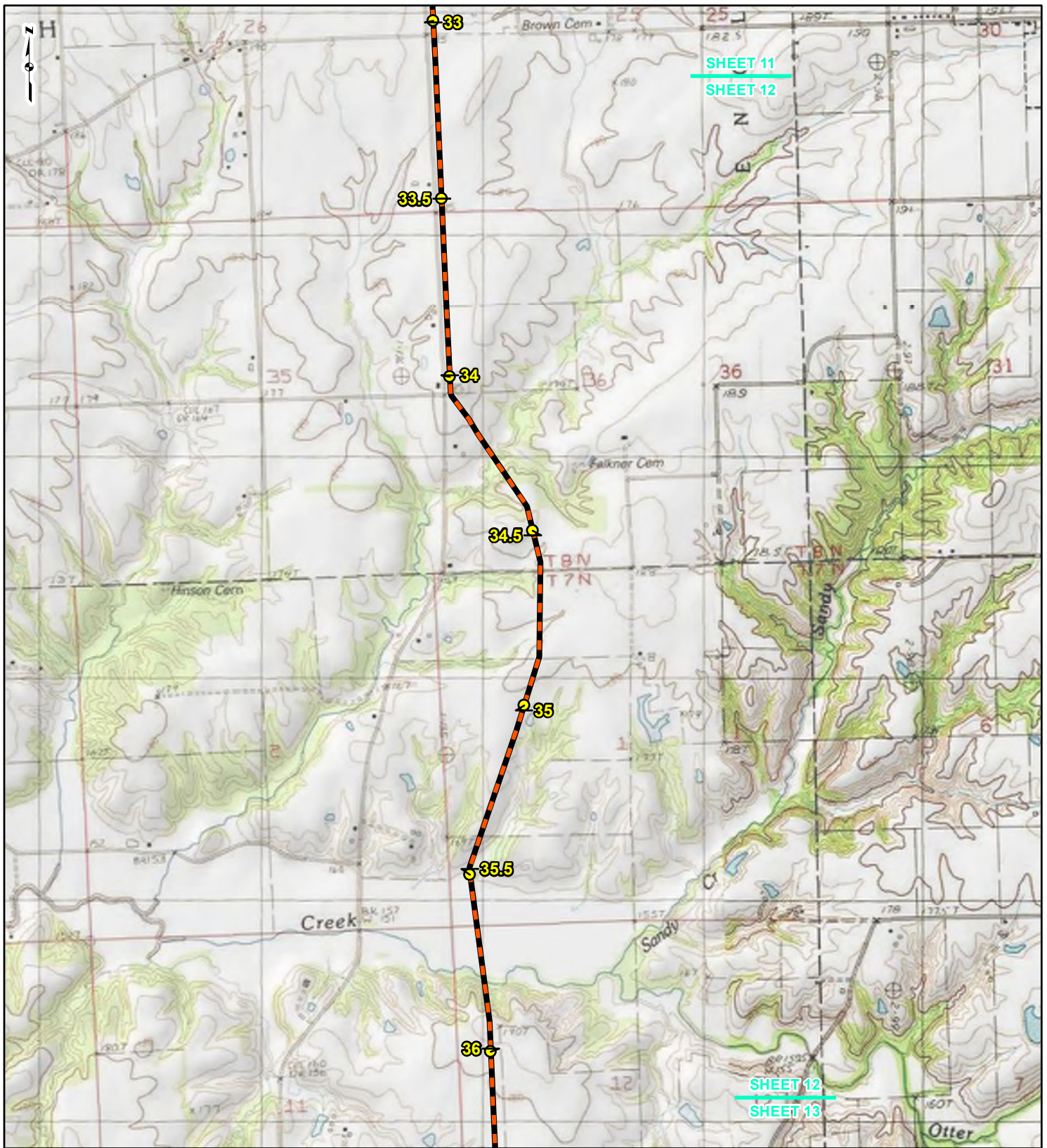


DRAWN BY: PMH  
CHECKED: SWW





DATE: 8/12/2016  
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

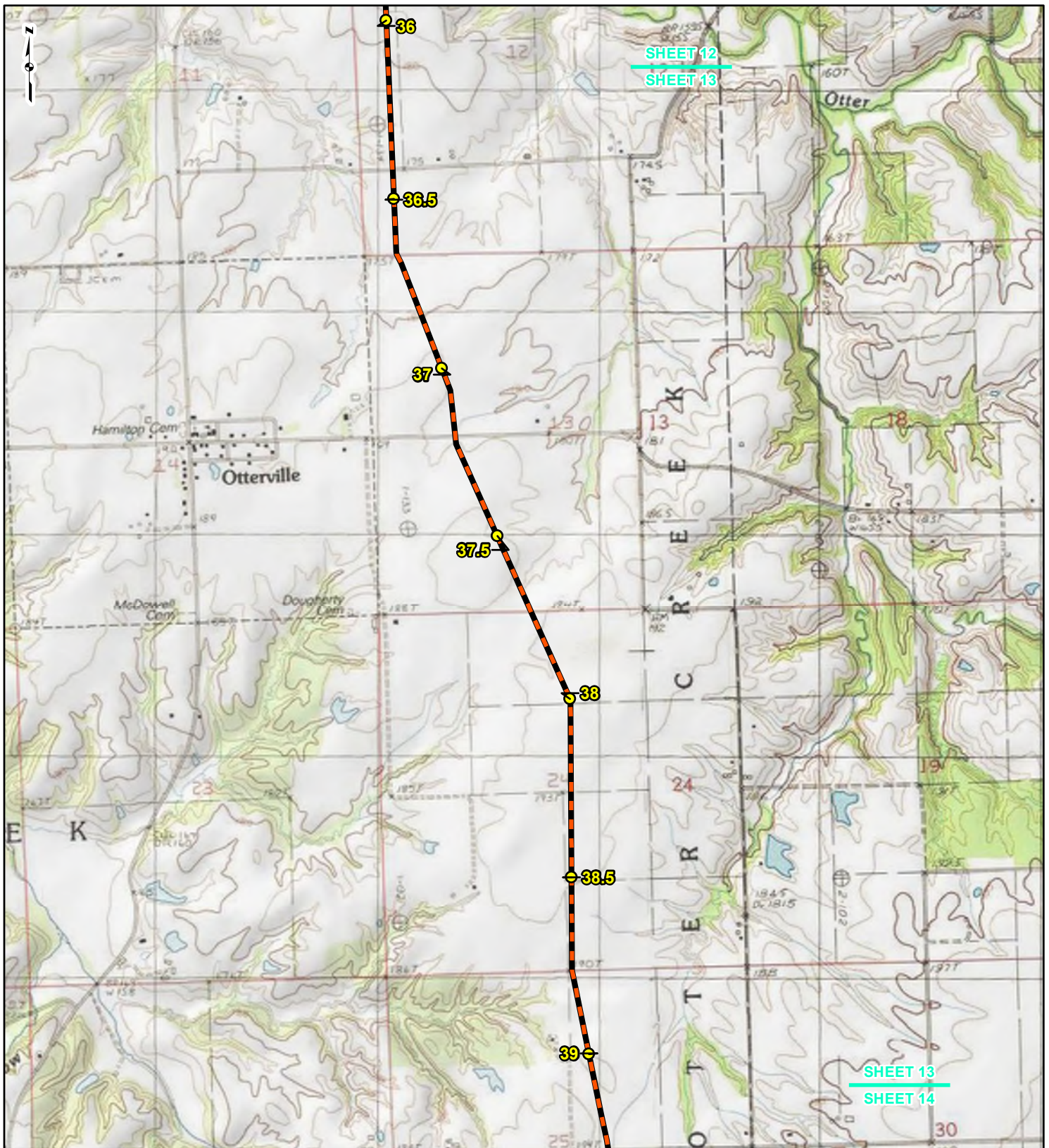
**FIGURE 1  
LOCATION MAP  
SHEET 12 OF 15**

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
 CHECKED: SWW      APPROVED: LMF

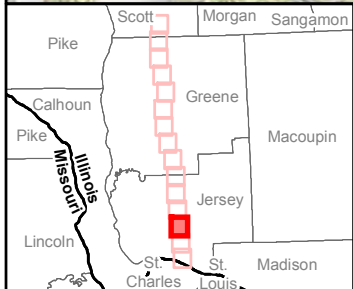
REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.









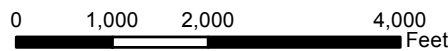
SHEET 12  
SHEET 13

SHEET 13  
SHEET 14



**LEGEND**

-  NEW BUILD MILEPOST
-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  COUNTY BOUNDARY
-  STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 13 OF 15**



**Spire STL Pipeline**

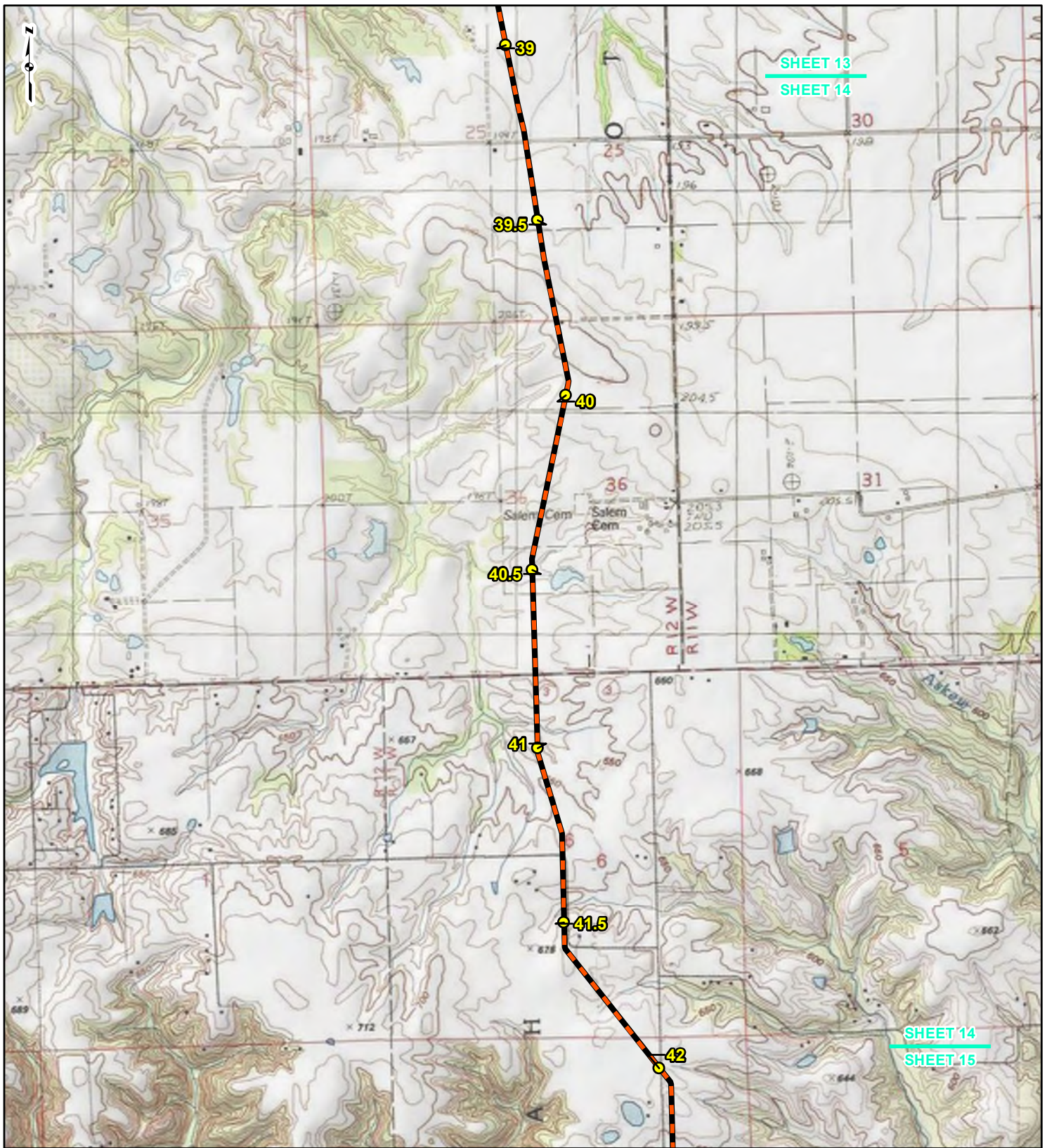


DRAWN BY: PMH  
CHECKED: SWW

DATE: 8/12/2016  
APPROVED: LMF

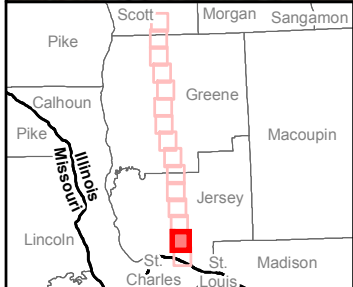
REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.





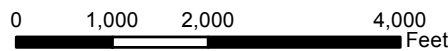
SHEET 13  
SHEET 14

SHEET 14  
SHEET 15



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 14 OF 15**



**Spire STL Pipeline**

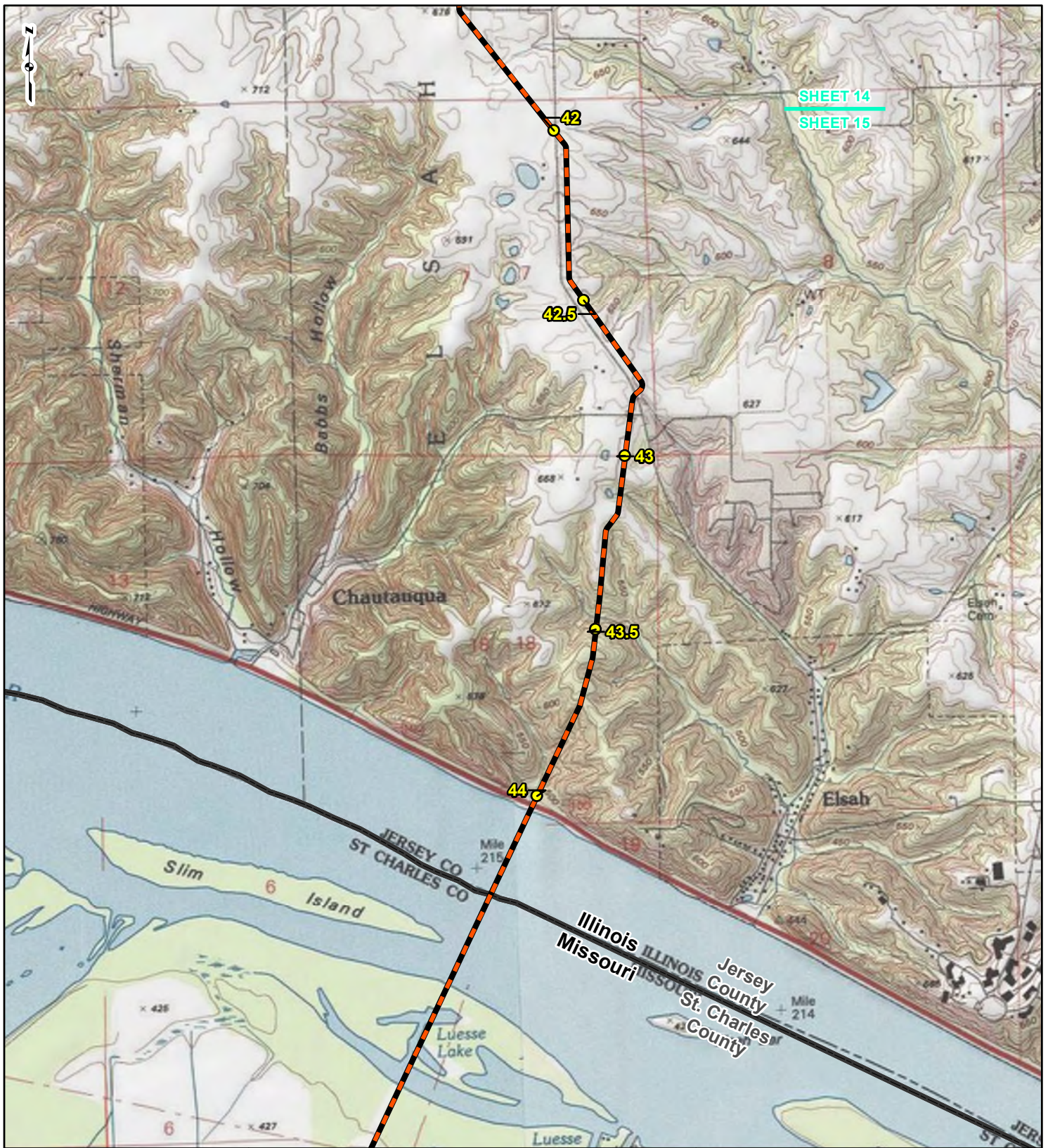


DRAWN BY: PMH  
CHECKED: SWW

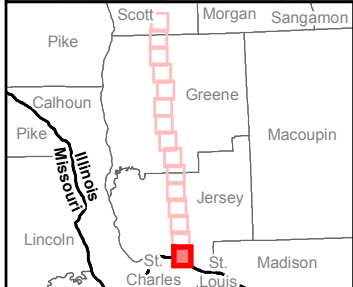
DATE: 8/12/2016  
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.









SHEET 14  
SHEET 15




**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

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

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.





August 12, 2016

Mr. Pat Malone  
Endangered Species Protection Board  
Illinois Department of Natural Resources  
One Springfield Way  
Springfield, Illinois 62702-1271

**Re: Rare, Threatened, and Endangered Species Consultation  
Spire STL Pipeline LLC  
Spire STL Pipeline  
Scott, Greene, and Jersey Counties, Illinois**

Dear Mr. Malone:

GAI Consultants, Inc. ("GAI") is submitting this information request on behalf of Spire STL Pipeline LLC ("Spire"), for the portion of the Spire STL Pipeline ("Project") in Scott, Jersey, and Greene Counties, Illinois. Representatives from Spire and GAI met with your office on June 21, 2016 to introduce the Project. As requested, GAI is submitting further information regarding the Natural Heritage Program data for the Project area.

**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 meter 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 United States Geological Survey ("USGS") Topographic Map with Illinois Natural Heritage Program Data (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.

## Site Description

The Illinois portion of the Project is located in Scott, Greene, and Jersey Counties, Illinois, and is depicted on the attached portions of the Alsey (1983), Roodhouse West (1983), Carrolton (1985), Boyer Creek (1983), Otterville (1983), Elsay (1979), and Grafton (1995), Illinois, USGS 7.5-minute series topographic maps (Figure 1). Data from the Illinois Natural Heritage Program is included on Figure 1, and shows the Project crossing, or in close vicinity to the following species or communities:

- a recorded population of groundplum milkvetch (*Astragalus crassicaerpus* var. *trichocalyx*);
- high quality Loess Hill Prairie Natural Community;
- Principia Hill Prairies West Inai; and
- Principia Hill Prairies – West Natural Heritage Landmark.

The majority of the pipeline is greenfield and crosses primarily agricultural landscapes with some areas of forest. 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), and Marais Temps Clair-Mississippi River (HUC #071100090401) watersheds.

**GAI would appreciate information concerning suggested surveys based on the data from the Natural Heritage Program, along with suggested best management practices for the portion of the Project crossing the Principia Hill Prairies – West Natural Heritage Landmark. In addition, GAI would appreciate the identification of state-listed species or significant biological features within one-half-mile of the proposed Project centerline, as shown on the attached Figure 1.**

Please note the intent of this letter is solely for the purpose of formally initiating consultation and/or applicable project reviews. 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.**

A handwritten signature in blue ink, appearing to read 'Jayme L. Fuller', written in a cursive style.

Jayne L. Fuller  
Environmental Manager

JLF/jbm

Attachment: USGS Topographic Map with Illinois Natural Heritage Program Data (Figure 1)



**ATTACHMENT**

**USGS TOPOGRAPHIC MAP  
WITH ILLINOIS NATURAL HERITAGE PROGRAM DATA  
(FIGURE 1)**

## Ali Trunzo

---

**From:** Garver, Luke <Luke.Garver@illinois.gov>  
**Sent:** Wednesday, August 10, 2016 10:09 AM  
**To:** Ali Trunzo  
**Cc:** DNR.CREP; Chandler, Mike  
**Subject:** Proposed Spire Pipeline  
**Attachments:** CREP Procedure for Easement Release (ammended 6-29-2015).pdf; Easement Subordination Document (1-26-16).pdf; IDNR Contractor certification 2016.doc.docx

Good morning Alessandra,

It was good speaking with you this morning. Per our conversation, attached are documents outlining our preferred procedure for subordinating portions of CREP Easements for utility projects. Please complete the IDNR Contractor Certification at your earliest convenience. After we have received it we can release CREP spatial data for your review. We would also like to request spatial data related to the SPIRE pipeline project so we can review areas on our end as well.

Thank you and please let us know if you have any questions regarding this process, or about CREP in general.

Take care,

### **Luke Garver**

CREP Program Coordinator  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield, Illinois 62702-1721  
(217) 524-3200



## CREP Procedure for Conservation Easement Release or Subordination

The state CREP program frequently receives requests to release or subordinate small pieces of conservation easements to make way for infrastructure projects.

The procedure outlined below is designed to provide a consistent response framework for these requests. Release/subordination requests are only considered for projects providing public benefit or in situations of imminent danger. The state CREP program does not release or subordinate executed conservation easements to landowners for private use.

### **Procedure for Requesting an Easement Release or Subordination:**

1. The requesting party should be directed to the corresponding county Soil and Water Conservation District (SWCD) to notify them of the request.
2. The county SWCD will confirm the landowner's interest before proceeding with the request.
3. The SWCD will notify the requesting party to provide a one page justification on company letterhead outlining the reason for the release or subordination and contact information for the primary project contact. The justification must include reasons for the release or subordination, alternatives considered, and public benefits of the project, along with a clear map outlining the project including an accurate legal description of the portion of the easement to be released or subordinated along with associated survey files (CAD survey files in .dwg or .dxf format). The SWCD will forward all information to the IDNR for final approval.
4. If there is an existing Federal contract involving the affected release/subordination across the landowner will need to work with the County FSA office for mitigation. A release or subordination of the state conservation easement does not negate any landowner responsibilities of their federal contract.

### **Procedure for Processing an Approved Easement Release or Subordination:**

1. Once a request for release or subordination has been approved, IDNR will work with the county SWCD to determine the associated costs. Calculations will be based upon the current market value of the conservation easement, as determined by a weighted average of the current market FSA soil rental rates of the three predominant soils of the affected acreage. Release/subordination costs shall be returned to IDNR CREP after recording. Additional transaction costs (e.g. recording costs) may also be requested by the SWCD.
  - a. If the affected acreage is less than 0.5 acres, the release/subordination request will be processed at a cost of \$500.00. Any additional transaction costs (e.g. recording costs) may also be requested by the SWCD.
2. Two options exist for recording the release or subordination of conservation easement:
  - a. The requesting party may provide the release/subordination document which they prefer to use, with the legal description appropriately included.
  - b. The IDNR may provide the release/subordination document, after an appropriate legal description has been provided.
3. Once the associated documents have been approved by IDNR, they will request the SWCD to execute the release or subordination.
4. It is the SWCD's responsibility to collect the funds from the requesting party, and provide these funds, in addition to the recorded documents, back to IDNR CREP.
5. It is also the SWCD's responsibility to ensure that recording costs and other transaction costs, as appropriate, are provided by the requesting party to cover the SWCD's costs.

*The procedures above have been developed to standardize the conservation easement release process. All final decisions are subject to discretion of IDNR.*

**EASEMENT SUBORDINATION**  
**AGREEMENT**

This easement subordination agreement is between \_\_\_ County Soil and Water Conservation District (“\_\_\_SWCD”), a unit of local government with offices at \_\_\_(address)\_\_\_ and \_\_\_(company)\_\_\_ **requesting subordination** \_\_\_ (“Requestor”), a(n) \_\_\_(description of company)\_\_\_ with offices at \_\_\_(address)\_\_\_.

\_\_\_SWCD has an easement agreement with \_\_\_\_\_ (“Landowner(s)”) that encumbers the real estate described on Exhibit A (“Property”):

- A. Grant of Conservation Right and Easement dated \_\_\_\_\_ and recorded on \_\_\_\_\_ as Document No. \_\_\_\_\_ made by \_\_\_(landowner)\_\_\_ to \_\_\_SWCD as Easement # \_\_\_\_\_ to secure a Conservation Right and Easement and;

The Landowner(s) own the Property that is encumbered by a grant of Conservation Right and Easement that is granted to \_\_\_SWCD (hereinafter with its successors and assigns) pursuant to the Real Property Conservation Rights Act, 765 ILCS 120, as amended (“CREP Easement”), along with rights of ingress and egress across the Property (“Access Easement”; the CREP Easement and Access Easement are collectively referred to as the “Easements”).

To allow Requestor to \_\_\_(reason for subordination)\_\_\_, \_\_\_SWCD agrees to subordinate the Easements on the described portion to Requestor for the above stated purpose and all actions associated with above stated purpose. This subordination does not release the portion of the Property from the easement but will allow Requestor to be exempt from the provisions set forth in the Easements on the portion described in Exhibit A. The Landowner(s) are not exempted in any case and are still fully bound by the terms of the Easements with exception to the actions required or conducted by Requestor on the Property. Any other uses other than as identified above will require subsequent subordinations. Under no circumstance can the Landowner(s) be granted rights to activities restricted by Easements by the Requestor.

This agreement is both a contract and a covenant running with the land. It benefits and burdens the parties’ successors and assigns pursuant to the interests to which they succeed.

The parties are signing this easement subordination agreement as of the last dated notary attestation below.

**Requestor:**  
**(Name)**

**Easement Holder:**  
\_\_\_\_\_ **County Soil and Water Conservation District**

By: \_\_\_\_\_

By: \_\_\_\_\_  
Individual authorized by SWCD/Title

Title: \_\_\_\_\_

Attest: \_\_\_\_\_

Title: \_\_\_\_\_

STATE OF ILLINOIS )  
 ) ss.  
COUNTY OF \_\_\_\_\_ )

I, the undersigned, a Notary Public, in and for said County, in the State aforesaid, do hereby certify that \_\_\_\_\_, personally known to me to be the \_\_\_\_\_ of the \_\_\_\_\_, and \_\_\_\_\_ personally known to me to be the \_\_\_\_\_ of \_\_\_\_\_, and personally known to me to be the same persons whose names are subscribed to the foregoing Easement Subordination Agreement, appeared before me this day in person and severally acknowledged that as such \_\_\_\_\_ and \_\_\_\_\_ they signed and delivered the said instrument, pursuant to authority given to them by the Board of Directors of the \_\_\_\_\_ and in their representative capacities on behalf of the \_\_\_\_\_, for the uses and purposes therein set forth.

Given under my hand and Notarial Seal this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public

STATE OF ILLINOIS )  
 ) ss.  
COUNTY OF \_\_\_\_\_ )

I, the undersigned, a Notary Public, in and for said County, in the State aforesaid, do hereby certify that \_\_\_\_\_ (SWCD Representative), personally known to me to be the \_\_\_\_\_ (SWCD Title) of the \_\_\_\_\_ Soil and Water Conservation District and personally known to me to be the same person whose name is subscribed to the foregoing Easement Subordination Agreement, appeared before me this day in person and acknowledged that as such \_\_\_\_\_ (SWCD Representative) he/she signed and delivered the said instrument, pursuant to authority given to him by the State of Illinois and in his/her representative capacity on behalf of the \_\_\_\_\_ County Soil and Water Conservation District, for the uses and purposes therein set forth.

Given under my hand and Notarial Seal this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public

Return this document to: \_\_\_\_\_ (SWCD Attorney and address or designated recipient) \_\_\_\_\_

Exhibit A

Map of the Property



# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
www.dnr.illinois.gov

Bruce Rauner, Governor

Wayne A. Rosenthal, Director

## Certification for Access to USDA Section 1619 Protected Information under Illinois Department of Natural Resources Memorandum of Understanding with USDA Farm Service Agency

I, \_\_\_\_\_ of \_\_\_\_\_ hereby  
(Print full name) (Print Name of Organization)

certify that I have read, understand, and will fully comply with the restrictions and limitations for USDA Section 1619 Protected Information per the Memorandum of Understanding (MOU) between the IDNR and the USDA Farm Service Agency executed on July 15, 2016.

I understand and agree that:

1. IDNR as a certified USDA Section 1619 Cooperator has authorized me to access otherwise protected agricultural information to provide:

\_\_\_\_\_  
\_\_\_\_\_  
(Describe nature of work such as technical assistance or monitoring.)

for the following USDA Conservation Programs (check programs included in IDNR contract):

- Conservation Reserve Program (CRP)
- Illinois Conservation Reserve Enhancement Program (CREP)
- Emergency Conservation Program (ECP)
- Emergency Forest Restoration Program (EFRP)
- Farmable Wetland Program (FWP)
- Grassland Reserve Program (GRP)
- Source Water Protection Program (SWPP)

2. I will only access information that is directly related to technical assistance activities, monitoring and reporting for the USDA Conservation Programs per my organization's contract with IDNR. Use of protected information that is not directly connected to USDA Conservation Programs in my contract is expressly prohibited. Section 1619 Protected Information may include, but is not limited to:

- State identification and county numbers;
- Producer/land owner and business entity name, full address, phone number, and identification type;
- Production information or Farm Serial Number;
- Aerial photographs that depict restricted information;
- Farm, tract, field, and contract numbers;
- Acreage information including crop code;
- Practice code;
- Attributes for Common Land Units (CLUs) in USDA's Geospatial Information System; and
- Producer Social Security Numbers (SSNs) and tax identification numbers.



3. I will not share, distribute, use or otherwise disclose any Section 1619 Protected Information or data types identified above or in Exhibit 1 of the MOU to any individual or organization not directly covered by the MOU between USDA Farm Service Agency and IDNR.
4. I will not share, distribute, use or otherwise disclose any Section 1619 Protected Information for personal or economic gain.
5. Section 1619 Protected Information is not subject to the Freedom of Information Act (FOIA). All FOIA requests must be submitted to IDNR Legal Department's FOIA Officer. I understand I do not have the authority to disclose Section 1619 Protected Information for any FOIA requests I receive.
6. I agree to use Section 1619 Protected Information solely for the purposes stated above. I agree to return all data upon completion of work requiring the data or by July 31, 2019, whichever occurs first.
7. The MOU between the USDA Farm Service Agency and the IDNR is a legally binding document and any misuse of Section 1619 Protected Information may result in termination of my contractual obligations and could result in termination of my organization's contract with IDNR.

---

(Job Title)

---

(E-mail)

---

(Phone number)

---

(Signature)

---

(Date)

---

Mike Chandler  
CREP Program Manager

---

(Date)

---

Lisa Beja  
GIS Technician

---

(Date)

# telephone log



gai consultants

Date: 8-10-16

---

Project / Admin. No.: E160438.00

---

Call From: Luke Garver

---

Company: Illinois Department of Natural Resources

---

Phone No.: 217-524-3200

---

Call To: Ali Trunzo

---

Company: GAI Consultants

---

Phone No.: 412-399-5096

---

Subject: CREP Lands

---

cc:

---

## **Summary of Discussion, Decisions, and Commitments:**

Luke returned my call regarding CREP lands. ILDNR maintains spatial data for the CREP lands. Luke will email a copy of the data sharing agreement. We can provide shapefiles of the preliminary project, and they will review and provide us with relevant shapefiles.

Utility crossings of CREP lands are not restricted, however a subordination agreement must be created.

Utilities will have control of their ROW across CREP lands. Should the utility be removed/abandoned, the lands will revert back to the CREP program. Luke will provide a copy of the procedures by email.



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

August 5, 2016

Mr. Pat Malone  
Impact Assessment Sections - Interagency Wetlands Illinois Department of Natural Resources -  
Endangered Species  
One Springfield Way  
Springfield, IL 62702

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

Dear Mr. Malone,

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](http://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.
<b>Scott County, Illinois</b>	<b>Jersey County, Illinois</b>	<b>St. Louis County, Missouri</b>	<b>St. Charles County, Missouri</b>	<b>Greene County, Illinois</b>
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](http://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](mailto:STLPipelineInfo@SpireEnergy.com).

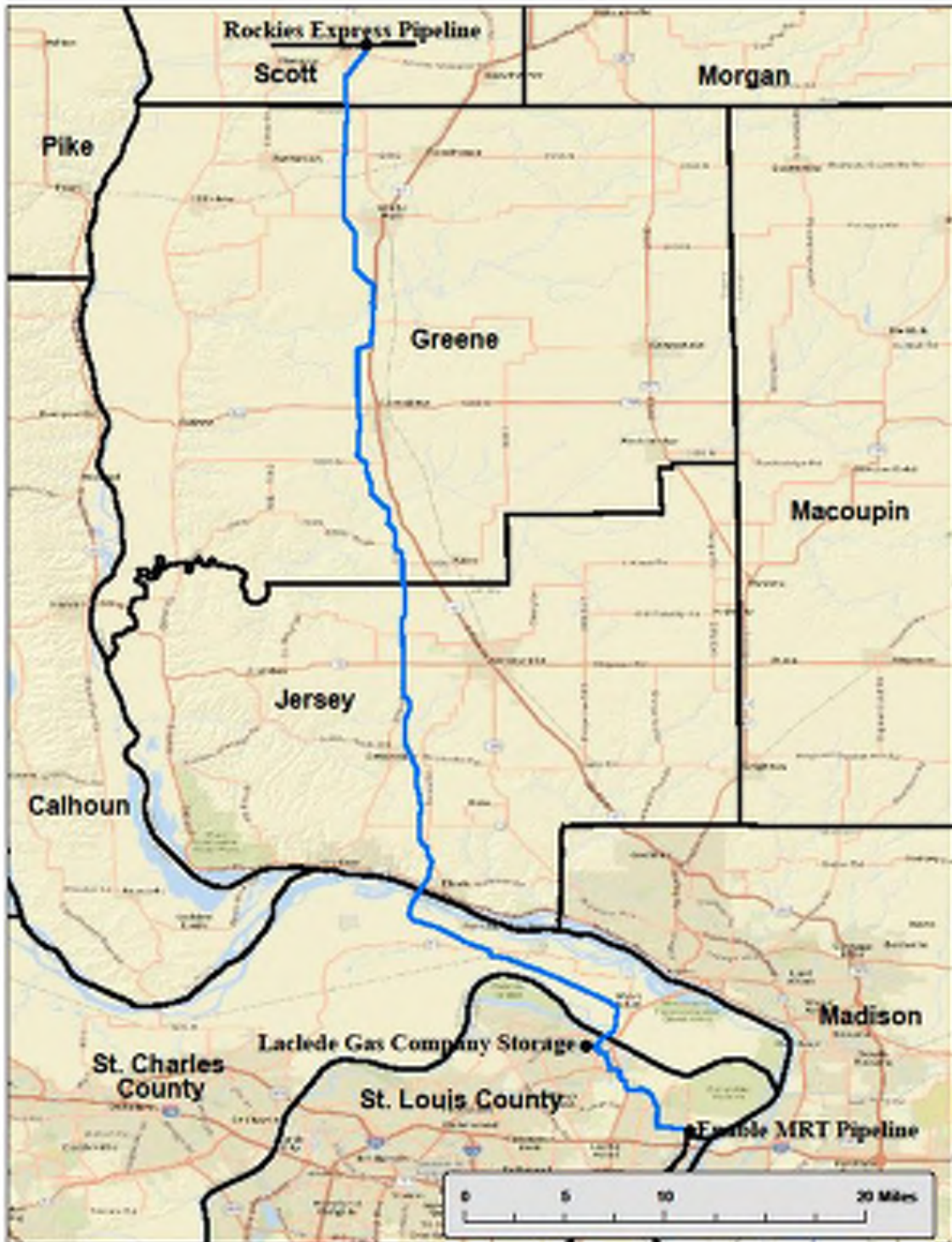
We look forward to working with you.

Sincerely,

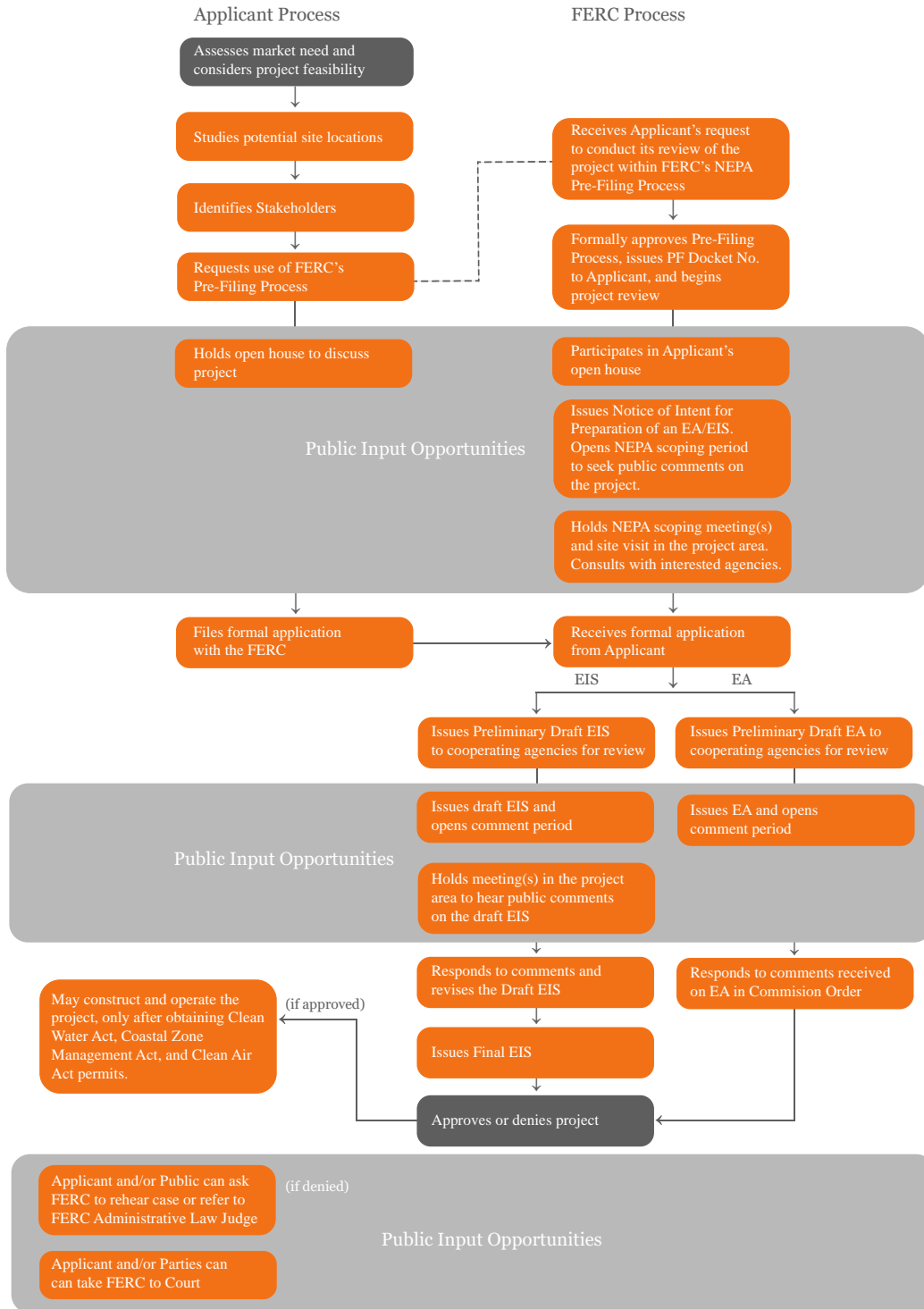


Scott Jaskowiak  
Vice President  
Spire STL Pipeline LLC

Project Map



# FERC Pre-Filing Process





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

August 5, 2016

Mr. Mike Diedrichsen  
P.E. Downstate Regulatory Program Illinois Department of Natural Resources - Water Resources  
One Springfield Way  
Springfield, IL 62702

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

Dear Mr. Diedrichsen,

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](http://www.ferc.gov). You can see all the information about the Spire STL Pipeline using the docket number PF16-9.

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Check out more information on our website at [www.SpireSTLPipeline.com](http://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](mailto:STLPipelineInfo@SpireEnergy.com).

We look forward to working with you.

Sincerely,



Scott Jaskowiak  
Vice President  
Spire STL Pipeline LLC



## Ali Trunzo

---

**From:** Ali Trunzo  
**Sent:** Thursday, August 04, 2016 4:58 PM  
**To:** 'mike.chandler@illinois.gov'  
**Cc:** Lori Ferry  
**Subject:** CREP lands - Spire STL Pipeline Project

Mr. Chandler,

I received your contact information from Terry Savko at the Illinois Department of Agriculture. I left you a voicemail and wanted to follow up with an email as well.

Our client, Spire, has a potential pipeline project proposed in Illinois. The pipeline is primarily greenfield, and I am looking for information regarding restrictions related to construction on CREP lands. In addition, does IDNR possess files and/or mapping that indicate where CRP and/or CREP lands are located?

Please feel free to call or email to discuss. I appreciate your assistance in this matter.

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](mailto:a.trunzo@gaiconsultants.com) | [gaiconsultants.com](http://gaiconsultants.com)     

\* Please update your records with my new direct telephone number

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July 29, 2016

Mr. Mike Diedrichsen, P.E.  
Downstate Regulatory Program  
Illinois Department of Natural  
Resources, Water Resources  
One Springfield Way  
Springfield, IL 62702-1271

**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. Diedrichsen:

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 Illinois Department of Natural Resources - Water Resources 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.**

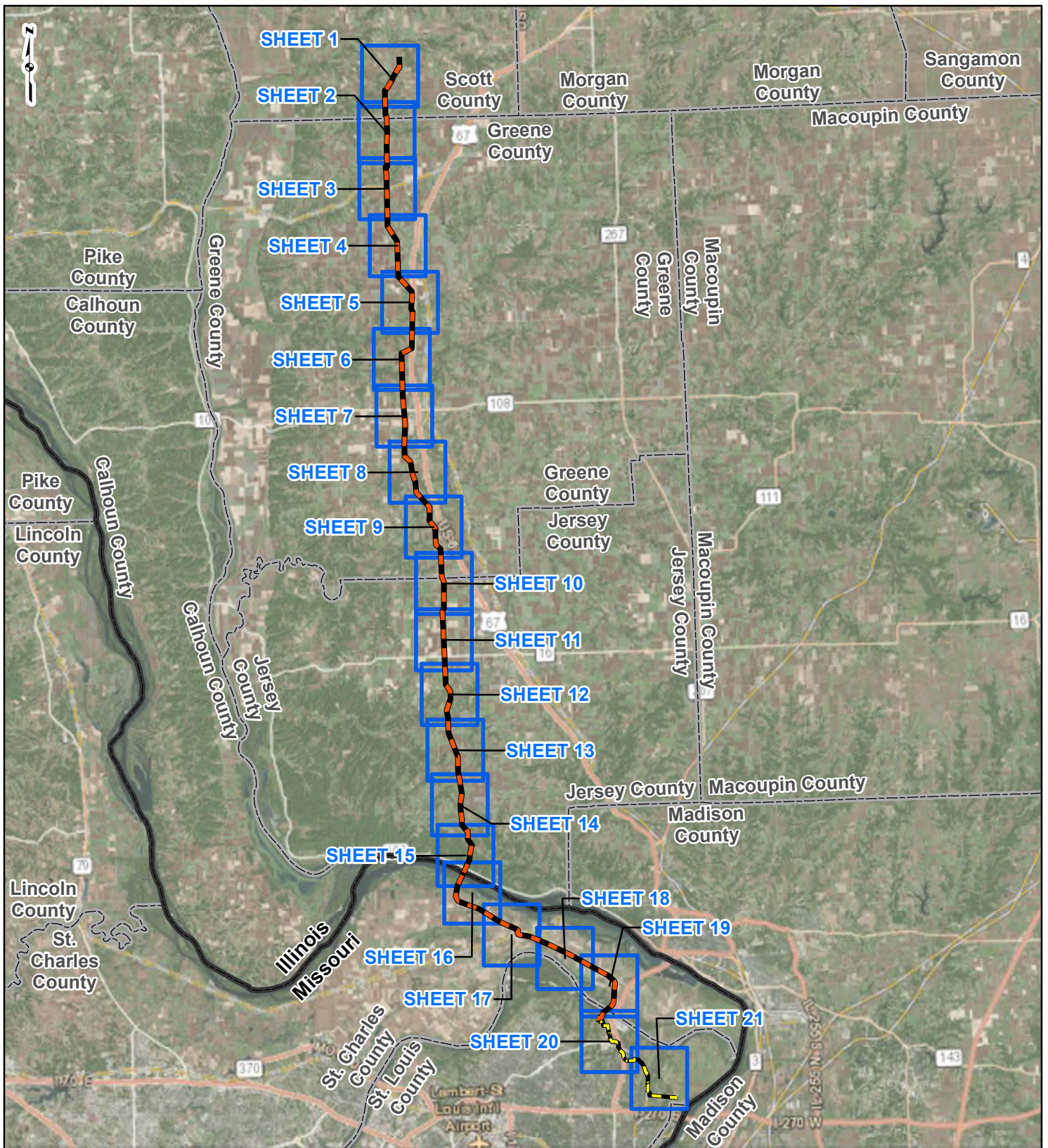
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry  
Environmental Project Manager

LMF/gmg

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





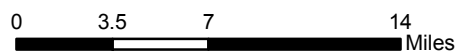
**PROJECT LOCATION**



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**

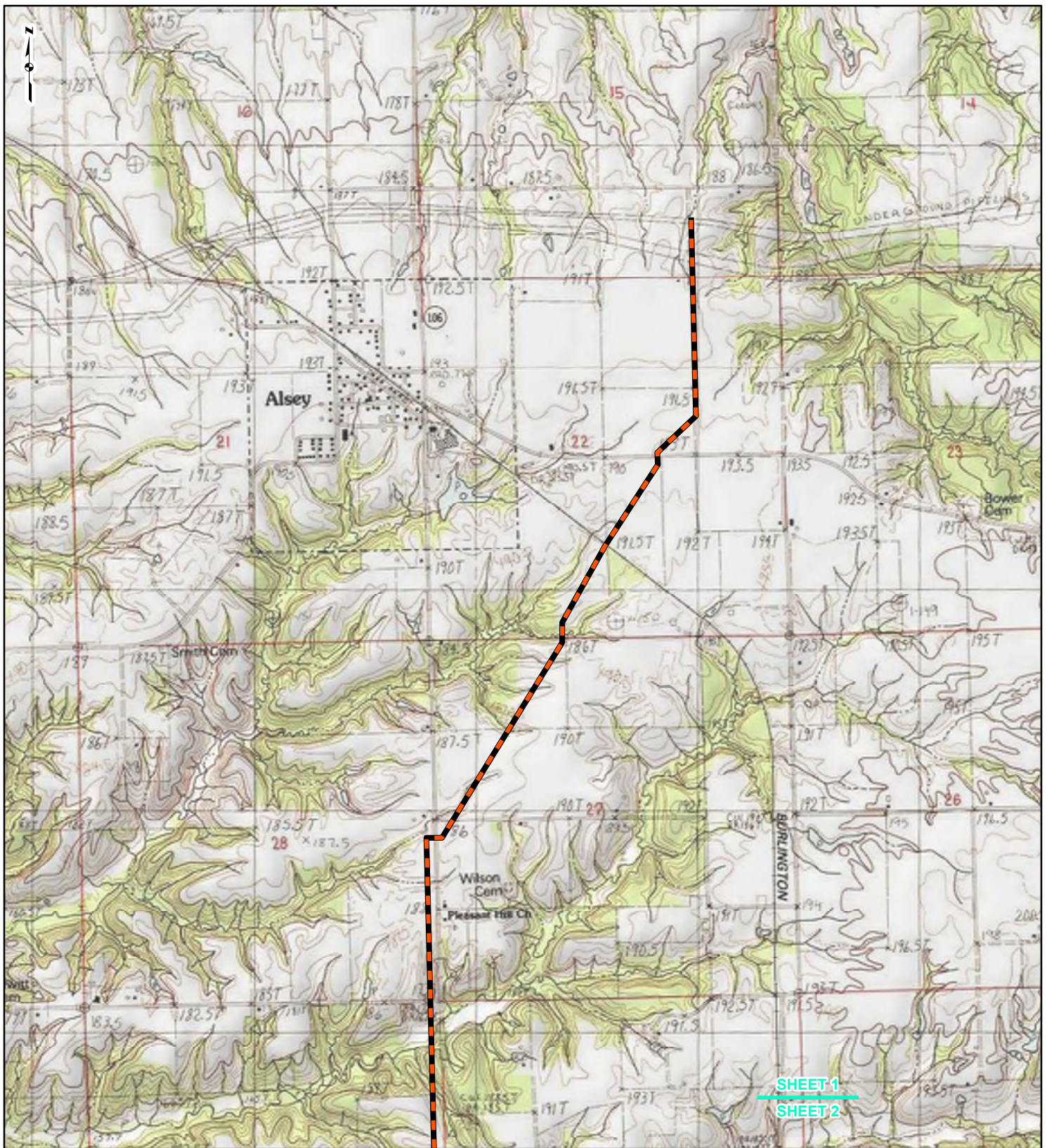


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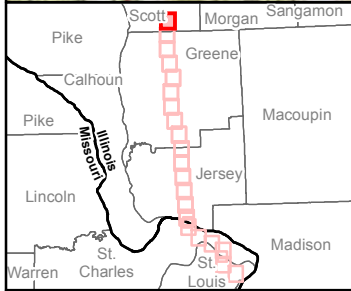
DATE: 7/28/2016  
APPROVED: LMF

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

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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), 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

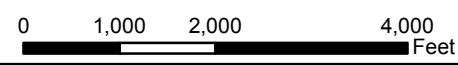
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**LEGEND**

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



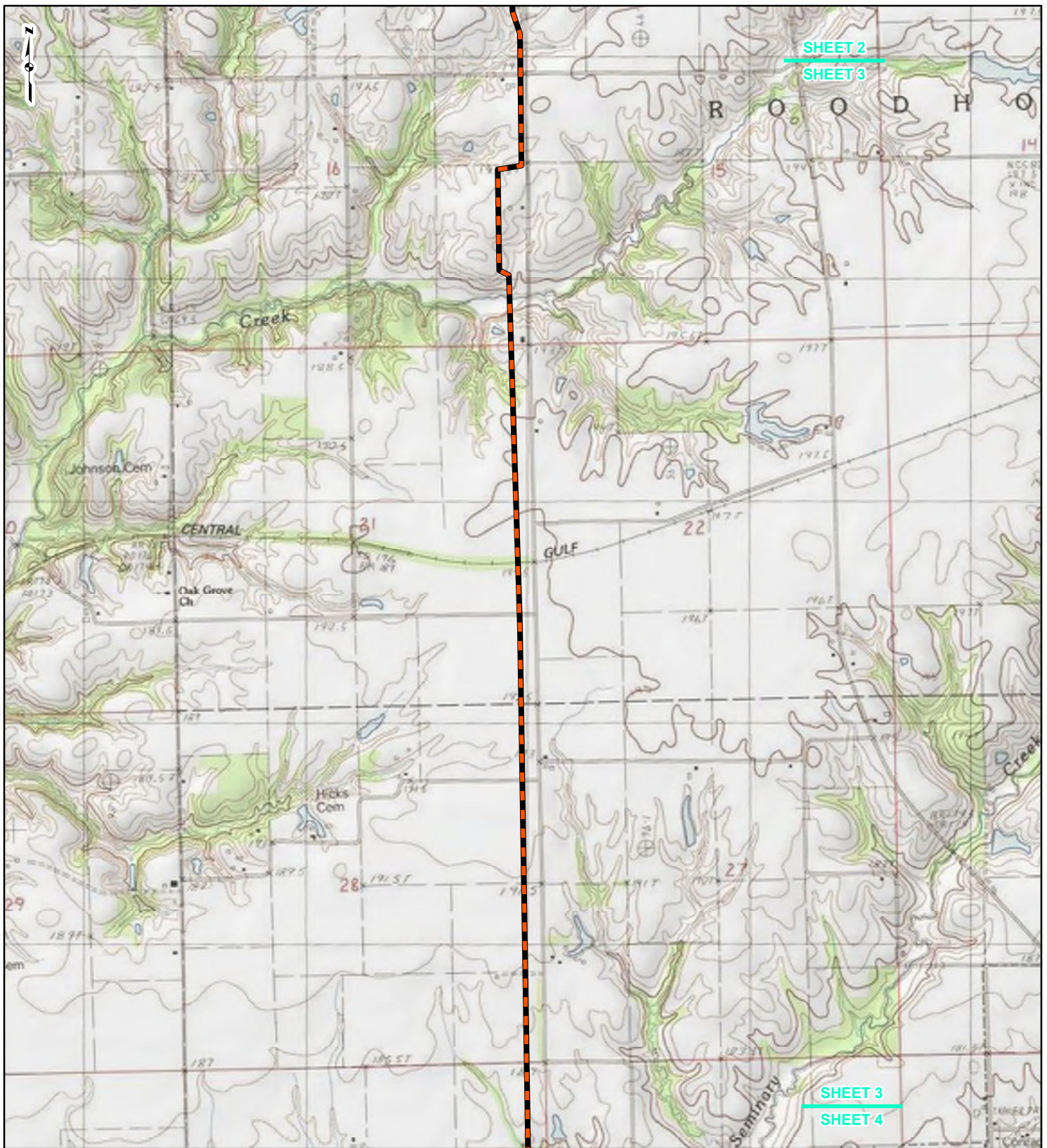
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 2 OF 21**



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

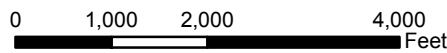
SHEET 3

SHEET 4



**LEGEND**

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



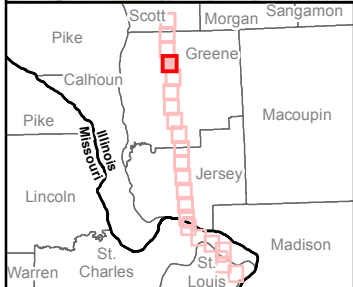
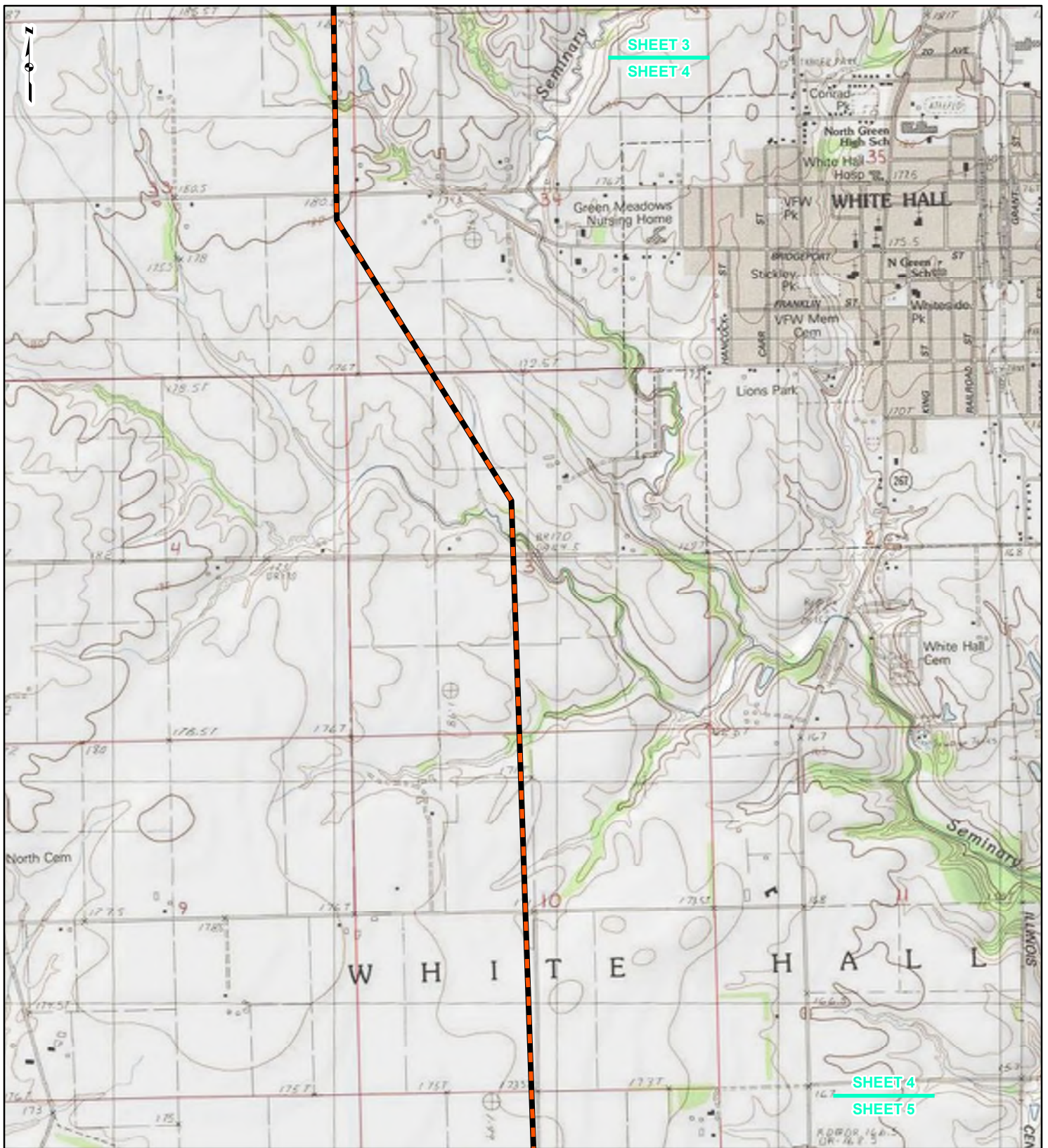
**FIGURE 1**  
LOCATION MAP  
SHEET 3 OF 21



DRAWN BY: PMH      DATE: 7/28/2016  
 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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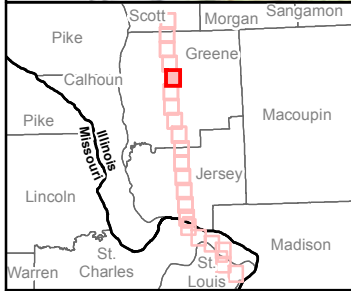
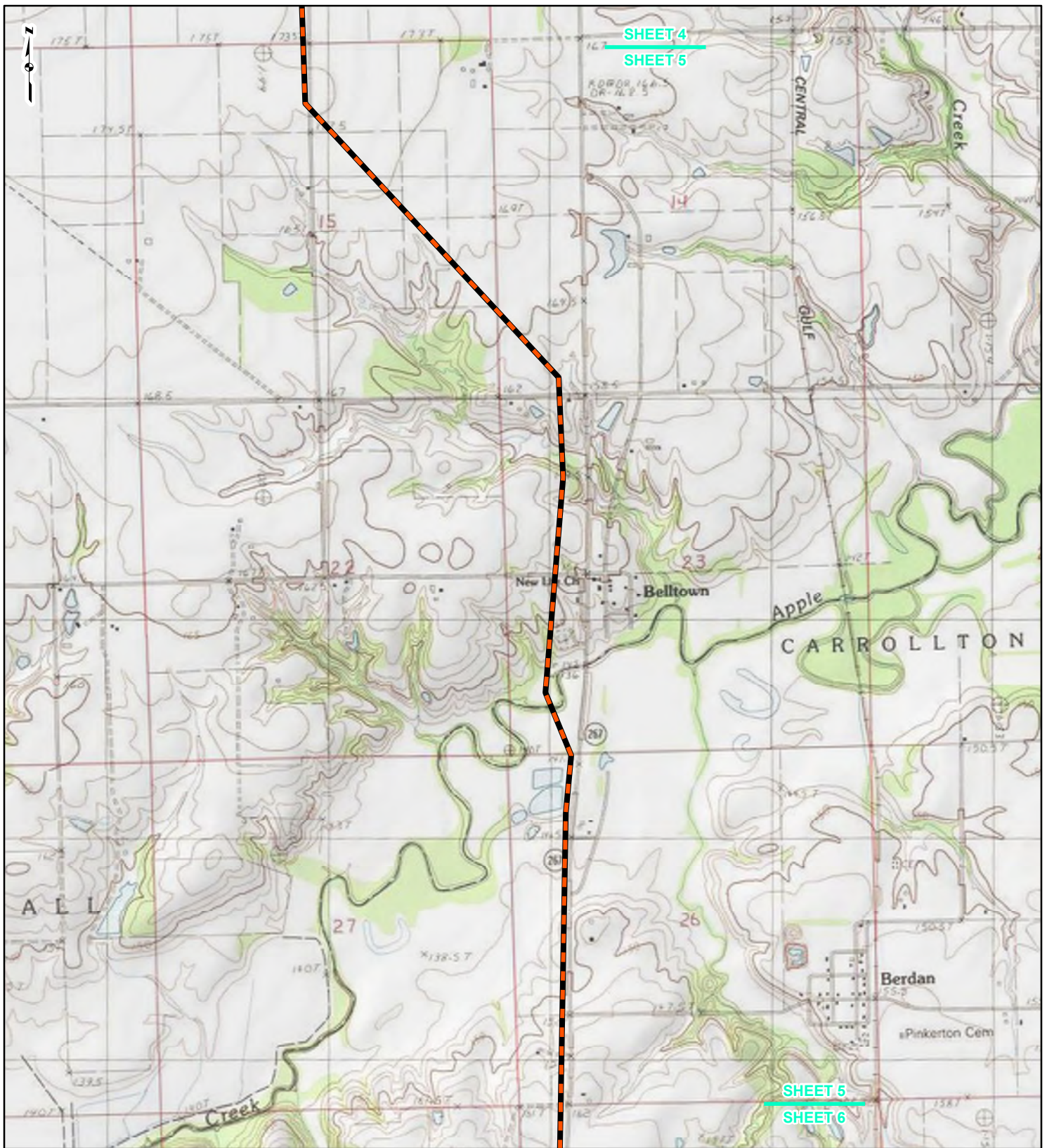
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 4 OF 21**

**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), FLOISSANT (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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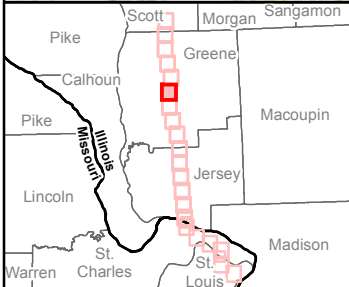
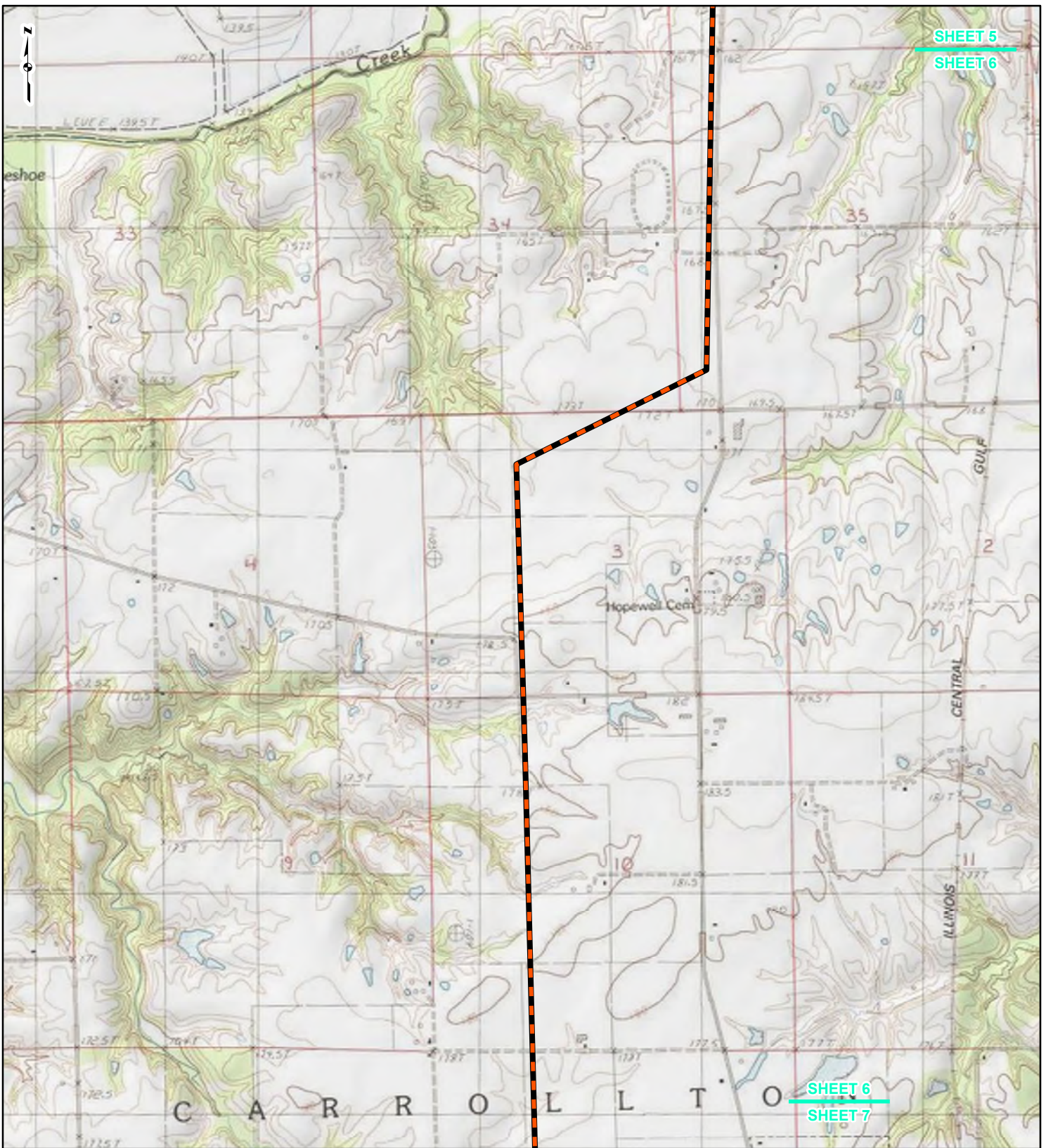
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 5 OF 21**

**Spire STL Pipeline**





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

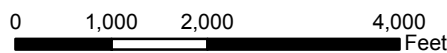
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**LEGEND**

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



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 6 OF 21**



**Spire STL**  
**Pipeline**

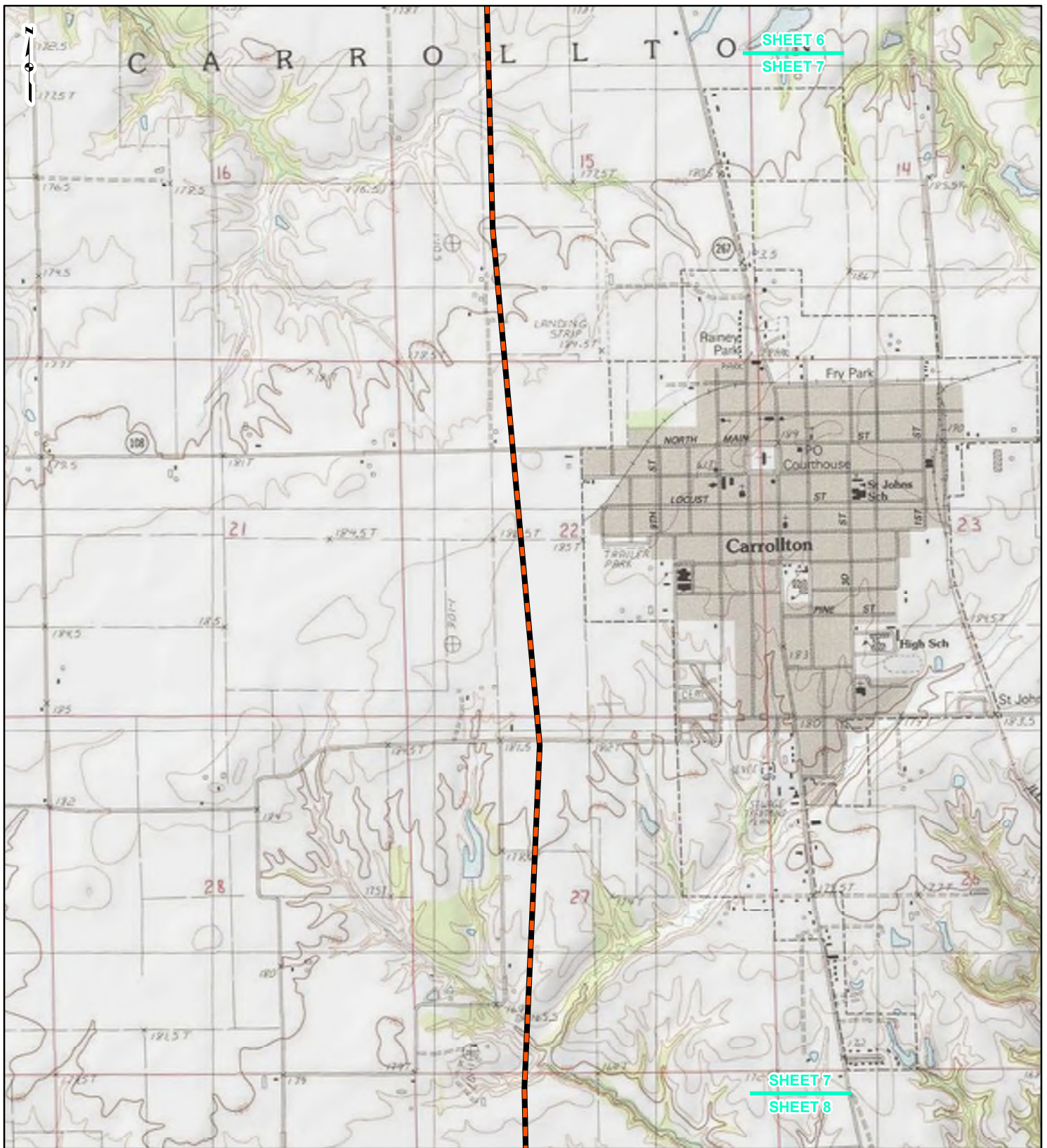


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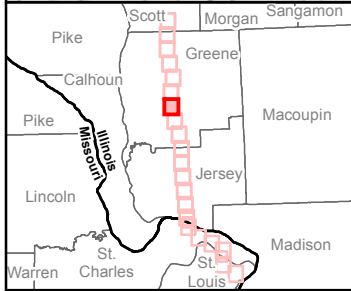
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SHEET 6  
SHEET 7

SHEET 7  
SHEET 8



**LEGEND**

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

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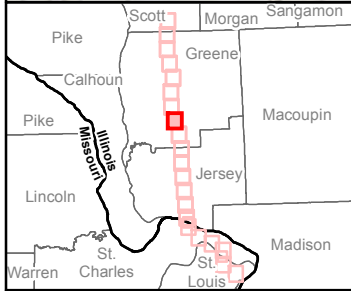
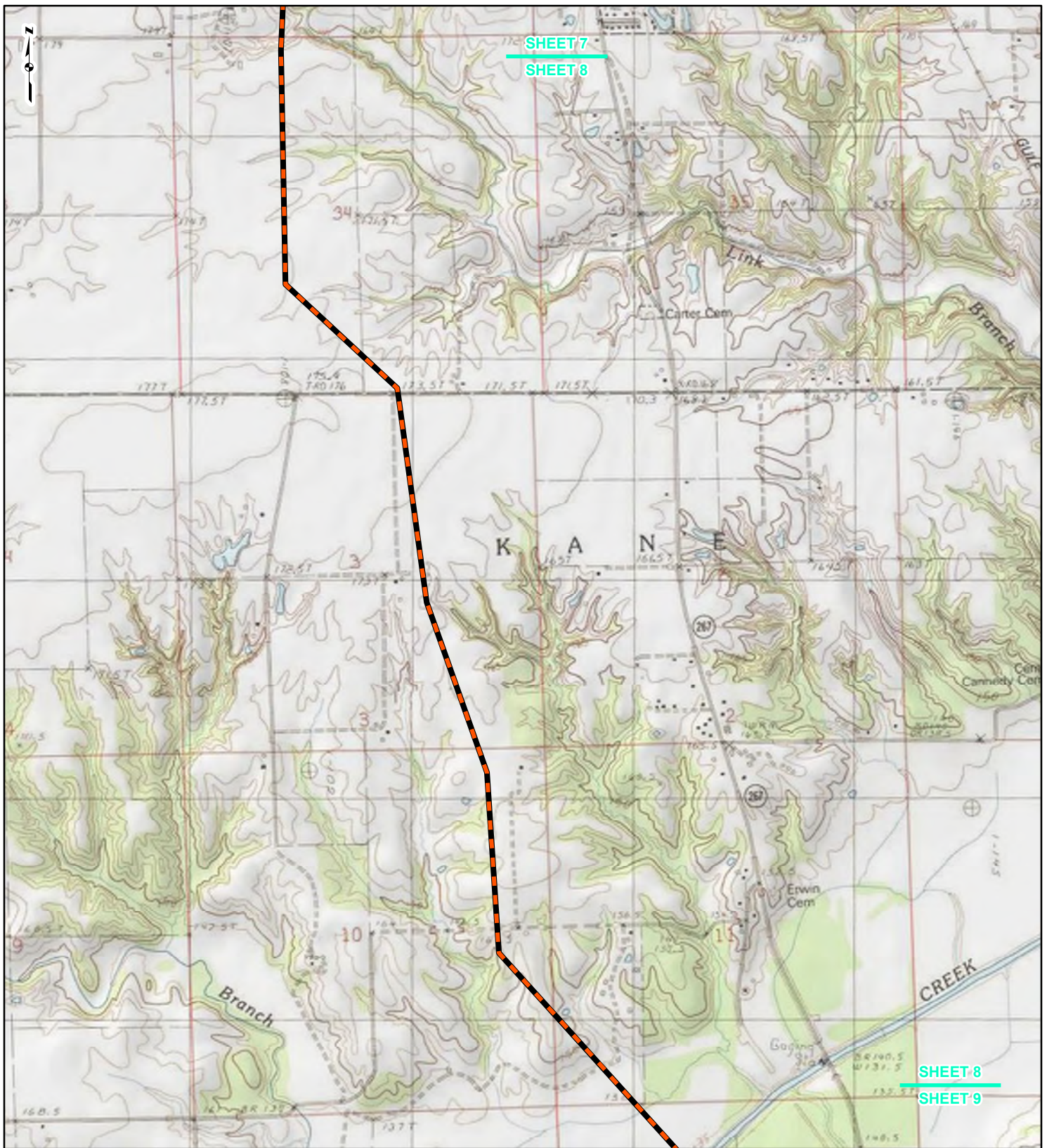
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 7 OF 21**

**Spire STL Pipeline**

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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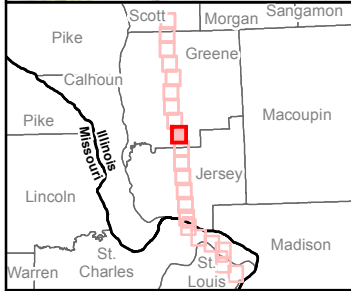
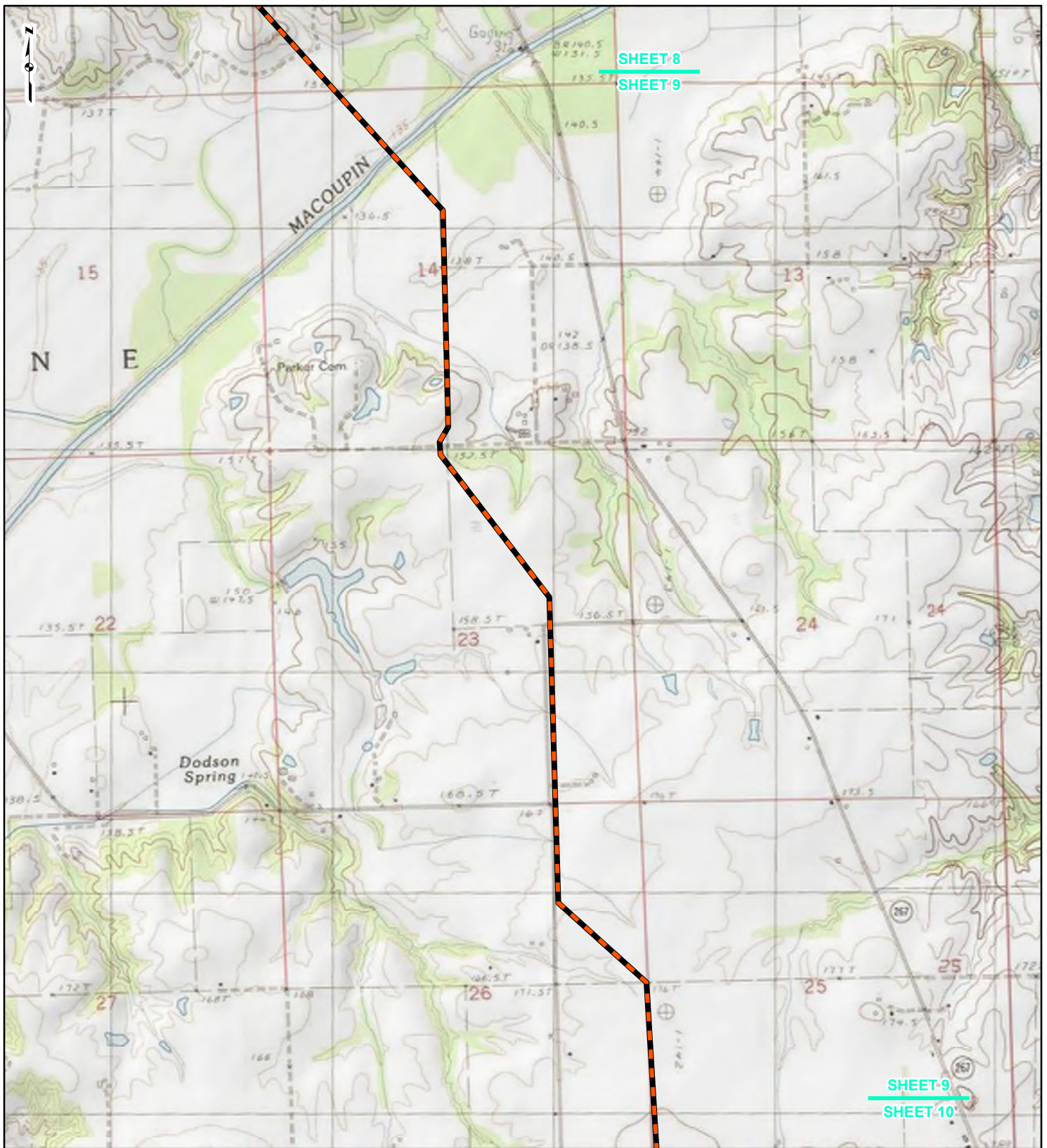
**FIGURE 1  
LOCATION MAP  
SHEET 8 OF 21**

**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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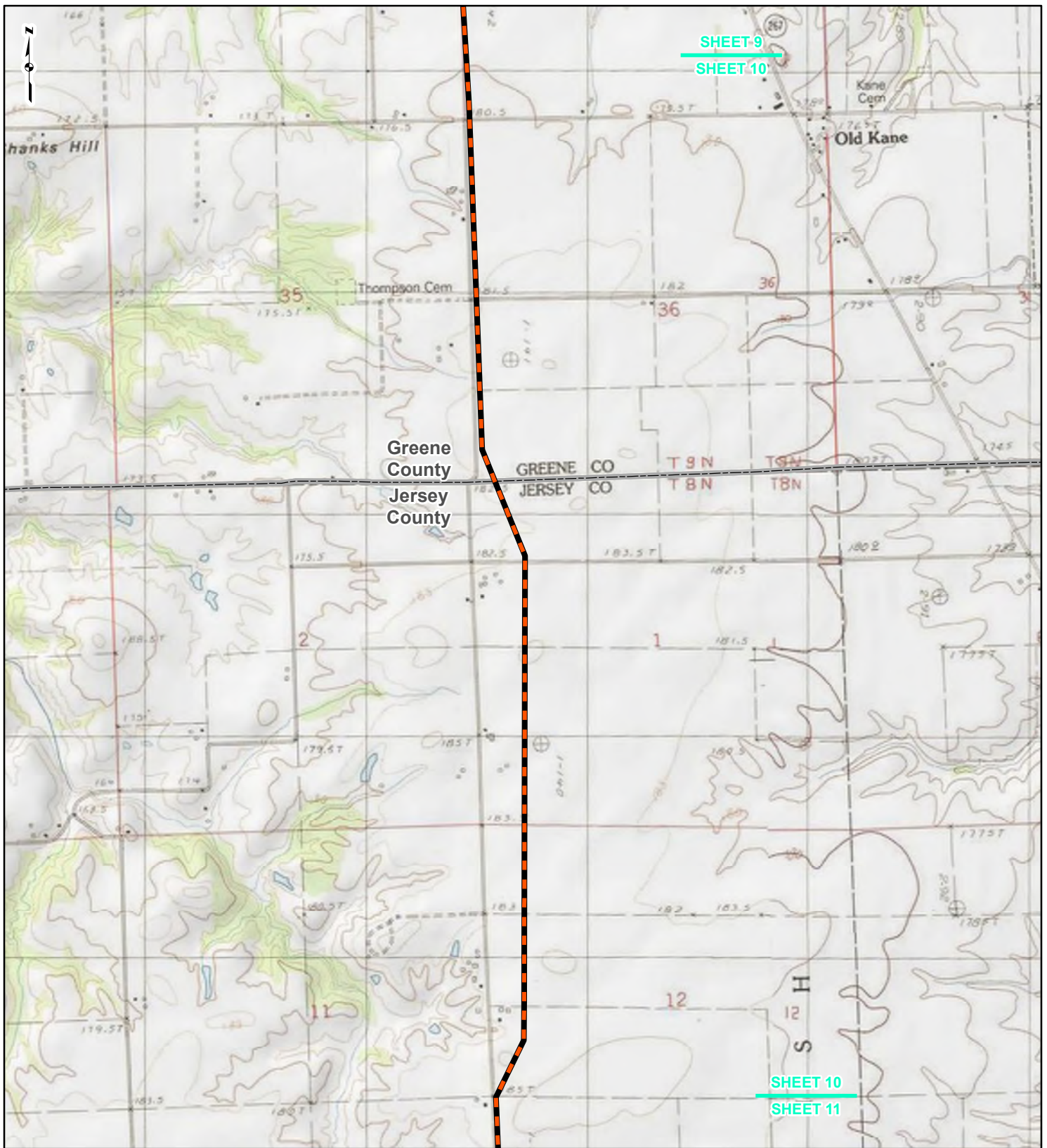
**FIGURE 1  
LOCATION MAP  
SHEET 9 OF 21**

**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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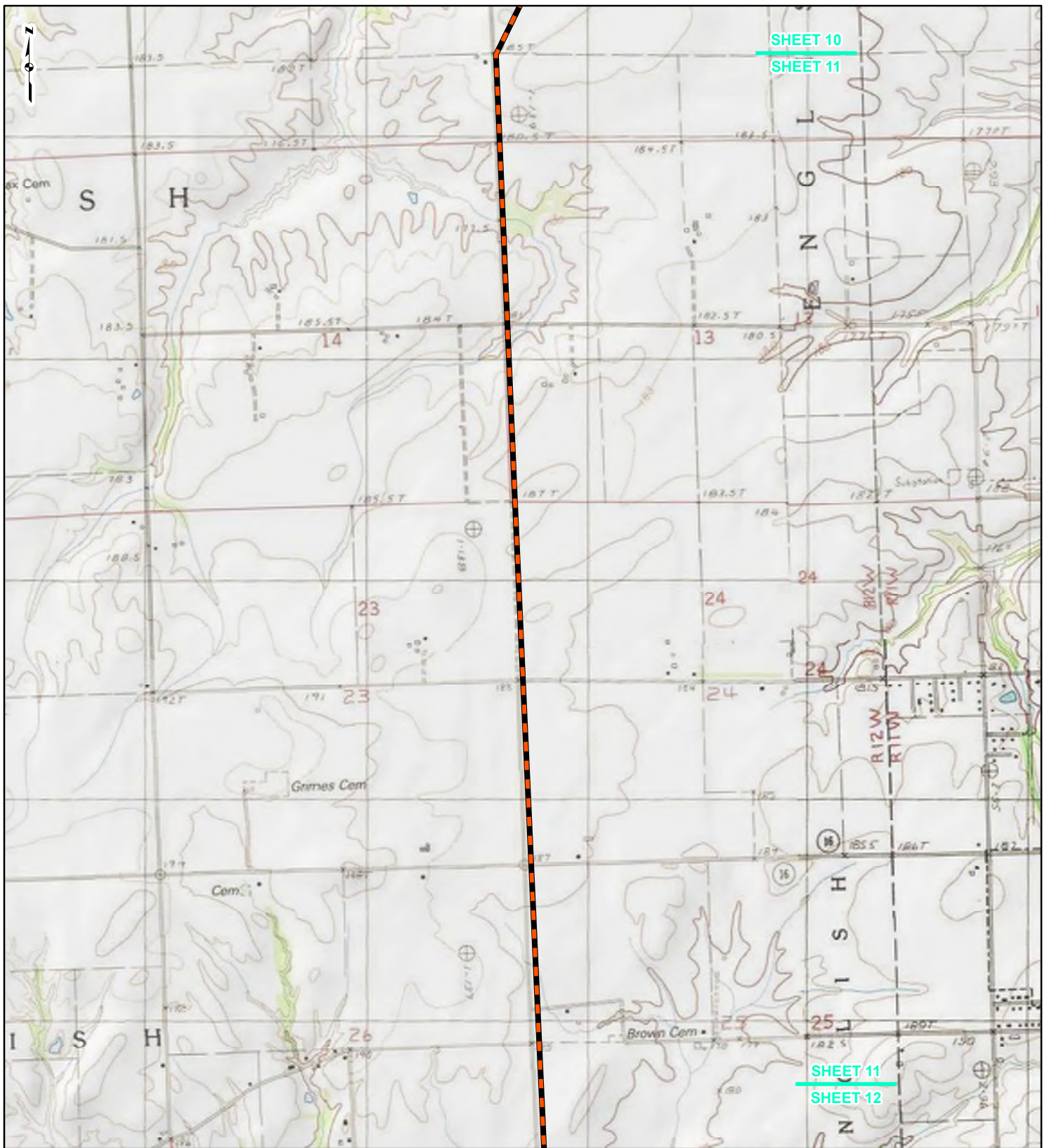
**FIGURE 1  
LOCATION MAP  
SHEET 10 OF 21**

**Spire STL Pipeline**

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

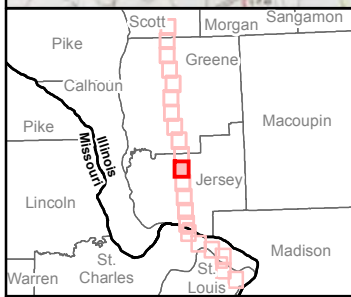
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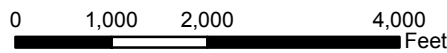
SHEET 10  
SHEET 11

SHEET 11  
SHEET 12



**LEGEND**

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



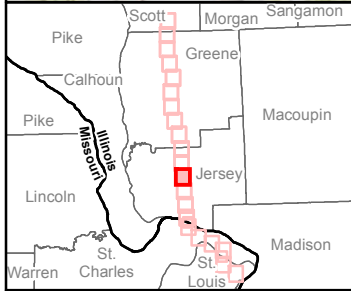
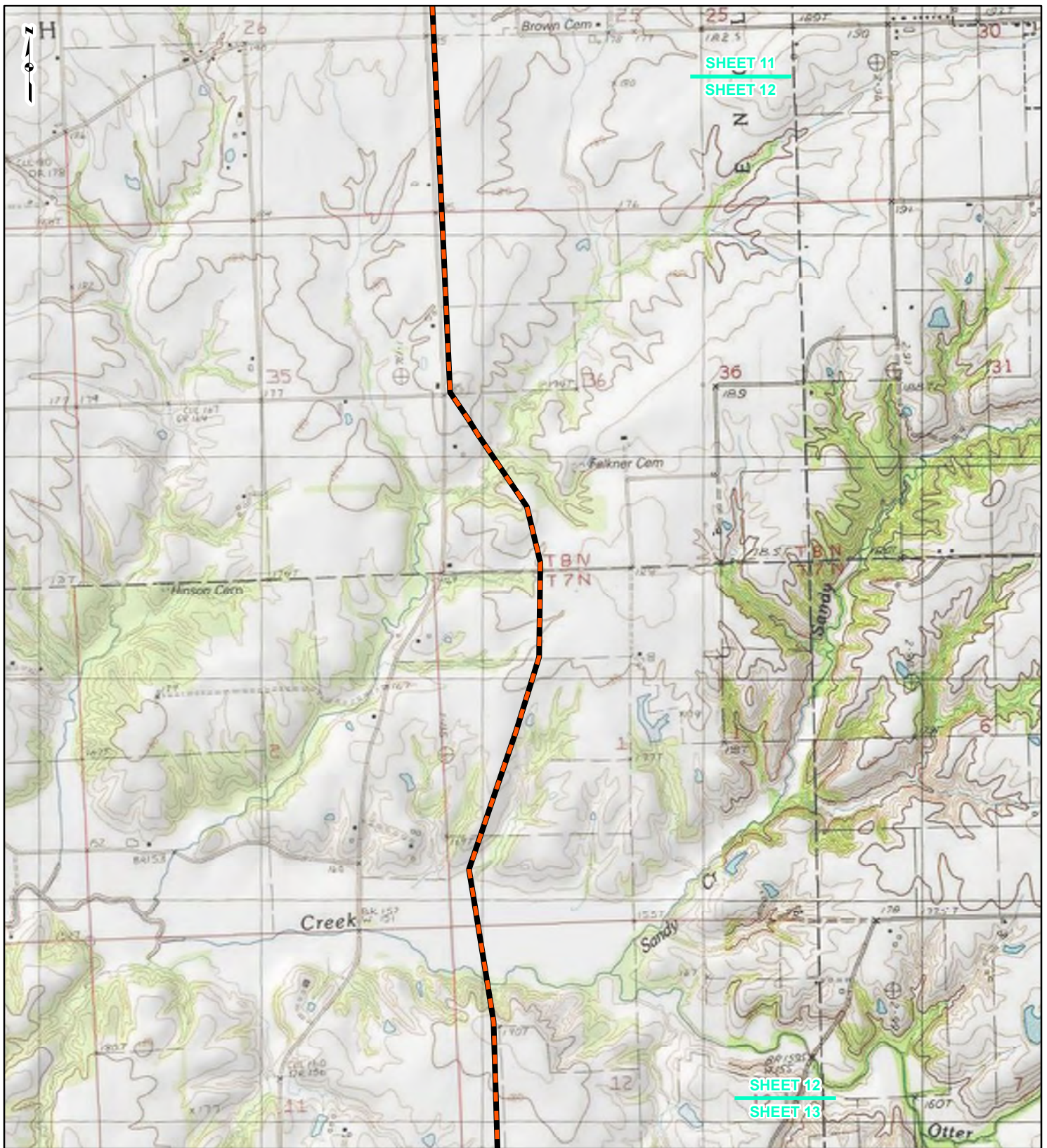
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 11 OF 21**



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 07/20/16.





**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**

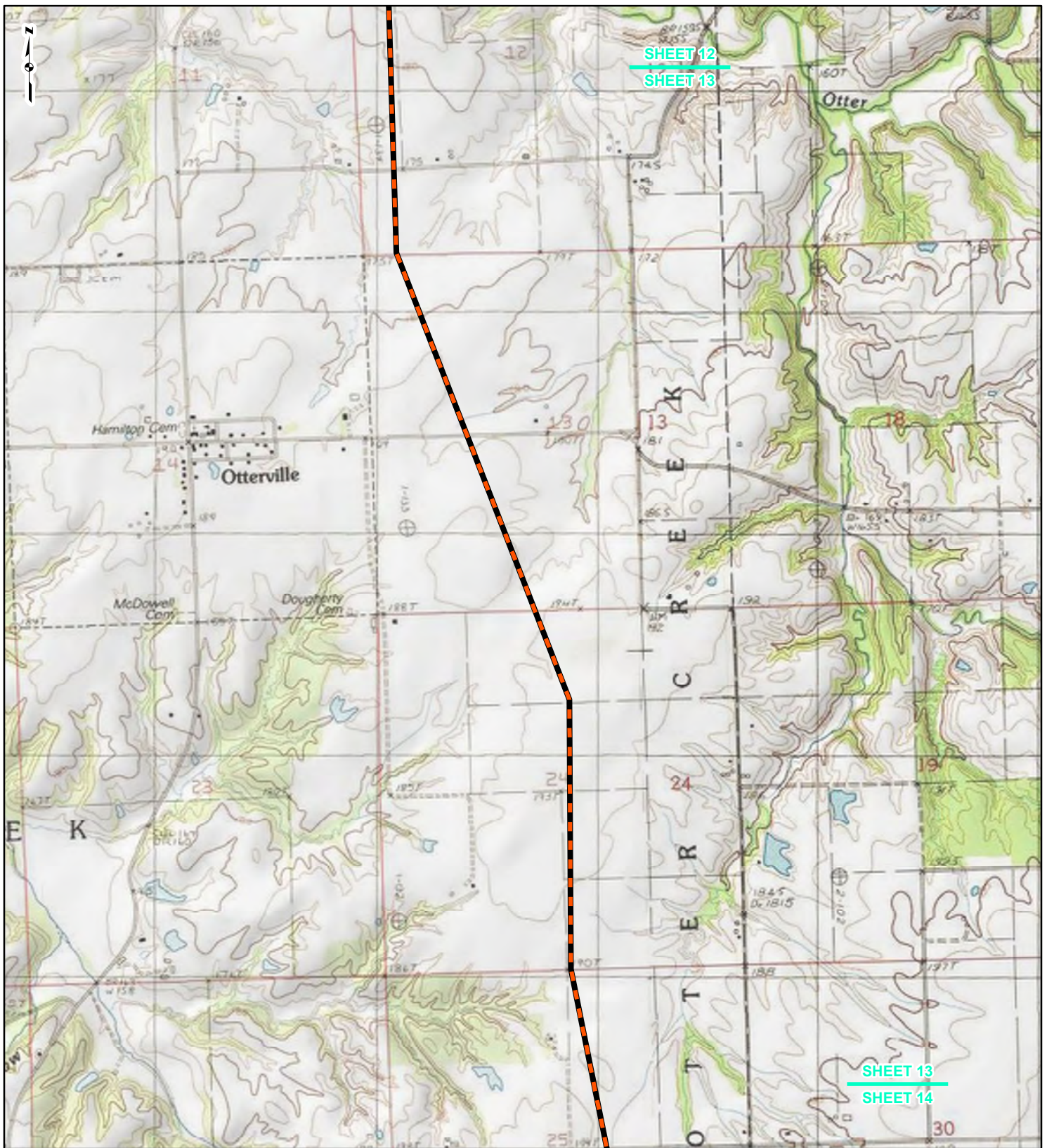
**Spire STL Pipeline**

**GSI CONSULTANTS**

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

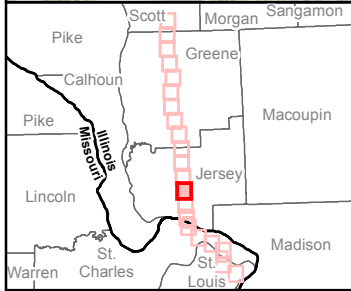
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SHEET 12  
SHEET 13

SHEET 13  
SHEET 14



**LEGEND**

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

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Feet

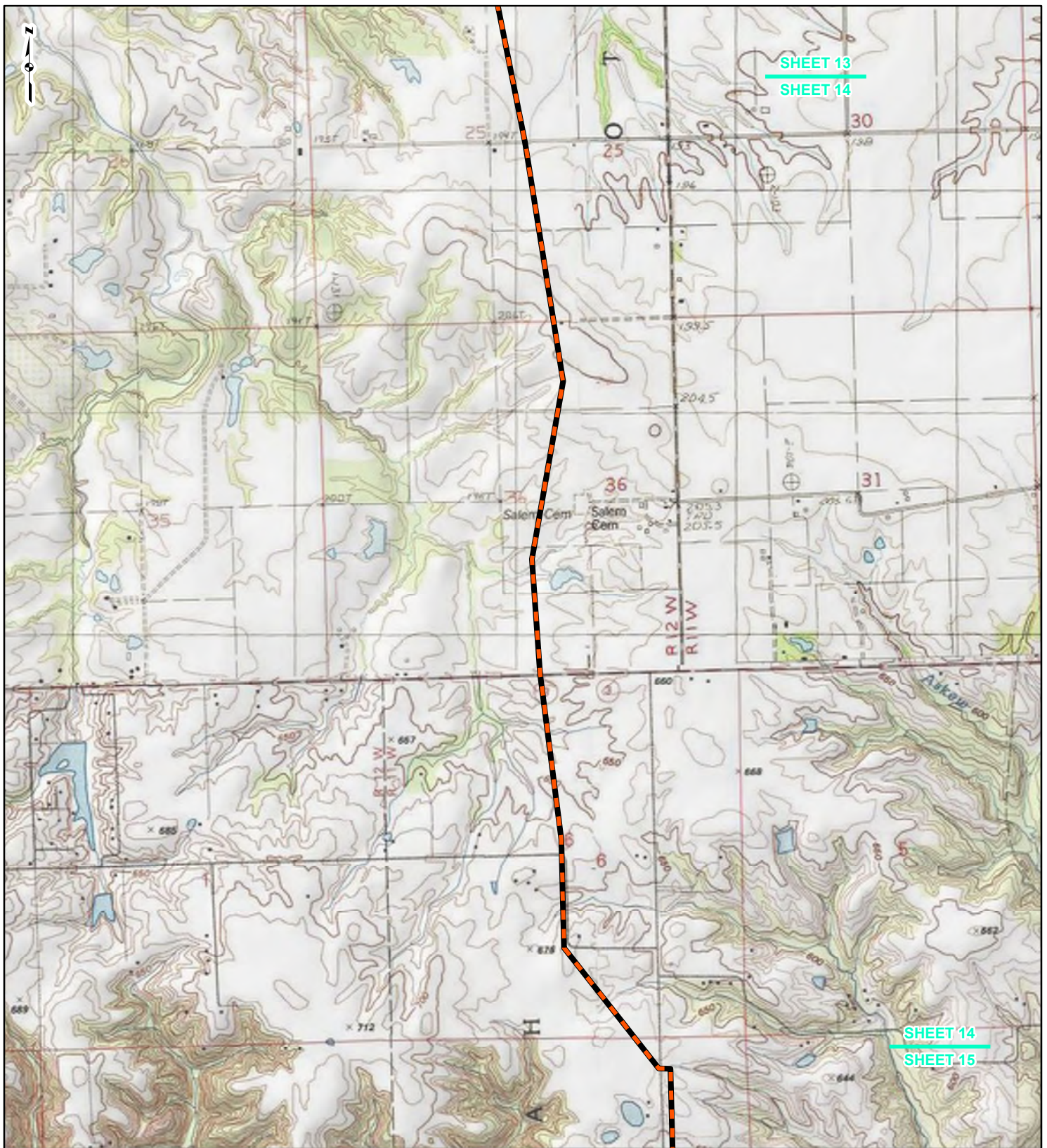
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 13 OF 21**

**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

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Feet

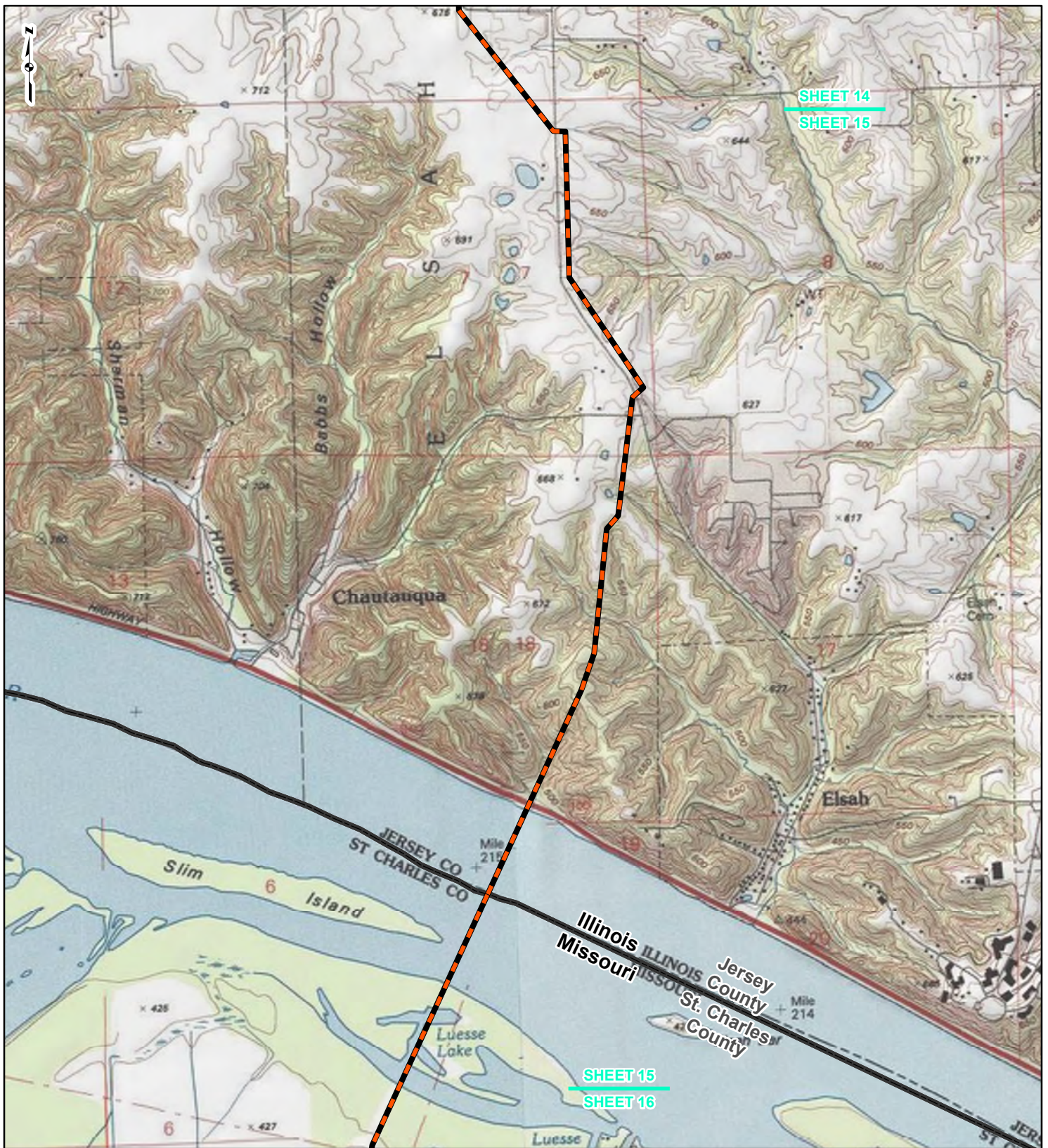
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 14 OF 21**

**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.





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

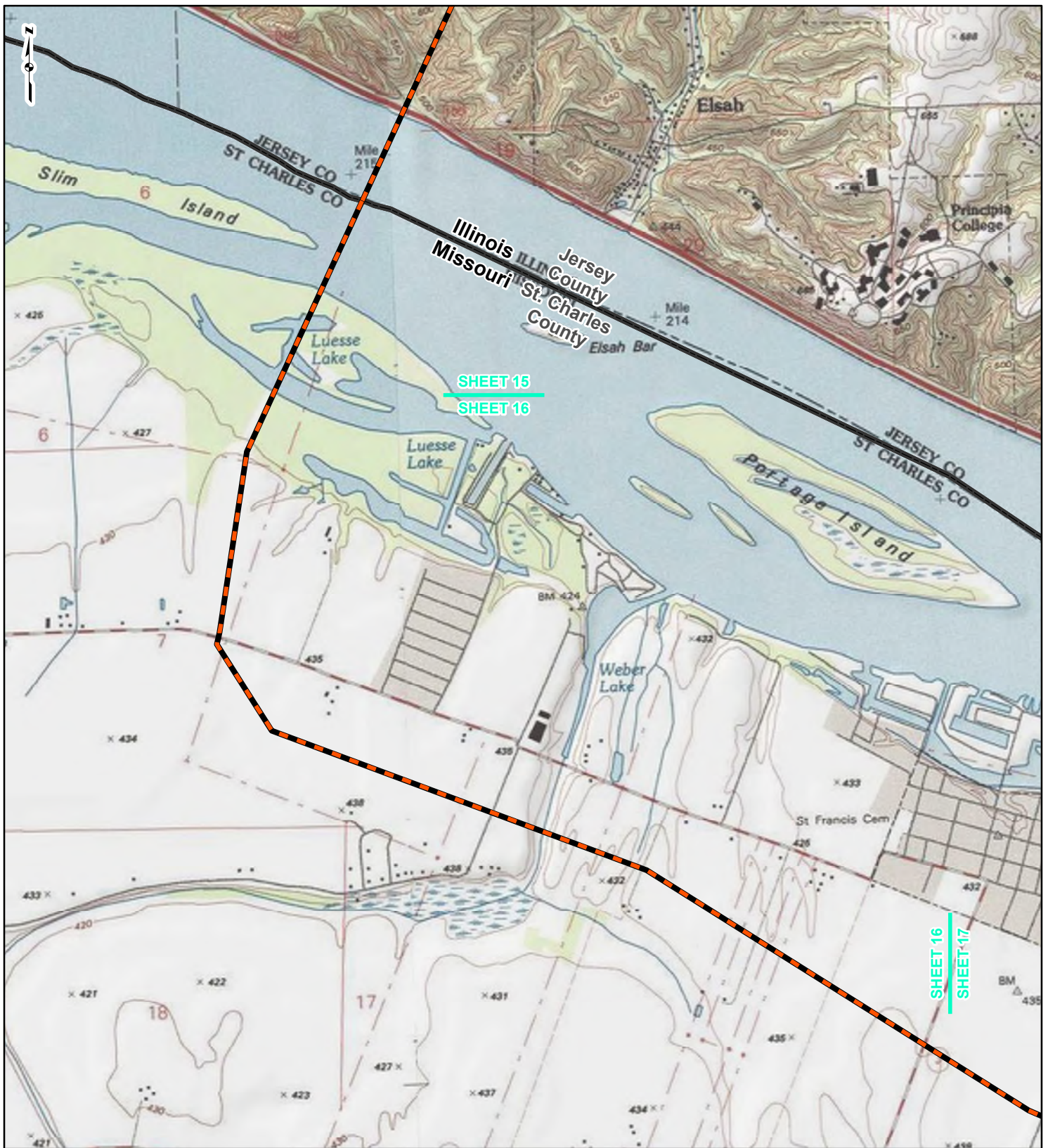
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 15 OF 21**



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 07/2016.





SHEET 15  
SHEET 16

SHEET 16  
SHEET 17



**LEGEND**

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

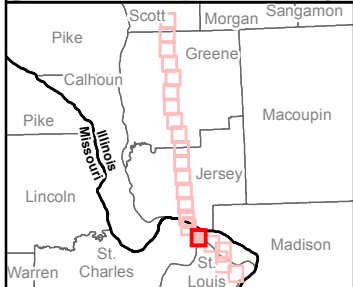
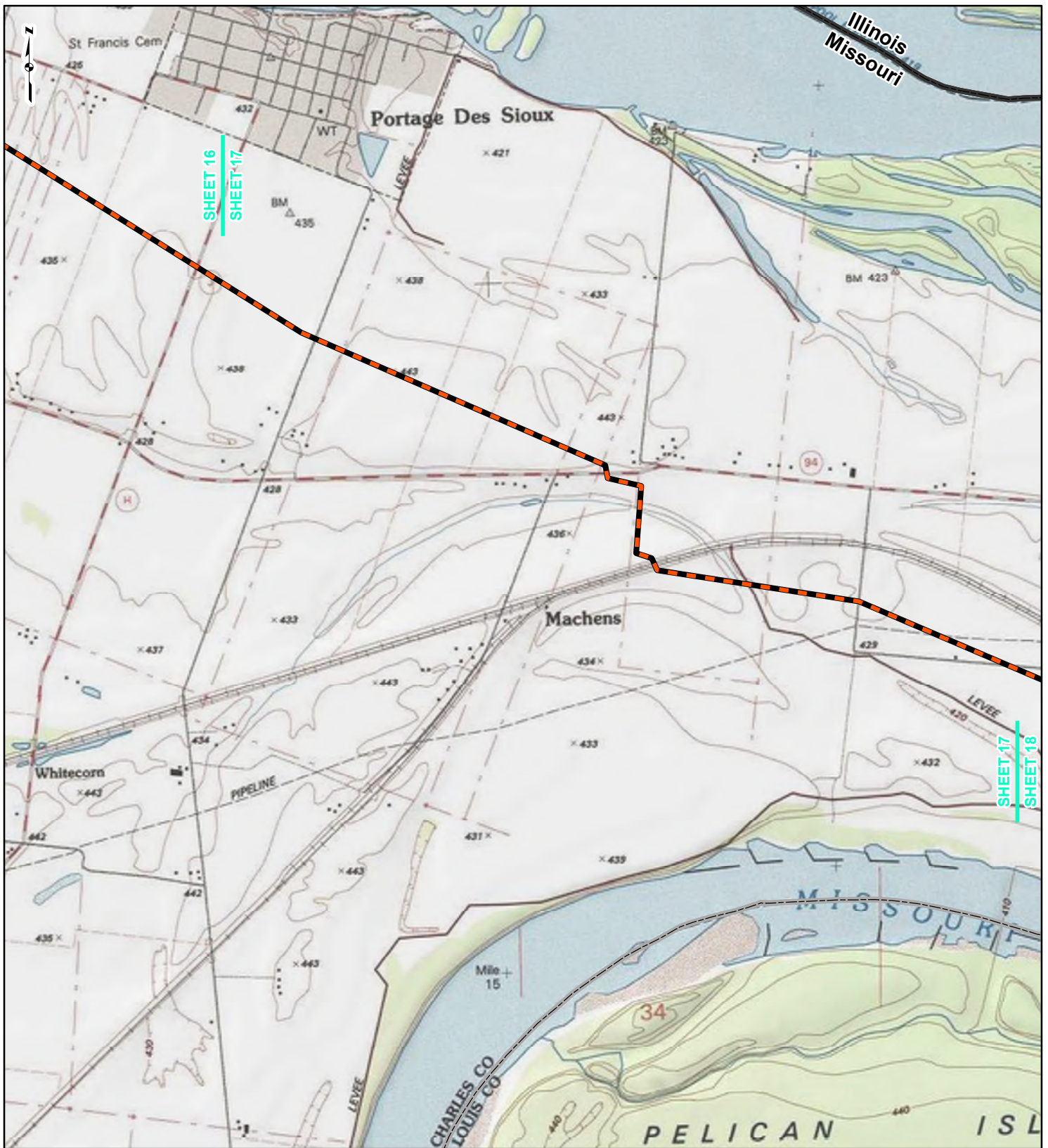
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**FIGURE 1**  
**LOCATION MAP**  
**SHEET 16 OF 21**

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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Feet

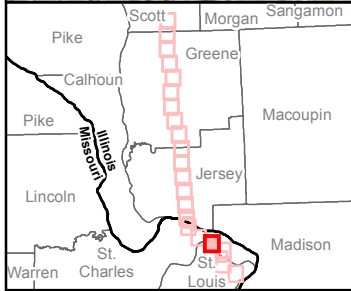
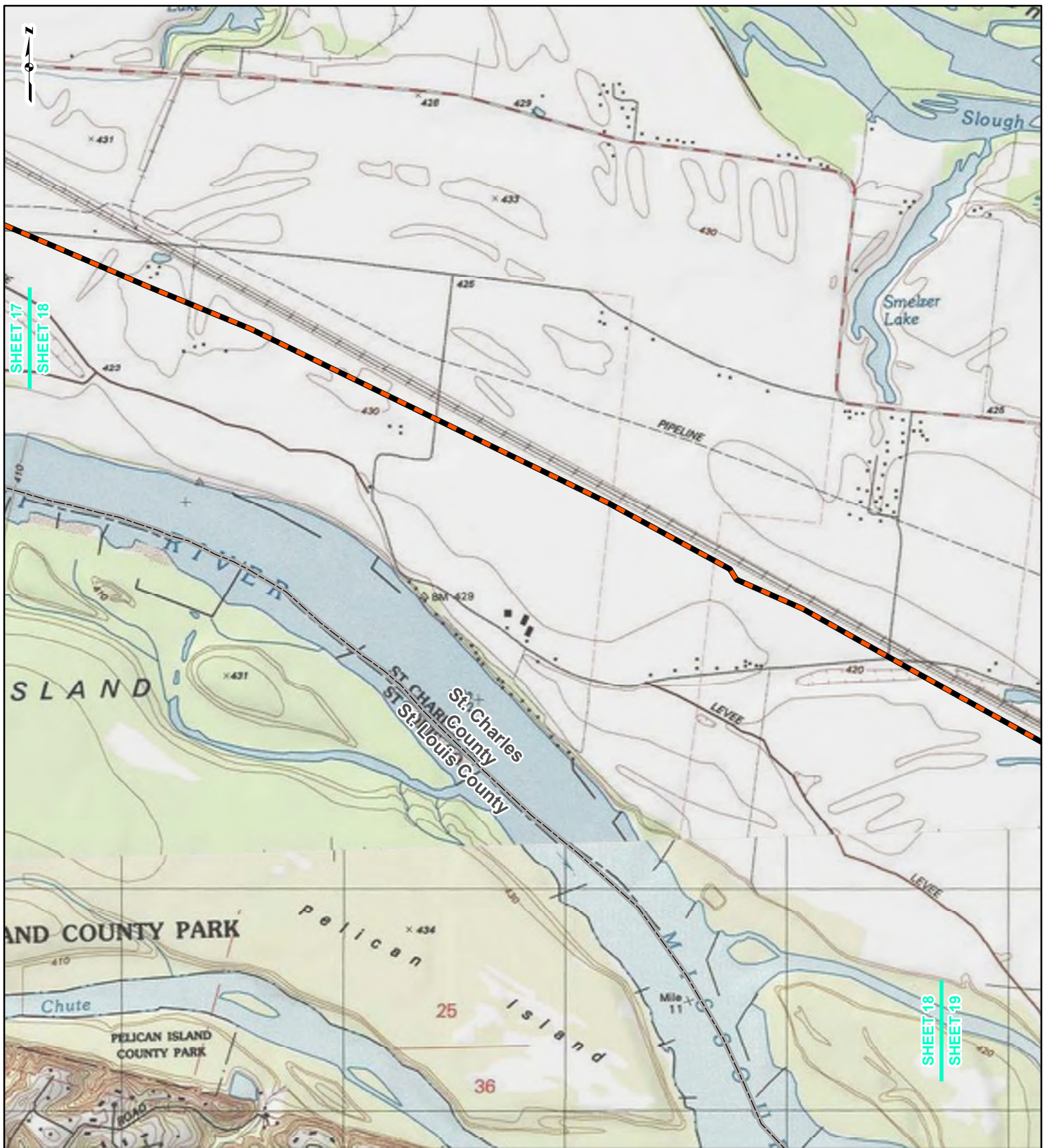
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 17 OF 21**



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.





**LEGEND**

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

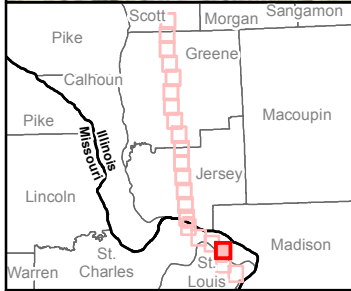
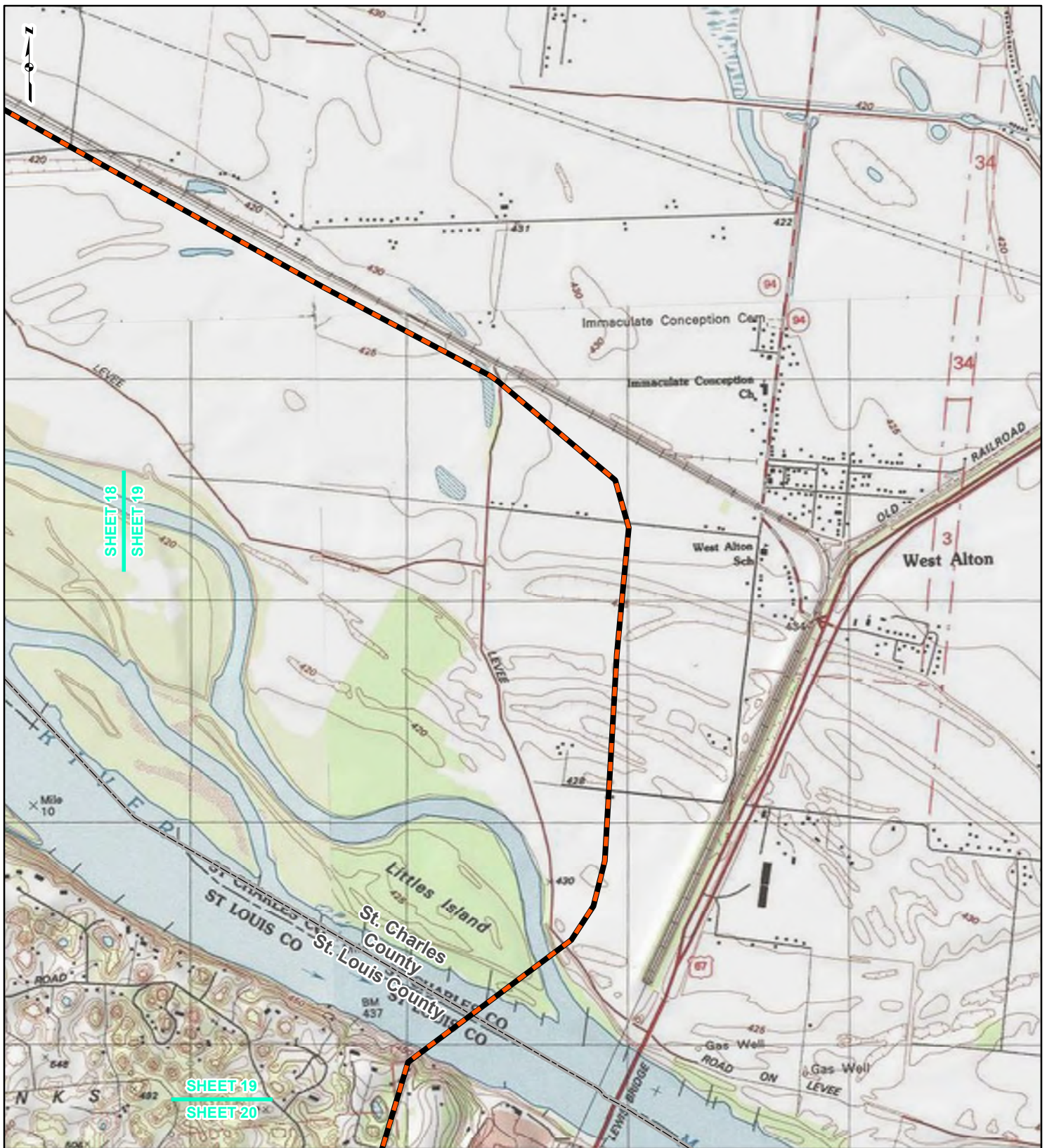
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**FIGURE 1  
LOCATION MAP  
SHEET 18 OF 21**

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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Feet

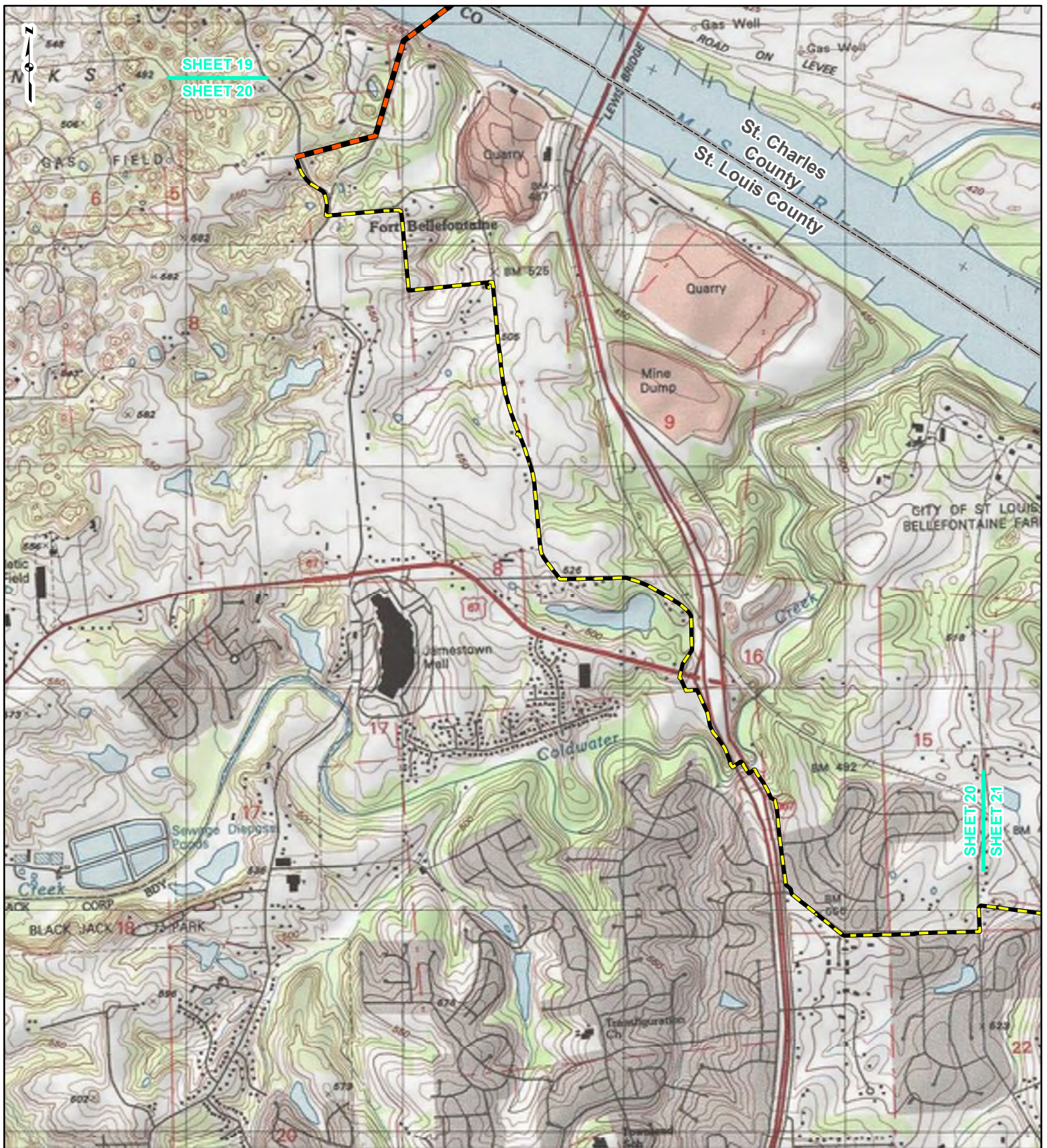
**FIGURE 1  
LOCATION MAP  
SHEET 19 OF 21**

**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.





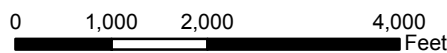
SHEET 19  
SHEET 20

SHEET 20  
SHEET 21



**LEGEND**

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



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 20 OF 21**



**Spire STL**  
**Pipeline**

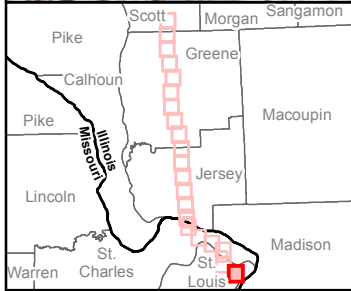
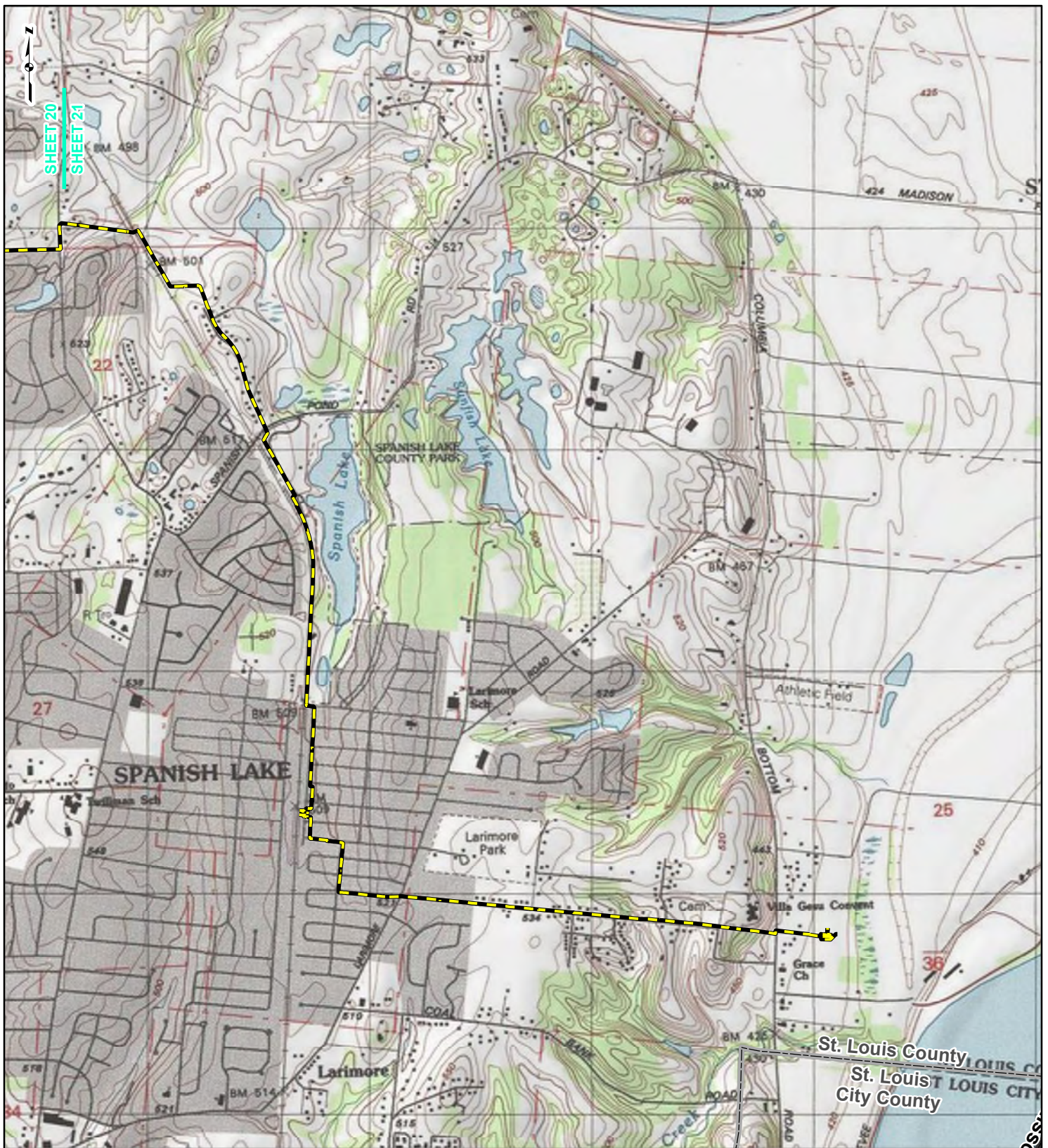


DRAWN BY: PMH  
CHECKED: SWW

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), 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), 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. Pat Malone  
Impact Assessment Sections - Interagency Wetlands  
Illinois Department of Natural  
Resources, Endangered Species  
One Springfield Way  
Springfield, IL 62702-1271

**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. Malone:

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 Illinois Department of Natural Resources - Endangered Species 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:** Kieninger, Tara <Tara.Kieninger@Illinois.gov>  
**Sent:** Monday, June 20, 2016 11:14 AM  
**To:** Ali Trunzo  
**Subject:** RE: IL Natural Heritage Program and EcoCAT information

Hi Ali –

Yes, we can provide the data once you sign a Data License Agreement. Please send me the shapefiles of the project extent so I can let you know how much the fee will be for the data. Note that for linear projects, our fee is \$15/quad for those topographic quads with data.

Sincerely,

***Tara Kieninger***

Heritage Database Program Manager  
Illinois Dept of Natural Resources - ORC  
One Natural Resources Way  
Springfield, IL 62711  
(217)782-2685 (phone) / (217)785-2438 (fax)  
[tara.kieninger@illinois.gov](mailto:tara.kieninger@illinois.gov)

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**From:** Ali Trunzo [mailto:A.Trunzo@gaiconsultants.com]  
**Sent:** Friday, June 17, 2016 2:14 PM  
**To:** Kieninger, Tara  
**Cc:** Lori Ferry  
**Subject:** IL Natural Heritage Program and EcoCAT information

Tara,

GAI and our client, Spire STL Pipeline LLC (Spire), have a meeting scheduled with the Illinois DNR next week to discuss an upcoming project in Scott, Greene, and Jersey Counties, IL. The proposed project is significantly longer than five miles, and we were interested in working with the Natural Heritage Program to see if shapefiles of EcoCAT related data were available through your office.

We would like to review the project as a whole to understand the possible concerns and be prepared to discuss during the meeting. Please let me know if this is doable, and any data agreements that would be required. We have shapefiles of the tentative project extent available.

Thank you for your assistance on this project.

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](mailto:a.trunzo@gaiconsultants.com) | [gaiconsultants.com](http://gaiconsultants.com)     

\* Please update your records with my new direct telephone number

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## Ali Trunzo

---

**From:** Lori Ferry  
**Sent:** Friday, July 15, 2016 11:26 AM  
**To:** Ali Trunzo  
**Subject:** FW: Spire STL Pipeline Project

---

**From:** Lori Ferry  
**Sent:** Friday, July 15, 2016 10:25 AM  
**To:** 'Malone, Pat' <Pat.Malone@Illinois.gov>  
**Subject:** RE: Spire STL Pipeline Project

I appreciate that, thank you!

Just as an update-we are still preparing the formal letter and mapping of your natural heritage data for you to review. We are trying to get them all out and once with our FERC docket number which was just issued this week.

Thanks again,  
Lori

---

**From:** Malone, Pat [<mailto:Pat.Malone@Illinois.gov>]  
**Sent:** Friday, July 15, 2016 9:41 AM  
**To:** Lori Ferry <L.Ferry@gaiconsultants.com>  
**Subject:** RE: Spire STL Pipeline Project

Hi Lori,

I'll see if they are in today/Monday and will talk to them about the criteria for the easements and get back with you. I'll see if I can get the locations for the CREP properties in those counties.

Pat

---

**From:** Lori Ferry [<mailto:L.Ferry@gaiconsultants.com>]  
**Sent:** Friday, July 15, 2016 9:34 AM  
**To:** Malone, Pat  
**Subject:** RE: Spire STL Pipeline Project

Hi Pat.

Thanks for following up on this. As far as I know, we have not been able to obtain a GIS layer with this information. We have requested this information from the IL Department of Agriculture and NRCS. In past experience, sometime they provide this information and sometimes they do not. This is information we would request of any landowners affected by the Project (any known easements on their property). Are there current restrictions on crossing CREP properties? Typically we've had to ensure that the property is restored back to conditions such that it does not eliminate the landowner's participation in the program.

Lori Ferry

---

**From:** Malone, Pat [<mailto:Pat.Malone@Illinois.gov>]  
**Sent:** Wednesday, July 06, 2016 8:45 AM

**To:** Lori Ferry <[L.Ferry@gaiconsultants.com](mailto:L.Ferry@gaiconsultants.com)>

**Subject:** RE: Spire STL Pipeline Project

Lori,

I had notified several other IDNR staff about your project. One of them inquired if your alignment development included a search for permanent CREP easements? These types of easements do not show up on my database when I evaluate the project.

Pat

---

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

**Sent:** Thursday, June 16, 2016 2:25 PM

**To:** Diedrichsen, Mike; Malone, Pat

**Subject:** RE: Spire STL Pipeline Project

Great, thank you both!

I'll forward out some meeting invites.

See you then,

Lori

---

**From:** Diedrichsen, Mike [<mailto:Mike.Diedrichsen@Illinois.gov>]

**Sent:** Wednesday, June 15, 2016 10:07 AM

**To:** Lori Ferry <[L.Ferry@gaiconsultants.com](mailto:L.Ferry@gaiconsultants.com)>; Malone, Pat <[Pat.Malone@Illinois.gov](mailto:Pat.Malone@Illinois.gov)>

**Subject:** RE: Spire STL Pipeline Project

Lori,

1 pm on Tuesday, June 21 will work for me.

Mike Diedrichsen, P.E.

Acting Manager, Downstate Regulatory Programs

IDNR, Office of Water Resources

One Natural Resources Way

Springfield, IL 62702-1271

Tel: 217/782-4426; Fax: 217/785-5014

[mike.diedrichsen@illinois.gov](mailto:mike.diedrichsen@illinois.gov)

---

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

**Sent:** Tuesday, June 14, 2016 12:47 PM

**To:** Malone, Pat

**Cc:** Diedrichsen, Mike

**Subject:** RE: Spire STL Pipeline Project

Hi All,

Hope you had a nice weekend.

Would you be available at 1pm on Tuesday the 21<sup>st</sup>?

Thank you,

Lori

---

**From:** Malone, Pat [<mailto:Pat.Malone@Illinois.gov>]

**Sent:** Thursday, June 09, 2016 10:46 AM

**To:** Lori Ferry <[L.Ferry@gaiconsultants.com](mailto:L.Ferry@gaiconsultants.com)>  
**Cc:** Diedrichsen, Mike <[Mike.Diedrichsen@Illinois.gov](mailto:Mike.Diedrichsen@Illinois.gov)>  
**Subject:** RE: Spire STL Pipeline Project

Hi Lori, My wife just scheduled a medical apt so I won't be available the morning of the 21<sup>st</sup>.

---

**From:** Lori Ferry [<mailto:L.Ferry@gaiconsultants.com>]  
**Sent:** Wednesday, June 08, 2016 4:08 PM  
**To:** Diedrichsen, Mike; Malone, Pat  
**Subject:** Spire STL Pipeline Project

Mike and Pat

Nice speaking with both today. I've attached a map and a short project description for you. Again, we hope to meet with you all sometime the week of June 20<sup>th</sup> as your schedules allow. I'll let you all talk it over and then get back with you in a day or so and see which date would work best.

Thanks again for your time and look forward to working with you,  
Lori Ferry

**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.**

**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://gaiconsultants.com) |     

[l.ferry@gaiconsultants.com](mailto:l.ferry@gaiconsultants.com)



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**Illinois Department of Agriculture**

## Ali Trunzo

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**From:** Lori Ferry  
**Sent:** Tuesday, January 24, 2017 7:06 PM  
**To:** Savko, Terry; Chard, Steve  
**Cc:** Douglas Sipe; Ali Trunzo  
**Subject:** Spire STL Pipeline-Draft Ag Plan  
**Attachments:** 2015 IDOA Drain Tile Repairs.pdf; IDOA Decompaction Stds A-B.PDF; IDOA Tile Bridge Permanent 2016.pdf; SPIRE Energy AIMA Draft4\_1-24-17 Track Change.docx; SPIRE Energy AIMA Draft4\_1-24-17 Accepted.docx

Hi Terry and Steve,

After some discussions with Spire, they have agreed to the 14 day permanent tile drain repair timeframe as outlined in the AIMA.






I've attached both the consolidated track change version of the AIMA which indicates acceptance of this timeframe (Draft 4), and a final word version which accepts all the changes and the comments. I've also included the name of the Spire representative who will sign this AIMA. The PDF documents will be attached with the final plan.

With your approval on these changes, please let me know that we can delete the "Draft" watermark and begin the signature process. We intend to include this version of the AIMA (Draft 4) in our FERC filing on January 25. We are also getting prepared to develop the list of mailing labels that are required for the IDOA.

Thank you so much for your continued coordination.

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](http://gaiconsultants.com) |       
[l.ferry@gaiconsultants.com](mailto:l.ferry@gaiconsultants.com)

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## Ali Trunzo

---

**From:** Lori Ferry  
**Sent:** Friday, December 02, 2016 4:50 PM  
**To:** Ali Trunzo  
**Subject:** FW: Spire STL Pipeline-AIMA  
**Attachments:** Temporary\_Permanent Drain Tile Details.pdf

---

**From:** Lori Ferry  
**Sent:** Friday, December 02, 2016 3:50 PM  
**To:** 'Savko, Terry' <Terry.Savko@Illinois.gov>; 'Chard, Steve' <Steve.Chard@Illinois.gov>  
**Subject:** RE: Spire STL Pipeline-AIMA

Hi Terry and Steve,  
I've included the revised drawing here for your review. Please send me any additional comments you may have.

Have a great weekend,  
Lori Ferry

---

**From:** Lori Ferry  
**Sent:** Tuesday, November 29, 2016 4:40 PM  
**To:** 'Savko, Terry' <[Terry.Savko@Illinois.gov](mailto:Terry.Savko@Illinois.gov)>; Chard, Steve <[Steve.Chard@Illinois.gov](mailto:Steve.Chard@Illinois.gov)>  
**Subject:** Spire STL Pipeline-AIMA





Hi Terry and Steve,  
Hope you had a nice holiday!

I've attached the updated agreement based on our conversation last week. I am still waiting on engineering to provide me an updated typical drawing with our proposed changes. Once I have that, I will forward.

Please let us know your remaining thoughts on the two outstanding comments.

Thanks again,  
Lori

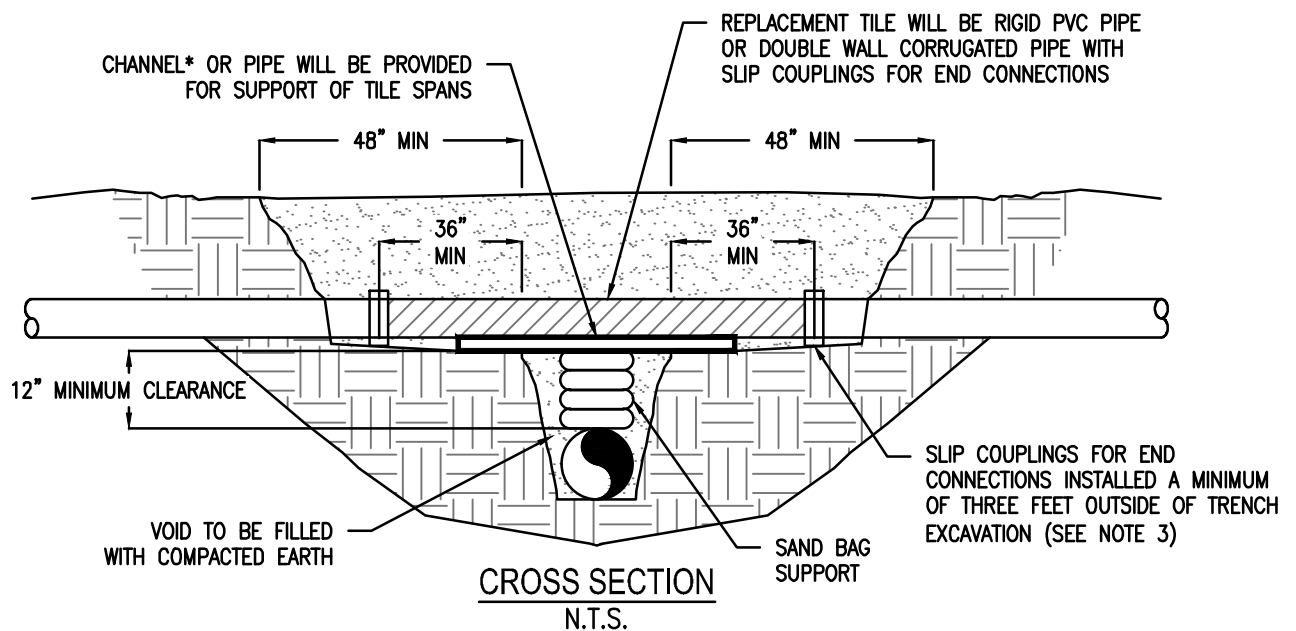
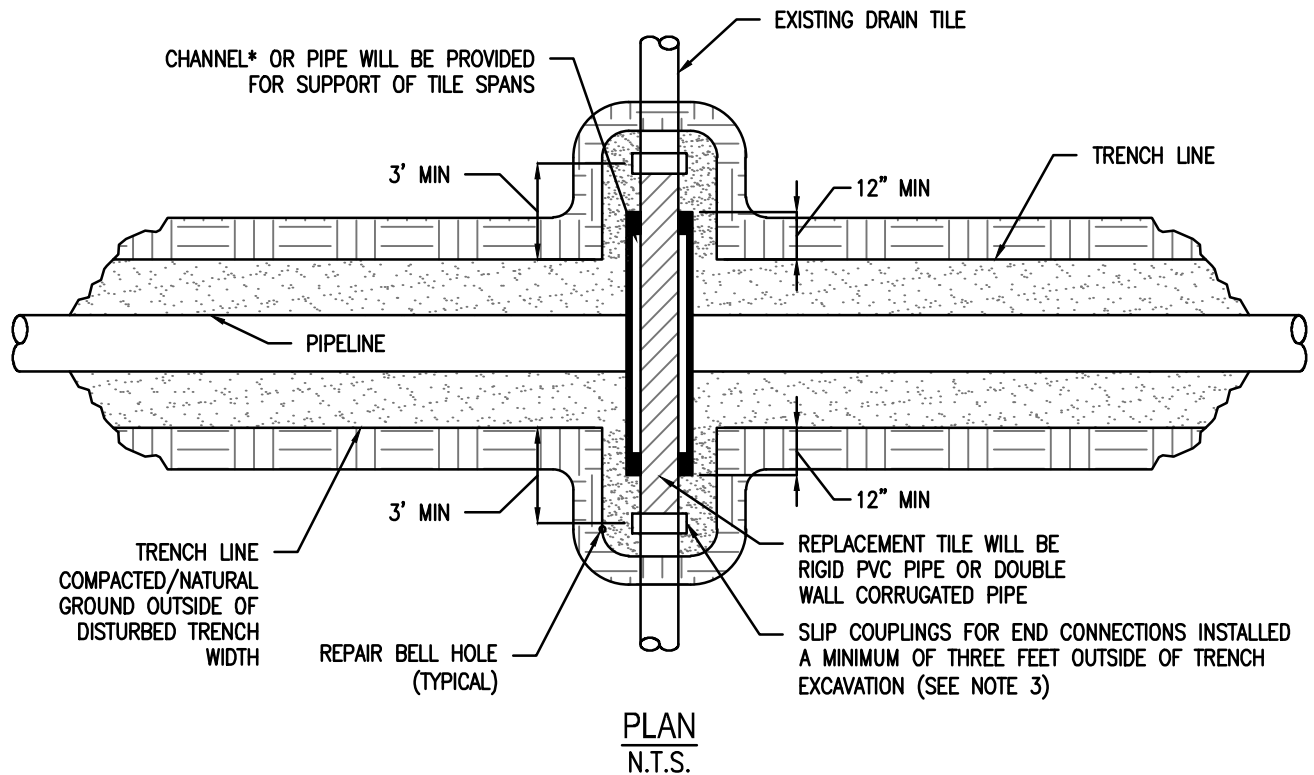
**Lori Ferry**  
Environmental Manager-Energy Business Unit

**GAI Consultants**  
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T 331.301.2002 M 630.605.5255 | [gaiconsultants.com](http://gaiconsultants.com) |      
[l.ferry@gaiconsultants.com](mailto:l.ferry@gaiconsultants.com)

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\* CHANNEL - OPEN OR SLOTTED CORRUGATED GALVANIZED, PVC OR ALUMINUM CRADLE TO SUPPORT DRAIN TILE.

NOTE:

1. IMMEDIATELY REPAIR TILE IF WATER IS FLOWING THROUGH TILE AT TIME OF TRENCHING. IF NO WATER IS FLOWING AND REPAIR IS DELAYED, OR NOT MADE BY THE END OF THE WORK DAY, A SCREEN OR APPROPRIATE 'NIGHT CAP' SHALL BE PLACED ON OPEN ENDS OF TILE TO PREVENT ENTRAPMENT OF ANIMALS ETC.
2. CHANNEL OR PIPE (OPEN OR SLOTTED) MADE OF CORRUGATED GALVANIZED PIPE, PVC OR ALUMINUM WILL BE USED FOR SUPPORT OF DRAIN TILE SPANS.
3. INDUSTRY STANDARDS SHALL BE FOLLOWED TO ENSURE PROPER SEAL OF REPAIRED DRAIN TILES.

TEMPORARY DRAIN TILE REPAIR

FIGURE #31

DWG.

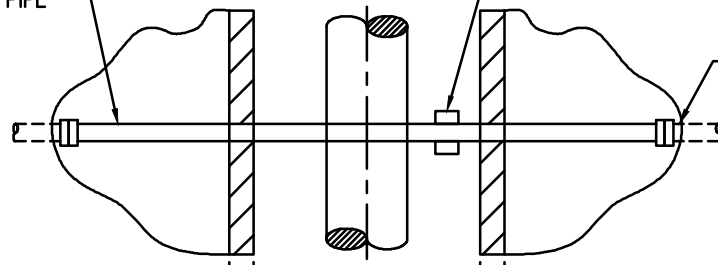
ES-00XX

REV.

NEW DUAL WALL PERFORATED CORRUGATED DRAIN TILE PIPE

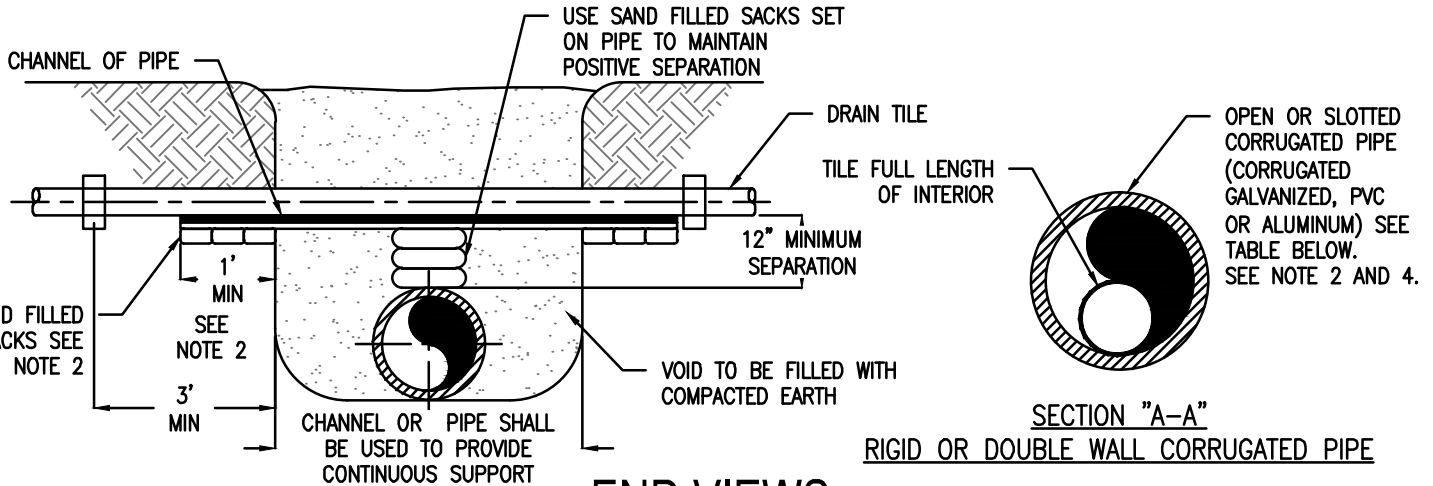
SAND BAG SUPPORT

EXISTING DRAIN TILE



DITCH SLOPE PLAN VIEW N.T.S.

## PLAN VIEW



## END VIEWS

MINIMUM SUPPORT TABLE			
TILE SIZE	CHANNEL SIZE	PIPE SIZE	
3"	4" @ 5.4	4"	STD. WT.
4"-5"	5" @ 6.7	6"	STD. WT.
8"-9"	7" @ 9.8	9"-10"	STD. WT.
10"	10" @ 15.3	12"	STD. WT.

### NOTE:

- TILE REPAIR AND REPLACEMENT SHALL MAINTAIN ORIGINAL ALIGNMENT GRADIENT AND WATER FLOW TO THE GREATEST EXTENT POSSIBLE. IF THE TILE NEEDS TO BE RELOCATED, THE INSTALLATION ANGLE MAY VARY DUE TO SITE SPECIFIC CONDITIONS AND LANDOWNER RECOMMENDATIONS.
- 1'-0" MINIMUM LENGTH OF CHANNEL OR RIGID PIPE (OPEN OR SLOTTED CORRUGATED GALVANIZED, PVC OR ALUMINUM CRADLE) SHALL BE SUPPORTED BY UNDISTURBED SOIL, OR IF CROSSING IS NOT AT RIGHT ANGLES TO PIPELINE, EQUIVALENT LENGTH PERPENDICULAR TO TRENCH. SHIM WITH SAND BAGS TO UNDISTURBED SOIL FOR SUPPORT AND DRAINAGE GRADIENT MAINTENANCE (TYPICAL BOTH SIDES).
- DRAIN TILES WILL BE PERMANENTLY CONNECTED TO EXISTING DRAIN TILES A MINIMUM OF THREE FEET OUTSIDE OF EXCAVATED TRENCH LINE USING INDUSTRY STANDARDS TO ENSURE PROPER SEAL OF REPAIRED DRAIN TILES INCLUDING SLIP COUPLINGS.
- DIAMETER OF RIGID PIPE SHALL BE OF ADEQUATE SIZE TO ALLOW FOR THE INSTALLATION OF THE TILE FOR THE LENGTH OF THE RIGID PIPE.
- OTHER METHODS OF SUPPORTING DRAIN TILE MAY BE USED IF ALTERNATE PROPOSED IS EQUIVALENT IN STRENGTH TO THE CHANNEL/PIPE SECTIONS SHOWN AND IF APPROVED BY COMPANY REPRESENTATIVES AND LANDOWNER IN ADVANCE. SITE SPECIFIC ALTERNATE SUPPORT SYSTEM TO BE DEVELOPED BY COMPANY REPRESENTATIVES AND FURNISHED TO CONTRACTOR FOR SPANS IN EXCESS OF 20", TILE GREATER THEN 10" DIAMETER, AND FOR "HEADER" SYSTEMS
- ALL MATERIAL TO BE FURNISHED BY CONTRACTOR.
- PRIOR TO REPAIRING TILE, CONTRACTOR SHALL PROBE Laterally INTO THE EXISTING TILE TO FULL WIDTH OF THE RIGHTS OF WAY TO DETERMINE IF ADDITIONAL DAMAGE HAS OCCURRED. ALL DAMAGED/DISTURBED TILE SHALL BE REPAIRED AS NEAR AS PRACTICABLE TO ITS ORIGINAL OR BETTER CONDITION.

PERMANENT DRAIN TILE REPAIR

FIGURE #32

DWG.

ES-00XX

REV.

# telephone log



gai consultants

Date: 11-22-2016

---

Project / Admin. No.: E160438.00

---

Call From: Lori Ferry

---

Company: GAI Consultants

---

Phone No.: 630-605-5255

---

Call To: Terry Savko, Steve Chard

---

Company: Illinois Department of Agriculture

---

Phone No.: 217-785-2661

---

Subject: Draft Agricultural Impact Mitigation Plan

---

cc:

---

## **Summary of Discussion, Decisions, and Commitments:**

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Held a call with IDOA to discuss Spire's response to the comments received from IDOA on 11/9/2016.

1. IDOA lacks time to assist in providing Spire with agricultural inspectors-Confirm. IDOA would like input on the inspectors that become hired but cannot help manage them.
2. Conditions of the AIMA-Item C-confirmed with IDOA that mitigative actions will be implemented upon the completion of construction within 45 days. "Completion of construction" means "final grade." All parties agreed.
3. Part 3-Repair of Damaged Tile Lines-Item C-IDOA requested that repairs be completed within 14 days. Spire requested 30 days to get backfilling completed, repair contractors mobilized etc. IDOA indicated that they would consider Spire's request and let us know if they will agree to these terms.
4. Part 3-Repair of Damaged Tile Lines-Item H-IDOA requested that repairs be completed within 14 days. Spire requested 30 days to get backfilling completed, repair contractors mobilized etc. IDOA indicated that they would consider Spire's request and let us know if they will agree to these terms.
5. Part 13-Damages to Private Property-Item C-Spire's proposed crop damage payment program will be over a period of 3 years. Spire will not make payments in public record at this time.

Other changes proposed by Spire and IDOA were accepted into the agreement. Spire will provide a revised Draft 3 agreement to IDOA which will include a revised Tile Drain Repair drawing with proposed changes. IDOA indicated they thought that an executed agreement prior to Spire's January 2017 filing would be possible.



## Ali Trunzo

---

**Subject:** Draft 2 for Spire AIMA

**From:** Savko, Terry [<mailto:Terry.Savko@Illinois.gov>]

**Sent:** Wednesday, November 09, 2016 4:36 PM

**To:** Lori Ferry <[L.Ferry@gaiconsultants.com](mailto:L.Ferry@gaiconsultants.com)>

**Cc:** Chard, Steve <[Steve.Chard@Illinois.gov](mailto:Steve.Chard@Illinois.gov)>; Sondgeroth, Craig <[Craig.Sondgeroth@illinois.gov](mailto:Craig.Sondgeroth@illinois.gov)>

**Subject:** Draft 2 for Spire AIMA

Hi Lori,

Thanks for your earlier call today regarding the AIMA review. Attached is our response to your initial comments.

Please review Draft 2 and then we can talk. I am in the office tomorrow should you have questions or need clarification.

In addition, let's discuss your proposed language for the Drain Tile Repair drawings.

Can you update or provide a drawing to show what you mean on stacking the sandbags as stated in your Sept 22 comments.

We would also request that the IDOA review our proposed language to the 2015 IDOA Drain Tile Repair drawings:

***The earthen/Sand bags should be installed from the top of the 24" pipeline to the mid span support of the tile support. This accomplishes two things, with the ditch being approx 90" deep, less the depth of top soil stockpiled, so we DO NOT want anyone physically in the ditch, that is equal or deeper than 48", as its confined space. Our revised plan will incorporate our 24" pipe resting on the bottom of the ditch and will provide mid span support for the tile repair over the ditch line. Additionally, to the agency, it should be noted that this provides additional assurances of lateral support to the tile repaired as the balance of the backfill is being placed over the repaired tile.***

Friday is a holiday, Veterans Day, and I am out of the office next week.

I will return on Nov 21.

---

**Terry Savko, IL Dept of Agriculture**

Bureau of Land and Water Resources

State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281

217.785.4458 [terry.savko@illinois.gov](mailto:terry.savko@illinois.gov)

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## Ali Trunzo

---

**From:** Lori Ferry  
**Sent:** Thursday, October 06, 2016 4:00 PM  
**To:** Ali Trunzo  
**Subject:** FW: Spire STL Pipeline-Draft AIMA

---

**From:** Savko, Terry [mailto:Terry.Savko@Illinois.gov]  
**Sent:** Thursday, October 06, 2016 2:32 PM  
**To:** Lori Ferry <L.Ferry@gaiconsultants.com>  
**Subject:** RE: Spire STL Pipeline-Draft AIMA

Hi Lori,  
I am updating the draft AIMA based upon your comments, but other matters have taken priority. Tomorrow, I am gone for a funeral, and Monday (Columbus Day) is a state and federal holiday. My apologies, but I will contact you again next week.

Terry

---

**Terry Savko, IL Dept of Agriculture**  
Bureau of Land and Water Resources  
State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281  
**217.785.4458** [terry.savko@illinois.gov](mailto:terry.savko@illinois.gov)

---

**From:** Lori Ferry [mailto:L.Ferry@gaiconsultants.com]  
**Sent:** Monday, September 26, 2016 12:15 PM  
**To:** Savko, Terry <Terry.Savko@Illinois.gov>  
**Cc:** Chard, Steve <Steve.Chard@Illinois.gov>  
**Subject:** [External] RE: Spire STL Pipeline-Draft AIMA

Hi Terry,  
Thanks for the update! We looking forward to hearing from you.

Lori

---

**From:** Savko, Terry [mailto:Terry.Savko@Illinois.gov]  
**Sent:** Monday, September 26, 2016 11:25 AM  
**To:** Lori Ferry <L.Ferry@gaiconsultants.com>  
**Cc:** Chard, Steve <Steve.Chard@Illinois.gov>  
**Subject:** FW: Spire STL Pipeline-Draft AIMA

Hi Lori,  
Thanks for your comments.  
Your revised version with comments has been relayed to Steve Chard, my Bureau Chief, for our internal review. I plan to get back with you by the end of this week.

Terry

---

**Terry Savko, IL Dept of Agriculture**  
Bureau of Land and Water Resources

---

**From:** Lori Ferry [<mailto:L.Ferry@gaiconsultants.com>]  
**Sent:** Thursday, September 22, 2016 4:24 PM  
**To:** Savko, Terry <[Terry.Savko@Illinois.gov](mailto:Terry.Savko@Illinois.gov)>  
**Cc:** Ali Trunzo <[A.Trunzo@gaiconsultants.com](mailto:A.Trunzo@gaiconsultants.com)>  
**Subject:** [External] Spire STL Pipeline-Draft AIMA

Hi Terry,  
Hope you are well!

I've attached our draft comments on your AIMA, sent to us on July 15. I have inserted some proposed changes and insertions as well as some comments. Everything is currently in track changes so please ensure the document is showing "all markups" in the Review tab.

We would also request that the IDOA review our proposed language to the 2015 IDOA Drain Tile Repair drawings:





***The earthen/Sand bags should be installed from the top of the 24" pipeline to the mid span support of the tile support. This accomplishes two things, with the ditch being approx 90 " deep, less the depth of top soil stockpiled, so we DO NOT want anyone physically in the ditch, that is equal or deeper than 48", as its confined space. Our revised plan will incorporate our 24" pipe resting on the bottom of the ditch and will provide mid span support for the tile repair over the ditch line. Additionally, to the agency, it should be noted that this provides additional assurances of lateral support to the tile repaired as the balance of the backfill is being placed over the repaired tile.***

Please review these comments and let me know if you'd like me to set up a time where we can discuss these via conference call.

Thank you for your continued assistance on this Project.

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://gaiconsultants.com) |      
[l.ferry@gaiconsultants.com](mailto:l.ferry@gaiconsultants.com)



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## Ali Trunzo

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**From:** Andrea Halfhill  
**Sent:** Thursday, September 08, 2016 2:09 PM  
**To:** Ali Trunzo  
**Subject:** FW: FERC Pipeline Project Soil Information Request

---

**From:** Savko, Terry [mailto:Terry.Savko@Illinois.gov]  
**Sent:** Wednesday, September 07, 2016 4:32 PM  
**To:** Andrea Halfhill <A.Halfhill@gaiconsultants.com>  
**Cc:** Chard, Steve <Steve.Chard@Illinois.gov>  
**Subject:** RE: FERC Pipeline Project Soil Information Request

Hi Andrea,

In response to your request, the IDOA doesn't have the level of information that the county NRCS offices or the local Soil and Water Conservation Districts have in their possession. They are the best sources of the specific GIS data that you are seeking.

We do look forward to working with you and your colleagues on the project. Please don't hesitate to contact me if you have any further questions or requests.

Best regards,  
Terry

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**Terry Savko, IL Dept of Agriculture**  
Bureau of Land and Water Resources  
State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281  
**217.785.4458** [terry.savko@illinois.gov](mailto:terry.savko@illinois.gov)

---

**From:** Andrea Halfhill [mailto:A.Halfhill@gaiconsultants.com]  
**Sent:** Wednesday, September 07, 2016 1:44 PM  
**To:** Savko, Terry <Terry.Savko@Illinois.gov>  
**Subject:** [External] 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](http://gaiconsultants.com) |     

\* Please update your records with my new direct telephone number



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August 15, 2016

Ms. Terry Savko  
Bureau of Land and Water Resources  
Illinois Department of Agriculture  
State Fairgrounds  
PO Box 19281  
Springfield, Illinois 62794-9281

**Re: Project Permitting Coordination  
Spire STL Pipeline LLC  
Spire STL Pipeline  
Scott, Greene, and Jersey Counties, Illinois**

Dear Ms. Savko:

GAI Consultants, Inc. ("GAI") is submitting this information request on behalf of Spire STL Pipeline LLC ("Spire"), for the portion of the Spire STL Pipeline ("Project") in Scott, Jersey and Greene Counties, Illinois. Representatives from Spire and GAI met with your office on June 22, 2016 to introduce the Project. GAI is submitting information to coordinate anticipated reviews 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 United States Geological Survey ("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 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.

## Site Description

The Illinois portion of the Project is located in Scott, Greene, and Jersey Counties, Illinois, 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 USGS 7.5-minute series topographic maps (Figure 1).

The majority of the pipeline is greenfield and crosses primarily agricultural landscapes with some areas of forest. In Illinois, 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), and Marais Temps Clair-Mississippi River (HUC #071100090401) watersheds.

As discussed during the meeting, an Agricultural Impact Mitigation Agreement will be required for this Project. Upon receipt of the template, Spire will review and continue to coordinate with the Illinois Department of Agriculture. Spire understands that the requirements for minimum cover are five feet in cropland areas and three feet of cover in timber areas.

**GAI would appreciate your continued assistance in developing the Agricultural Impact Mitigation Agreement. In addition, GAI would appreciate the identification of any additional concerns based on the current Project route, as shown on Figure 1.**

Please note the intent of this letter is solely for the purpose of formally initiating consultation and/or applicable Project reviews. 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.**



Jayme L. Fuller  
Environmental Manager

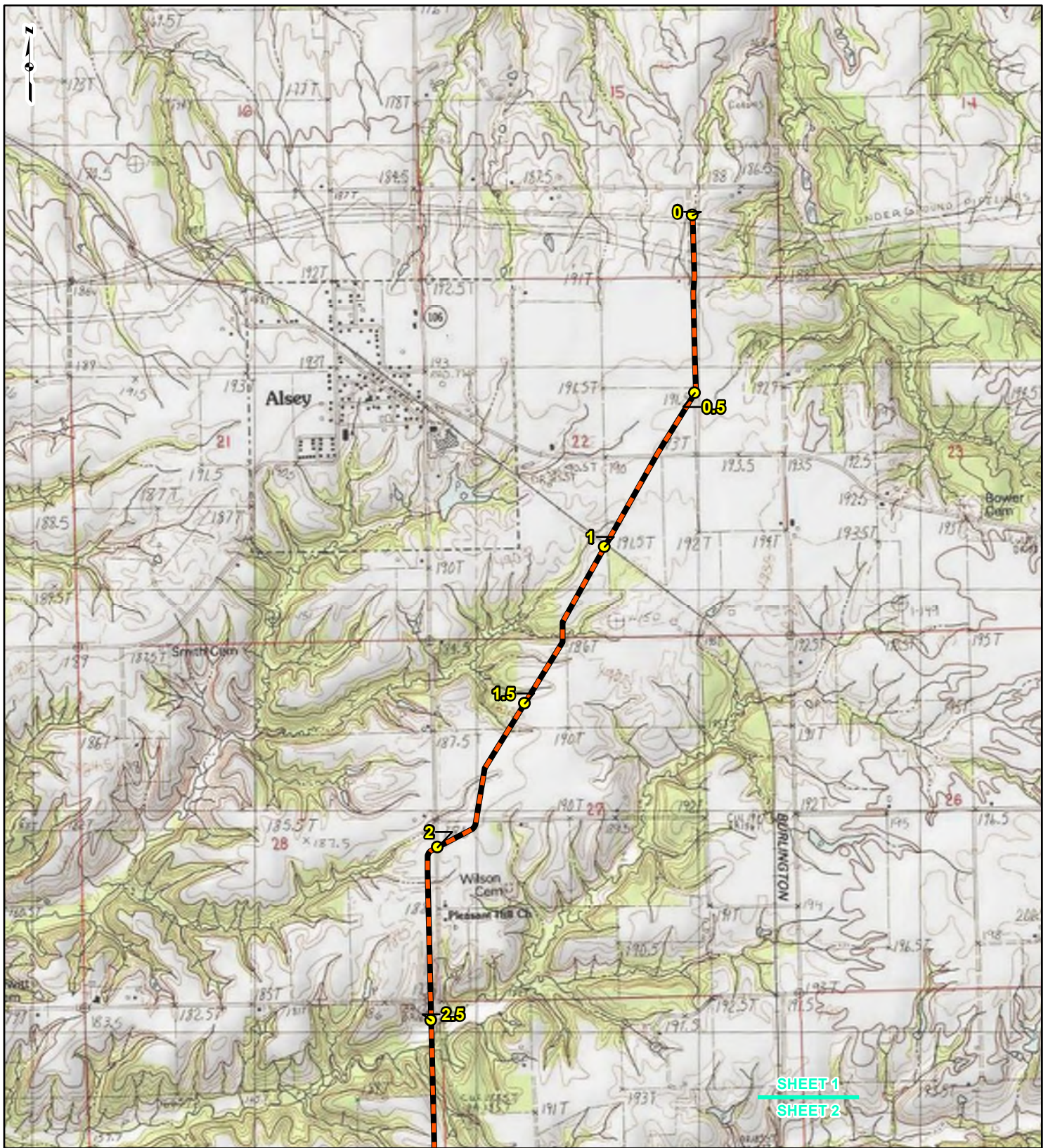
JLF/jbm

Attachment: USGS Topographic Map (Figure 1)





**ATTACHMENT**

**USGS TOPOGRAPHIC MAP (FIGURE 1)**






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0    1,000    2,000    4,000  
Feet

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

**Spire STL Pipeline** 





DRAWN BY: PMH    DATE: 8/12/2016  
CHECKED: SWW    APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.





**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

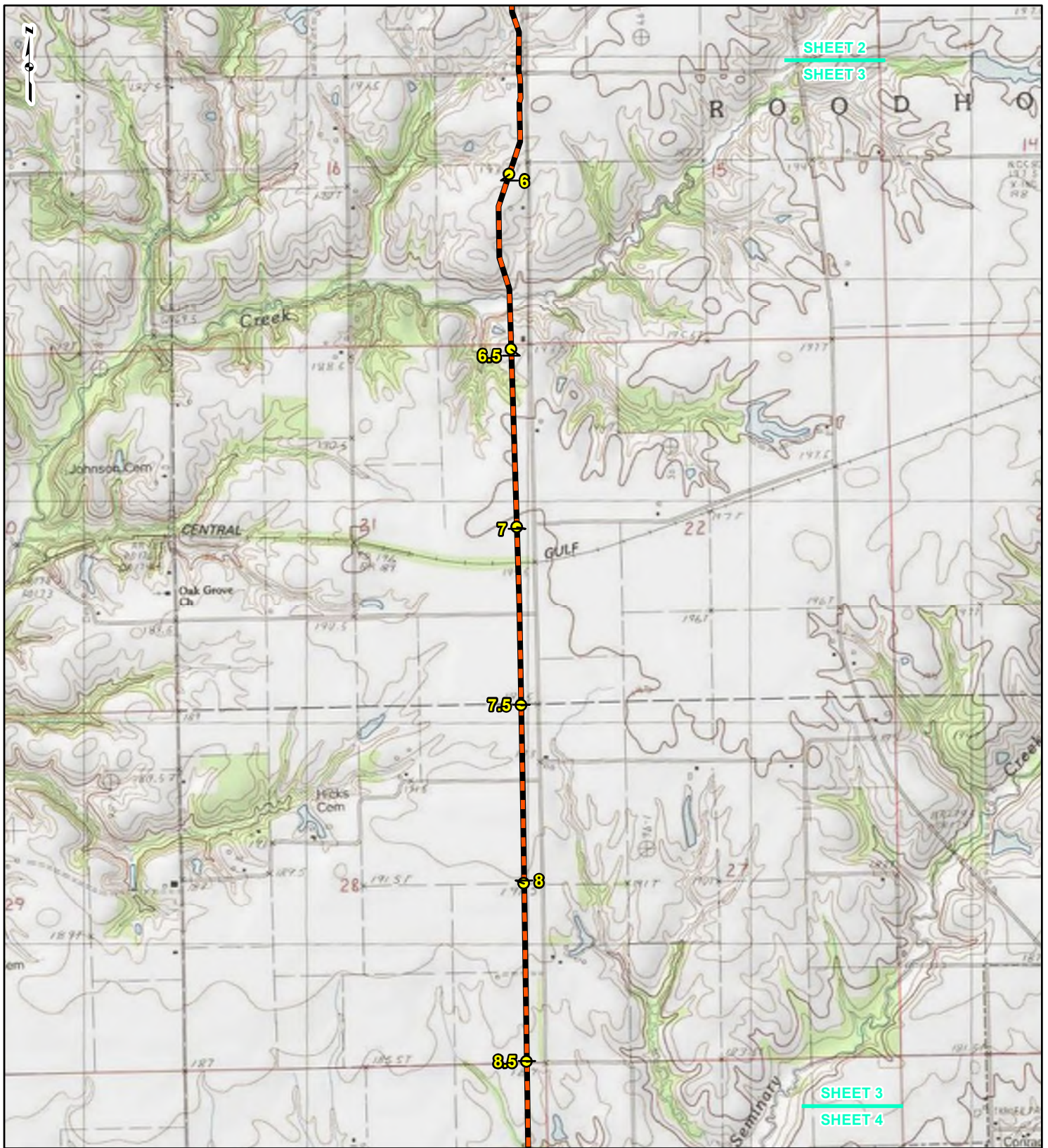
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 2 OF 15**



DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.





**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

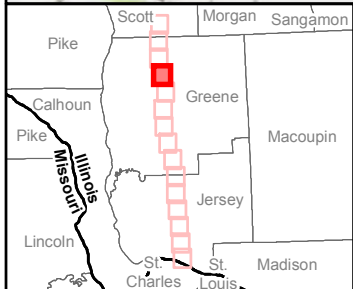
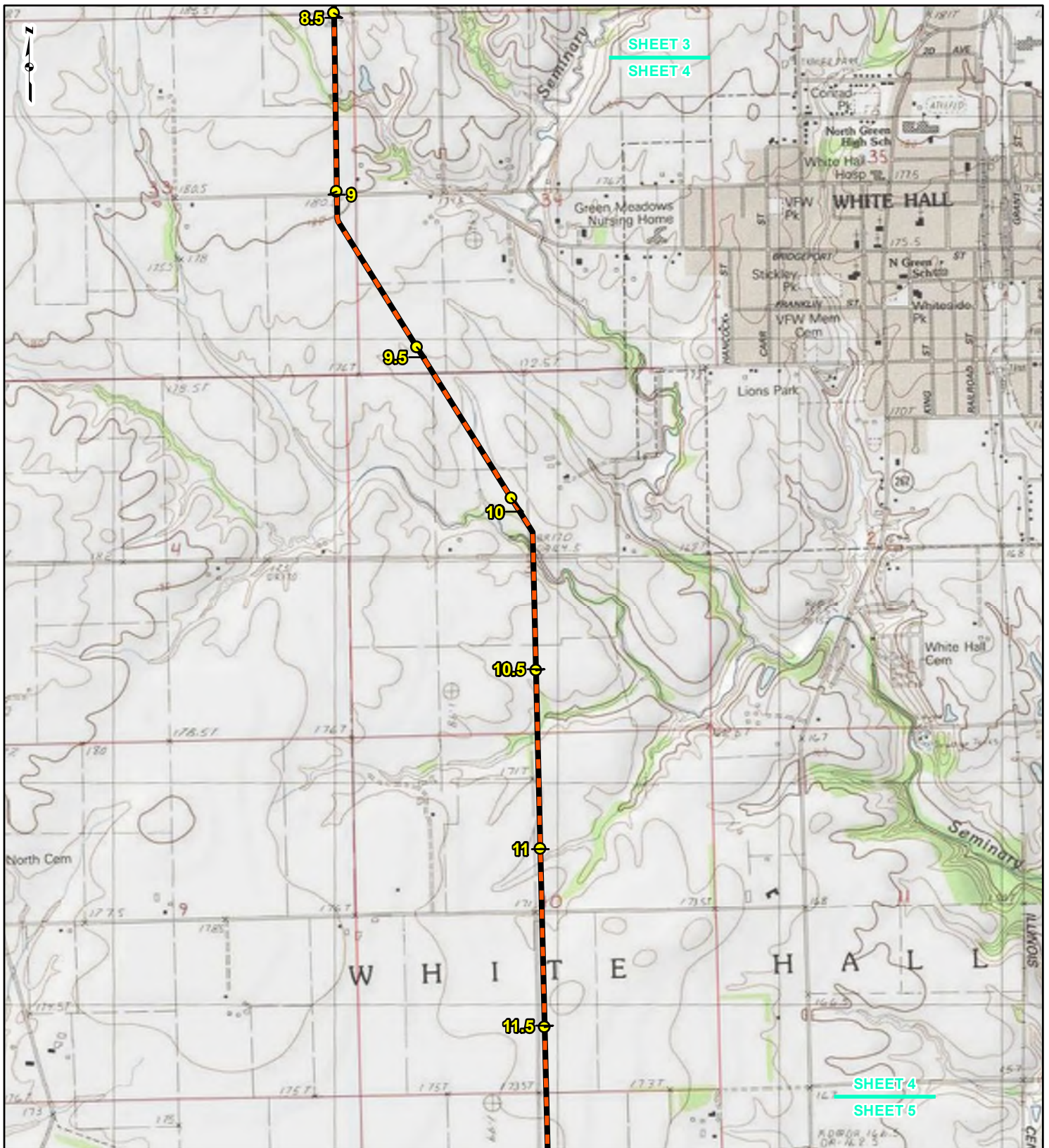
**FIGURE 1  
LOCATION MAP  
SHEET 3 OF 15**

**Spire STL Pipeline**





DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ELSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

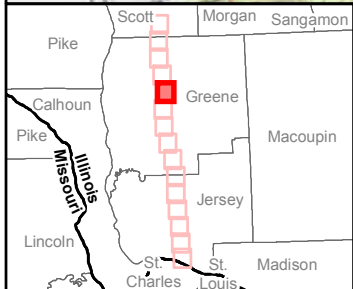
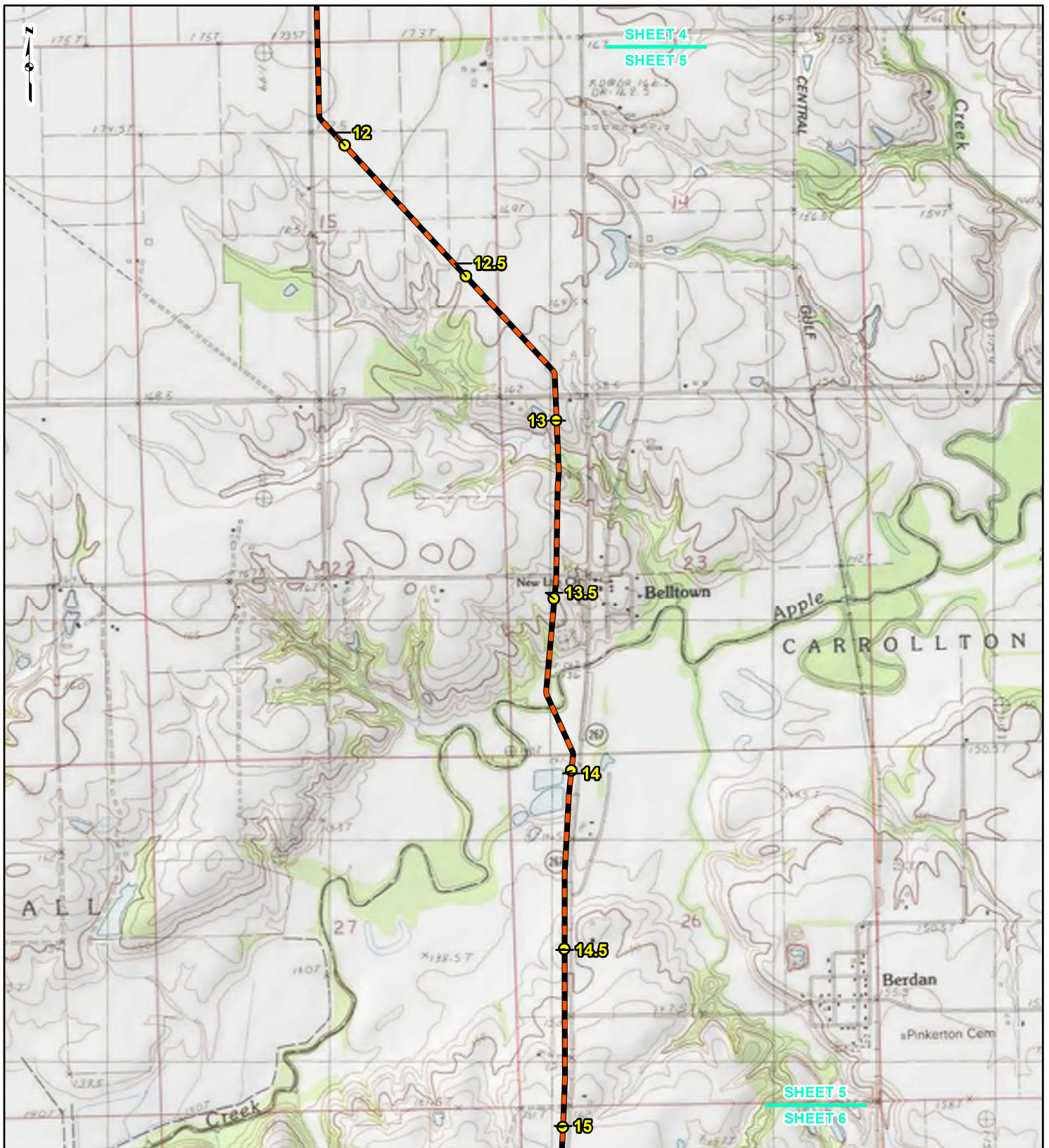
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 4 OF 15**

**Spire STL Pipeline** 





DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

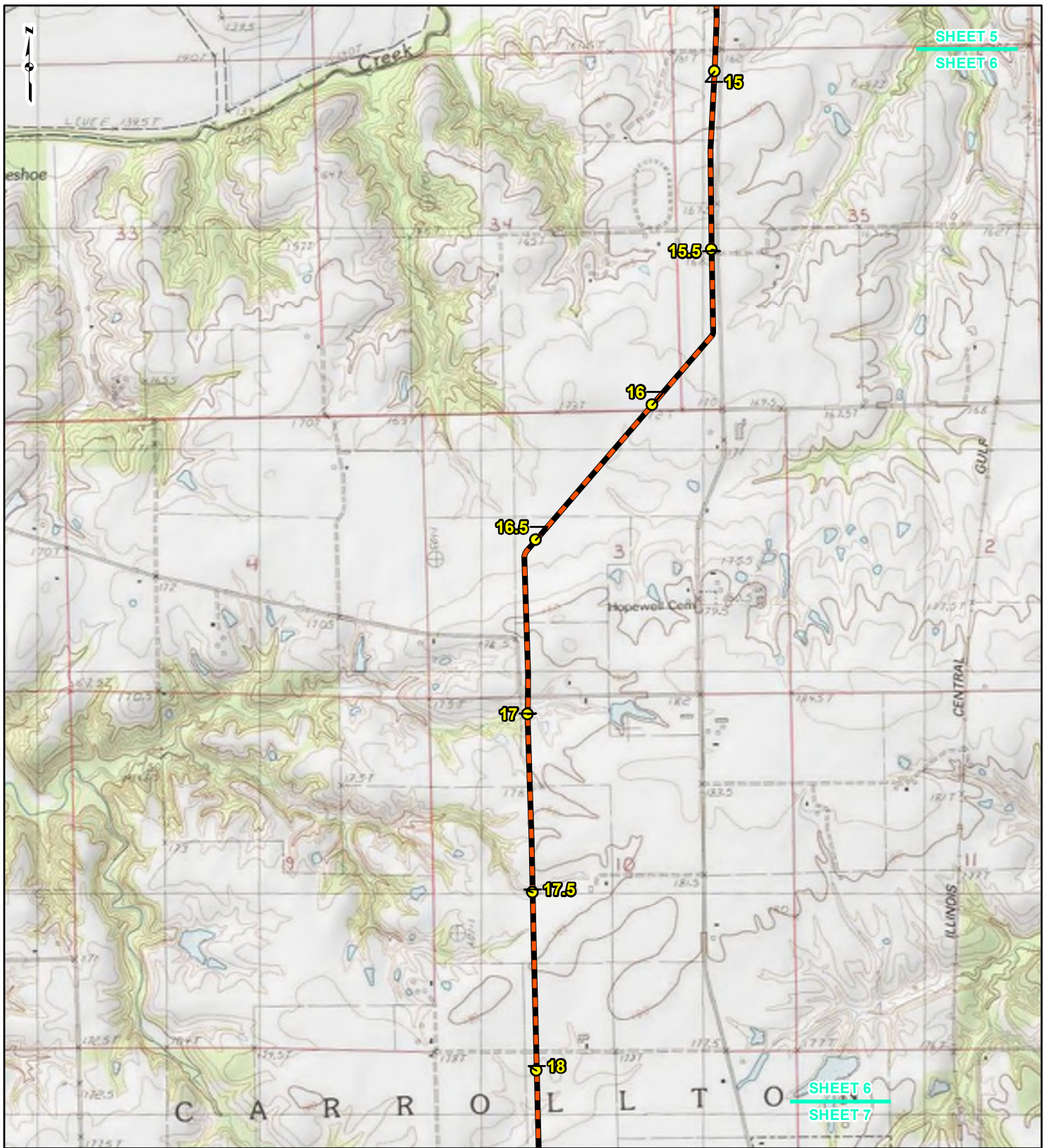
**FIGURE 1  
LOCATION MAP  
SHEET 5 OF 15**

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/2016.





**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

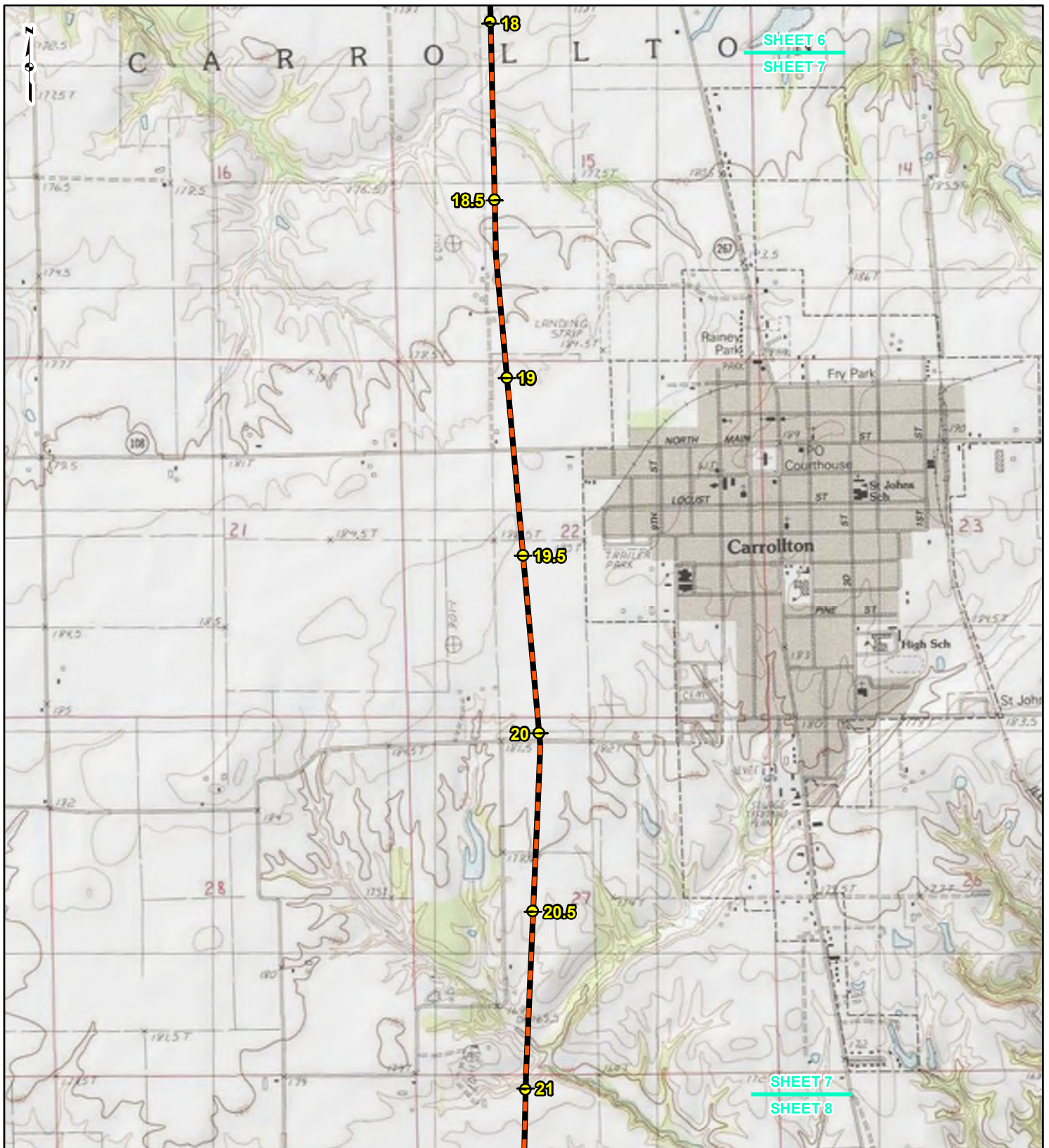
**FIGURE 1  
LOCATION MAP  
SHEET 6 OF 15**

**Spire STL Pipeline**

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

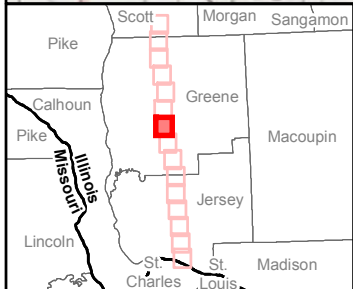
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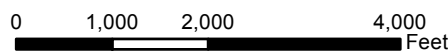
SHEET 6  
SHEET 7

SHEET 7  
SHEET 8



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 7 OF 15**



**Spire STL Pipeline**

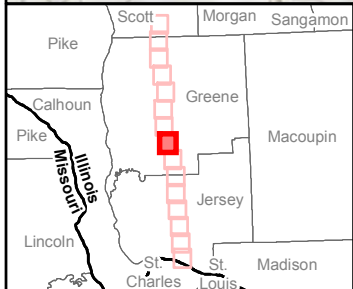
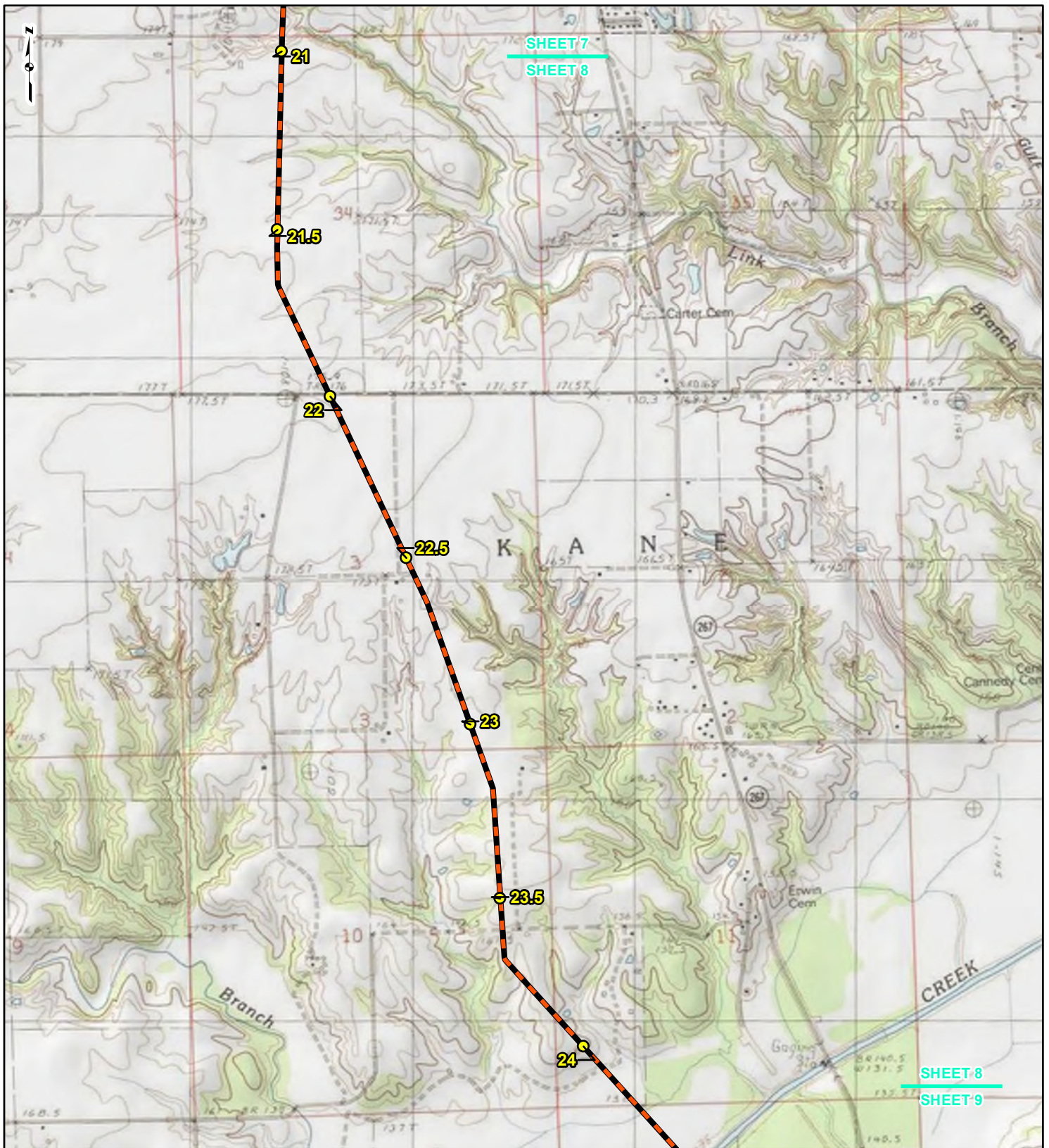


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DATE: 8/12/2016  
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

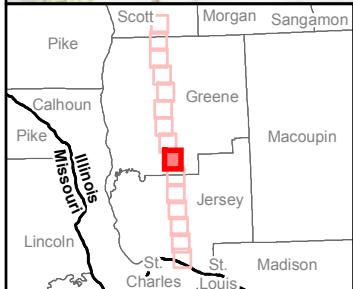
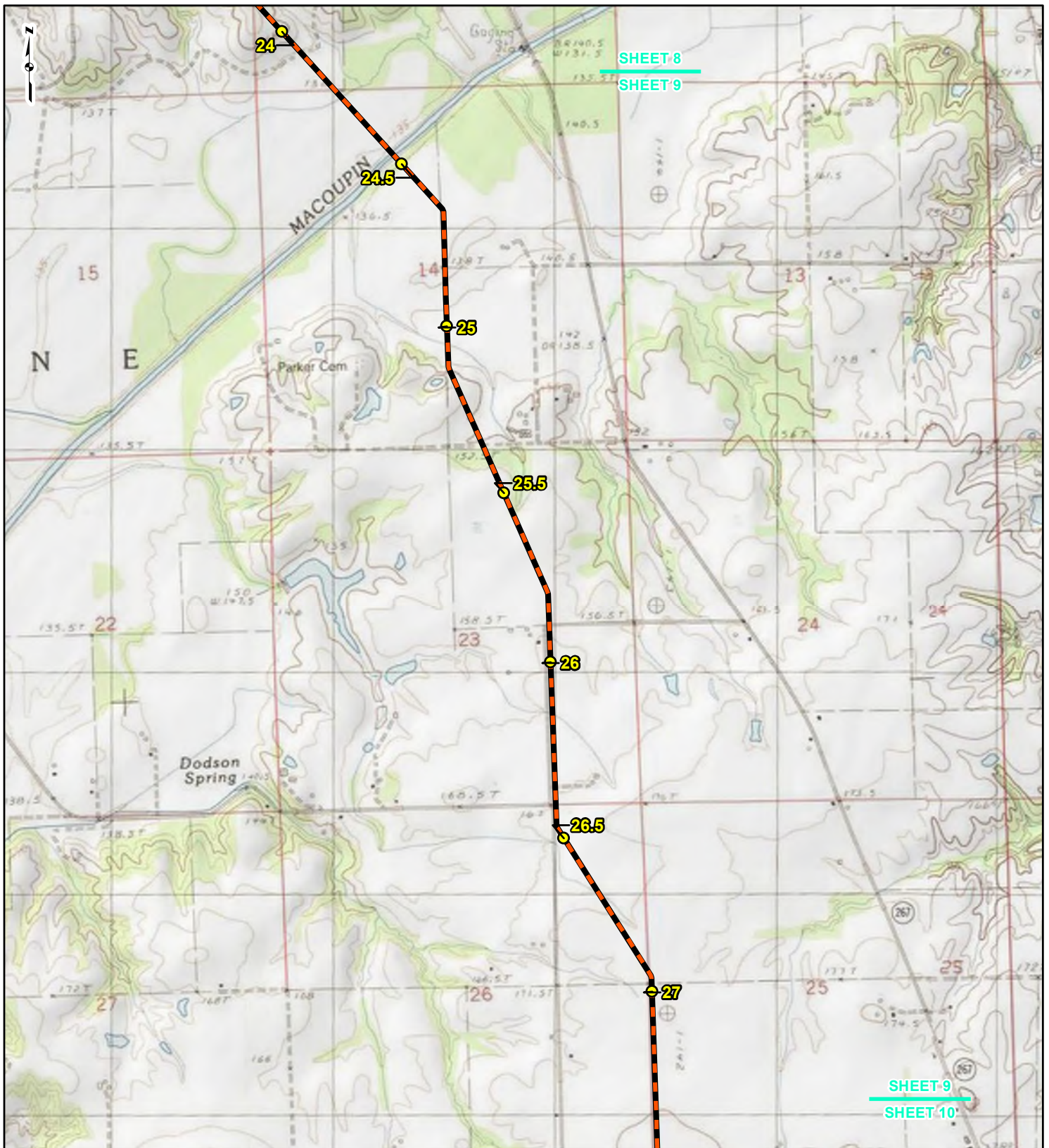
**FIGURE 1  
LOCATION MAP  
SHEET 8 OF 15**

**Spire STL Pipeline** 





DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

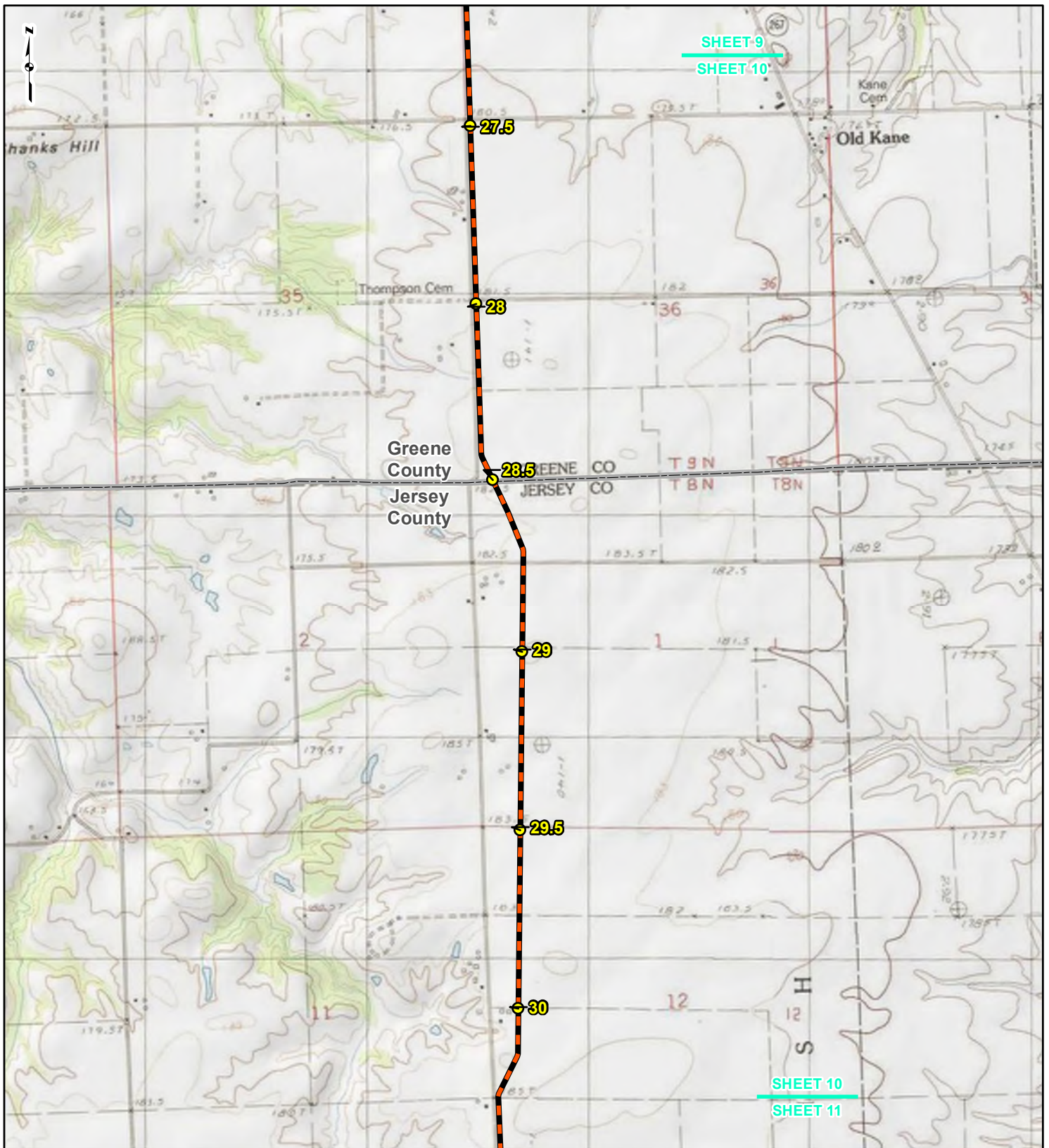
**FIGURE 1  
LOCATION MAP  
SHEET 9 OF 15**

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

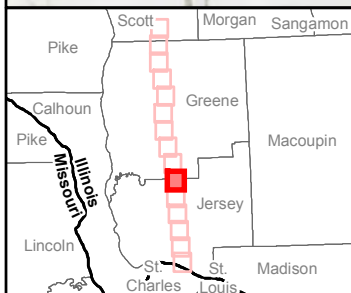
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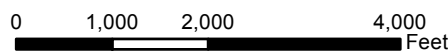
SHEET 9  
SHEET 10

SHEET 10  
SHEET 11



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 10 OF 15**



**Spire STL Pipeline**

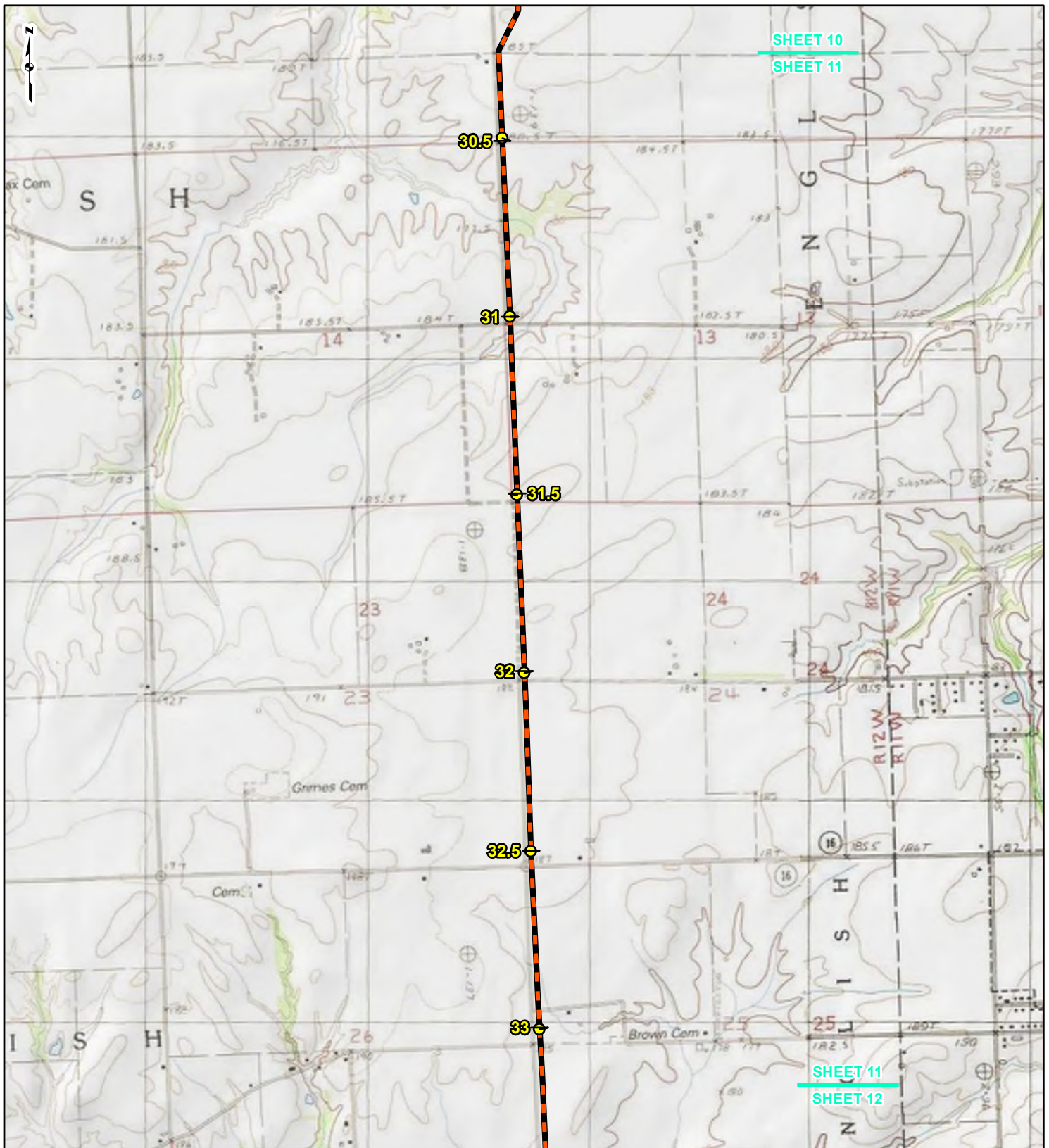


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DATE: 8/12/2016  
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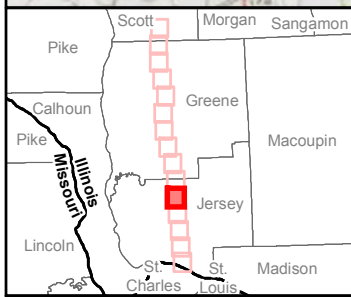
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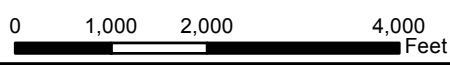
SHEET 10  
SHEET 11

SHEET 11  
SHEET 12



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 11 OF 15**



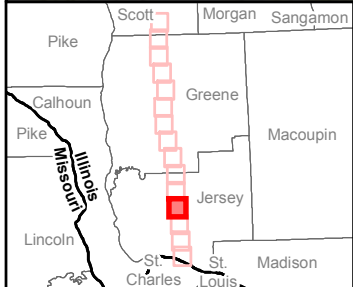
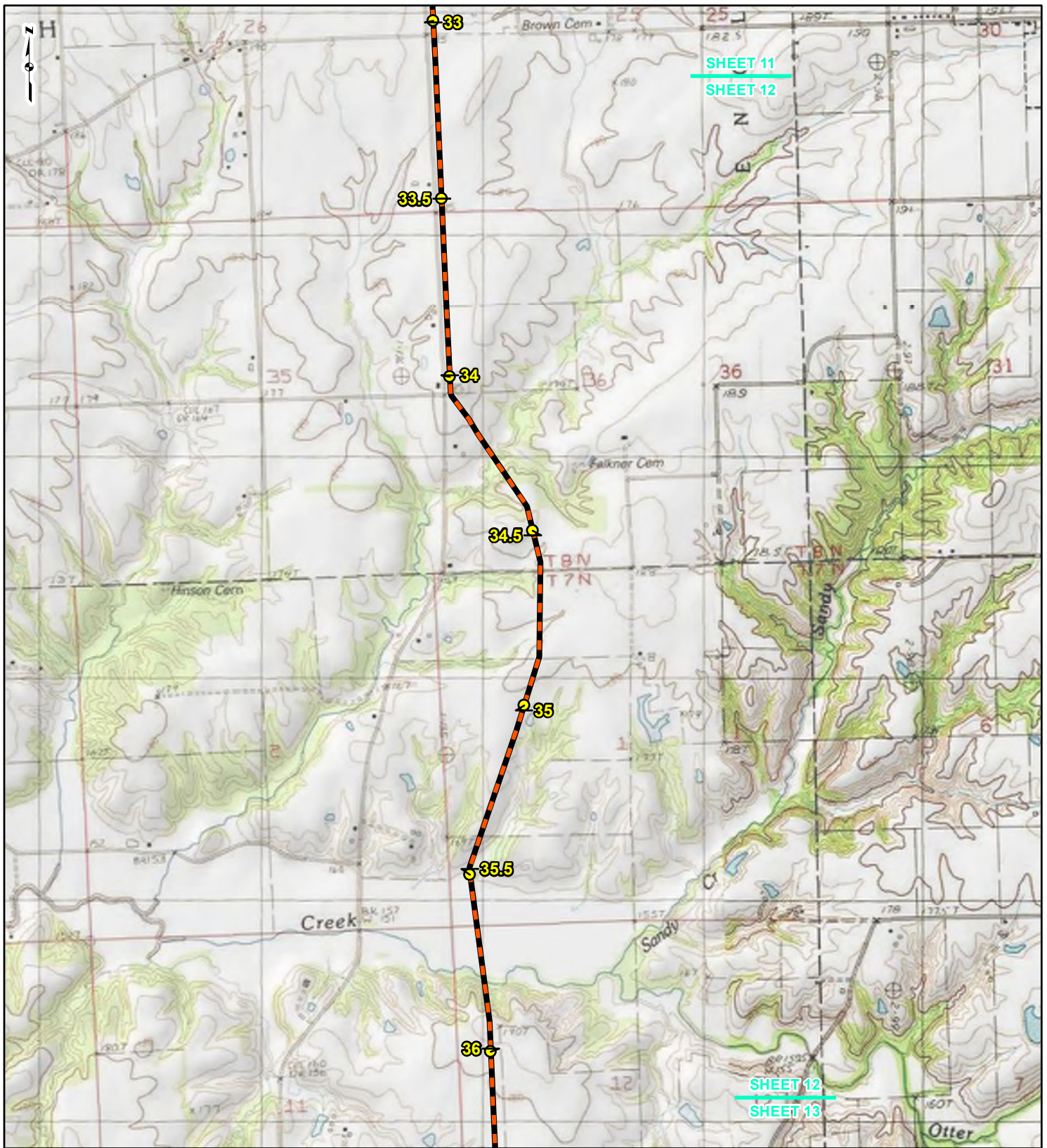
**Spire STL Pipeline**







DRAWN BY: PMH      DATE: 8/12/2016  
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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

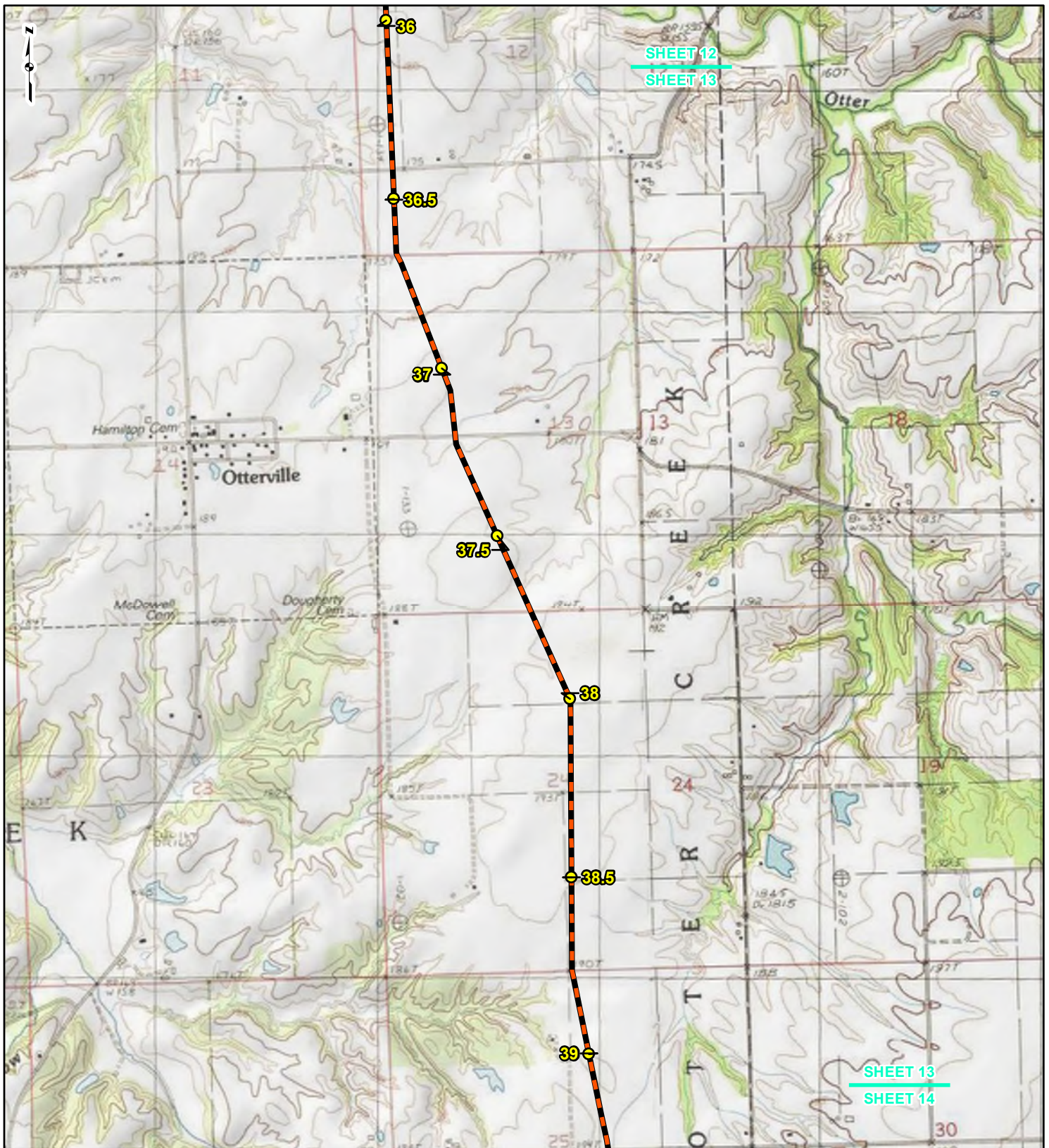
**FIGURE 1  
LOCATION MAP  
SHEET 12 OF 15**

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
 CHECKED: SWW      APPROVED: LMF

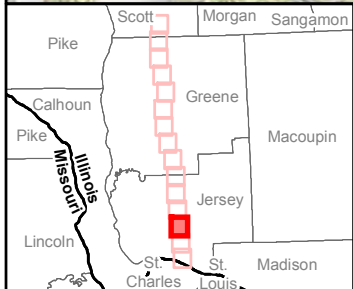
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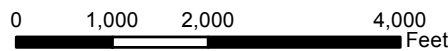
SHEET 12  
SHEET 13

SHEET 13  
SHEET 14



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 13 OF 15**



**Spire STL Pipeline**

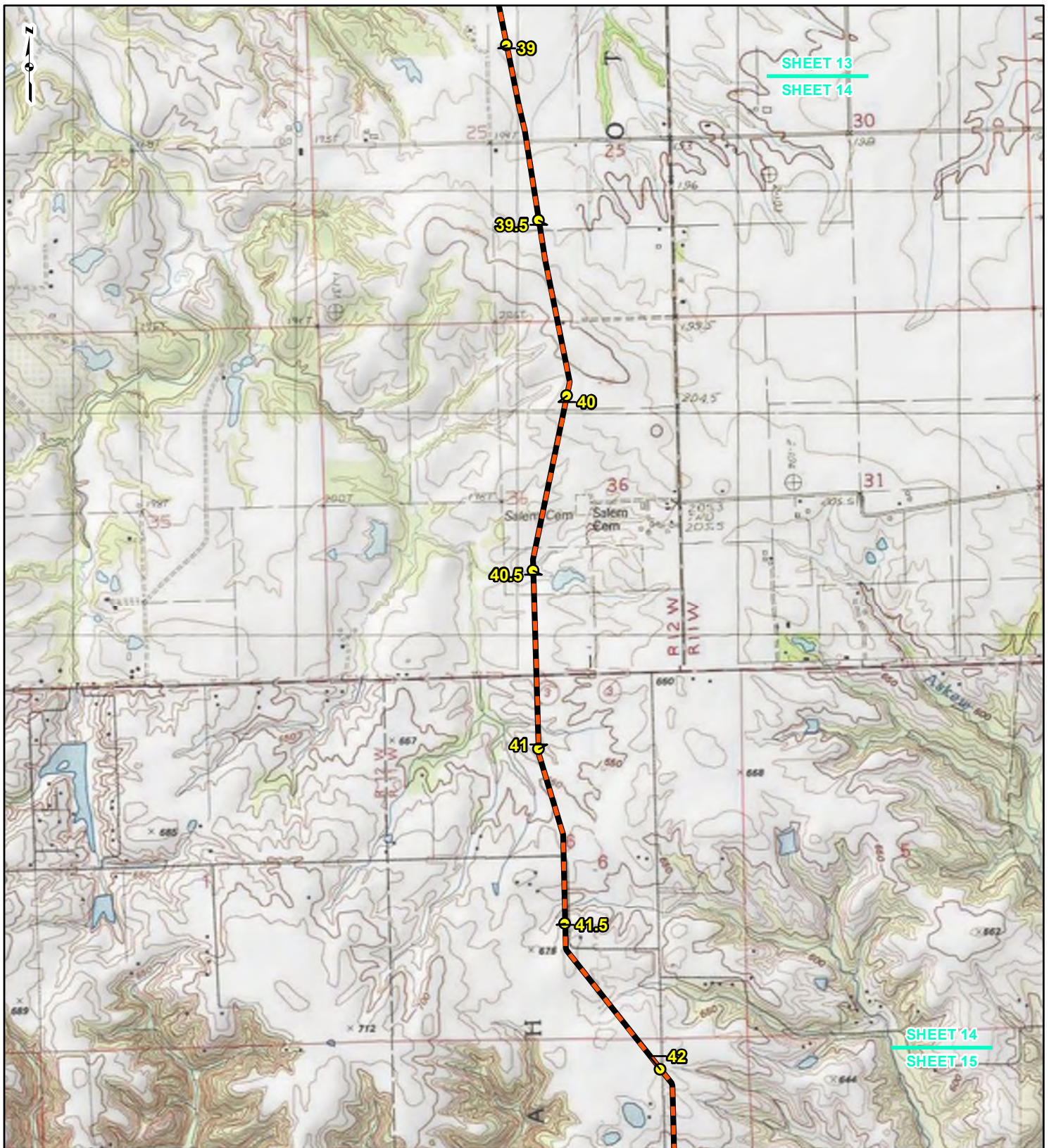


DRAWN BY: PMH  
CHECKED: SWW

DATE: 8/12/2016  
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.



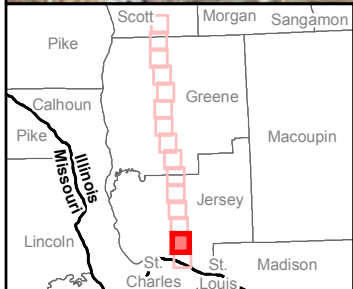


SHEET 13

SHEET 14

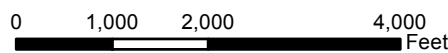
SHEET 14

SHEET 15



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1  
LOCATION MAP  
SHEET 14 OF 15**



**Spire STL  
Pipeline**

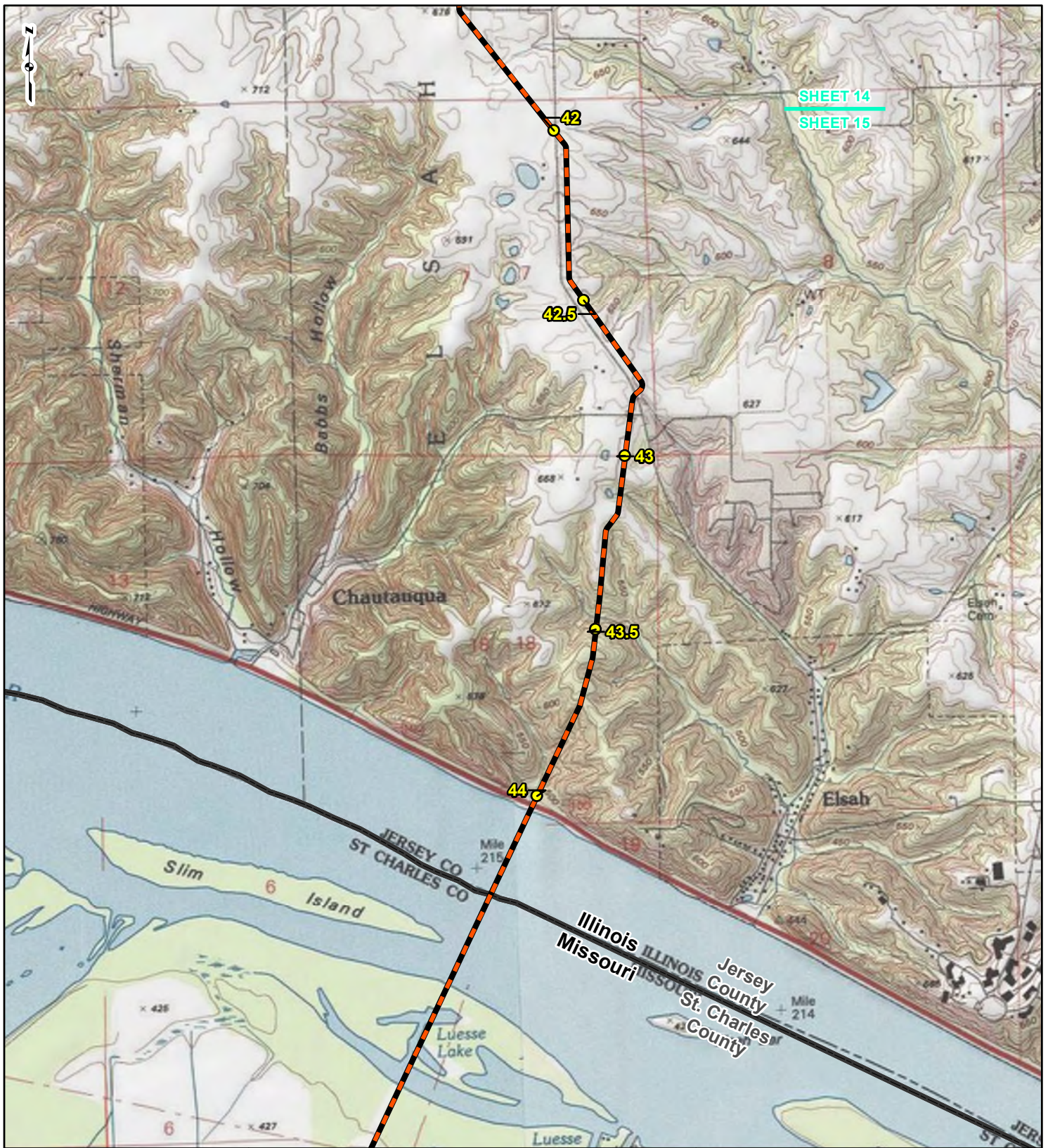


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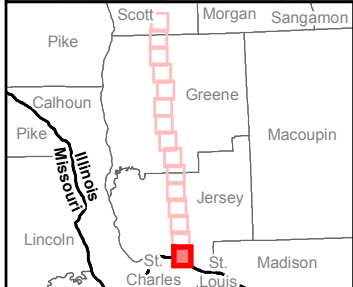
DATE: 8/12/2016  
APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.









SHEET 14  
SHEET 15




**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

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

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.





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

August 5, 2016

Mr. Terry Savko  
Illinois Department of Agriculture - Bureau of Land and Water Resources  
PO Box 19281  
Springfield, IL 62794

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

Dear Mr. Savko,

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](http://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.
<b>Scott County, Illinois</b>	<b>Jersey County, Illinois</b>	<b>St. Louis County, Missouri</b>	<b>St. Charles County, Missouri</b>	<b>Greene County, Illinois</b>
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](http://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](mailto:STLPipelineInfo@SpireEnergy.com).

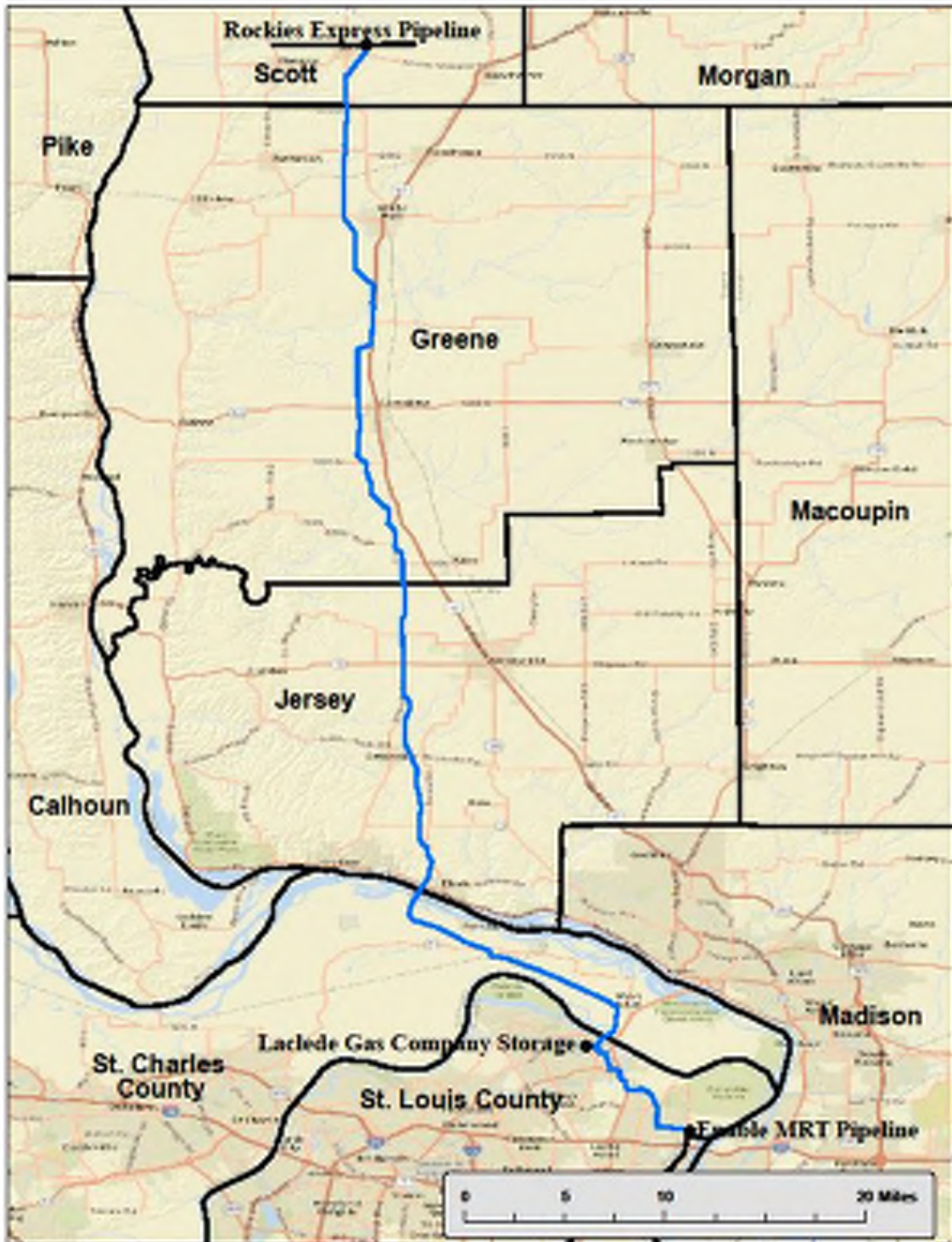
We look forward to working with you.

Sincerely,



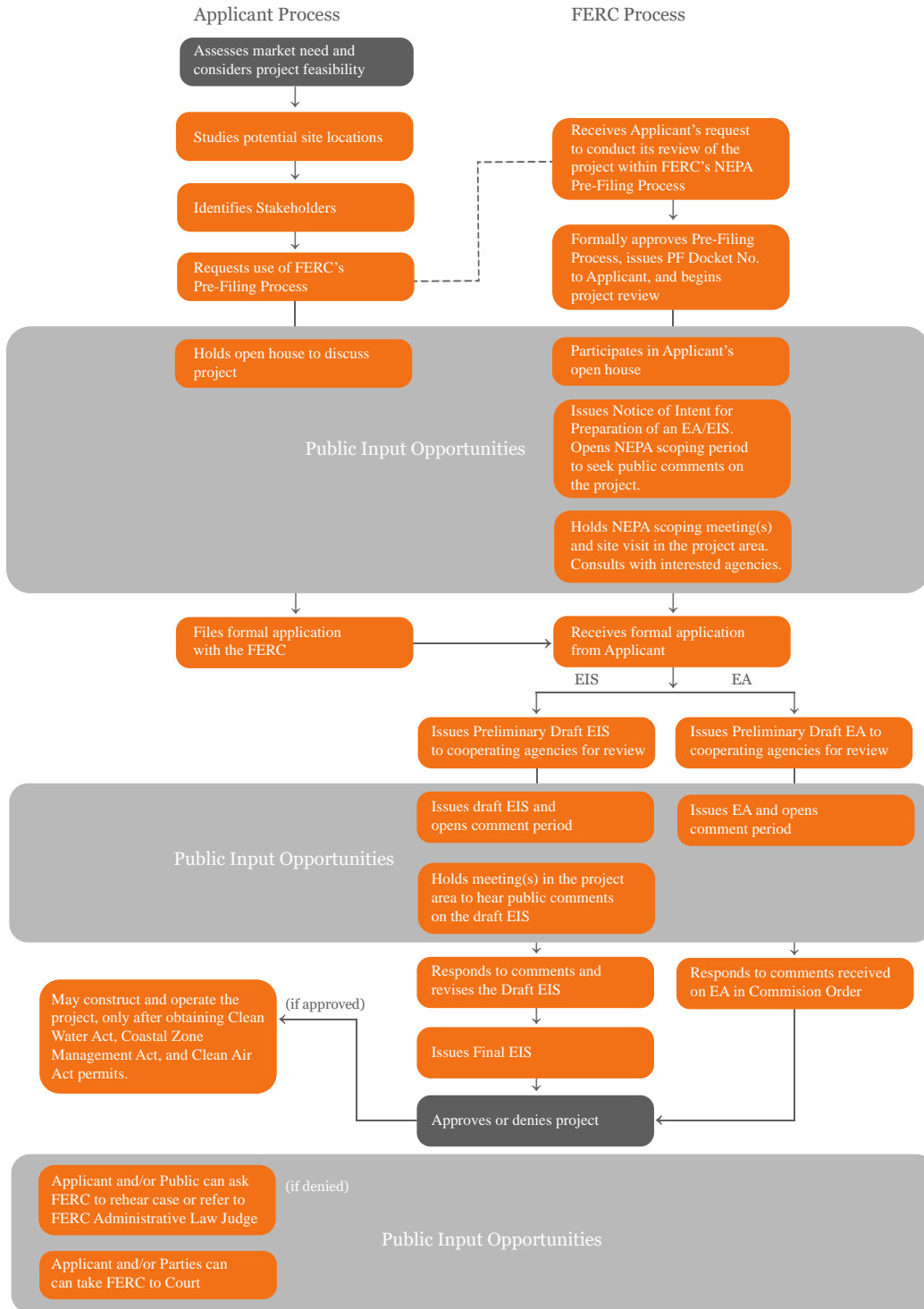
Scott Jaskowiak  
Vice President  
Spire STL Pipeline LLC

Project Map





# FERC Pre-Filing Process





July 29, 2016

Mr. Terry Savko  
Illinois Department of Agriculture  
Bureau of Land and Water Resources  
State Fairgrounds  
P.O. Box 19281  
Springfield, IL 62794-9281

**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. Savko:

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 Illinois Department of Agriculture - Bureau of Land and Water Resources 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.**

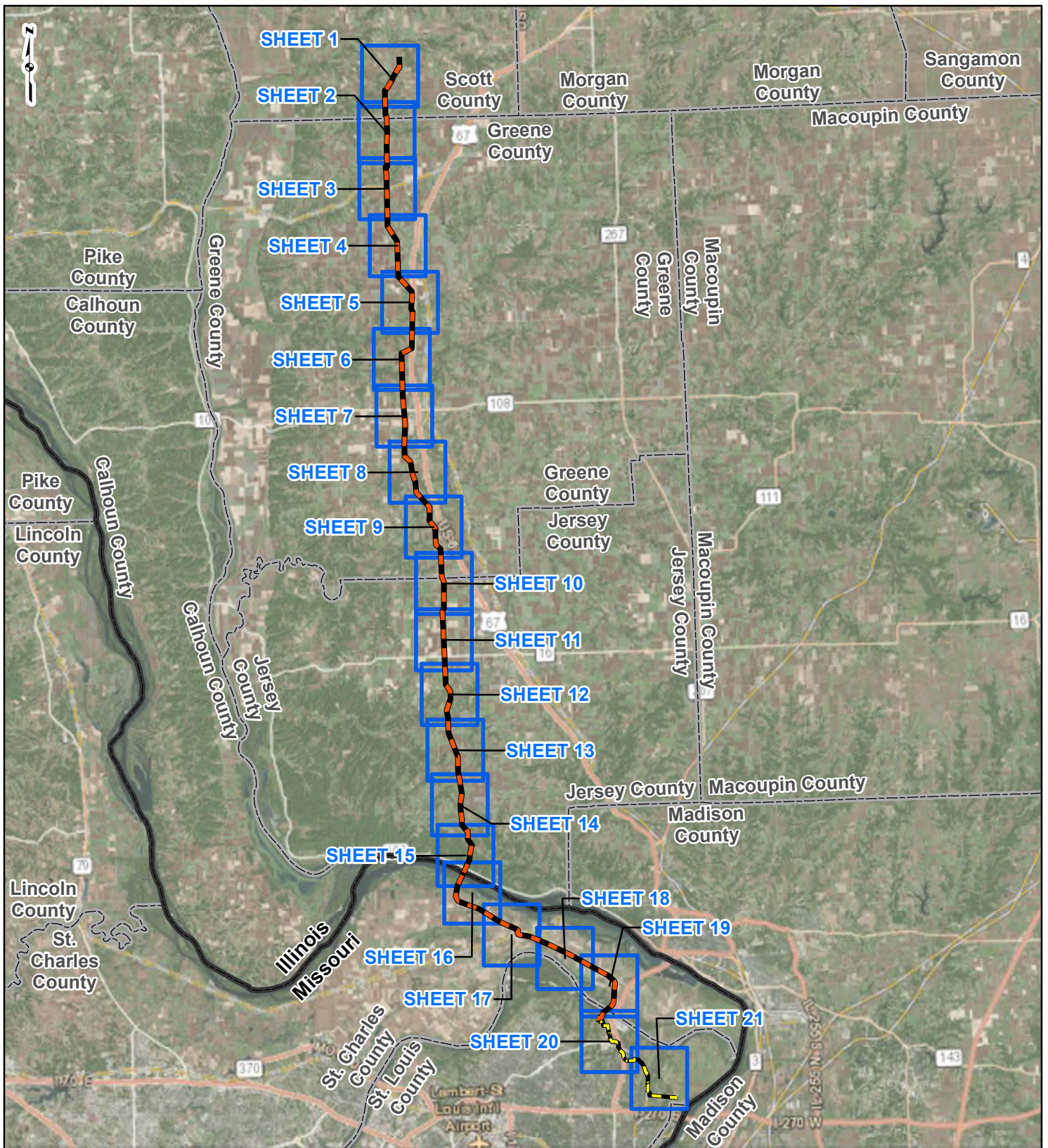
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive, flowing style.

Lori M. Ferry  
Environmental Project Manager

LMF/gmg

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





**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**

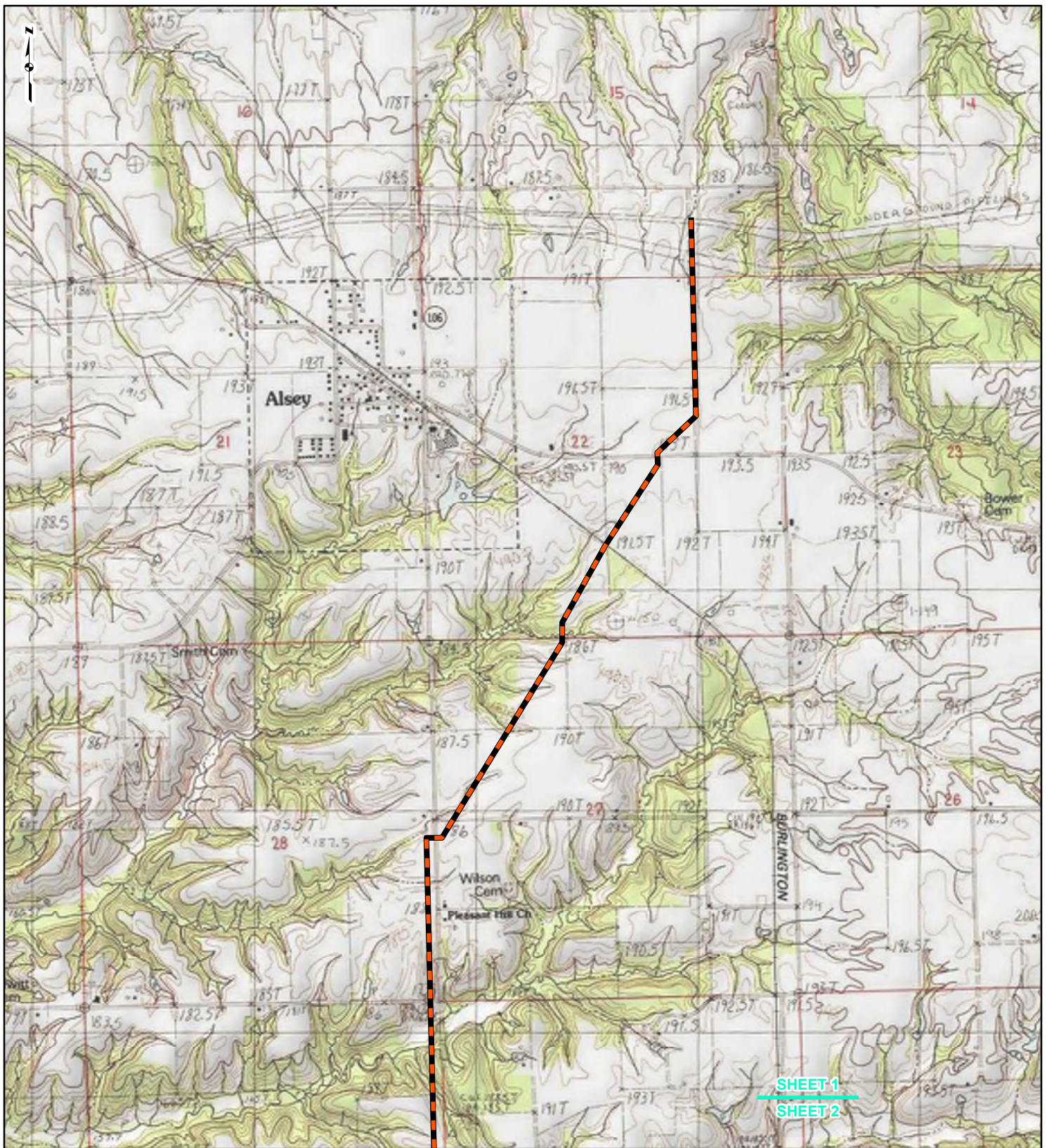


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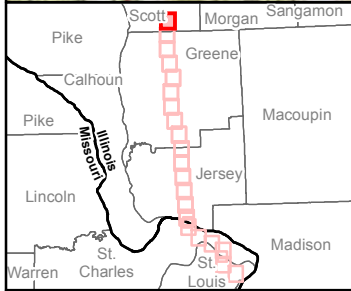
DATE: 7/28/2016  
APPROVED: LMF

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

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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), 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

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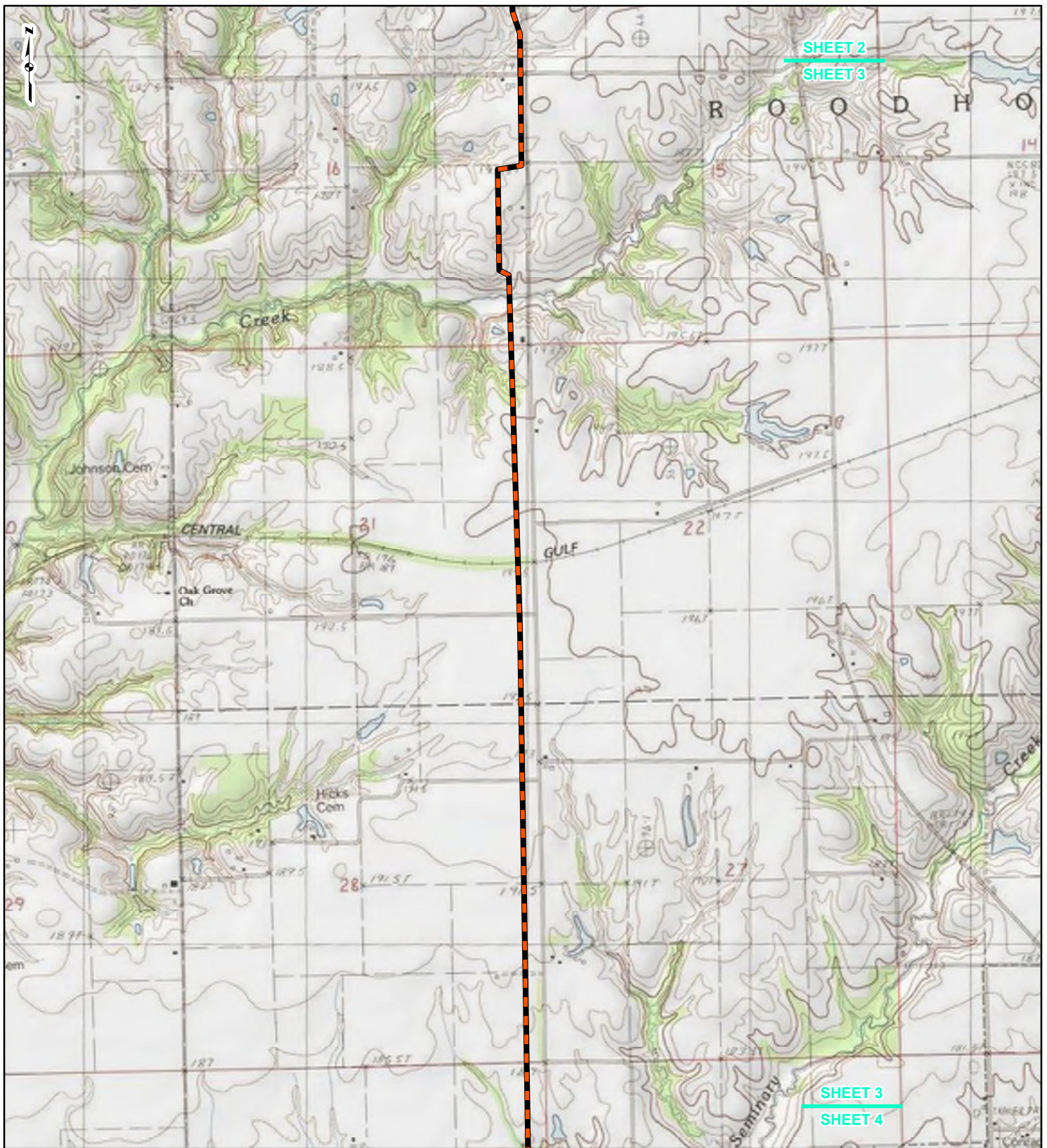
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 2 OF 21**

**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

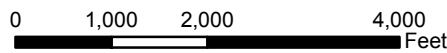
SHEET 3

SHEET 4



**LEGEND**

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



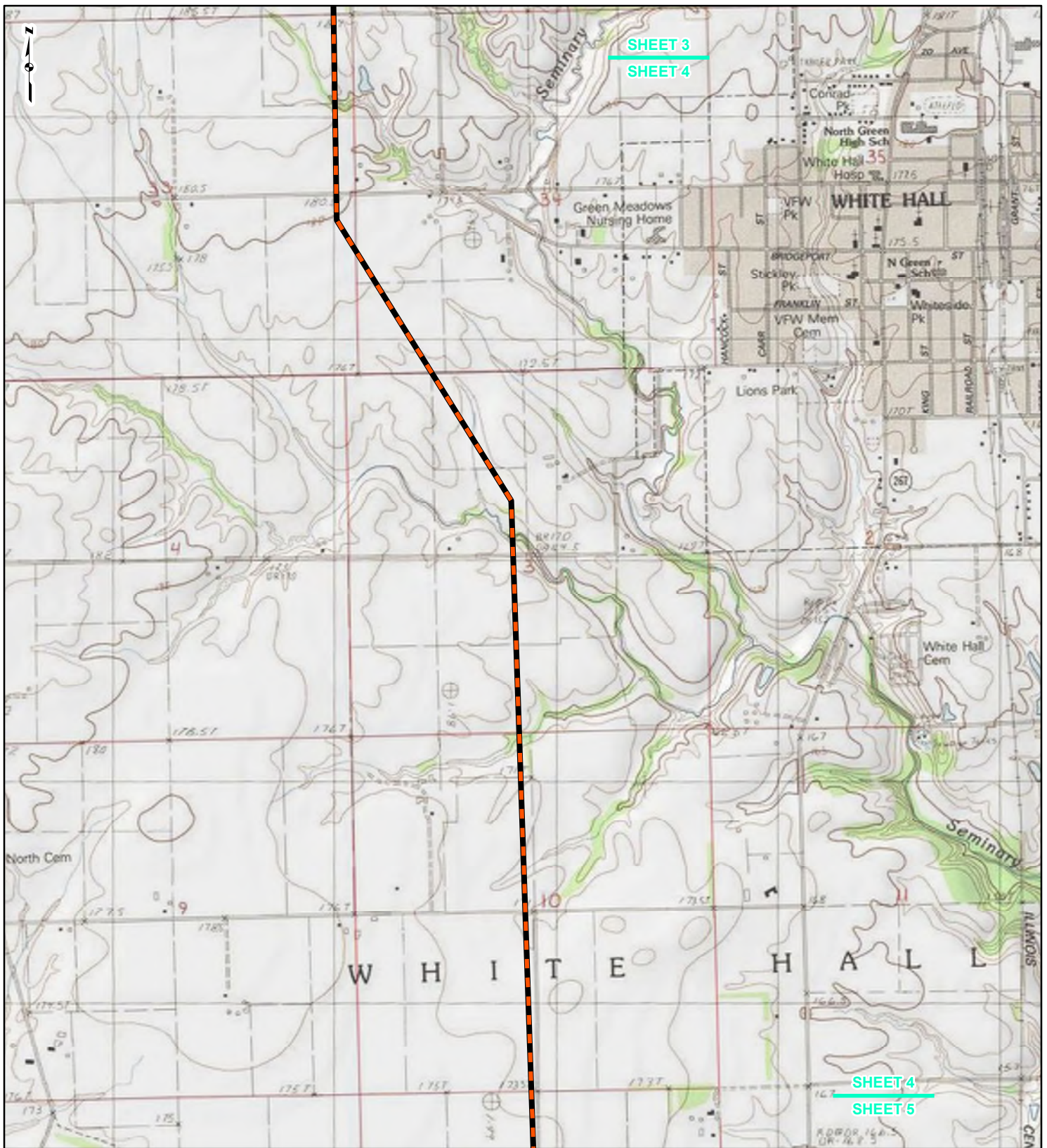
**FIGURE 1**  
LOCATION MAP  
SHEET 3 OF 21



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

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: 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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Feet

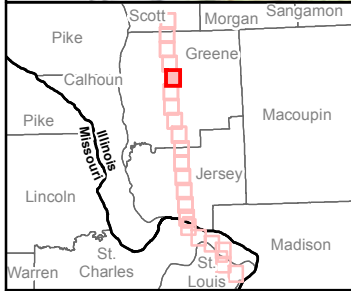
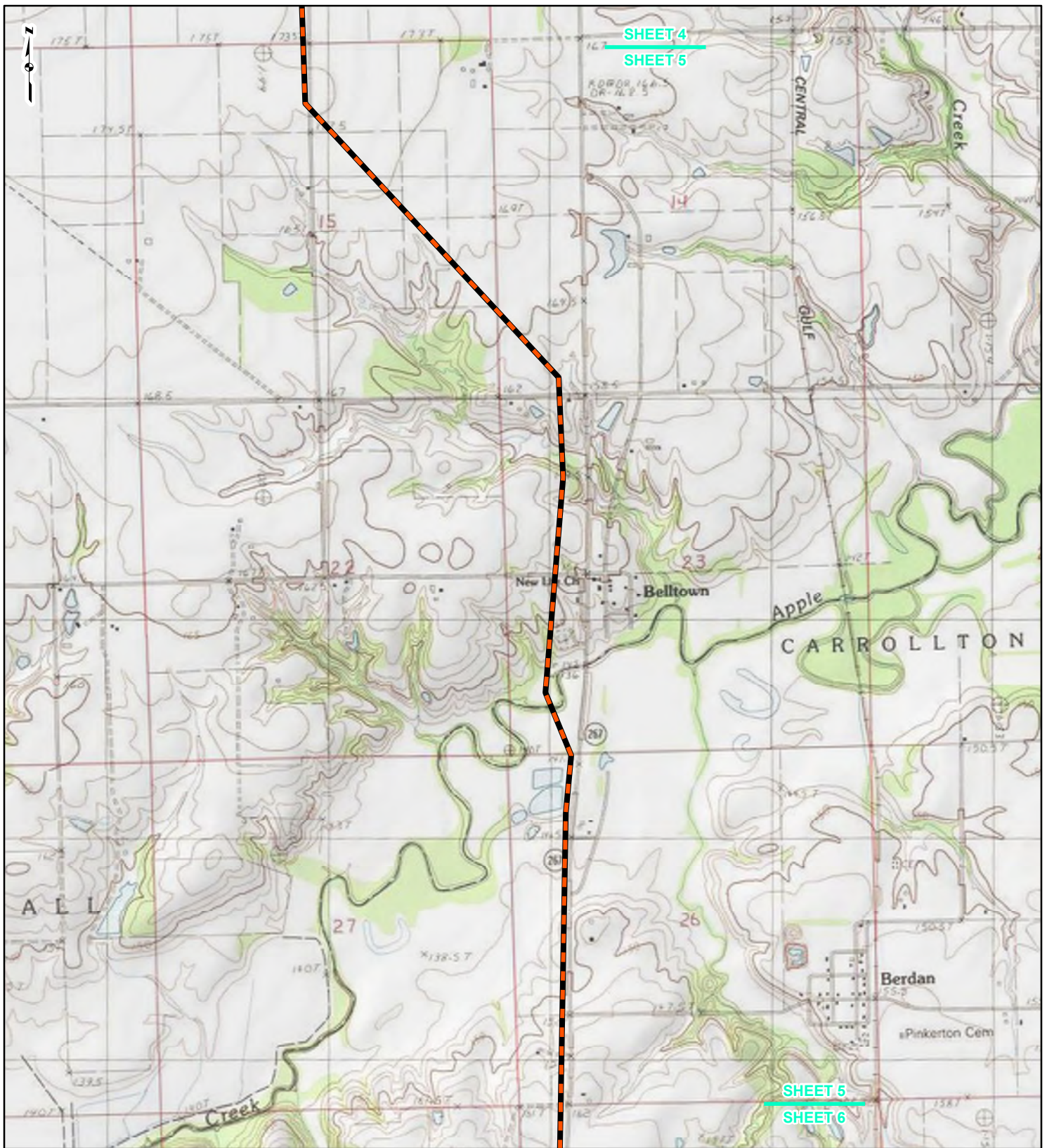
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 4 OF 21**

**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), FLOISSANT (1995), 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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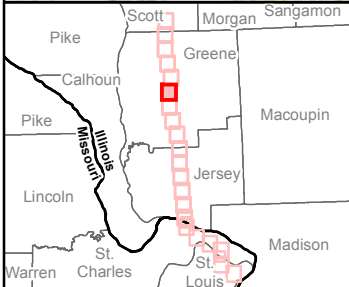
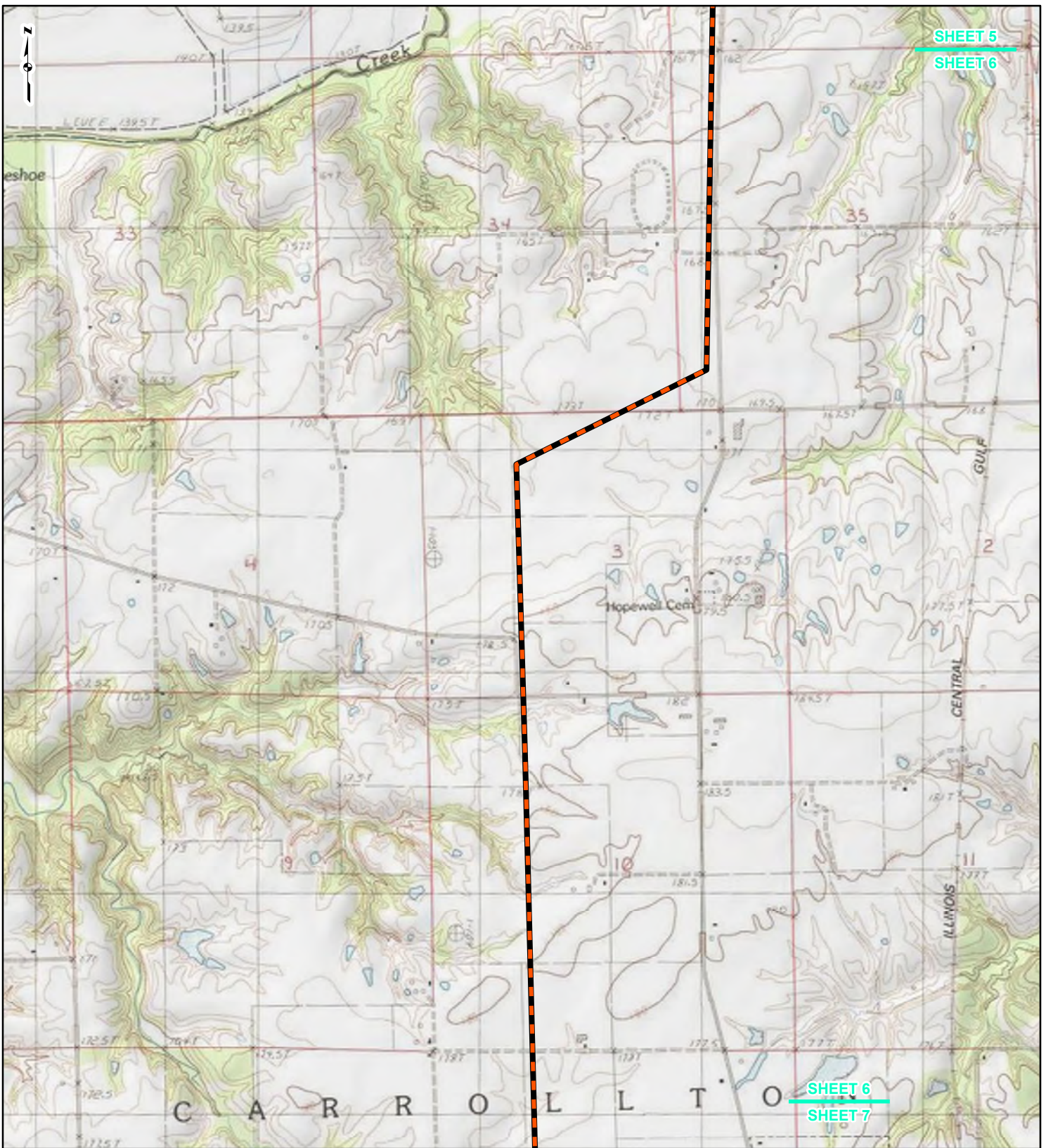
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 5 OF 21**

**Spire STL Pipeline**





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

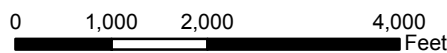
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**LEGEND**

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



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 6 OF 21**



**Spire STL**  
**Pipeline**

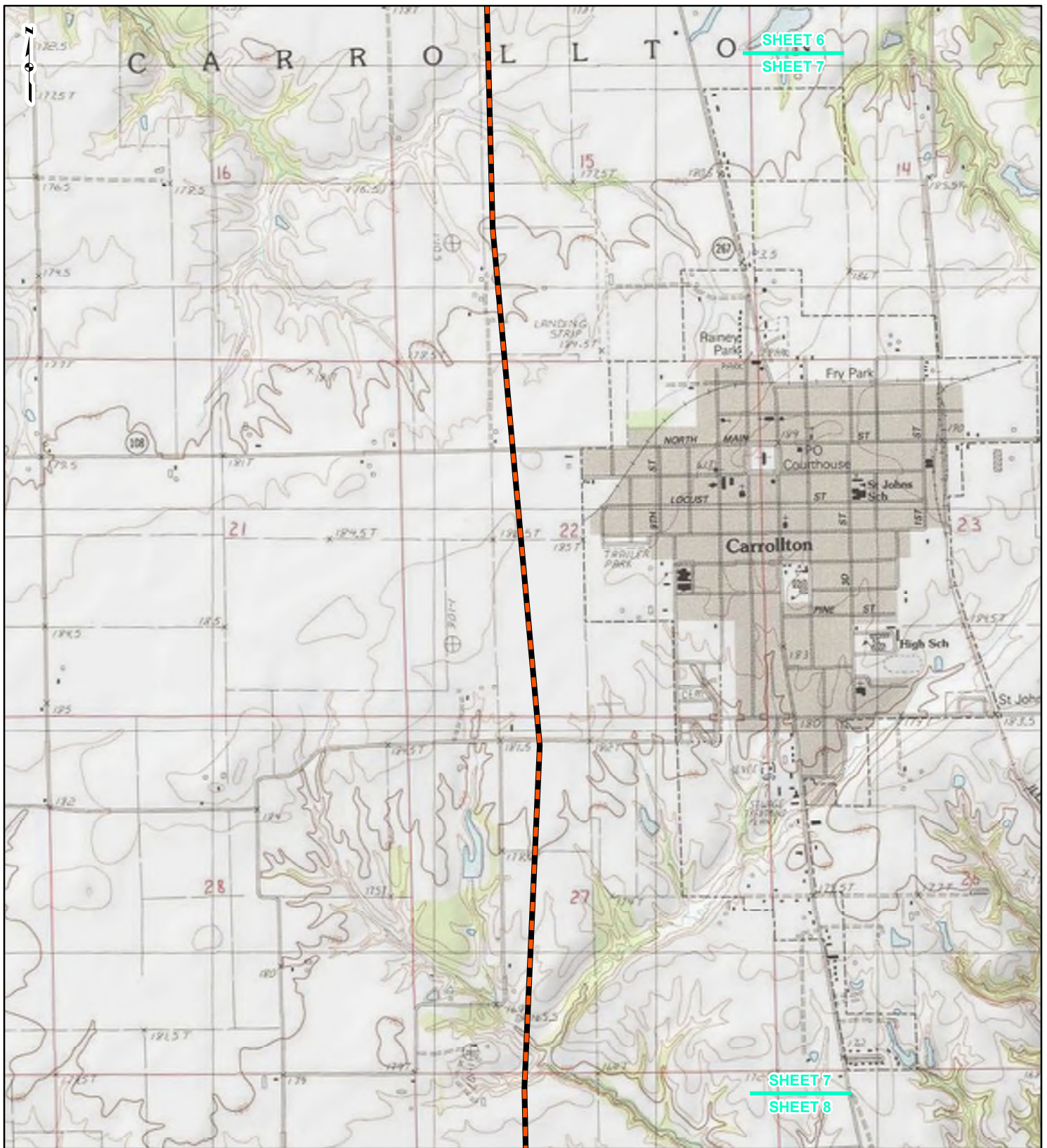


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DATE: 7/28/2016  
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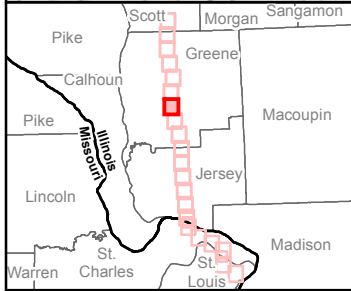
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SHEET 6  
SHEET 7

SHEET 7  
SHEET 8



**LEGEND**

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

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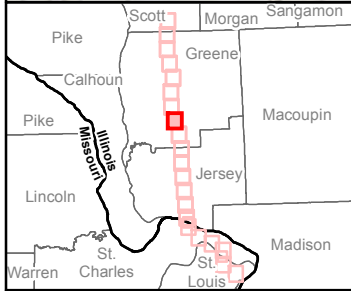
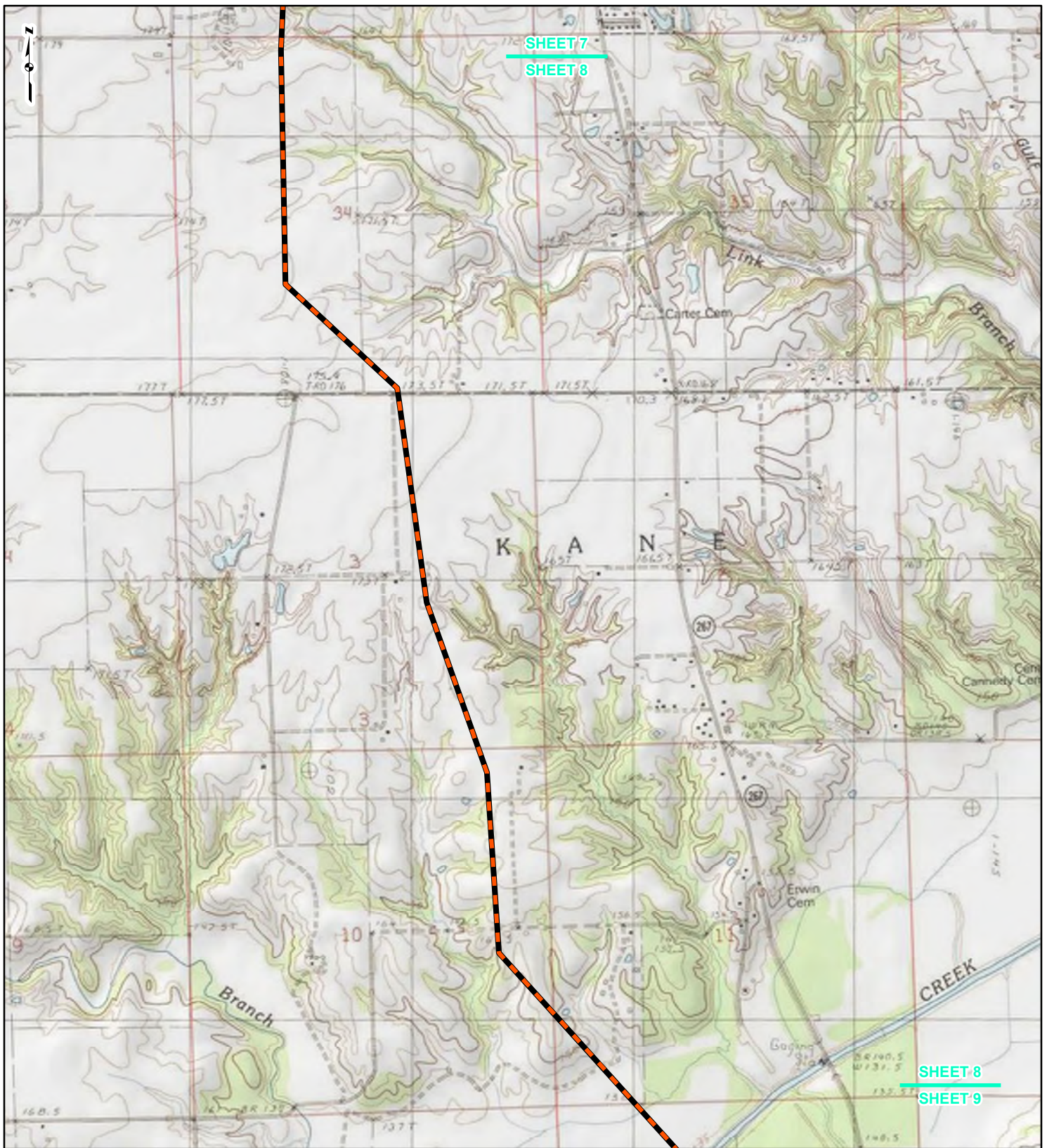
**FIGURE 1  
LOCATION MAP  
SHEET 7 OF 21**

**Spire STL Pipeline**

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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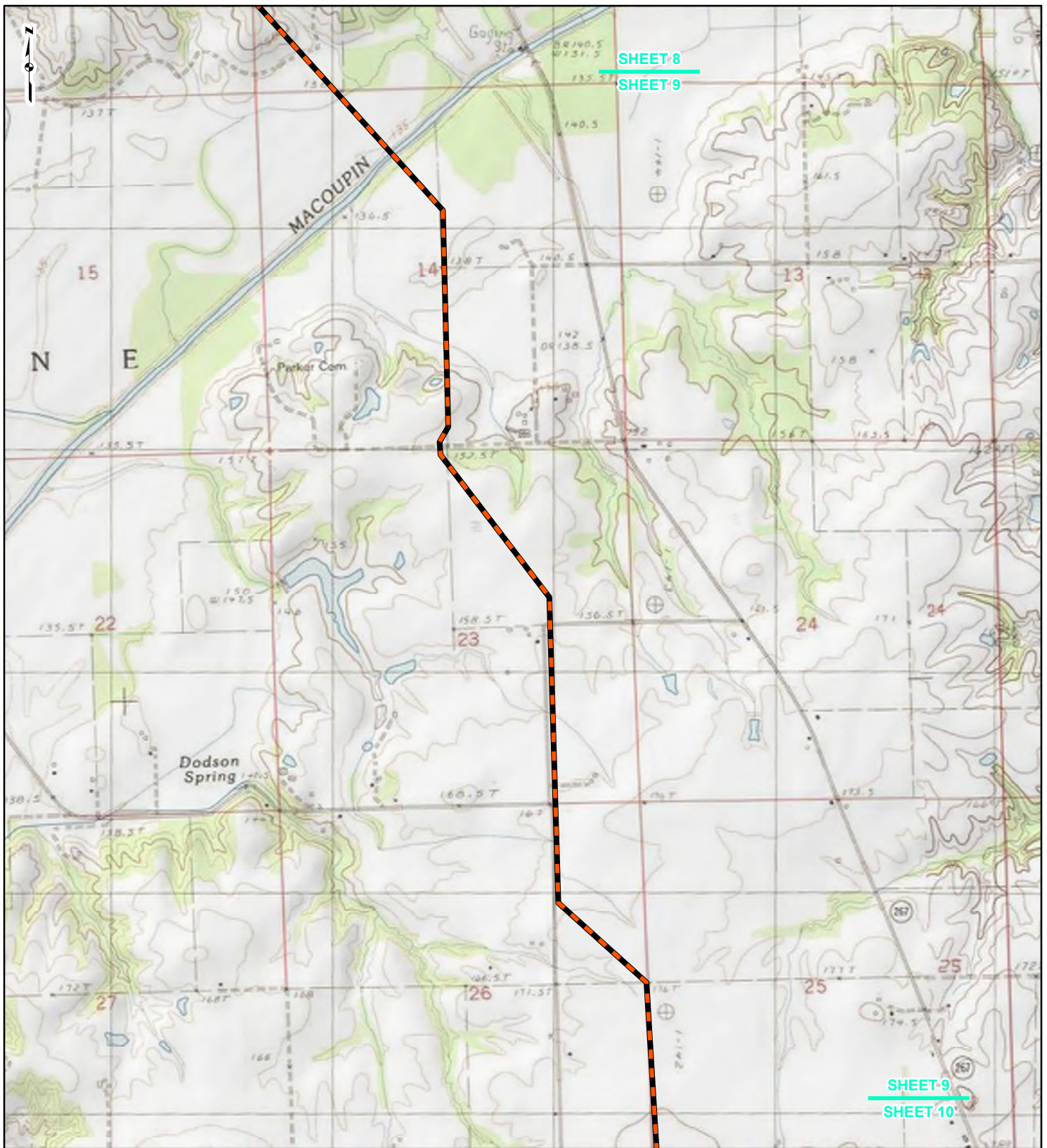
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 8 OF 21**

**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.









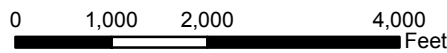
SHEET 8  
SHEET 9

SHEET 9  
SHEET 10



**LEGEND**

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



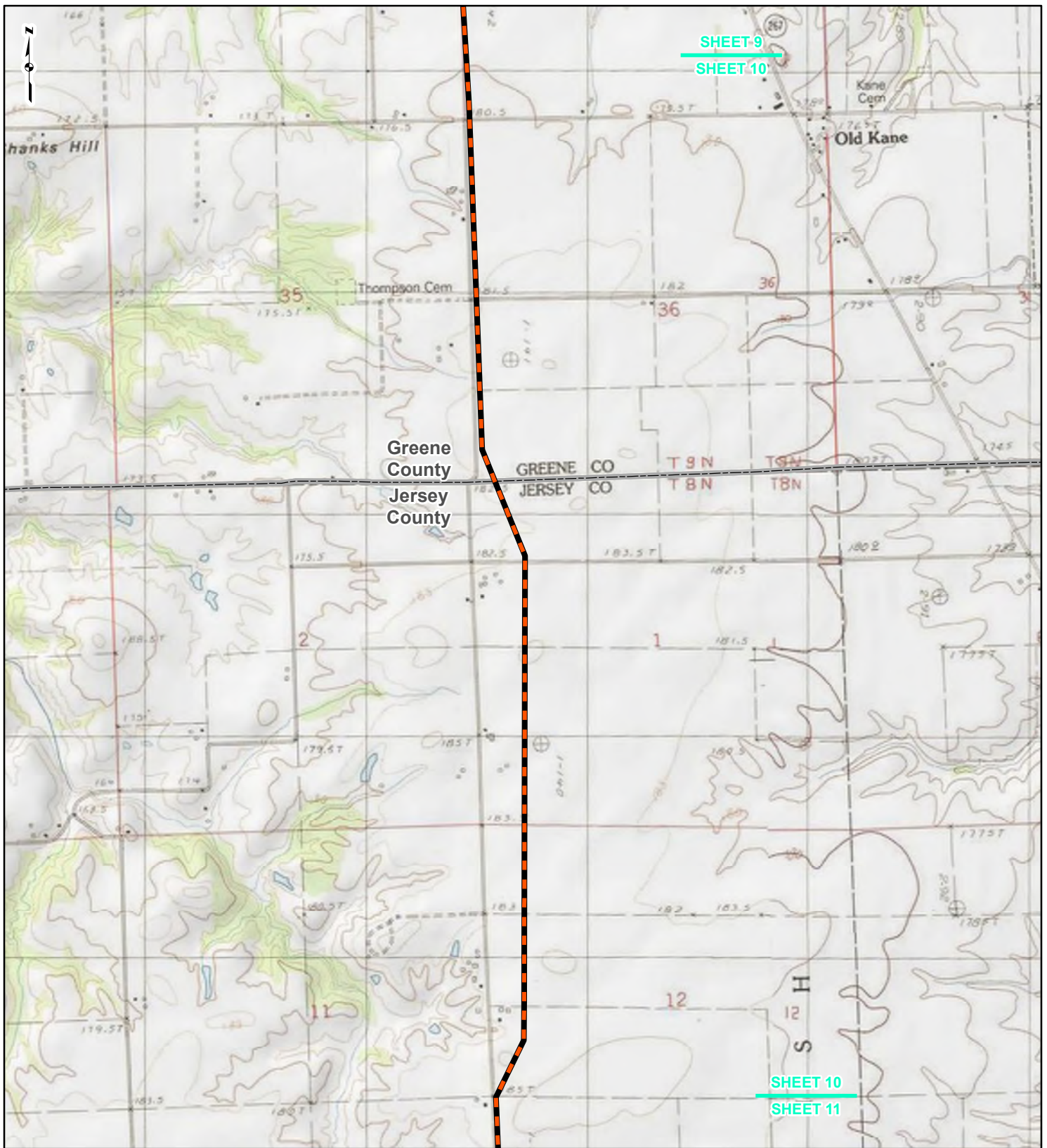
**FIGURE 1  
LOCATION MAP  
SHEET 9 OF 21**



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.





**LEGEND**

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

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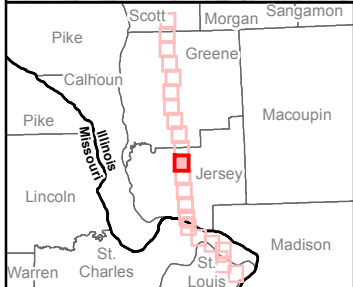
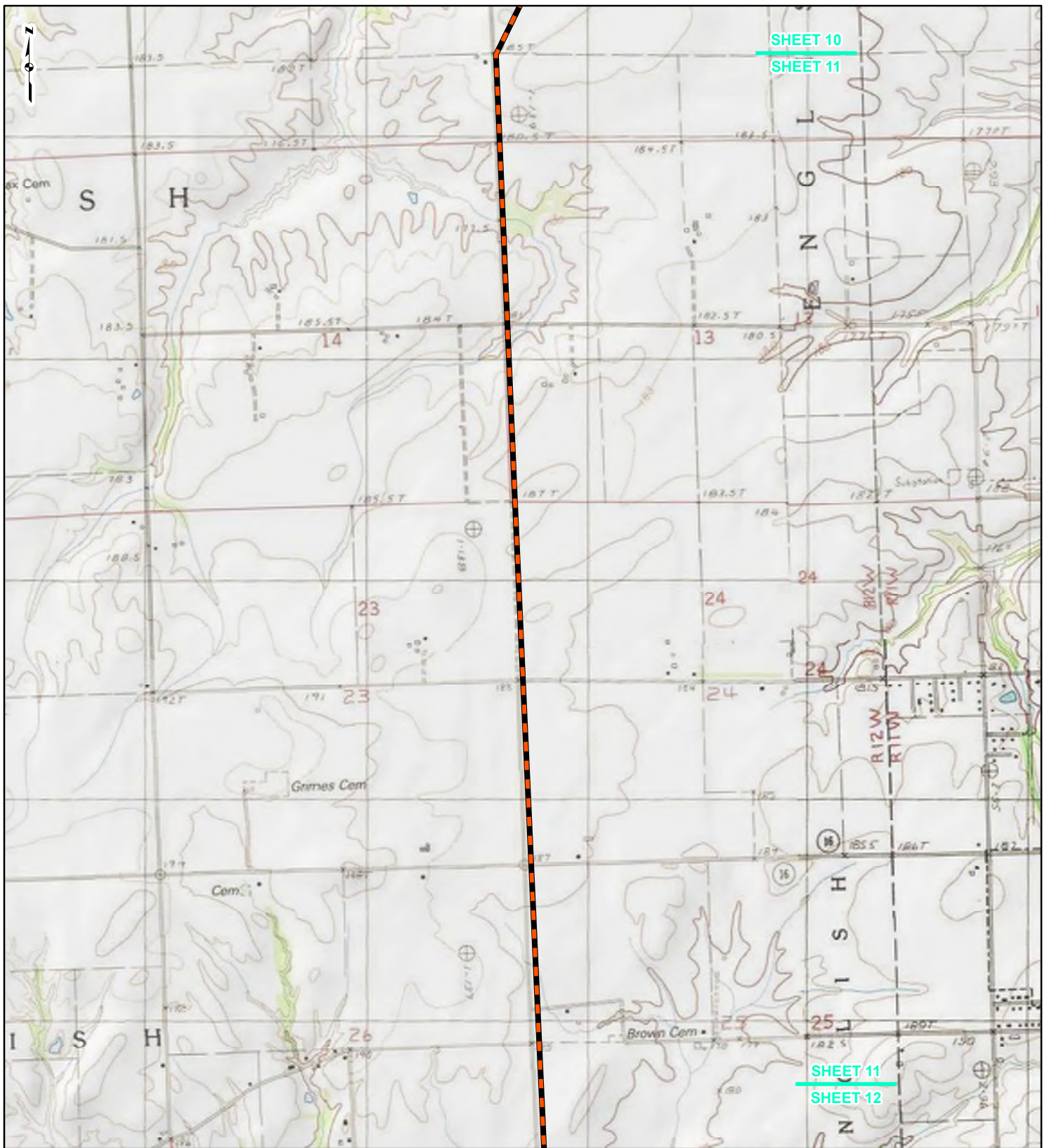
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 10 OF 21**

**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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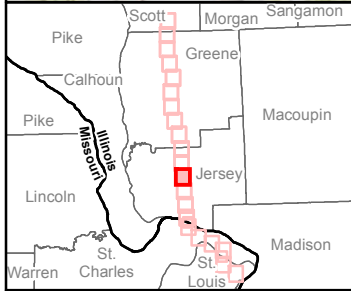
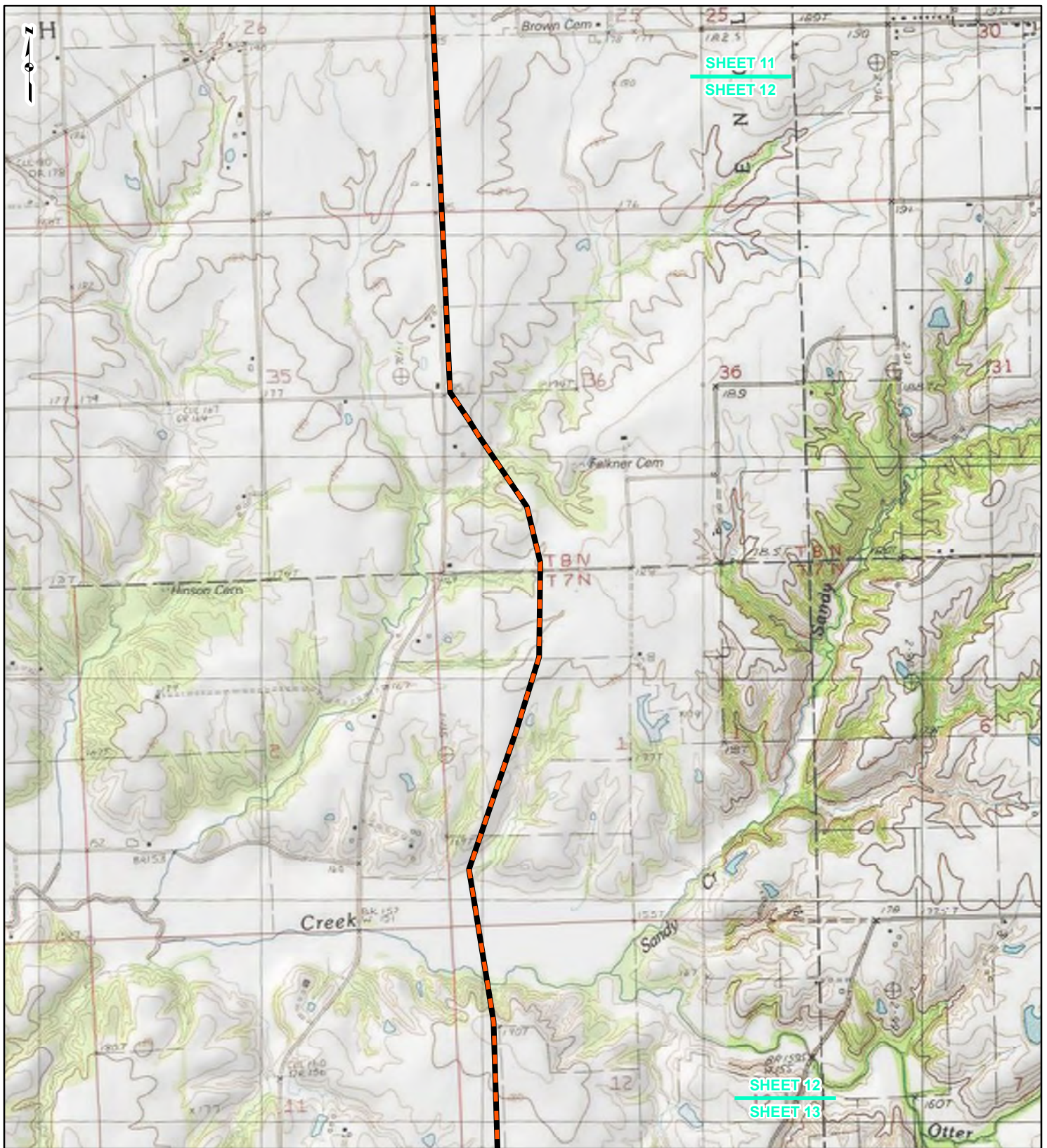
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 11 OF 21**



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

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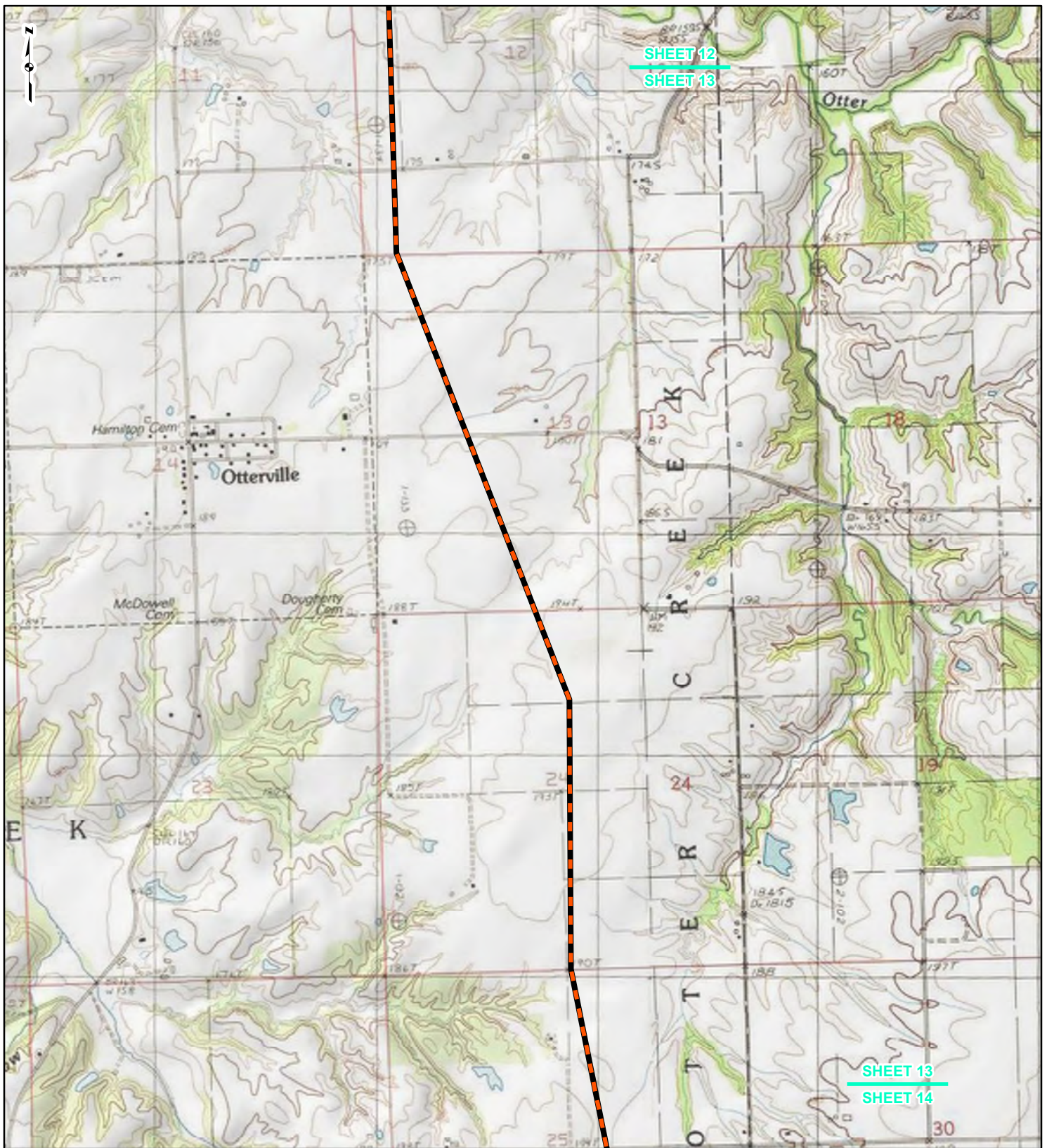
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 12 OF 21**

**Spire STL Pipeline**

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

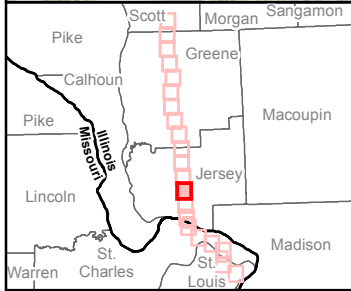
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SHEET 12  
SHEET 13

SHEET 13  
SHEET 14



**LEGEND**

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

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Feet

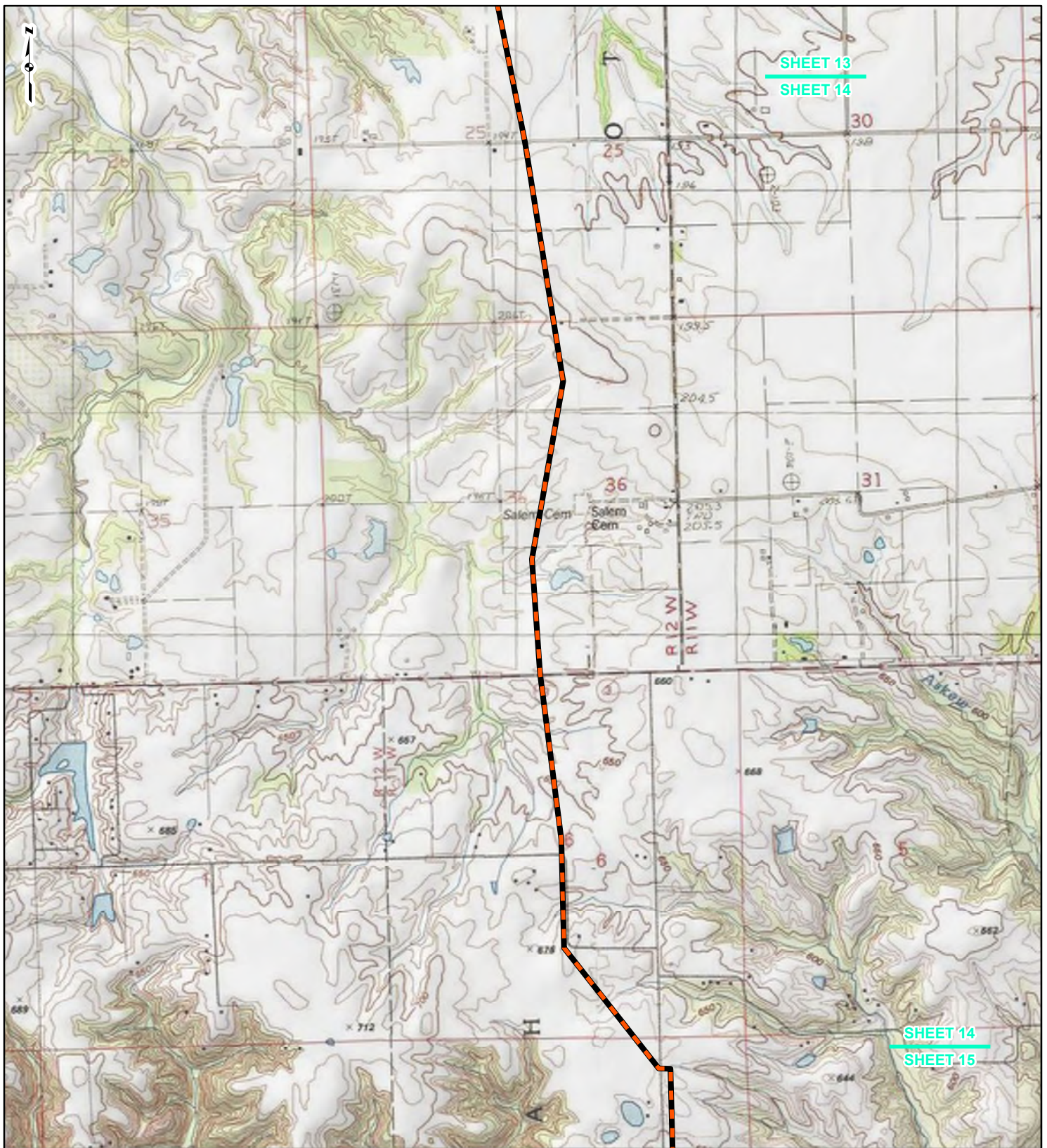
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 13 OF 21**

**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

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Feet

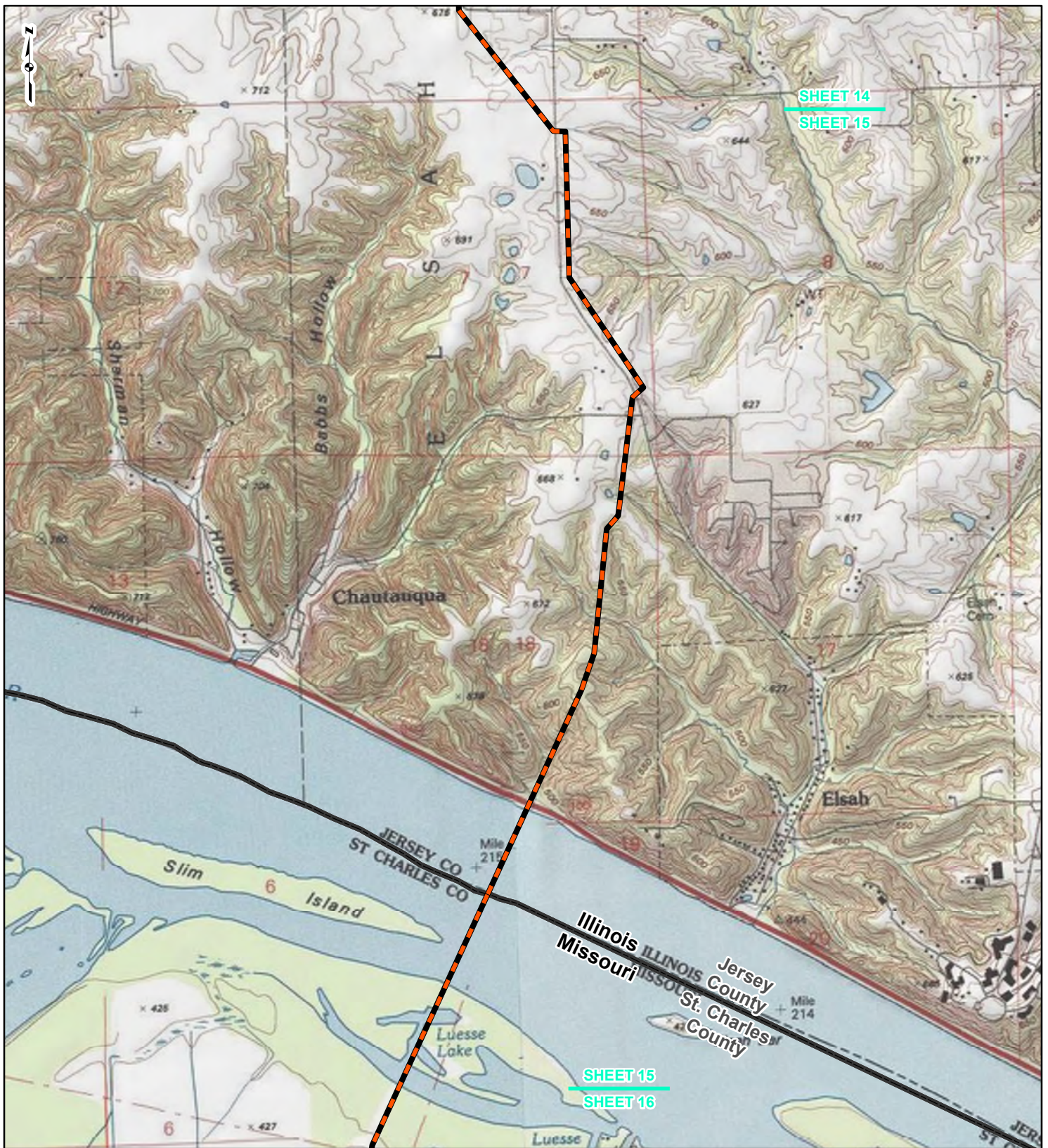
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 14 OF 21**



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), 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

0    1,000    2,000    4,000  
Feet

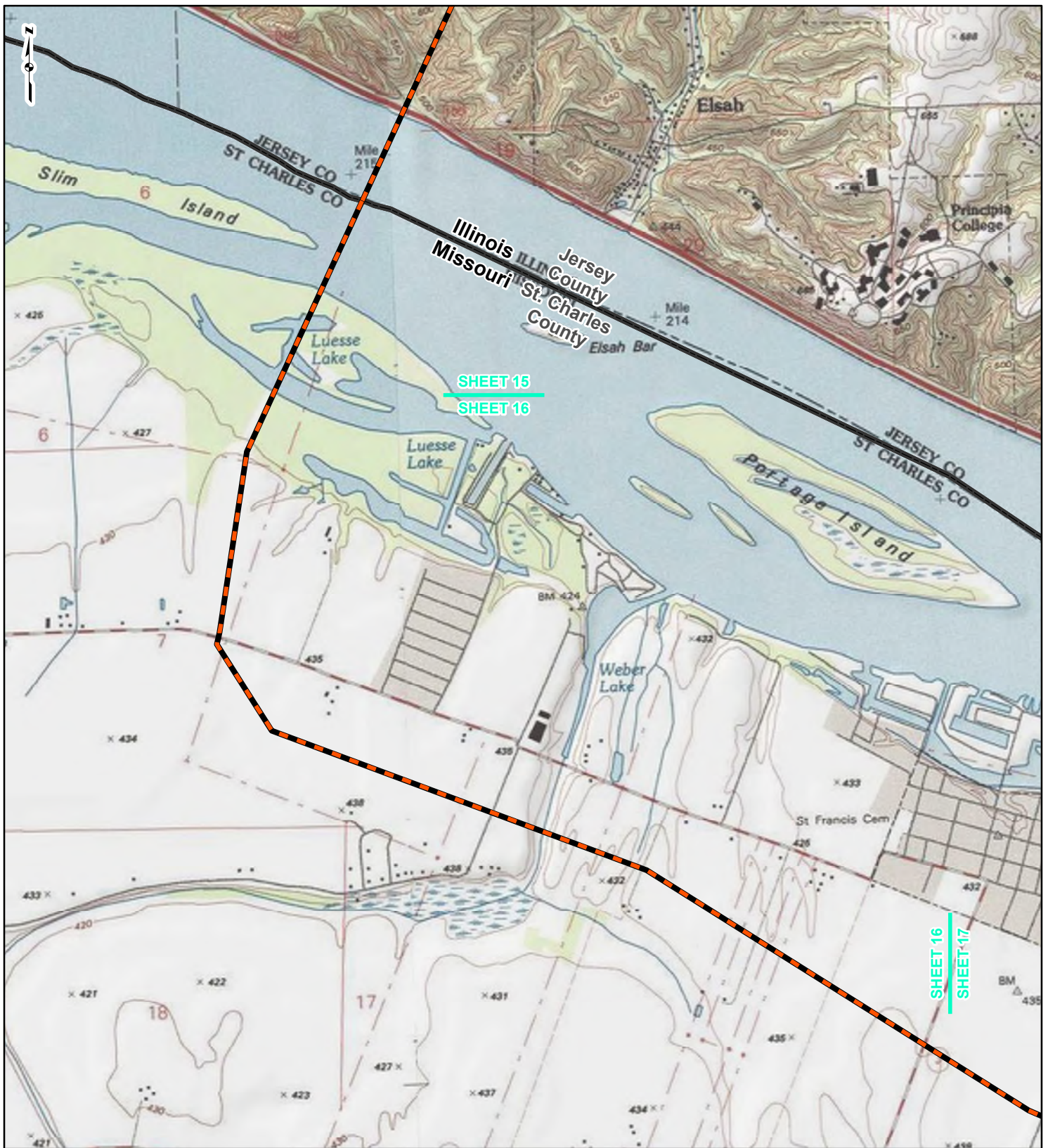
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 15 OF 21**



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), 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.





**LEGEND**

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

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Feet

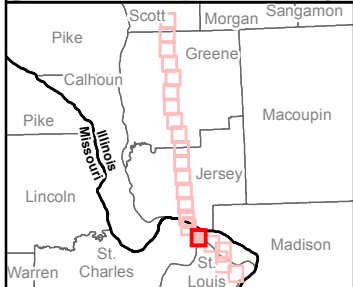
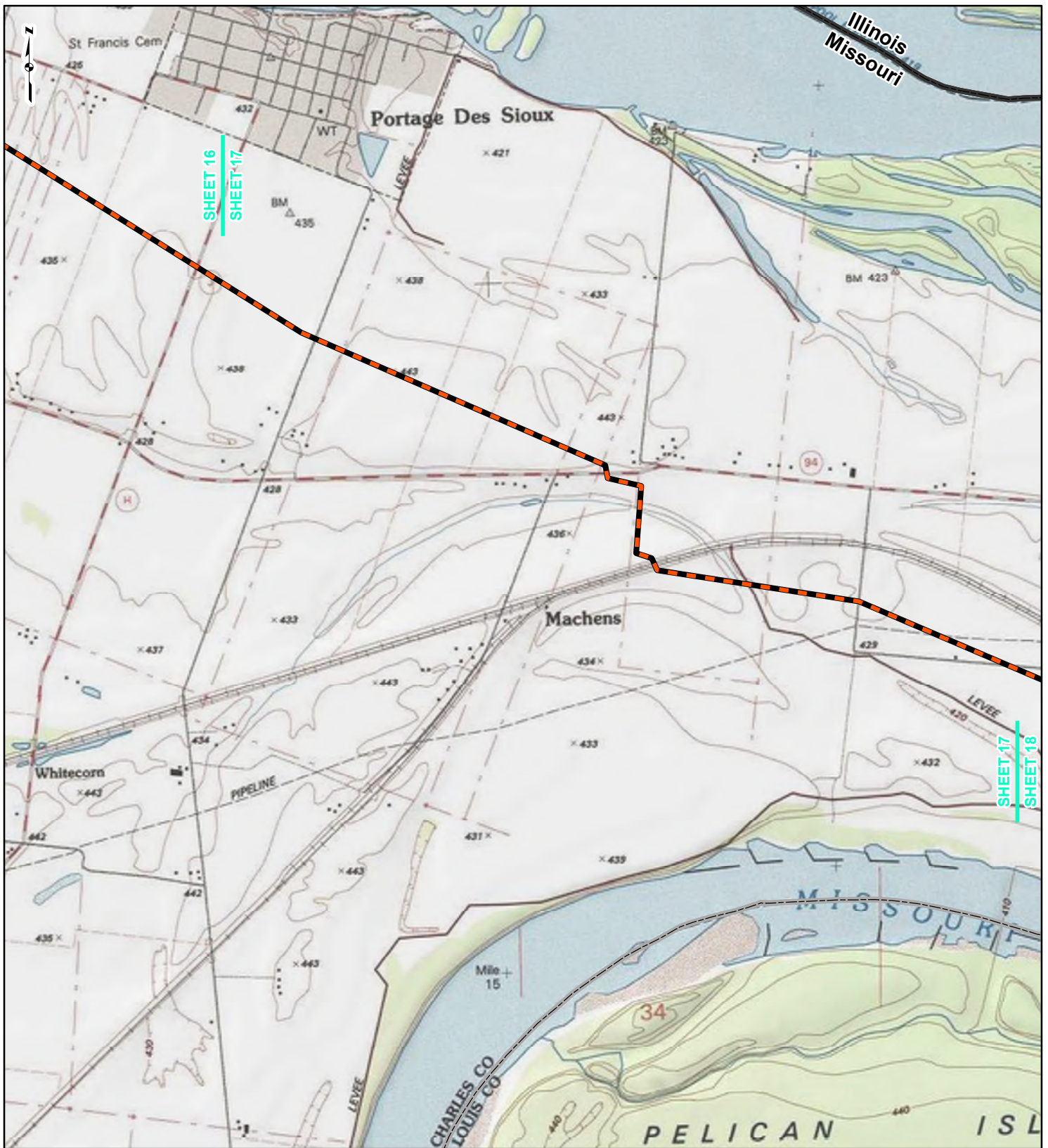
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 16 OF 21**

**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), 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

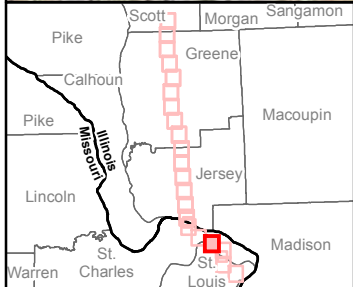
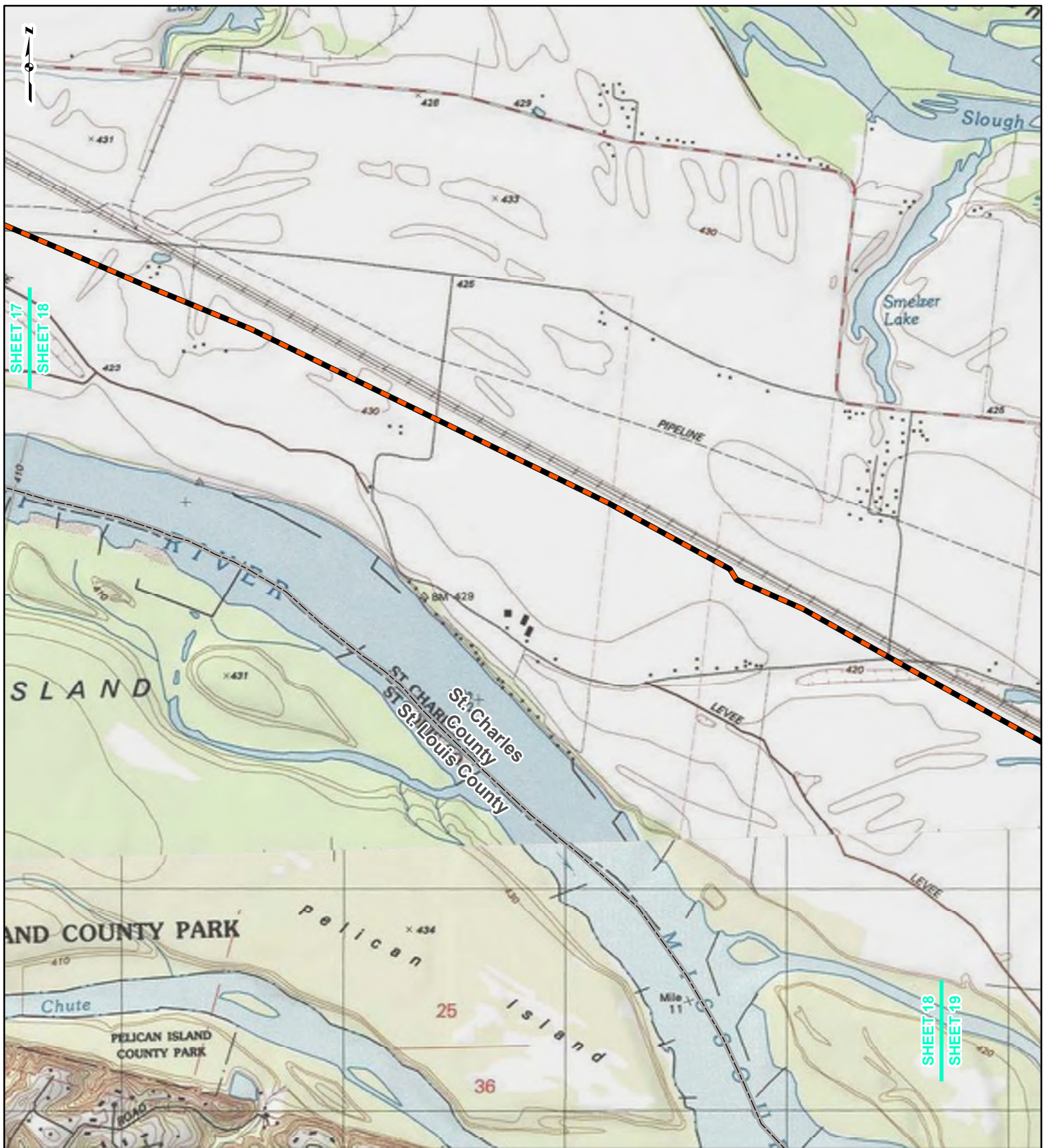
0    1,000    2,000    4,000  
Feet

**FIGURE 1**  
LOCATION MAP  
SHEET 17 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

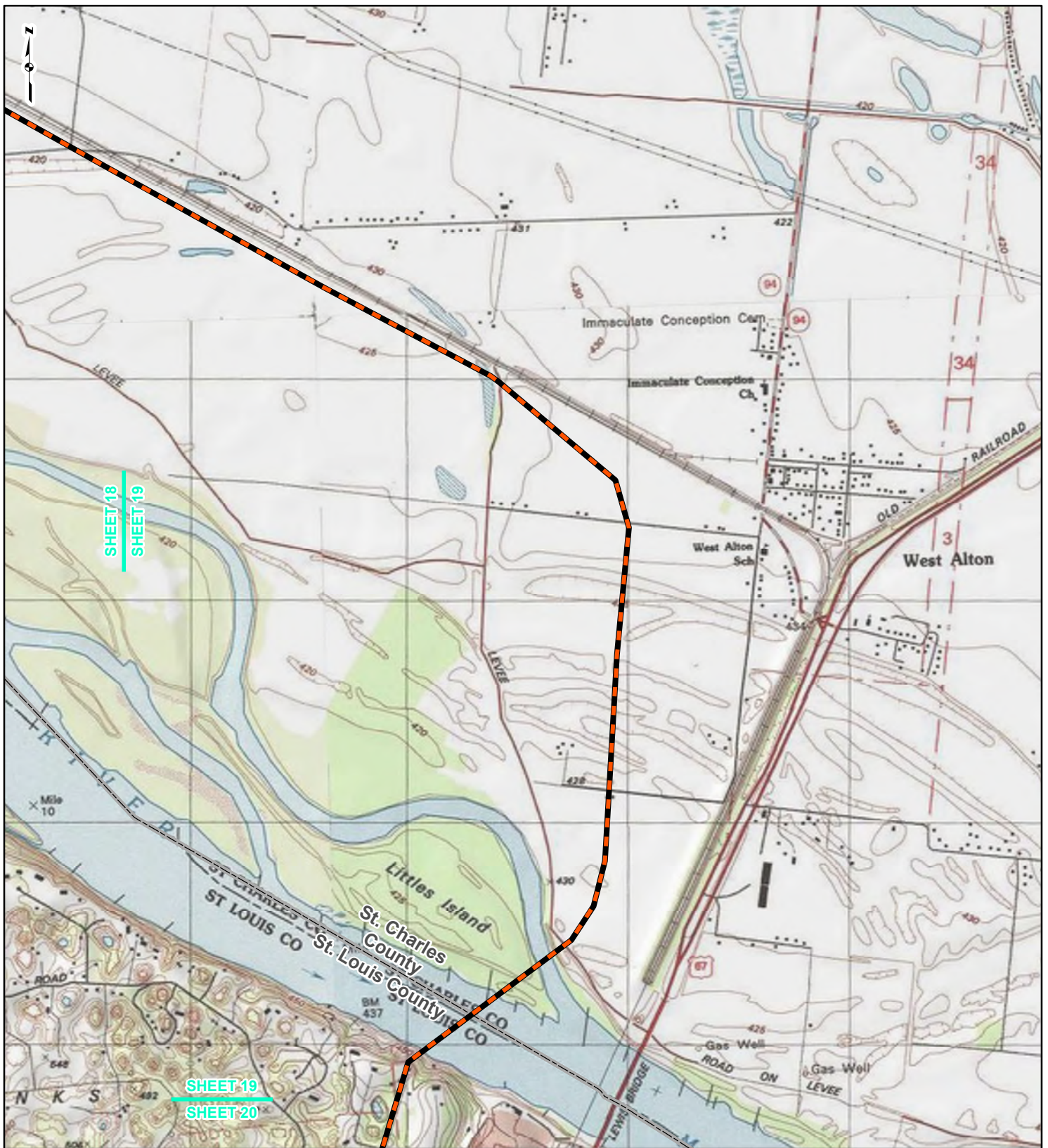
0      1,000      2,000      4,000  
Feet

**FIGURE 1**  
**LOCATION MAP**  
**SHEET 18 OF 21**

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

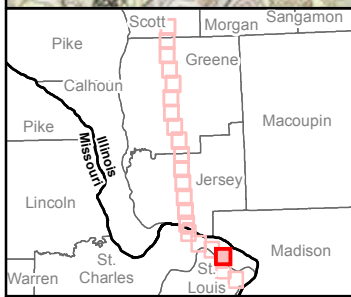
REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTerville (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, 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

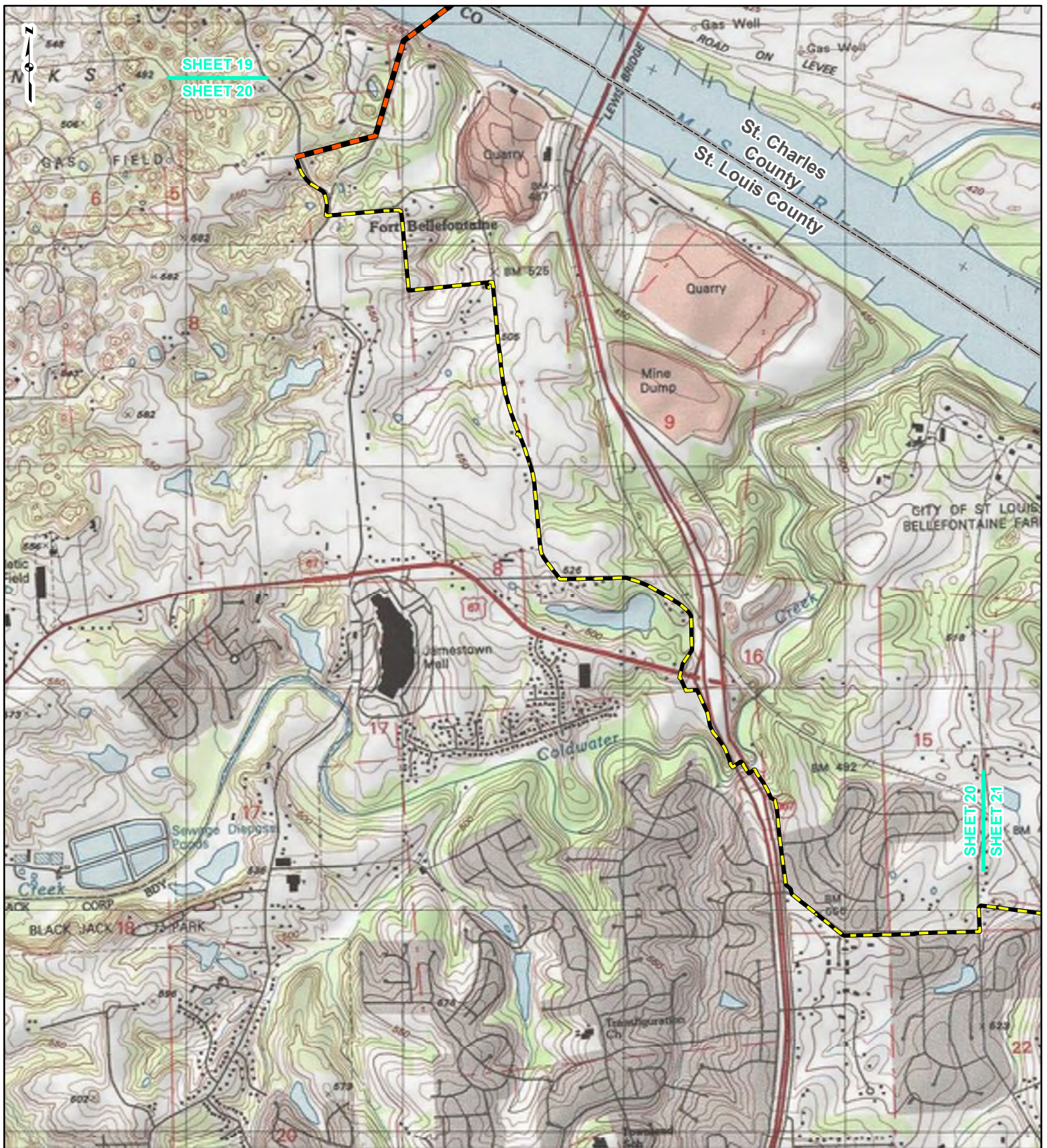
**FIGURE 1  
LOCATION MAP  
SHEET 19 OF 21**

**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 19  
SHEET 20

SHEET 20  
SHEET 21



**LEGEND**

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

0      1,000      2,000      4,000  
Feet

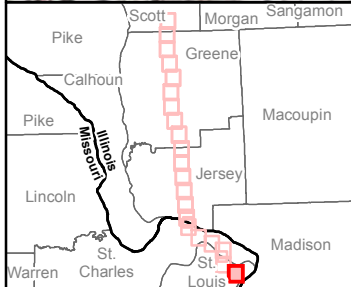
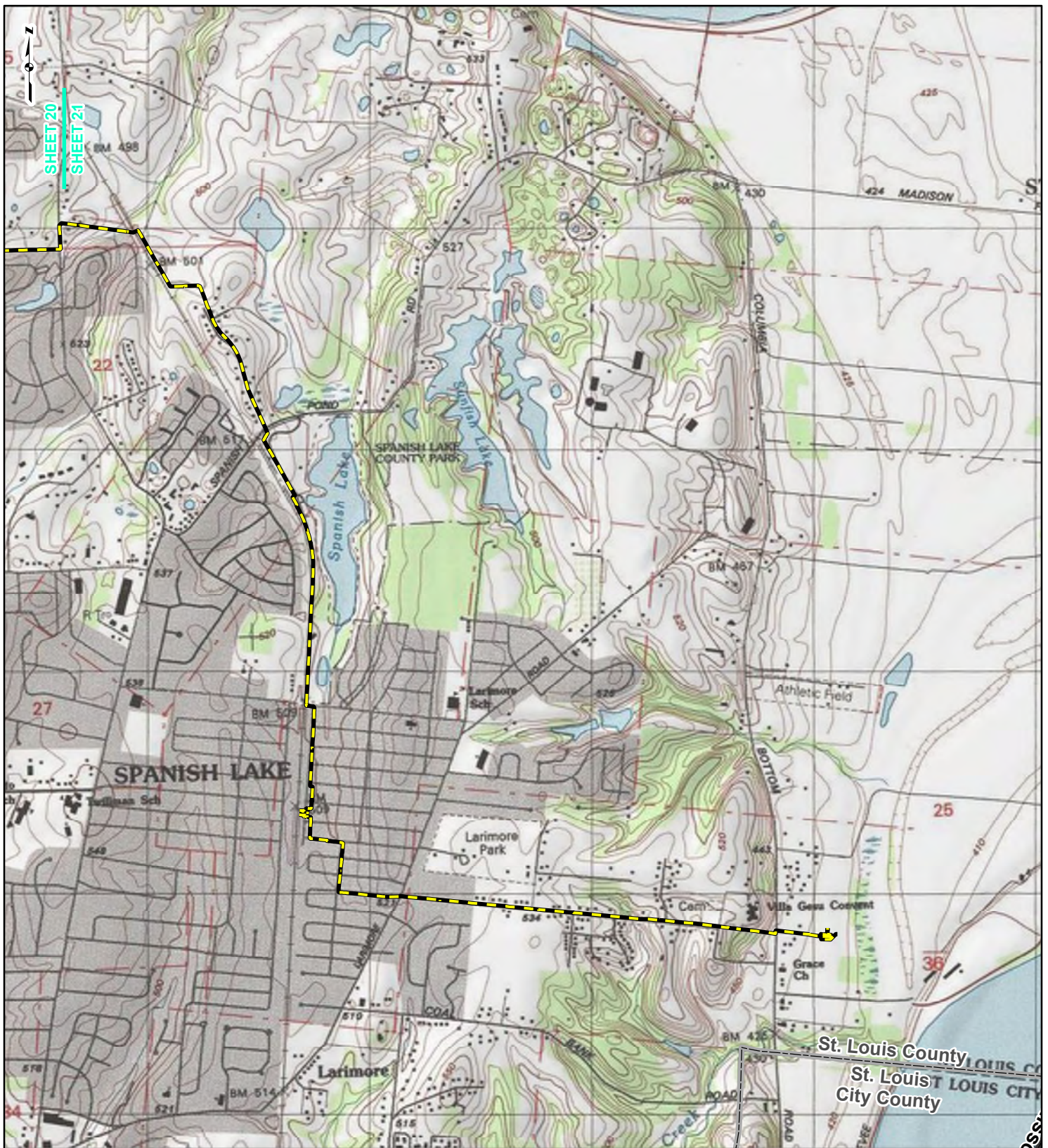
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 20 OF 21**



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), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.

## Lori Ferry

---

**From:** Lori Ferry  
**Sent:** Thursday, June 09, 2016 10:45 AM  
**To:** 'terry.savko@illinois.gov'  
**Subject:** Spire STL Pipeline Project  
**Attachments:** Spire STL Pipeline Project Overview.png

Hi Terry,

Nice speaking with you today. I've attached a map and a short project description for you.

Again, we hope to meet with you all sometime the week of June 20<sup>th</sup> (21<sup>st</sup> or 22<sup>nd</sup> if possible) as your schedules allow. I'll let you all talk it over and then if you would let me know which date would work best, that would be great.

Thanks again for your time and look forward to working with you,  
Lori Ferry

### 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.**

### 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://gaiconsultants.com) |     

[l.ferry@gaiconsultants.com](mailto:l.ferry@gaiconsultants.com)



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# telephone log



gai consultants

Date: 6/9/2016

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Project / Admin. No.: E160438.00

---

Call From:

---

Company: GAI Consultants

---

Phone No.:

---

Call To: Terry Savko

---

Company: IL DOA

---

Phone No.: 217-785-4458

---

Subject: Project Introduction

---

cc:

---

**Summary of Discussion, Decisions, and Commitments:**

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Called Ms. Savko to introduce the Project and understand the ILDOA requirements for an Agricultural Mitigation Agreement. Ms. Savko was agreeable to setting up a meeting to talk with the ILDOA regarding the Project and a date will be set up in the next week.



## **Illinois Historic Preservation Agency**





January 26, 2017

Ms. Rachel Leibowitz  
Division Manager and Deputy SHPO  
Illinois Historic Preservation Agency  
1 Old State Capitol Plaza  
Springfield, Illinois 62701-1507

**Re: Spire STL Pipeline Project; Scott, Greene, and Jersey Counties, Illinois  
Submission of Technical Report  
Phase I Archaeological Survey and  
Architectural and Historical Resources Reconnaissance Survey  
IHPA Log #: 005080216**

Dear Ms. Leibowitz:

Spire STL Pipeline LLC ("Spire"), a wholly owned subsidiary of Spire Inc., is seeking authorization from the Federal Energy Regulatory Commission pursuant to Section 7(c) of the Natural Gas Act to construct and operate the proposed Spire STL Pipeline Project ("Project") located in Scott, Greene, and Jersey Counties, Illinois, and St. Charles and St. Louis Counties, Missouri. The total length of the Project pipelines will be approximately 66 miles, of which approximately 45.35 miles are in Illinois.

GAI Consultants, Inc. ("GAI") conducted Phase I archaeological survey between October and December 2016. The Area of Potential Effect ("APE") for the archaeological investigations was defined as the direct APE, the area of ground disturbance anticipated for the construction activities. For the purposes of the archaeological survey, in order to accommodate Project design changes throughout the process, the APE along the new 24-inch pipeline portion of the Project consists of a 300-foot-wide study corridor centered on the proposed pipeline route, a 100-foot-wide study corridor for each access road, and the footprint of the workspace needed for construction of the metering and regulating station interconnect in Illinois. Other workspace in Illinois required for construction includes four groundbeds, and two contractor yards/staging areas.

The APE for the Illinois portion of the Project was 721.3 hectares (1,782.3 acres). Of this, 536.2 hectares (1,324.9 acres) was surveyed during this field season, 5.1 hectares (12.5 acres) was previously surveyed, and 180.0 hectares (444.8 acres) was not surveyed, due to land access restrictions, slope, disturbance, or avoidance via horizontal directional drilling.

In total, 113 archaeological sites and 57 isolated finds were newly-identified, and one previously recorded site was re-identified during Phase I survey. Ten sites are recommended eligible for the listing in the National Register of Historic Places ("NRHP"), including 11ST613, 11GE789, 11GE773, 11GE757, 11GE758, 11JY700, 11JY698, 11JY699, 11JY661, and 11JY680. Additional work is recommended if these sites cannot be avoided. The remaining 103 sites are recommended not eligible, and no further work is recommended. The 57 isolated finds are all recommended not eligible for NRHP listing.

In addition to the Phase I archaeological survey, an architectural and historical resources reconnaissance survey was conducted in October 2016. The APE for above-ground resources encompasses a direct (construction impacts) and indirect APE. The indirect APE was defined as a

0.125-mile buffer of the proposed pipeline to account for visual impacts on aboveground historic resources. There were no previously recorded resources located within the APE. The survey resulted in the identification of 31 previously unrecorded architectural and historical resources in Scott, Greene, and Jersey Counties. Two of the resources are recommended eligible for listing in the NRHP: GAI-02/House at +/- 1238 Havens Road (under Criterion C) and GAI-06/Gulf, Mobile and Ohio Railroad (under Criterion A). The remaining 29 identified architectural and historical resources lack sufficient integrity and/or significance to be recommended eligible for NRHP listing. Overall, Project-related construction will not adversely impact any NRHP-eligible historic and architectural resources identified to date. GAI-02, recommended as potentially eligible, lies outside the APE for the Project as it is currently defined. Following completion of the October survey, additional workspace and access roads were added to the Project, potentially requiring additional architectural and historical reconnaissance survey. If additional field surveys are conducted, Spire will submit supplemental Phase I reports to the Illinois Historic Preservation Agency as required.

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

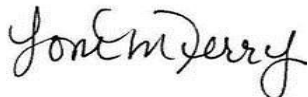
We look forward to continuing to work with you on this Project. Please contact Eric Scuoteguazza at (412) 399-5188 or e.scuoteguazza@gaiconsultants.com, if there are questions regarding this report.

Sincerely,

**GAI Consultants, Inc.**



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



Lori M. Ferry  
Environmental Project Manager

EPS/LMF

Attachment: Phase I Archaeological Survey and Architectural and Historical Resources  
Reconnaissance Survey  
Spire STL Pipeline Project; Scott, Greene, and Jersey Counties, Illinois



# telephone log



gai consultants

Date: 11-7-2016

---

Project / Admin. No.: E160438.00

---

Call From: Elizabeth Williams, Senior Architectural Historian

---

Company: GAI Consultants

---

Phone No.: 412.399.5060

---

Call To: David Halpin

---

Company: Illinois SHPO

---

Phone No.: 217-785-4998

---

Subject: Architectural History Reporting

---

cc:

---

**Summary of Discussion, Decisions, and Commitments:**

---

Call to discuss approach to reporting for Illinois portion of Spire STL Pipeline; report to be in the form of an identified resource table with photo appendix and mapping of project and resource locations

# GAI Consultants, Inc.

**Chicago Office**  
 1444 Farnsworth Avenue, Suite 303  
 Aurora, IL 60505  
 T 313.301.2002  
[www.gaiconsultants.com](http://www.gaiconsultants.com)

## Letter of Transmittal

TRANSMITTAL NO.	T009
DATE:	11/1/2016
PROJECT NO.	E160438.00, Task 003

**Illinois Historic Preservation Agency**  
**1 Old State Capitol Plaza**  
**Springfield, Illinois 62701**  
**Attention: Ms. Rachel Leibowitz**  
**Division Manager and Deputy SHPO**

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  
**VIA:** Next Day Delivery  
**PURPOSE:** For Your Use

COMMENTS:

### ATTACHMENTS:

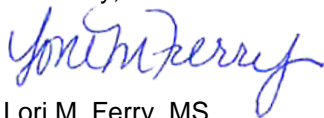
Quantity	Document No.	Rev.	Document Date	Document Description/Title	Status*
1	-	-	October 2016	Draft Resource Report 4 Cultural Resources	-

\*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





October 28, 2016

Ms. Rachel Leibowitz  
Division Manager and Deputy SHPO  
Illinois Historic Preservation Agency  
1 Old State Capitol Plaza  
Springfield, Illinois 62701-1507

**Re: Unanticipated Discoveries Plan for Cultural Resources  
Spire STL Pipeline LLC  
Spire STL Pipeline  
Scott, Greene and Jersey Counties, Illinois**

Dear Ms. Leibowitz:

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

As part of the Commission filing, Spire is including an Unanticipated Discoveries Plan for Cultural Resources in Illinois. I have enclosed a copy of that plan for your review and concurrence.

Thank you for your consideration of this matter. If you have any questions regarding this submission, please feel free to contact me at 412.399.5191, or by e-mail at [J.Glenn@gaiconsultants.com](mailto:J.Glenn@gaiconsultants.com).

Sincerely,  
**GAI Consultants, Inc.**

A handwritten signature in blue ink that reads 'Jonathan Glenn'.

Jonathan Glenn  
Cultural Resources Manager

Attachment: Unanticipated Discoveries Plan for Cultural Resources in Illinois

October 28, 2016  
Project E160438.00

**ATTACHMENT:**

**UNANTICIPATED DISCOVERIES PLAN FOR CULTURAL RESOURCES IN ILLINOIS**





# Spire STL Pipeline Project

Unanticipated Discoveries Plan  
for Cultural Resources in Illinois

FERC Docket No. PF16-9-000

Draft  
October 2016

Public



## Table of Contents

Unanticipated Discoveries Plan for Cultural Resources in Illinois .....	1
1.1    References.....	4





## Acronyms and Abbreviations

FERC	Federal Energy Regulatory Commission
IHPA	Illinois Historic Preservation Agency
NHPA	National Historic Preservation Act of 1966
NRHP	National Register of Historic Places
Project	Spire STL Pipeline Project
Spire	Spire STL Pipeline LLC



# Unanticipated Discoveries Plan for Cultural Resources in Illinois

This Unanticipated Discoveries Plan details the procedures that will be implemented by Spire STL Pipeline LLC ("Spire") and its contractors to handle the unanticipated discovery of cultural resources that may be encountered during construction of the proposed Spire STL Pipeline Project ("Project"). This plan was developed in accordance with 36 Code of Federal Regulations 800.13 (Post-Review Discovery clause), as well as the following regulations:

- Illinois Historic Preservation Agency's ("IHPA's") *Guidelines for Archaeological Reconnaissance Survey/Reports* (IHPA, undated);
- Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420);
- Illinois Archaeological and Paleontological Resources Protection Act (20 ILCS 3435); and,
- Illinois Human Skeletal Remains Protection Act (20 ILCS 3440).

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

The Spire Environmental Project Manager will notify the IHPA and the Federal Energy Regulatory Commission ("FERC"), and will hire a state-approved archaeological consultant who will evaluate the site and provide an immediate verbal recommendation to Spire and the IHPA regarding the eligibility status of the site. Spire's Environmental Manager will notify FERC of the recommendation and continue to consult with the IHPA's office, as per the requirements of Section 106 of the National Historic Preservation Act of 1966 ("NHPA"). Communications, such as consultation, transmittals, and reports may be provided via e-mail, as appropriate and acceptable to each agency. Contact information for the various agencies is listed below:

**Environmental Inspector**

*To be determined*

**Chief Inspector**

*To be determined*





**Spire Environmental Project Manager**

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

**Spire Project Manager**

Scott Jaskowiak  
Spire, Inc.  
700 Market Street  
St. Louis, Missouri 63101  
314-575-5588  
scott.jaskowiak@SpireEnergy.com

**IHPA**

Rachel Leibowitz  
Division Manager and Deputy State Historic Preservation Office  
Illinois Historic Preservation Agency  
1 Old State Capital Plaza  
Springfield, Illinois 62701-1507  
217-785-5031  
rachel.leibowitz@illinois.gov

**FERC**

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

**Greene County Coroner**

Dean Bishop  
P.O. Box 207  
Greenfield, Illinois 62044  
217-368-2202

**Greene County Sheriff's Office**

403 7th Street  
Carrollton, Illinois 62016  
217-942-6901



**Jersey County Coroner**

Larry Alexander  
108 North Liberty  
Jerseyville, Illinois 62052  
618-498-2711

**Jersey County Sheriff's Office**

114 North Washington  
Jerseyville, Illinois 62052  
618-498-6881

**Scott County Coroner**

David King, Jr.  
35 East Market Street  
Winchester, Illinois 62094  
217-742-3141

**Scott County Sheriff's Office**

35 East Market Street  
Winchester, Illinois 62094  
217-742-5217

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

In the event that human remains are discovered during construction, the Environmental or Chief Inspector will immediately halt work and notify the Spire Environmental Project Manager, the county coroner's office, and the IHPA. If the county coroner is not available, the Environmental Inspector will contact the local law enforcement agency. The Environmental Inspector will ensure that human remains are protected from further damage, intrusion, or removal until proper examinations can be performed. Provision for security to protect suspected burials from vandalism will be taken, including monitoring of the area. Discovery of human remains should not be made public, including but not limited to, conversations with local residents, posting on social media, or communication with news outlets. Construction activities including vehicle traffic will be kept a minimum of 25 feet from the remains (dependent on the location, construction design, and agency consultation) and separated by temporary fencing. If remains are found not to be of recent origin, the Spire Environmental Project Manager will contact the IHPA and FERC to ensure that relevant laws are followed. As soon as a determination has been



made that the human remains are Native American, FERC will contact appropriate tribal representatives for the region in which the remains were found. If the remains are not Native American and not associated with a crime scene, FERC and the Spire Environmental Project Manager will take into account guidance in *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places* (Potter and Boland 1992). A reasonable attempt will be made to identify the next of kin. Spire's Environmental Manager will notify FERC of the situation and will continue to keep FERC informed as to the progress of further consultation. Spire will attempt to redesign the Project to avoid impact to the human remains. Only if avoidance is not possible will Spire proceed with removal of the human remains.

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

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

## 1.1 References

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

Illinois Historic Preservation Agency. Undated. *Guidelines for Archaeological Reconnaissance Survey/Reports*. Illinois Historic Preservation Agency, Springfield. Accessed electronically, September 2016, <https://www.illinois.gov/iHPA/Preserve/Pages/Archaeology.aspx>.





August 29, 2016

Ms. Rachel Leibowitz  
Division Manager and Deputy SHPO  
Illinois Historic Preservation Agency  
1 Old State Capitol Plaza  
Springfield, Illinois 62701-1507

**Re: Initial Cultural Resources Consultation  
Spire STL Pipeline LLC  
Spire STL Pipeline  
Scott, Greene and Jersey Counties, Illinois**

Dear Ms. Leibowitz:

GAI Consultants, Inc. ("GAI") is submitting for your review the attached documentation on behalf of Spire STL Pipeline LLC ("Spire"), for the portion of the Spire STL Pipeline Project ("Project") in Scott, Jersey, and Greene Counties, Illinois. The overall Project includes components in both Illinois and Missouri, and consultation with the Missouri State Historic Preservation Office ("SHPO") is being submitted under separate cover. Spire will be applying to the Federal Energy Regulatory Commission ("FERC") for a certificate of Public Convenience and Necessity under Section 7(c) of the Natural Gas Act, as amended, for construction, operation, and maintenance of natural gas transmission facilities. Representatives from GAI and Spire met with your office on June 21, 2016 to introduce the 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 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"). 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 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 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 dekatherms per day. No compression will be required.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75-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 meter and regulating station and one pig launcher are proposed in Scott County, Illinois, at the interconnection location with the REX pipeline. In addition, Spire has assumed the use/development of new and/or existing access roads throughout the Project area. Additional temporary workspaces 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.

### **Site Description**

The Illinois portion of the Project is located in Scott, Greene, and Jersey Counties, Illinois, 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 United States Geological Survey (USGS) 7.5-minute series topographic maps (Figure 1).

The majority of the new build 24-inch pipeline is Greenfield and crosses primarily agricultural landscapes with some areas of forest.

### **Methods**

On behalf of Spire, GAI will conduct a Phase I archaeological survey, geomorphological assessment of select locations with potential to contain deeply buried cultural deposits, and a Phase I historic architectural survey. Prior to fieldwork, GAI will conduct additional background research to supplement the online GIS data obtained for the Project area, and further determine the extent of previously recorded cultural resources in the proposed Area of Potential Effect ("APE").

Investigations will be completed for the APE for the Project, which will consist of a 300-foot wide study corridor centered on the new pipeline route, a 100-foot wide study corridor for each access road, and study of a contractor yard. GAI proposes to conduct systematic Phase I archaeological survey for those portions of the proposed APE determined to contain moderate to high potential for yielding archaeological sites. Per the current accepted guidelines, previously plowed areas exhibiting at least 25 percent ground surface visibility will be surface collected by walking five meter intervals to look for exposed artifacts. This will be supplemented by excavating shovel test pits ("STPs") in small areas where surface visibility drops below the accepted threshold. In areas that have not been previously plowed, or large areas where surface visibility is below the 25 percent visibility threshold, subsurface testing will be conducted by excavating STPs at 15 meter intervals along transects spaced 15 meters apart. Each STP will measure at least 40 centimeters in diameter. STPs will be excavated to an average depth of 60 centimeters deep unless culturally sterile subsoil is reached first. Excavated soil will be screened through one-quarter-inch mesh to allow for systematic artifact recovery. If artifacts are recovered in STPs, radial STPs placed at five meter intervals will be excavated around the perimeter of the cluster of positive STPs to more accurately define the archaeological site boundaries, per state guidelines.

Portions of the new-build pipeline will be located on floodplains that may have potential to contain buried soils. GAI will consult with IHPA to establish a vertical APE for the Project in these settings. If the vertical APE is still considered to extend deep enough to impact potentially buried soils, a professional soil scientist will conduct an initial geomorphological assessment of those settings. GAI will collect soil samples via hand-augering. That data, combined with previous soil survey reports, will be used to present an opinion as to the potential of select areas to contain buried deposits that could contain intact archaeological remains. That assessment will be used to consult with IHPA to determine

if deep testing is required, and if required, help focus the efforts in limited areas of higher potential. Subsequent deep archaeological testing will be conducted as necessary and in coordination with IHPA.

Based on guidance from IHPA, GAI will complete an historic architectural survey within one-eighth-mile of the proposed centerline. Architectural survey will serve to identify buildings, objects, structures, sites, or districts within the APE that are 50 years old or older. This will consist of photography of identified resources and landscape features using a high resolution digital camera, field notes recording significant architectural and landscape features, and marking locations of identified resources on Project mapping.

Following completion of the Phase I survey of the Project, GAI will prepare draft Phase I Survey reports describing the methods and results of the cultural resources investigations, including Project maps, graphics and photographs, in accordance with IHPA's guidelines. Mapping will be submitted displaying the survey status of each tract, areas tested versus disturbed, previously recorded sites within the APE only, and STP locations in the vicinity of recorded sites. GAI will include the requested short report as well.

**GAI would appreciate your review of the above proposed methods for this Project. GAI anticipates to begin background research and surveys in August 2016, and will coordinate with the appropriate personnel to conduct additional background research as the Project progresses.**

Please note the intent of this letter is solely for the purpose of formally initiating consultations and/or applicable permit applications. An invitation for you to participate in the FERC's NEPA 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 412.399.5191, or by e-mail at J.Glenn@gaiconsultants.com.

Sincerely,

**GAI Consultants, Inc.**



Jonathan Glenn, M.A., RPA  
Cultural Resources Manager

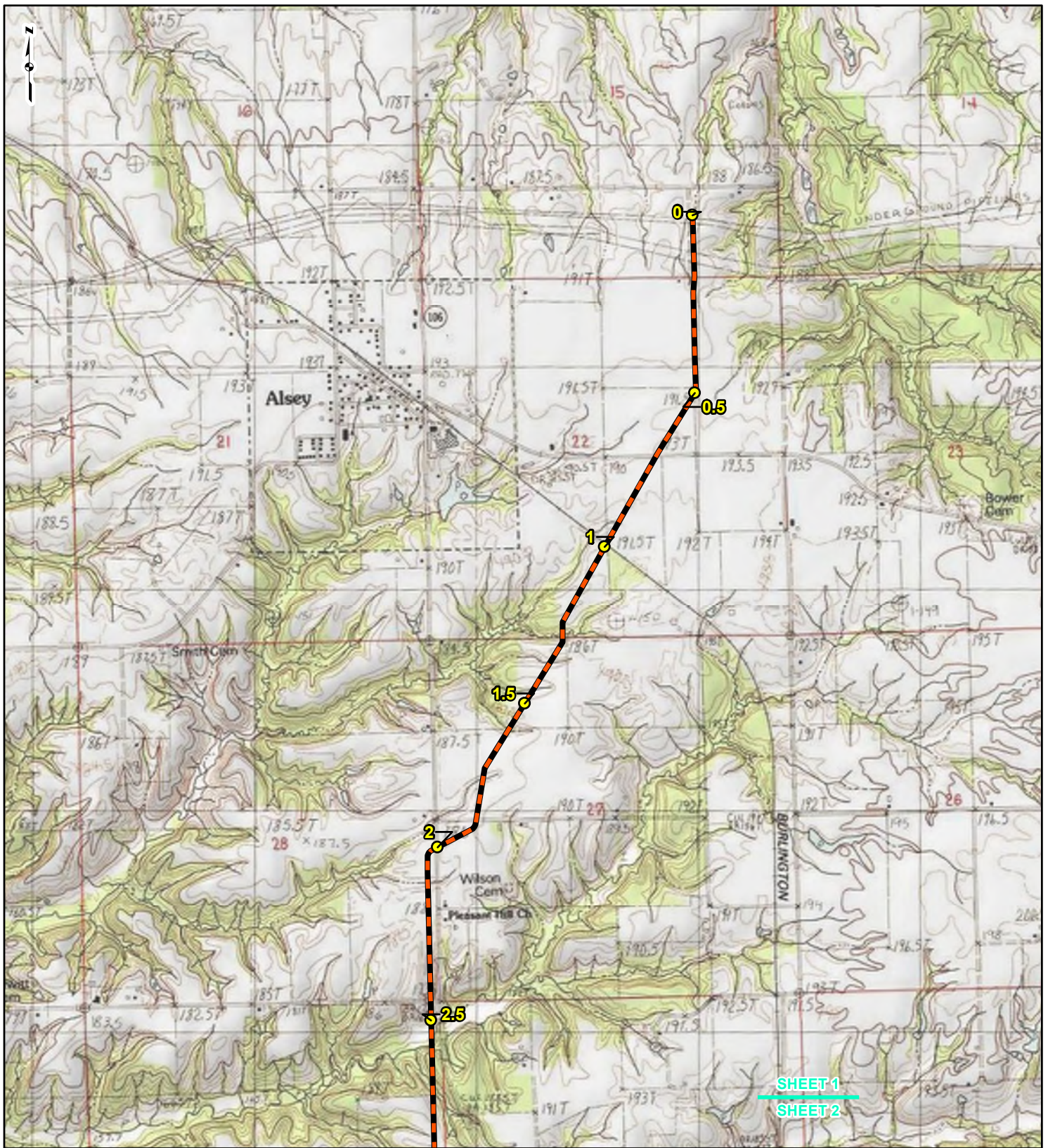
JG/gmg

Attachments: USGS Topographic Maps (Figure 1)

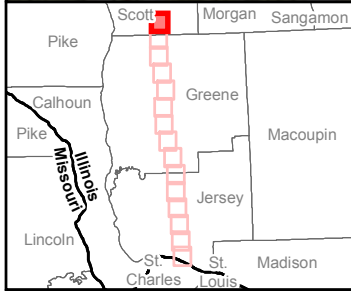


August 29, 2016  
Project E160438.00, Task 002.001





**ATTACHMENT**  
**USGS TOPOGRAPHIC MAPS (FIGURE 1)**



SHEET 1  
SHEET 2




**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

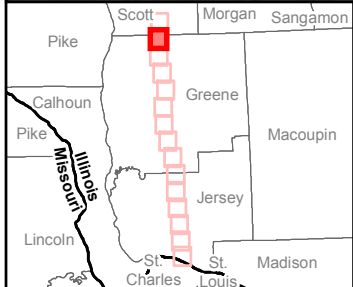
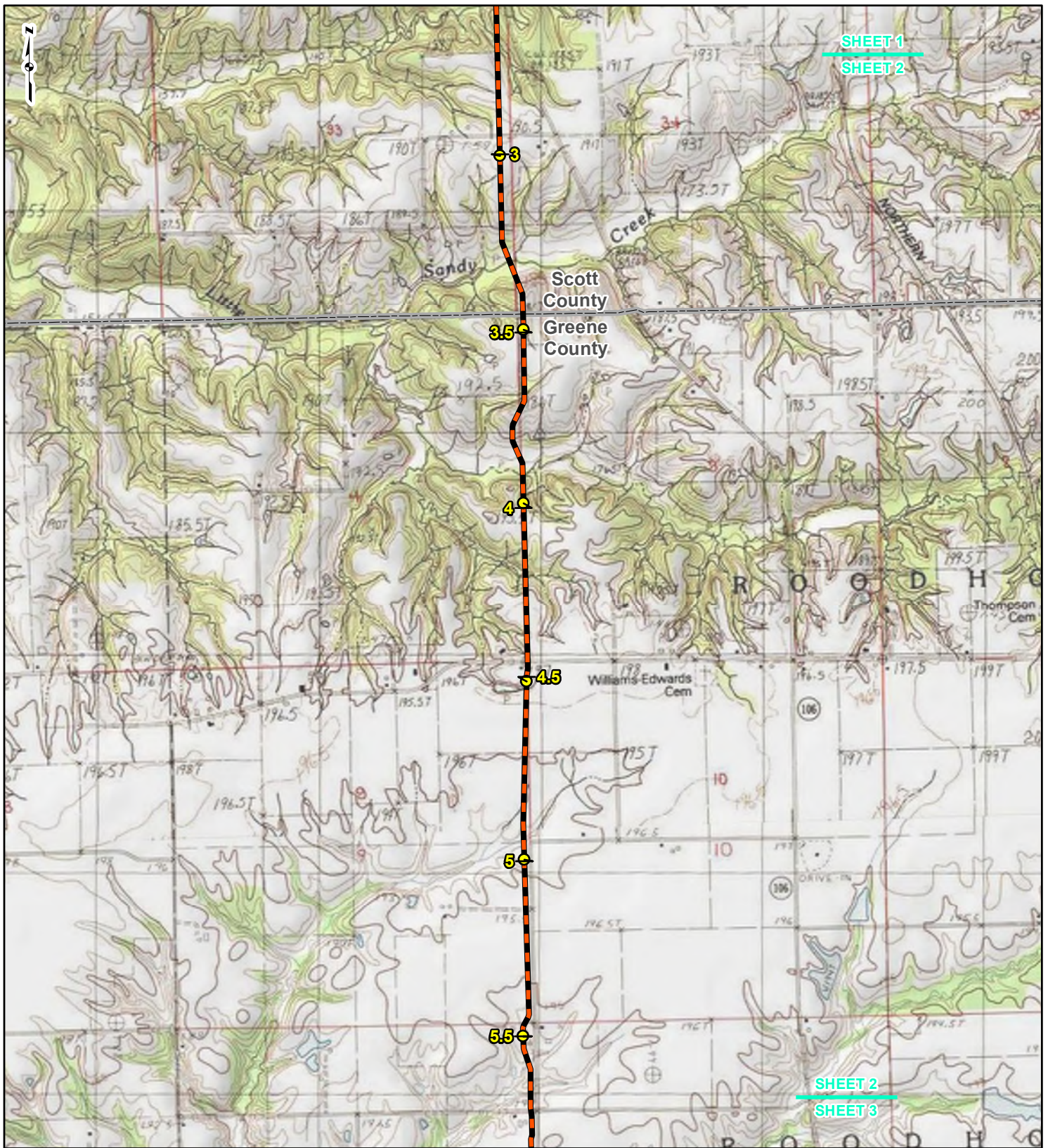
**FIGURE 1  
LOCATION MAP  
SHEET 1 OF 15**

**Spire STL Pipeline** 





DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

**FIGURE 1  
LOCATION MAP  
SHEET 2 OF 15**

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

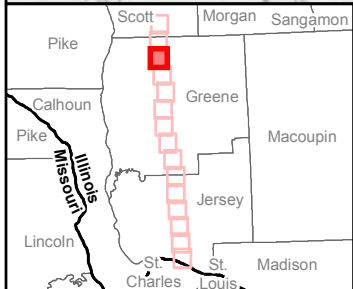
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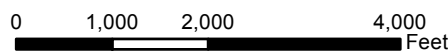
SHEET 2  
SHEET 3

SHEET 3  
SHEET 4



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 3 OF 15**



**Spire STL Pipeline**

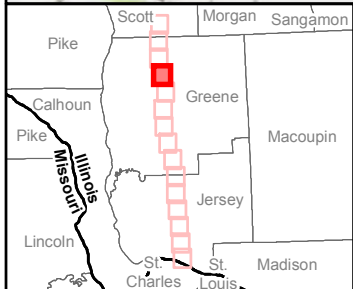
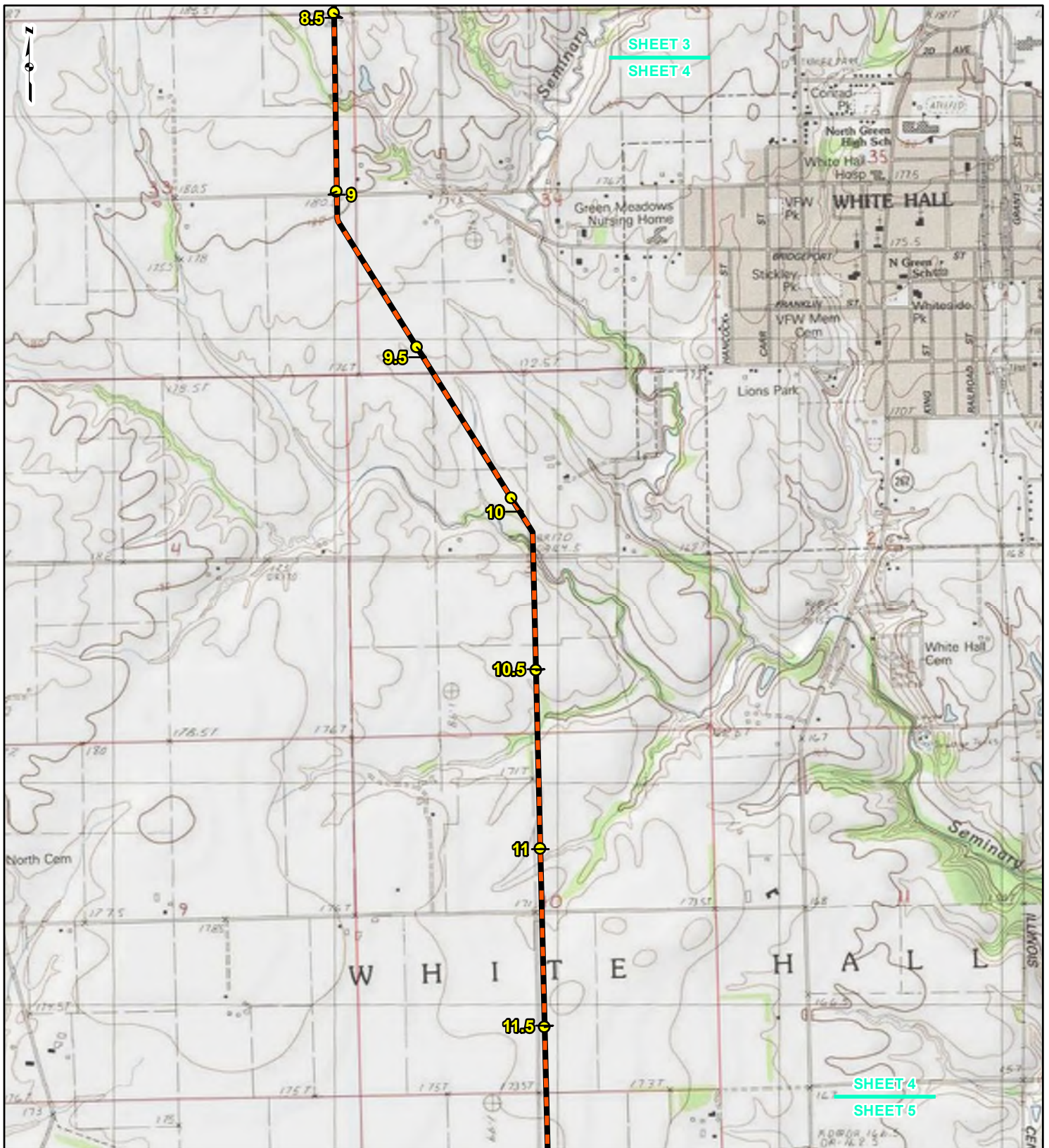


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**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

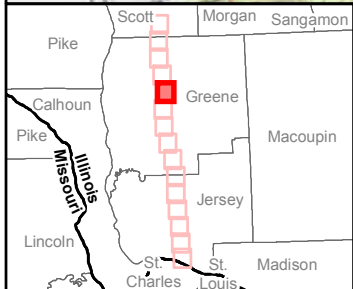
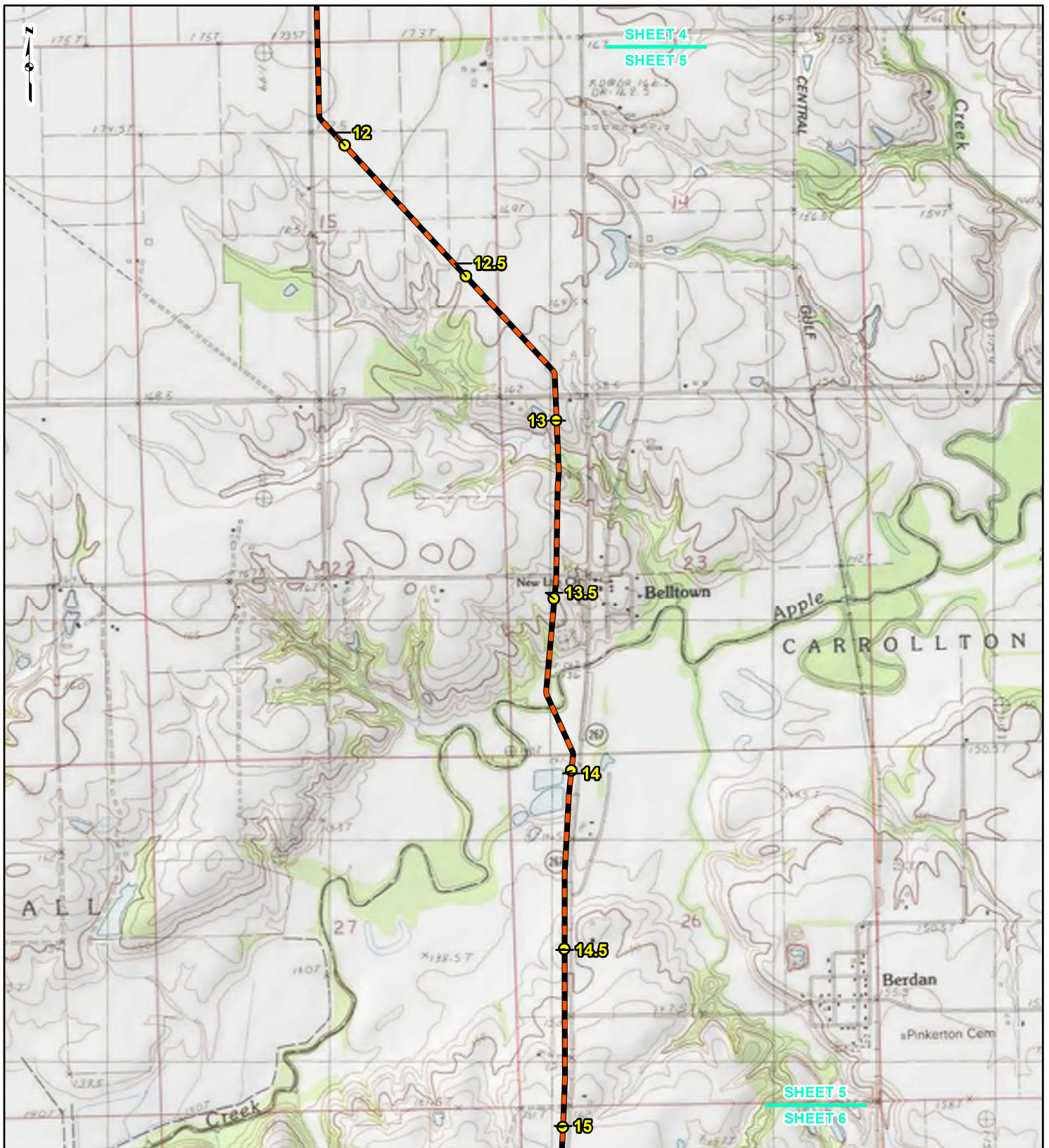
**FIGURE 1  
LOCATION MAP  
SHEET 4 OF 15**

**Spire STL Pipeline** 





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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

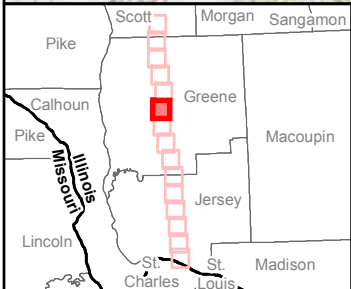
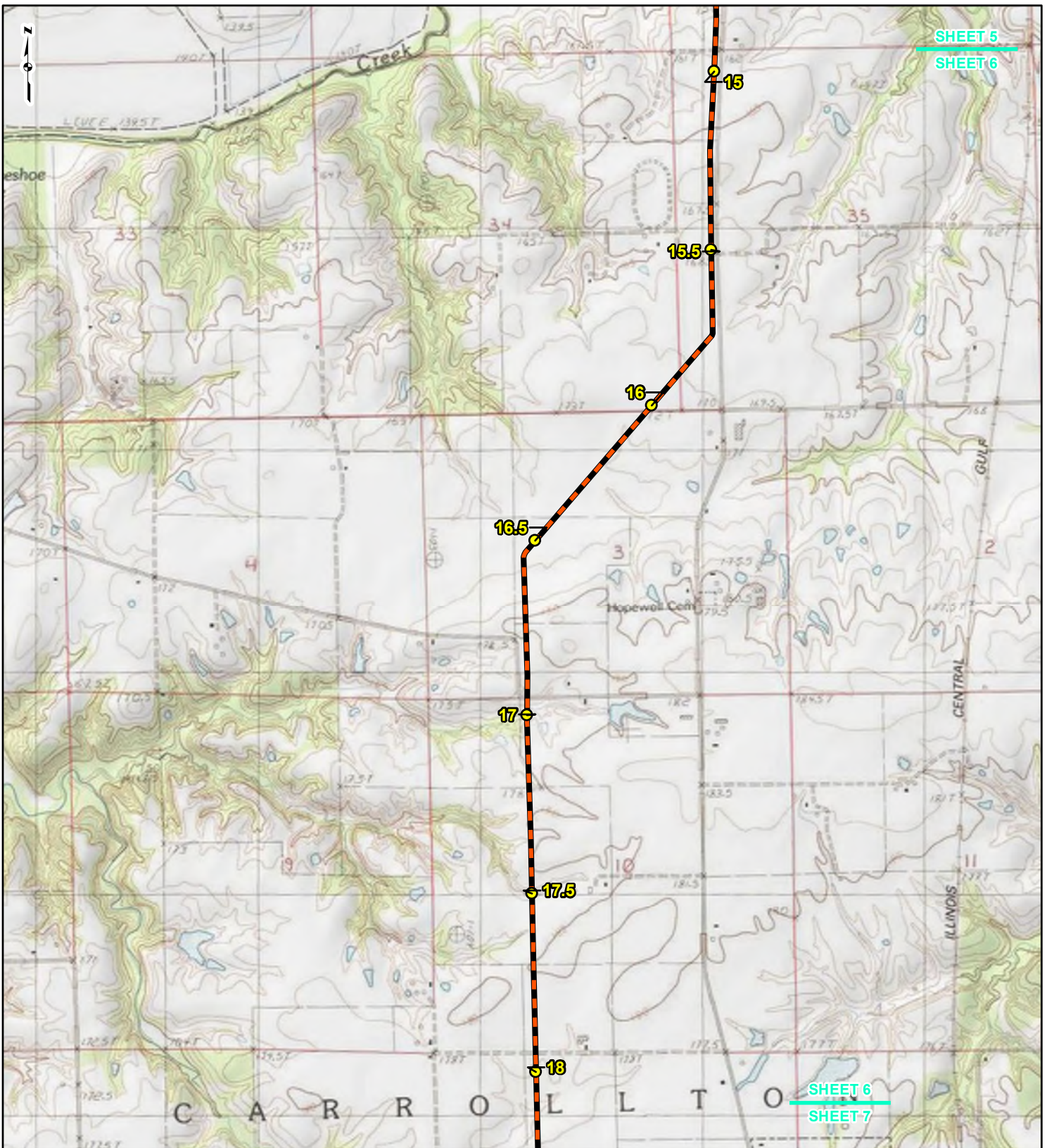
**FIGURE 1  
LOCATION MAP  
SHEET 5 OF 15**

**Spire STL Pipeline** 





DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

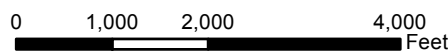
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**LEGEND**

-  NEW BUILD MILEPOST
-  NEW BUILD 24-INCH DIAMETER PIPELINE
-  COUNTY BOUNDARY
-  STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 6 OF 15**



**Spire STL Pipeline**

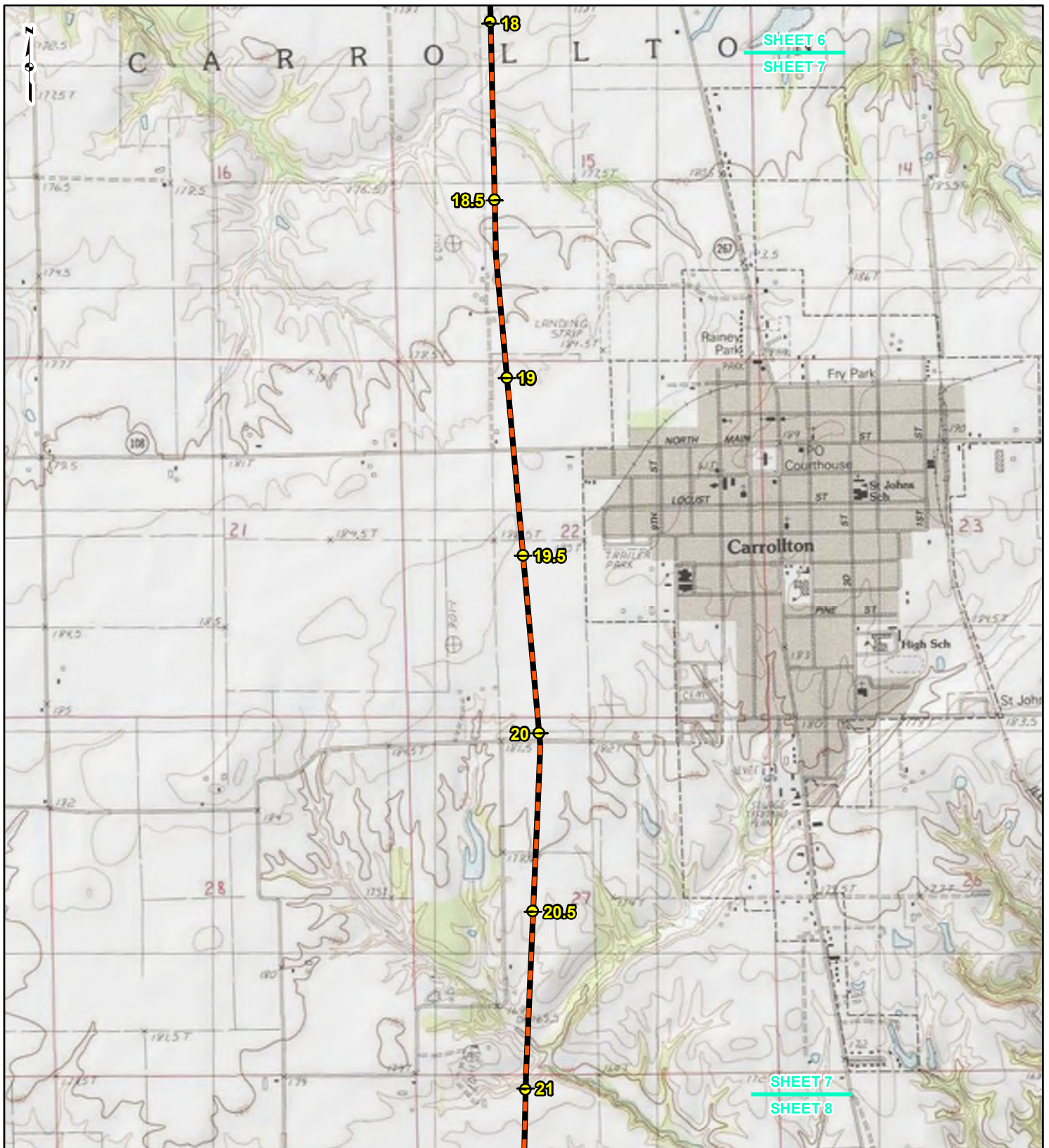


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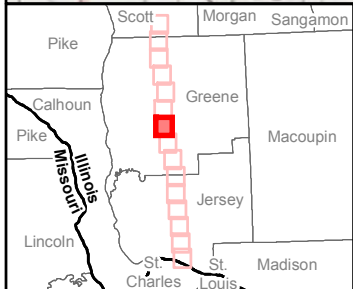
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SHEET 6  
SHEET 7

SHEET 7  
SHEET 8




**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

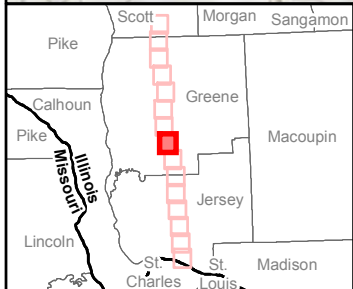
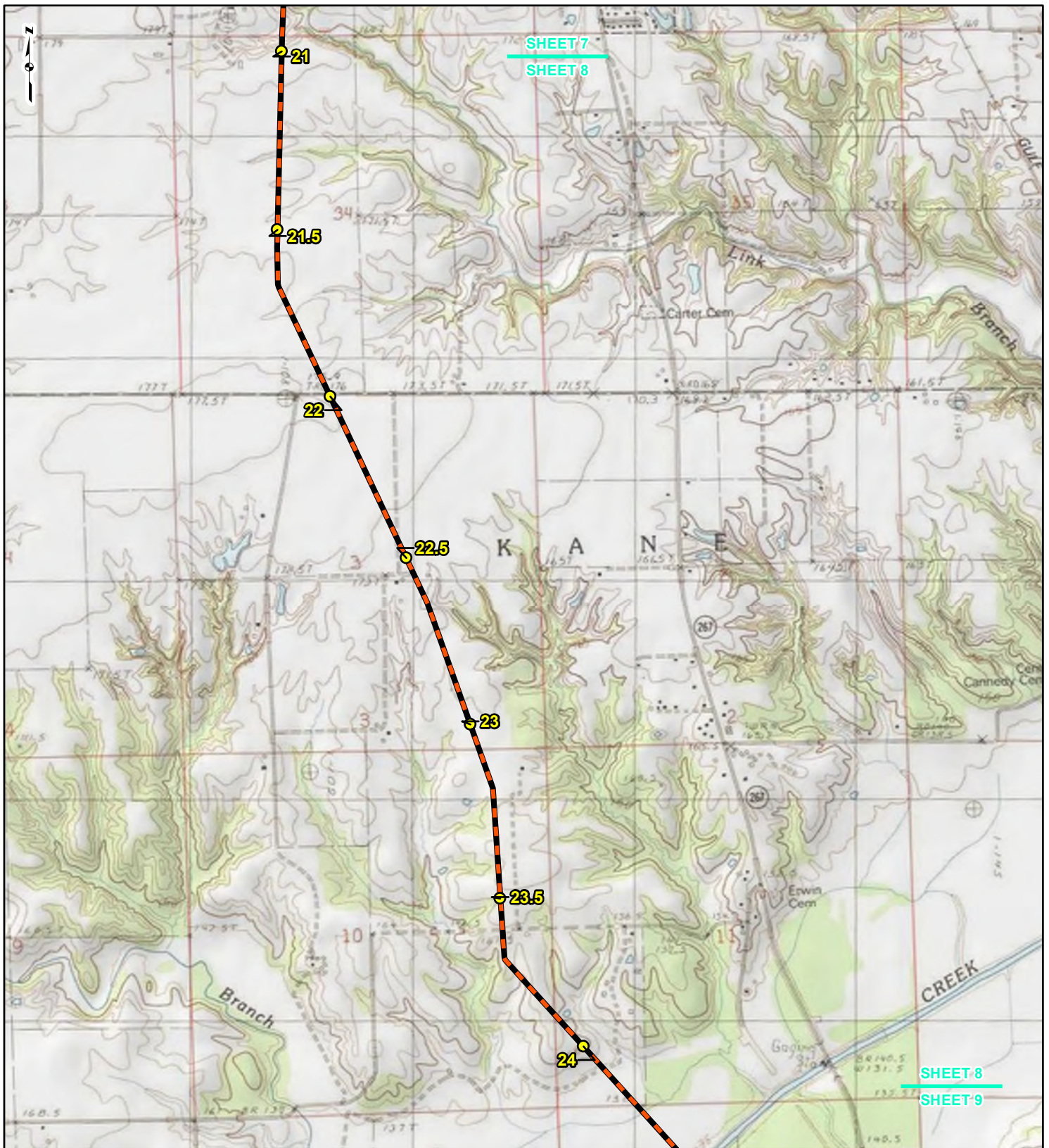
**FIGURE 1  
LOCATION MAP  
SHEET 7 OF 15**

**Spire STL Pipeline** 





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CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

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Feet

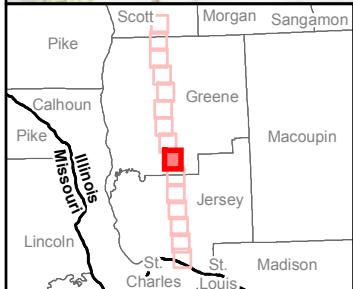
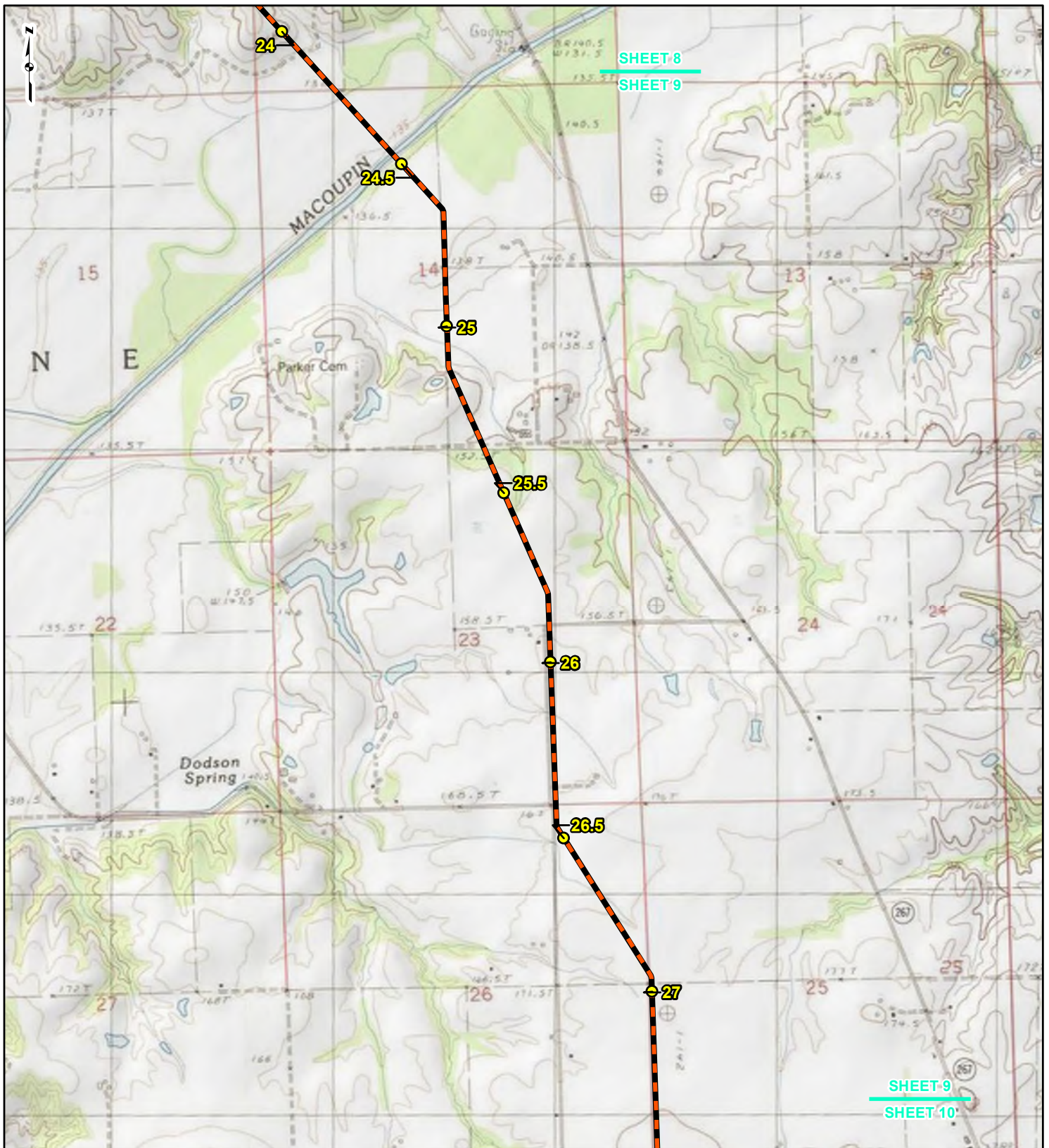
**FIGURE 1  
LOCATION MAP  
SHEET 8 OF 15**

**Spire STL Pipeline** 





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REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

 NEW BUILD MILEPOST	 COUNTY BOUNDARY
 NEW BUILD 24-INCH DIAMETER PIPELINE	 STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

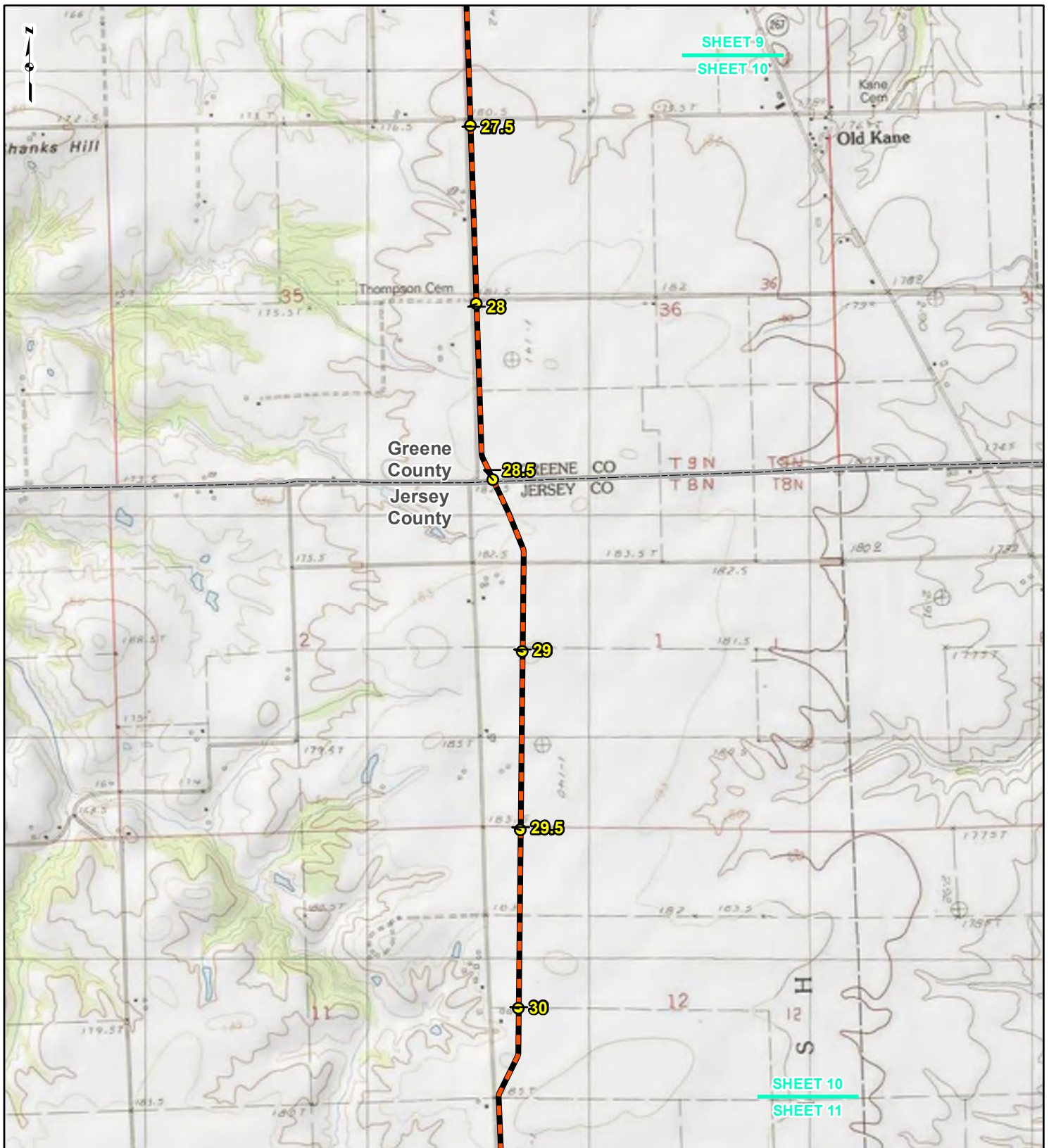
**FIGURE 1  
LOCATION MAP  
SHEET 9 OF 15**

**Spire STL Pipeline** 

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CHECKED: SWW      APPROVED: LMF

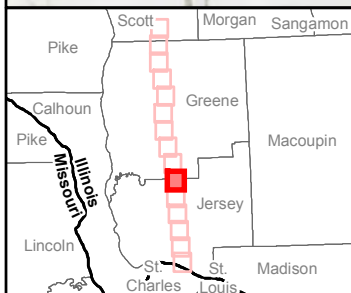
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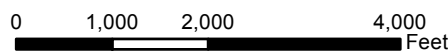
SHEET 9  
SHEET 10

SHEET 10  
SHEET 11



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



**FIGURE 1**  
**LOCATION MAP**  
**SHEET 10 OF 15**



**Spire STL Pipeline**

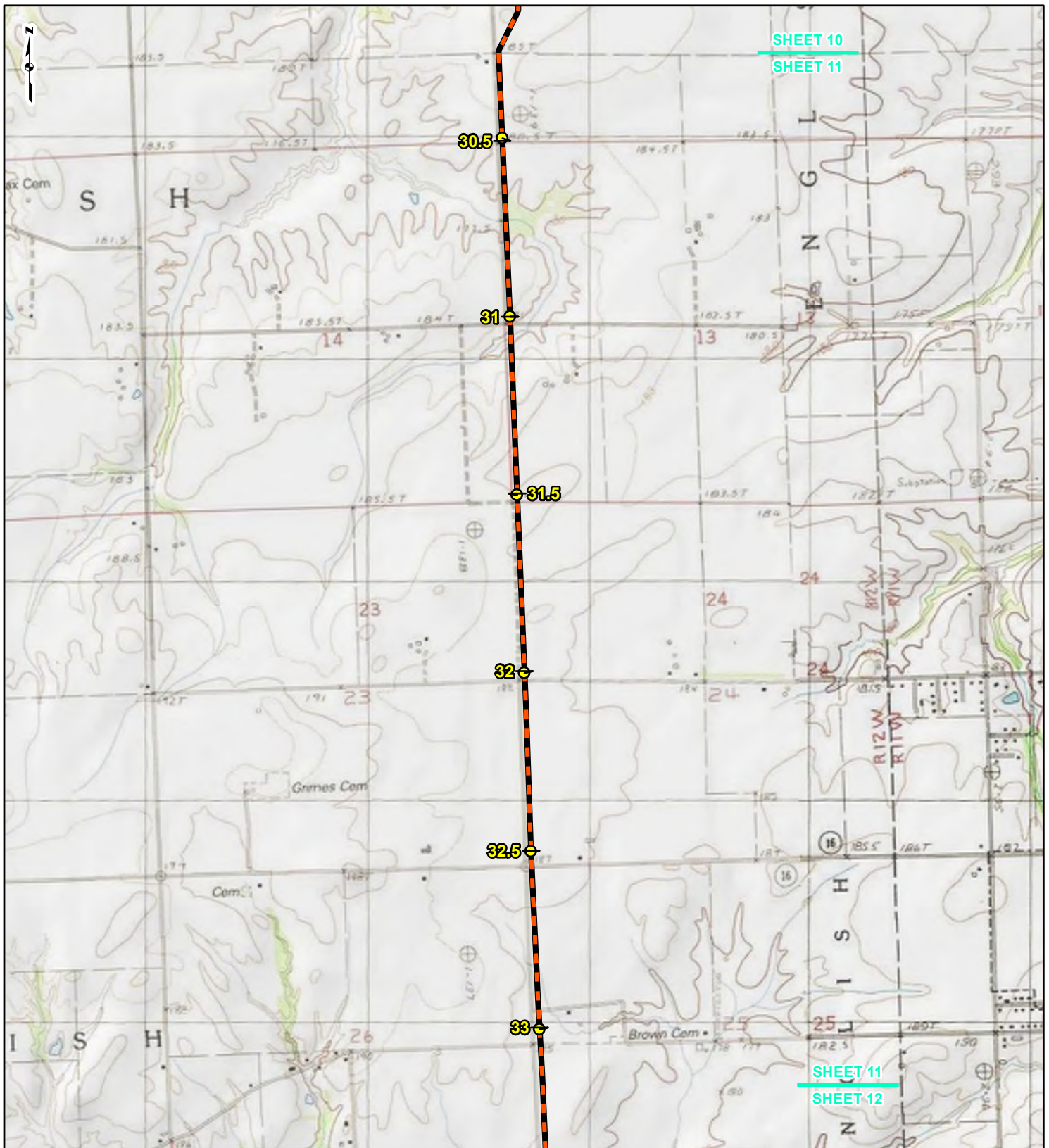


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DATE: 8/12/2016  
APPROVED: LMF

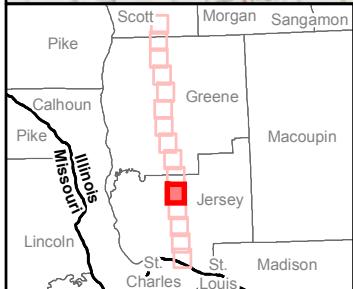
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SHEET 10  
SHEET 11

SHEET 11  
SHEET 12




**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

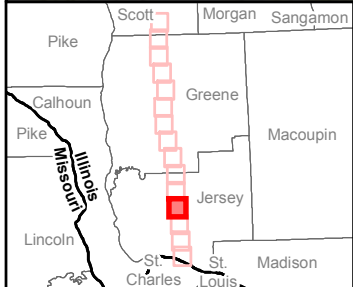
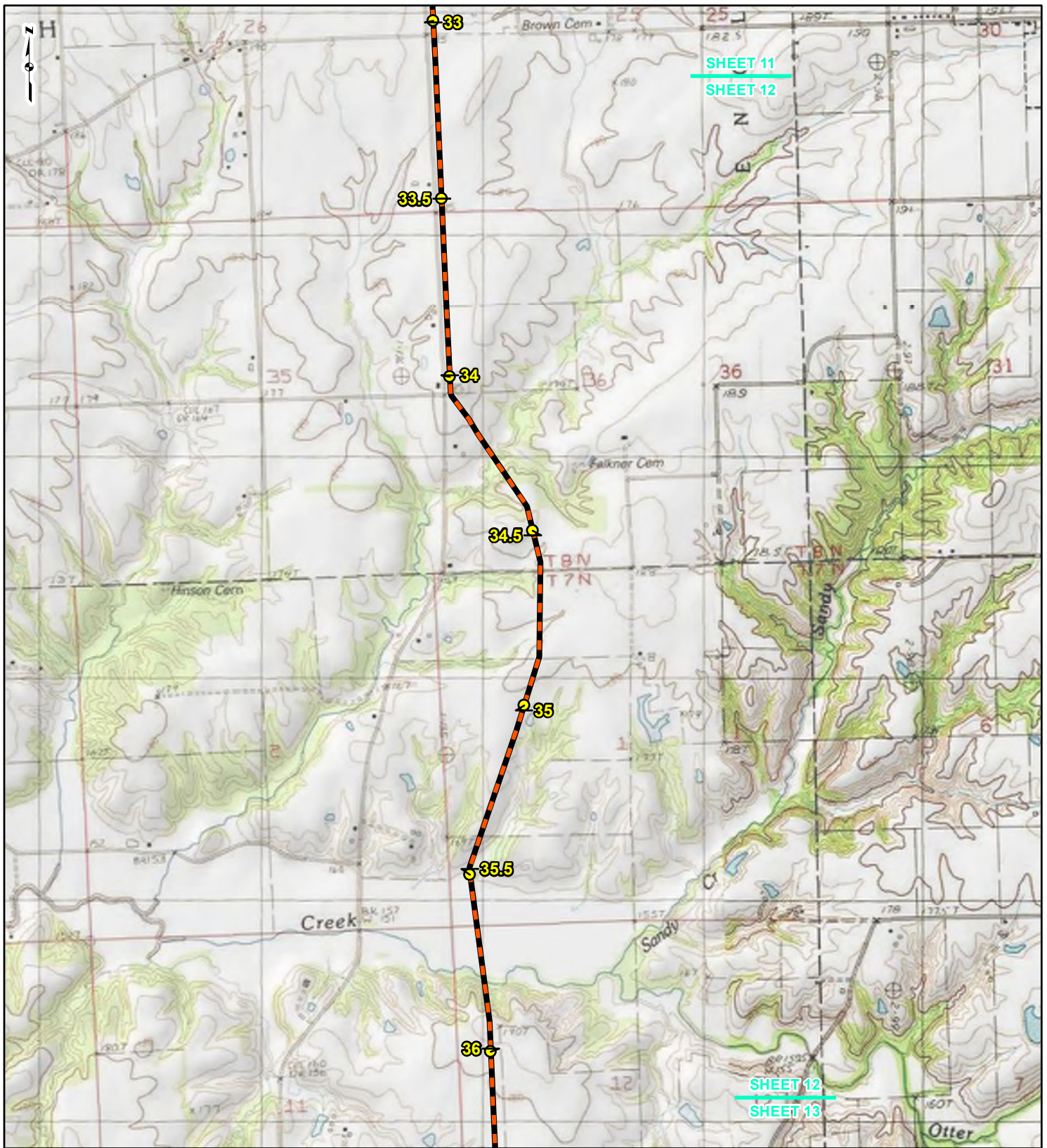
**FIGURE 1  
LOCATION MAP  
SHEET 11 OF 15**

**Spire STL Pipeline** 

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.





**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

**FIGURE 1  
LOCATION MAP  
SHEET 12 OF 15**

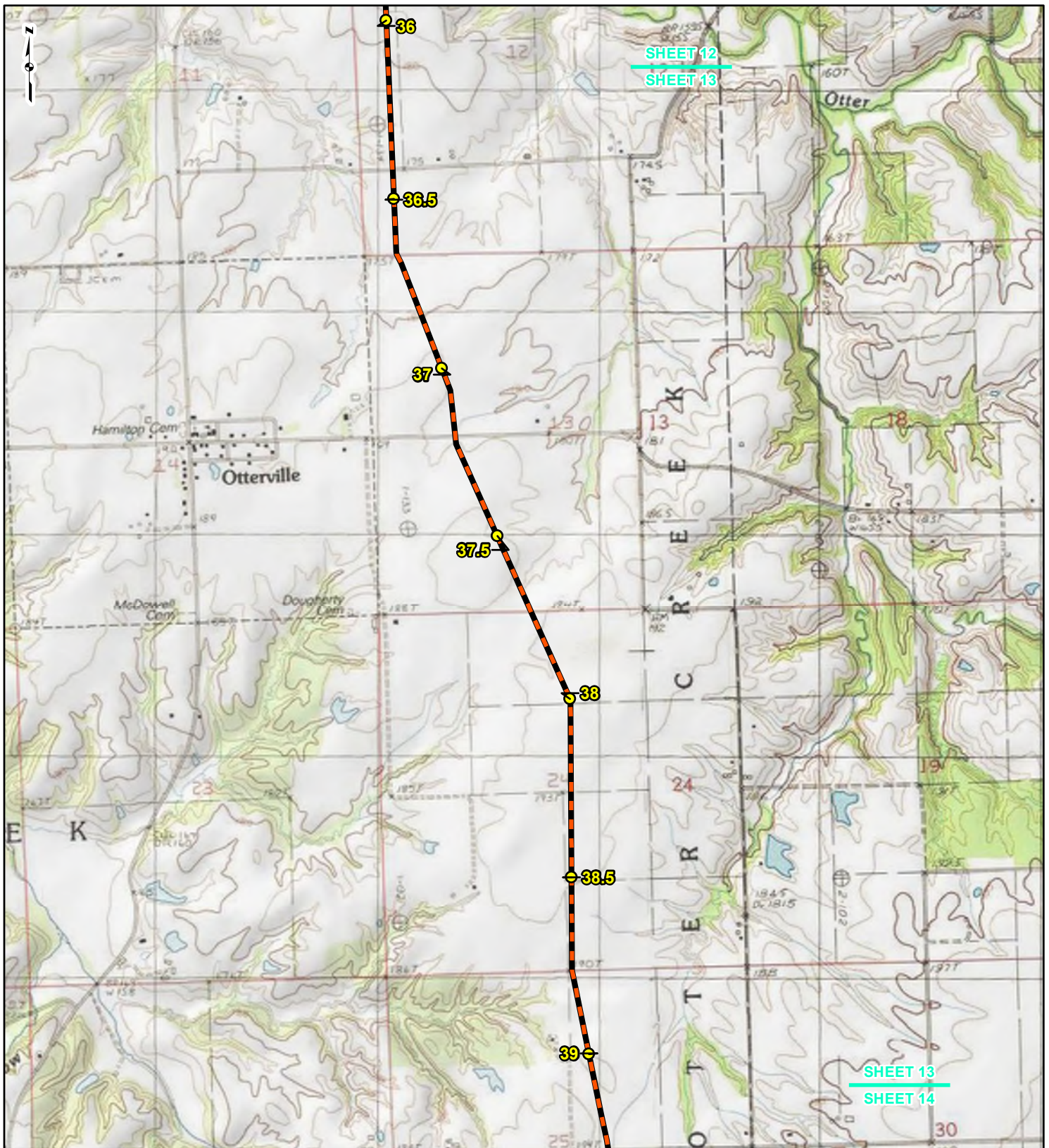
**Spire STL Pipeline**

gial consultants

DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

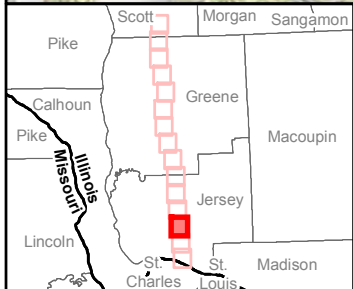
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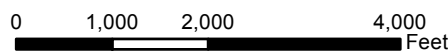
SHEET 12  
SHEET 13

SHEET 13  
SHEET 14



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



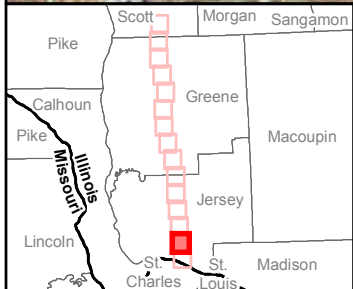
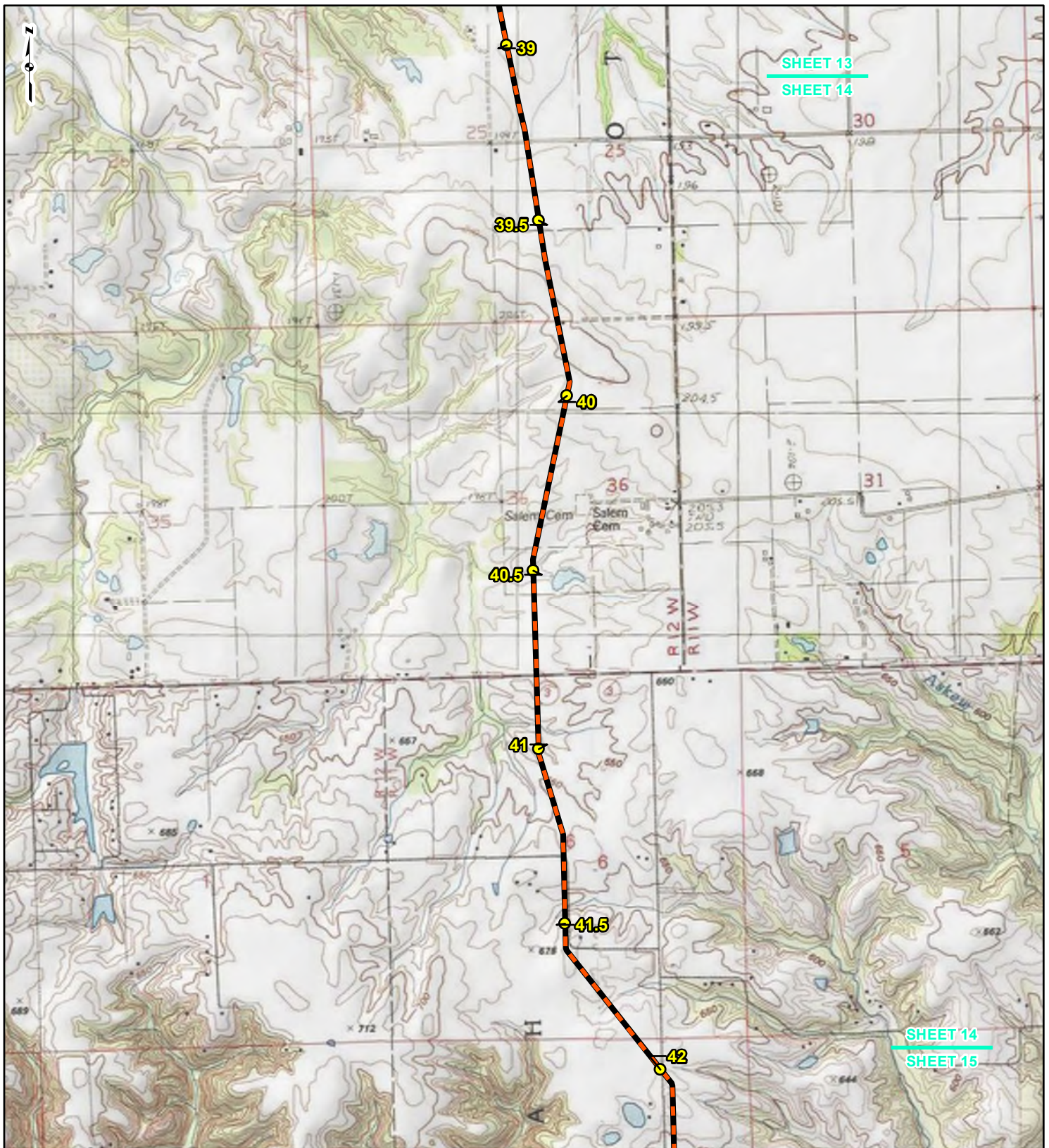
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 13 OF 15**







DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.






**LEGEND**

	NEW BUILD MILEPOST		COUNTY BOUNDARY
	NEW BUILD 24-INCH DIAMETER PIPELINE		STATE BOUNDARY

0      1,000      2,000      4,000  
Feet

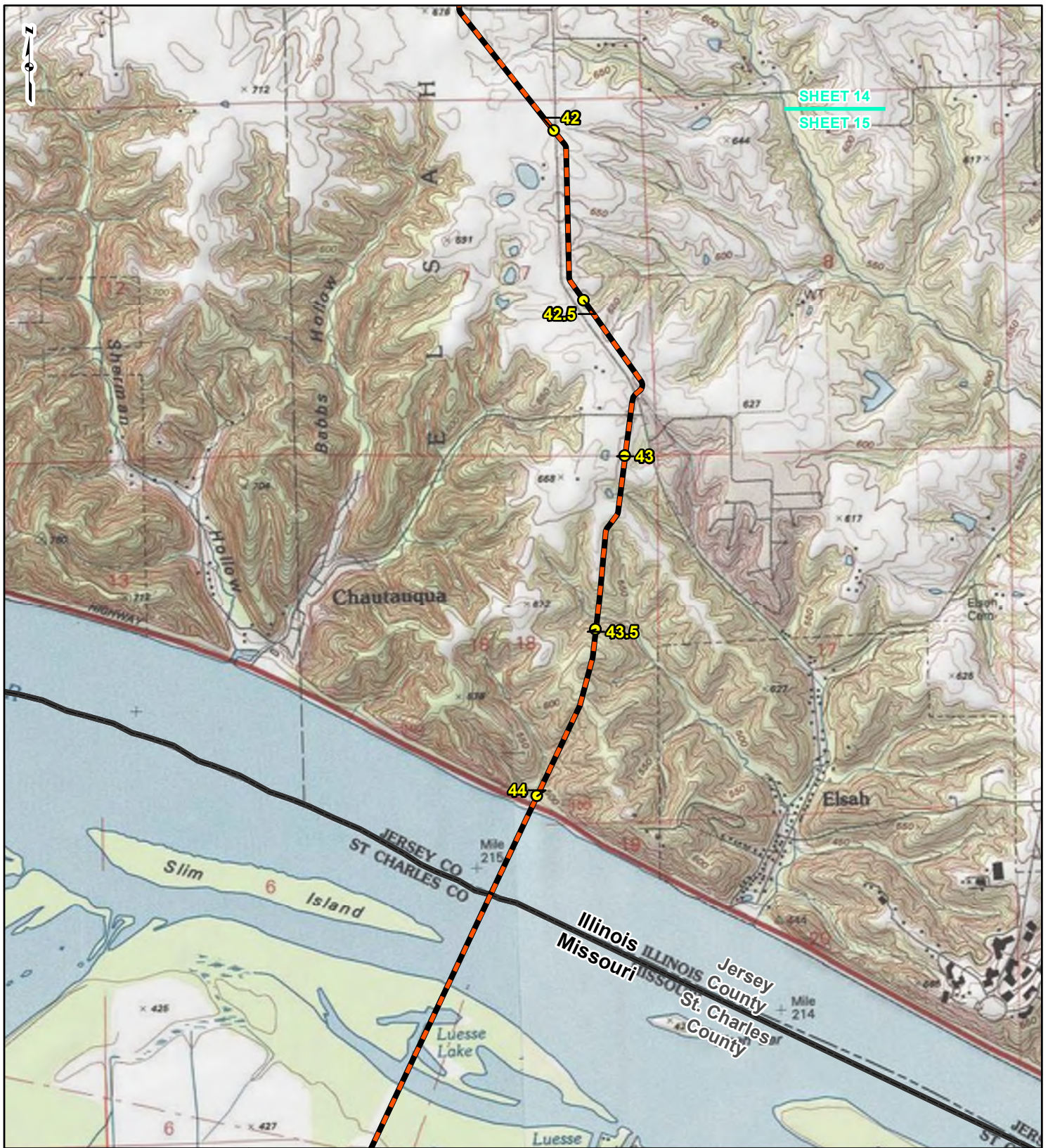
**FIGURE 1  
LOCATION MAP  
SHEET 14 OF 15**

**Spire STL Pipeline** 

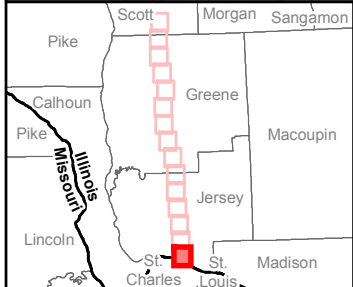
DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.



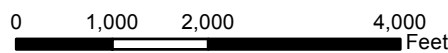


SHEET 14  
SHEET 15



**LEGEND**

- NEW BUILD MILEPOST
- NEW BUILD 24-INCH DIAMETER PIPELINE
- COUNTY BOUNDARY
- STATE BOUNDARY



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



DRAWN BY: PMH      DATE: 8/12/2016  
CHECKED: SWW      APPROVED: LMF

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1984), BOYER CREEK (1985), CARROLLTON (1985), ELSAH (1979), GRAFTON (1979), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1985) AND ROODHOUSE WEST (1984), ILLINOIS, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 08/20/16.



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

August 5, 2016

Ms. Rachel Leibowitz  
Division Manager & Deputy SHPO Illinois Historic Preservation Agency  
1 Old State Capitol Plaza  
Springfield, IL 62701

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

Dear Ms. Leibowitz,

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](http://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.
<b>Scott County, Illinois</b>	<b>Jersey County, Illinois</b>	<b>St. Louis County, Missouri</b>	<b>St. Charles County, Missouri</b>	<b>Greene County, Illinois</b>
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](http://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](mailto:STLPipelineInfo@SpireEnergy.com).

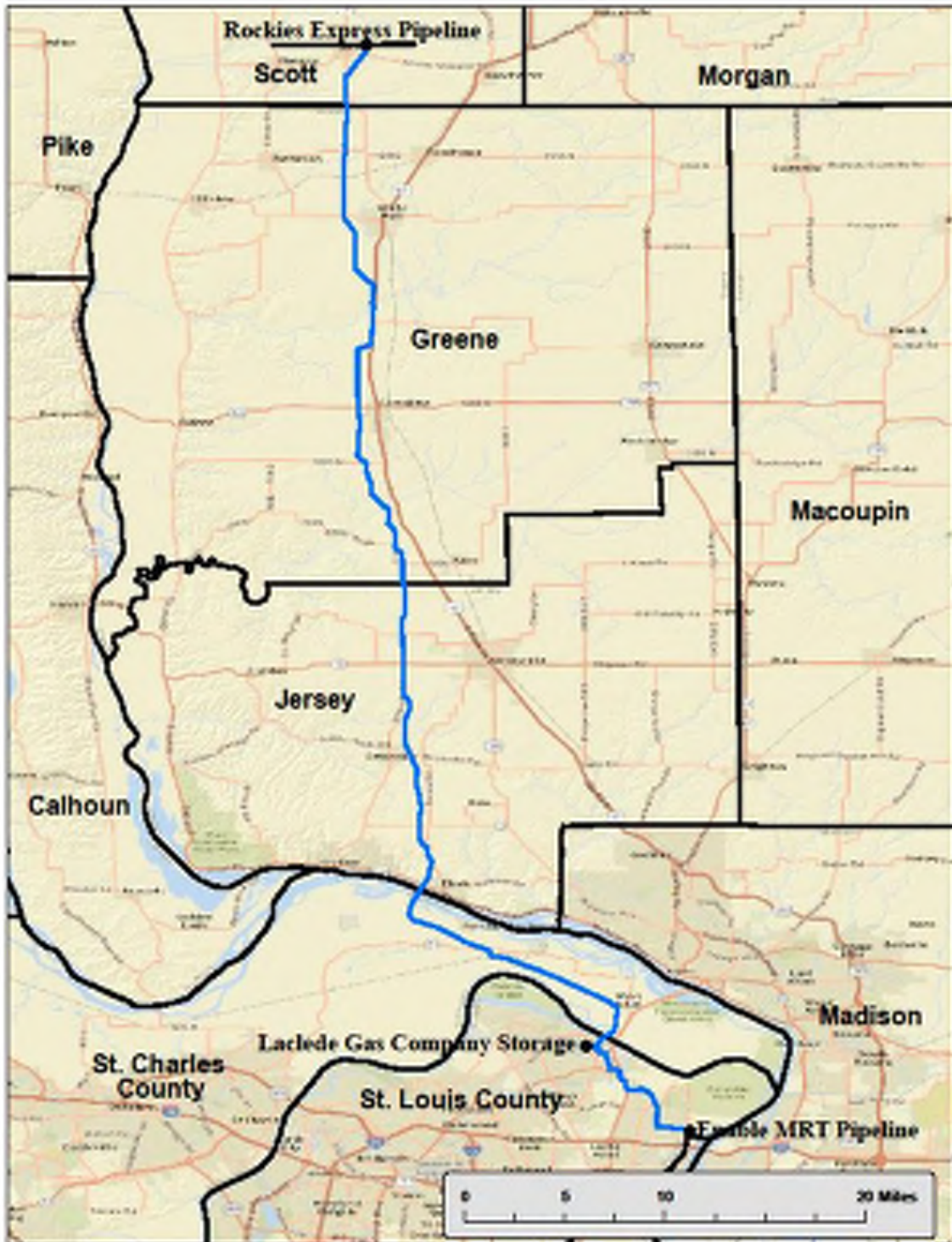
We look forward to working with you.

Sincerely,



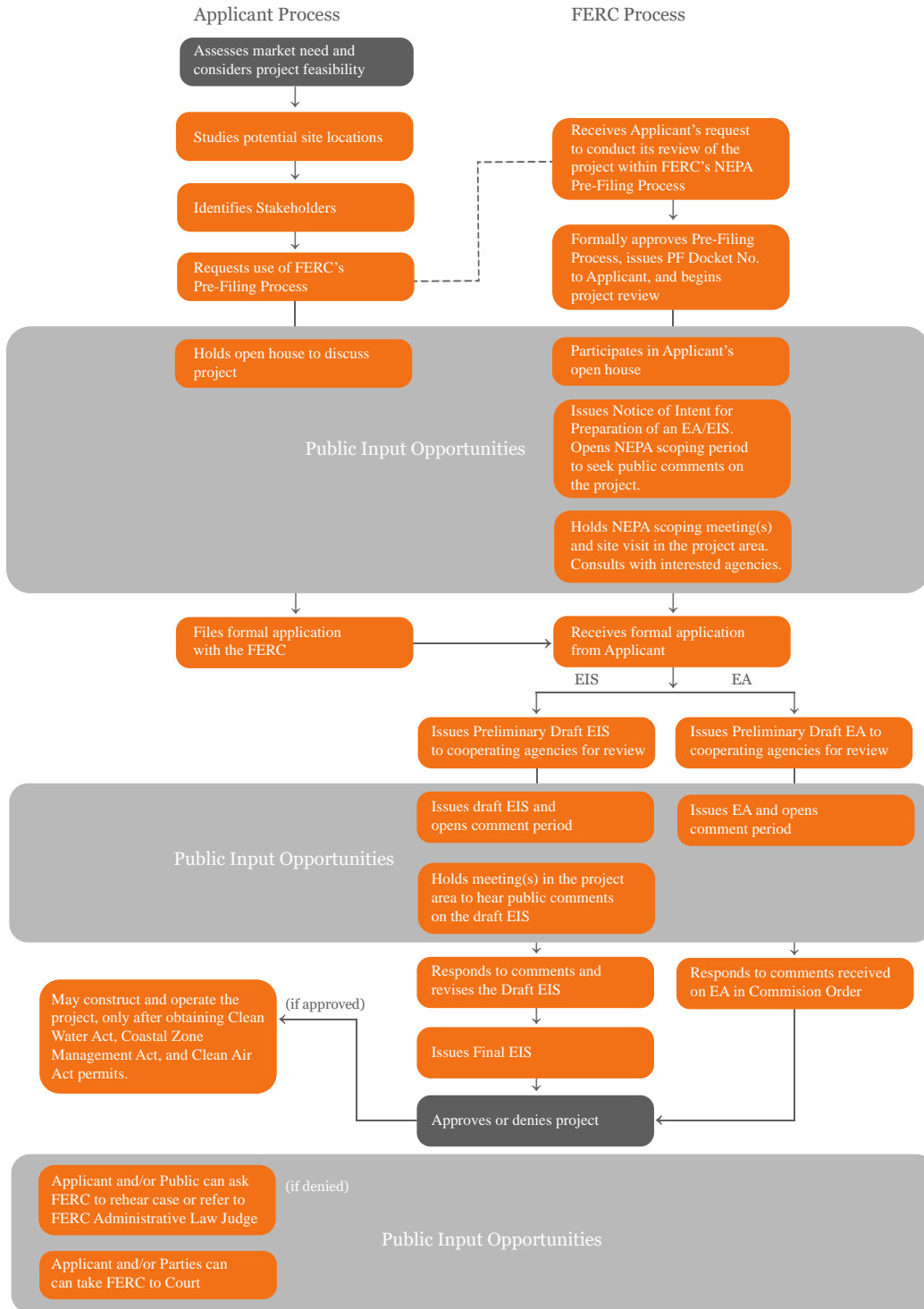
Scott Jaskowiak  
Vice President  
Spire STL Pipeline LLC

Project Map





# FERC Pre-Filing Process





## SURVEY REQUEST

FAX 217/524-7525

[www.illinoishistory.gov](http://www.illinoishistory.gov)

Various County PLEASE REFER TO: IHPA LOG #005080216  
Scott, Greene & Jersey Co.  
Illinois: Scott, Greene & Jersey Counties; Missouri: St. Charles & St. Louis Counties  
FERC, GAIC-E160438.00  
New construction, Spire STL Pipeline

August 4, 2016

Lori M. Ferry  
GAI Consultants, Inc.  
1444 Farnsworth Avenue, Suite 306  
Aurora, IL 60505

Dear Ms. Ferry:

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

The project area has not been surveyed and may contain prehistoric/historic archaeological resources. Accordingly, a Phase I archaeological reconnaissance survey to locate, identify, and record all archaeological resources within the project area will be required. This decision is based upon our understanding that there has not been any large scale disturbance of the ground surface (excluding agricultural activities) such as major construction activity within the project area which would have destroyed existing cultural resources prior to your project. If the area has been heavily disturbed prior to your project, please contact our office with the appropriate written and/or photographic evidence.

The area(s) that need(s) to be surveyed include(s) all area(s) that will be developed as a result of the issuance of the federal agency permit(s) or the granting of the federal grants, funds, or loan guarantees that have prompted this review. In addition to the archaeological survey please provide clear photographs of all structures in, or adjacent to, the current project area as part of the archaeological survey report.

Enclosed you will find an attachment briefly describing Phase I surveys and a list of archaeological contracting services. THE IHPA LOG NUMBER OR A COPY OF THIS LETTER SHOULD BE PROVIDED TO THE SELECTED PROFESSIONAL ARCHAEOLOGICAL CONTRACTOR TO ENSURE THAT THE SURVEY RESULTS ARE CONNECTED TO YOUR PROJECT PAPERWORK.

If you have further questions, please contact Joe Phillippe at 217/785-1279.

Sincerely,

Rachel Leibowitz, Ph.D.  
Deputy State Historic  
Preservation Officer

Enclosure

c: Donna M. Caton, Illinois Commerce Commission  
Jerome Pederson, Director, Federal Energy Regulation Commission





# Illinois Historic Preservation Agency

1 Old State Capitol Plaza, Springfield, IL 62701-1512

[www.illinoishistory.gov](http://www.illinoishistory.gov)

## PROTECTING ILLINOIS' CULTURAL RESOURCES An Introduction to Archaeological Surveys

Prepared by  
**ILLINOIS STATE HISTORIC PRESERVATION OFFICE**

When you read the accompanying letter, you were notified that your Federal or State permitted, funded, or licensed project will require an archaeological survey. We also review projects that use public land. The purpose of this survey will be to determine if prehistoric or historic resources are present within the project area. If you are the average applicant you have had little or no experience with such surveys – this short introduction is designed to help you fulfill the Federal/State requirements and complete the process.

**WHY PROTECT HISTORIC RESOURCES?** Historic preservation legislation grew out of the public concern for the rapid loss of our prehistoric and historic heritage in the wake of increasingly large-scale Federal/State and private development. The legislation is an attempt to protect our heritage while at the same time allowing economic development to go forward.

**WHAT IS THE LEGAL BASIS?** The basis for all subsequent historic preservation legislation lies within the national Historic Preservation Act of 1966 (NHPA). Section 106 of NHPA requires all Federal Agencies "undertakings" to "take into account" their effect on historic properties. As of January 1, 1990, the State Agency Historic Resources Preservation Act (Public Act 86-707) requires the same for all private or public undertakings involving state agencies. An "undertaking" is defined to cover a wide range of Federal or State permitting, funding, and licensing activities. It is the responsibility of Federal/State Agencies to ensure the protection of historic resources and the State Historic Preservation Office (SHPO) regulates this effort. In Illinois the SHPO is part of the Illinois Historic Preservation Agency (IHPA).

**WHAT IS AN ARCHAEOLOGICAL SURVEY?** An archaeological survey includes both (1) an examination of the written records, such as county plat books, published and unpublished archaeological reports, state site files, and (2) a field investigation of the project area to determine if prehistoric or historic resources are present. This process of resource identification is called a Phase I survey.

**WHAT DOES A PHASE I SURVEY REQUIRE?** Archaeological evidence is normally buried beneath the surface of the ground. To determine if an archaeological site is present it is necessary to get below this surface. The most efficient way is by plowing. If the project area is or can be plowed then the artifactual evidence will be brought to the surface and systematic pedestrian surveys (walkovers) will determine if a site is present. These walkovers are best done when the vegetation is low in the fall or spring. If the project area is covered with vegetation then small shovel probes (1' sq.) are excavated on a systematic grid pattern (usually 50' intervals) to sample the subsurface deposits. Where deeply buried sites may be present, such as in floodplains, deep coring or machine trenching may be required.

**WHO DOES ARCHAEOLOGICAL SURVEYS?** Professional archaeologists who meet the Federal standards set forth in the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-9) may conduct Federal surveys, while those meeting the State standards set forth in the Archaeological and Paleontological Resources Protection Act (20 ILCS 3435) may conduct surveys on public land in the State (see the other side of this sheet for information on obtaining the services of a contract archaeologist). The applicant is responsible for obtaining and paying for such services.

**AFTER THE SURVEY – WHAT NEXT?** When the field investigations are completed the archaeologist will submit a report of their findings and recommendations to the applicant. **IT IS THE RESPONSIBILITY OF THE APPLICANT TO FORWARD TWO (2) PAPER COPIES AND ONE (1) CD WITH THE REPORT IN PDF FORMAT TO THE SHPO FOR EVALUATION AND FINDINGS.** If no sites were found or the sites found are not eligible for the National Register the project may proceed. Occasionally, a significant archaeological site may be encountered. In such a case the SHPO and the Federal or State Agency will work with the applicant to protect both the cultural resources and to facilitate the completion of your project.

**NEED FURTHER ASSISTANCE?** The IHPA is here to assist you and the Federal/State agencies in complying with the mandates of the historic preservation legislation. If you have questions or need assistance with archaeological resources protection or Federal/State compliance, please contact the Archaeology Section, Preservation Services Division, Illinois Historic Preservation Agency, One Old State Capitol Plaza, Springfield, Illinois 62701 (217-782-4836).

**OVER**

05/24/16

For TTY communication, dial 888-440-9009. It is not a voice or fax line.

**ILLINOIS-BASED CONSULTING SERVICES WITH PROFESSIONAL ARCHAEOLOGISTS** (by zip code order, 3/22/2010 update)  
In order to assist agencies, engineering firms, and others who require professional archaeological services the Illinois Historic Preservation Agency (IHPA) has listed below Illinois-based firms with professional archaeologists currently performing contract archaeological compliance work. Based on documentation supplied by them these individuals appear to meet current Federal qualifications. This list is provided for your assistance, however, you may use any archaeologist who meets the minimum qualifications as set forth in Secretary of the Interior's Professional Qualifications Standards (36 CFR 61). Federal and state regulations require a completed graduate degree with an emphasis in archaeology and 16 months of professional archaeological experience (**BOLD names** below). If you have any questions please contact IHPA at 217-785-4512. THE INCLUSION OF INDIVIDUALS OR ORGANIZATIONS ON THIS LIST DOES NOT CONSTITUTE ANY RECOMMENDATION OR ENDORSEMENT OF THEIR PROFESSIONAL EXPERTISE OR PERFORMANCE RECORD BY THE IHPA.

## CHICAGO METRO REGION

**Dr. Kevin P. McGowan**  
Public Service Archaeology Prgm  
Chicagoland Office (UI-UC)  
7428 Bradford Ct.  
Gurnee, Illinois 60031  
847-548-7961 (fax same)  
[kevin57m@earthlink.net](mailto:kevin57m@earthlink.net)

**Dr. Leslie B. Kirchler, RPA**  
Ecology and Environment, Inc.  
33 West Monroe  
Chicago, Illinois 60603  
312/578-9243 Ext. 4109-Office  
312/802-5598-Cell  
[leslie.kirchler-Owen@ene.com](mailto:leslie.kirchler-Owen@ene.com)

**Dr. Thomas E. Berres**  
OurHeritage Archaeological Svcs, Inc.  
983 Quail Run  
DeKalb, Illinois 60115-6117  
815-754-9611 / 758-5692 (fax)  
[bearus1@aol.com](mailto:bearus1@aol.com)

**Jay Martinez, M.A., RPA**  
Midwest Archaeological  
Research Services  
P.O. Box 2533  
Crystal Lake, Illinois 60039  
815-568-0680  
[jmartinez.mars@gmail.com](mailto:jmartinez.mars@gmail.com)

**Jim Snyder, MA**  
Civil & Environmental Consultants, Inc.  
555 Butterfield Road, Suite 300  
Lombard, Illinois 60148  
630/963-6026 or 877/963-6026  
Fax-630/963-6027  
[jsnyder@ceecinc.com](mailto:jsnyder@ceecinc.com)

**Dr. Cynthia L. Balek**  
Archaeology & Geomorphology Services  
2220 Mayfair Avenue  
Westchester, Illinois 60154  
708-531-1445 / 562-7314 (fax)  
[clb2220@gmail.com](mailto:clb2220@gmail.com)

## CHICAGO METRO REGION CONT

**Ms. Lynn M. Gierke**  
ENSR International  
27755 Diehl Road  
Warrenville, Illinois 60555-3998  
630-839-5332 / 836-1711 (fax)  
[lgierke@ensr.com](mailto:lgierke@ensr.com)

**Mr. Douglas Kullen**  
Burns & McDonnell  
1431 Opus Place, Suite 400  
Downers Grove, Illinois 60515  
630/515-4626, Cell-630/408-2385  
[dkullen@burnsmcd.com](mailto:dkullen@burnsmcd.com)

**Ben Banks, Archaeologist**  
Atwell, LLC  
1245 East Diehl Road, Suite 100  
Naperville, Illinois 60563  
866/850-4200  
[bbanks@atwell-group.com](mailto:bbanks@atwell-group.com)

**Judy Cooper**  
**Williams Whitehead**  
SWCA Environmental Consultants  
4320 Winfield Road, Suite 200  
Warrenville, Illinois 60555  
630/836-8717, Judy 630/836-8722  
[jcooper@swca.com](mailto:jcooper@swca.com)  
[wwhitehead@swca.com](mailto:wwhitehead@swca.com)

**Mr. Phil Millhouse**  
Red Gates Archaeology  
410 Wight Street  
Galena, Illinois 61036  
608/205-2753 / Cell - 608/718-9324  
[philipmillhouse@gmail.com](mailto:philipmillhouse@gmail.com)

**Veronica Parsell, MA**  
Cardno JFNew  
6605 Steger Road, Unit A  
Monee, Illinois 60449  
708/534-3450, cell-574/229-8747  
[Veronica.parsell@cardno.com](mailto:Veronica.parsell@cardno.com)

## CENTRAL REGION

**Ms. Karen A. Atwell**  
Farmland Archaeological Services  
10475 N 2300 Avenue  
Geneseo, Illinois 61254  
309-507-1330  
[Karen@karenatwell.com](mailto:Karen@karenatwell.com)

**Mr. Keith L. Barr**  
Archaeological & Architectural Surveys  
Old Inn Farm  
Rural Route 1  
Fairview, Illinois 61432  
309-778-2536

**Mr. Lawrence A. Conrad**  
Western Illinois Archaeology Research  
Center, 1104 West Piper Street  
Macomb, Illinois 61455  
309-333-6783 or 836-3811  
[La-conrad@wiu.edu](mailto:La-conrad@wiu.edu)

**Dr. Charles L. Rohrbaugh**  
Archaeological Consultants  
302 Kelly Drive  
Normal, Illinois 61761  
309-454-6590

**Dr. Gregory Walz**  
University of Illinois  
Anthropology Department  
Public Service Archaeology Program  
1707 South Orchard Street  
607 South Matthews Avenue  
Urbana, Illinois 61801  
217-333-1636 (fax same)  
[gwalz@netonecom.net](mailto:gwalz@netonecom.net)

**Mr. Dale McElrath**  
University of Illinois Champaign-Urbana  
UIUC-ITARP Statewide Office  
23 East Stadium Drive  
209 Nuclear Physics Lab (MC 571)  
Champaign, Illinois 61820  
217-333-0667 / 244-7458 (fax)  
*More Central Listings - Over*





July 29, 2016

Ms. Rachel Leibowitz  
Division Manager and Deputy SHPO  
Illinois Historic Preservation Agency  
1 Old State Capitol Plaza  
Springfield, IL 62701-1507

**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. Leibowitz:

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 Illinois Historic Preservation Agency 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.**

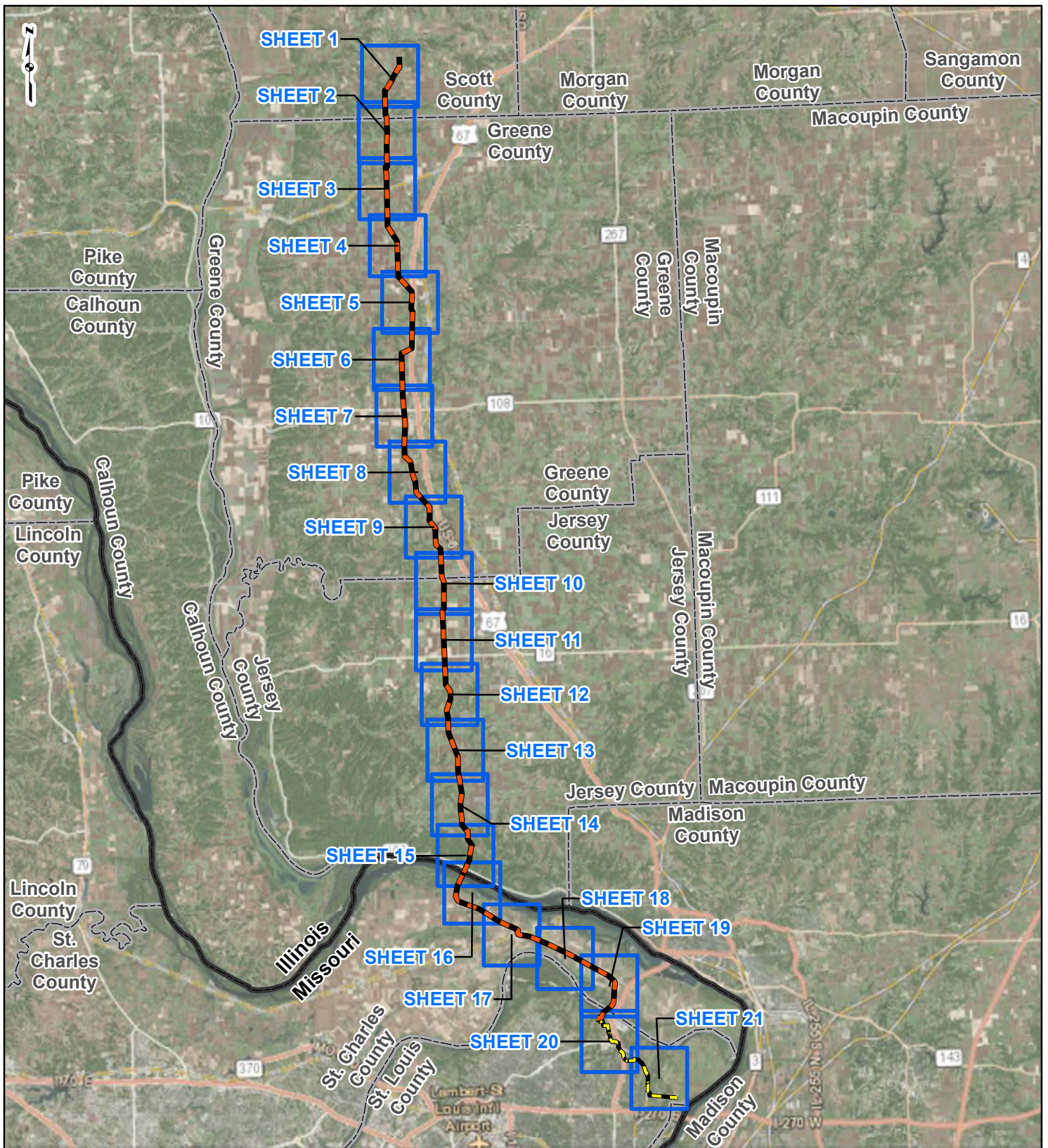
A handwritten signature in black ink that reads "Lori M. Ferry". The signature is written in a cursive style with a large, stylized "L" and "F".

Lori M. Ferry  
Environmental Project Manager

LMF/gmg

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





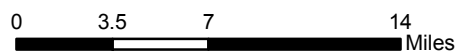
**PROJECT LOCATION**



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**

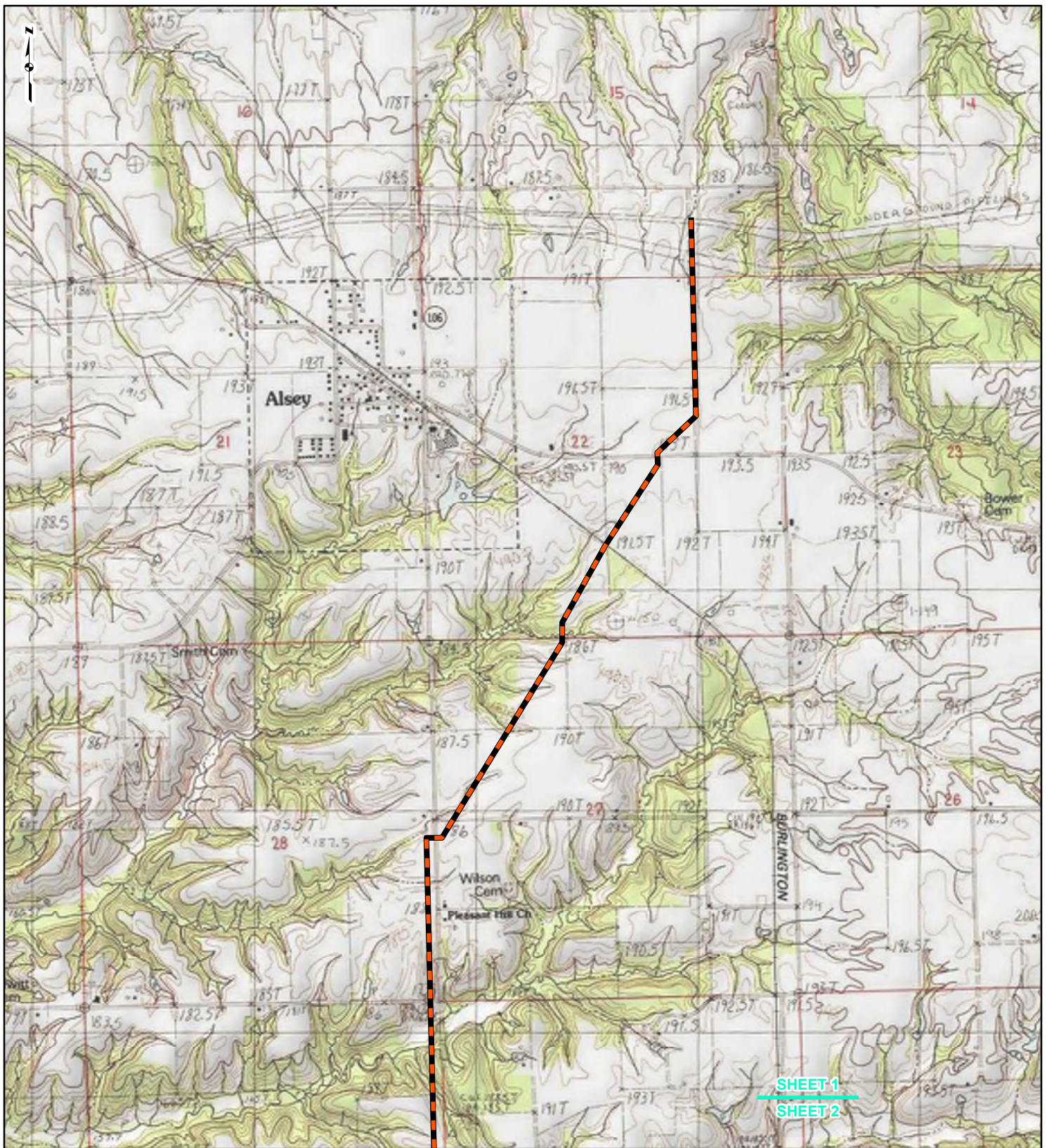


DRAWN BY: PMH  
CHECKED: SWW

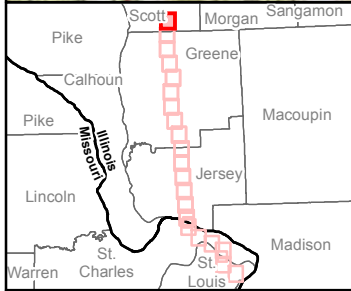
DATE: 7/28/2016  
APPROVED: LMF

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), 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

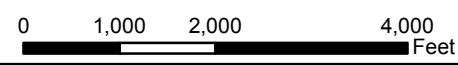
R O O D H C

R O O D H C



**LEGEND**

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



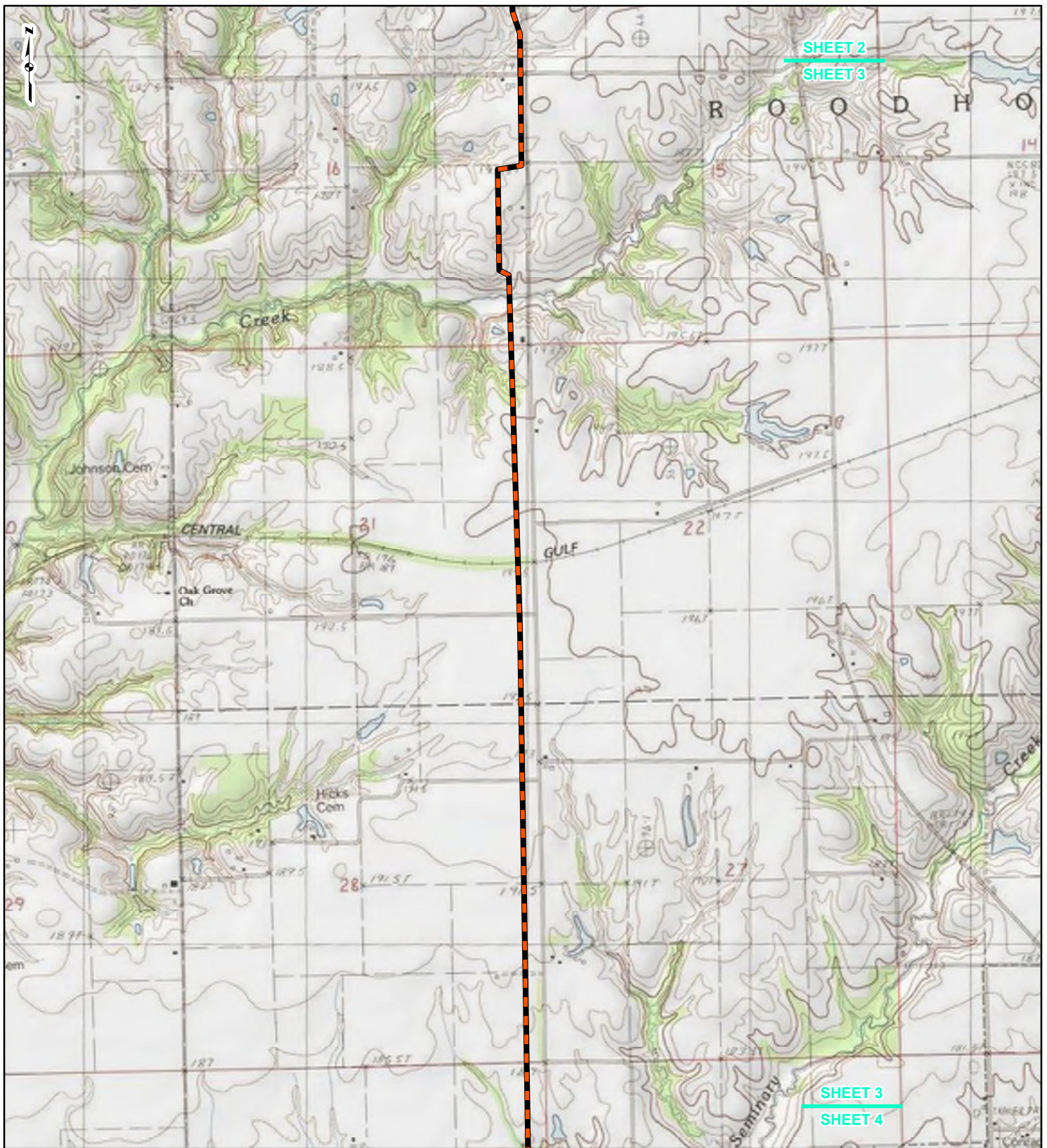
**FIGURE 1  
LOCATION MAP  
SHEET 2 OF 21**



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

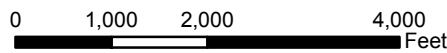
SHEET 3

SHEET 4



**LEGEND**

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



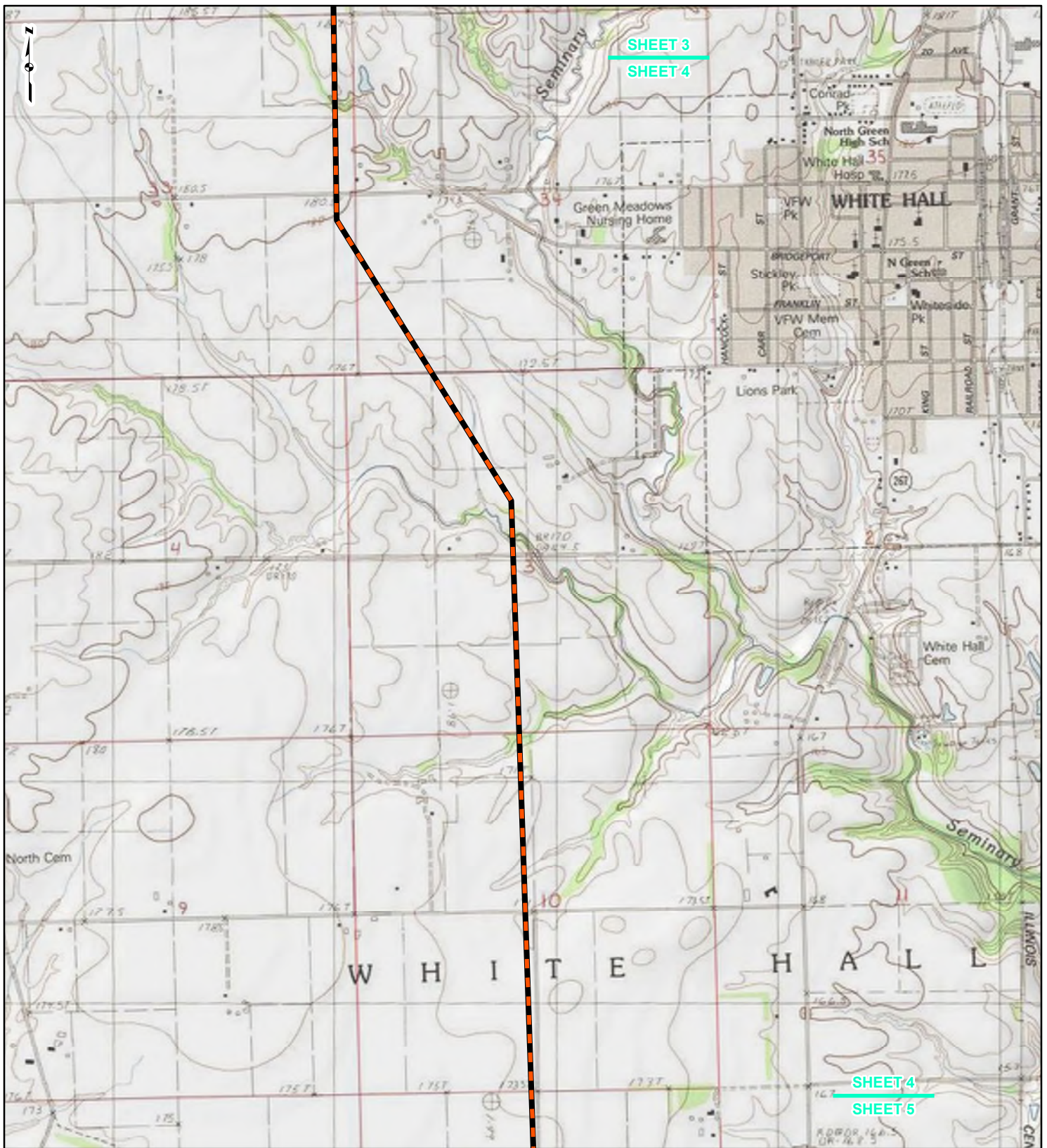
**FIGURE 1**  
LOCATION MAP  
SHEET 3 OF 21



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

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: 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.





SHEET 3  
SHEET 4

SHEET 4  
SHEET 5



**LEGEND**

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

0      1,000      2,000      4,000  
Feet

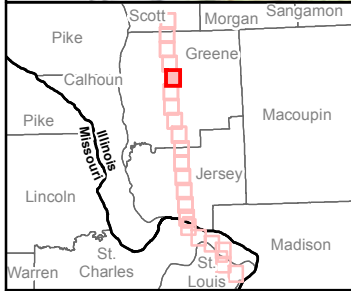
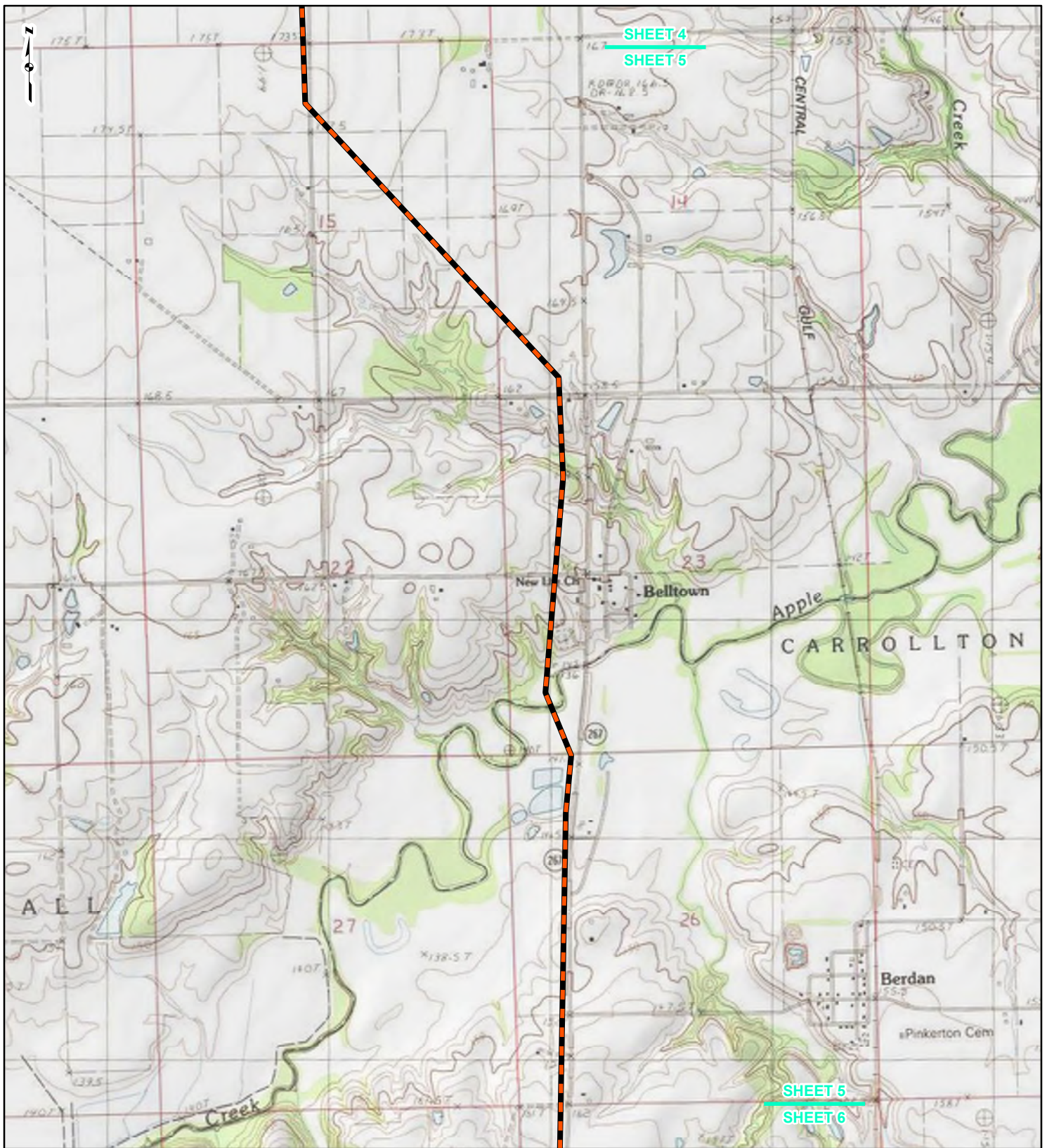
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 4 OF 21**

**Spire STL Pipeline**

DRAWN BY: PMH      DATE: 7/28/2016  
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 (1995), 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

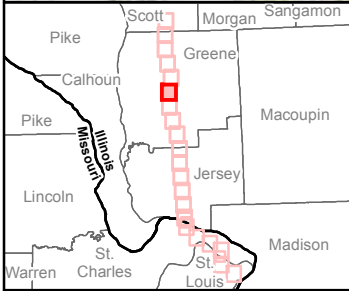
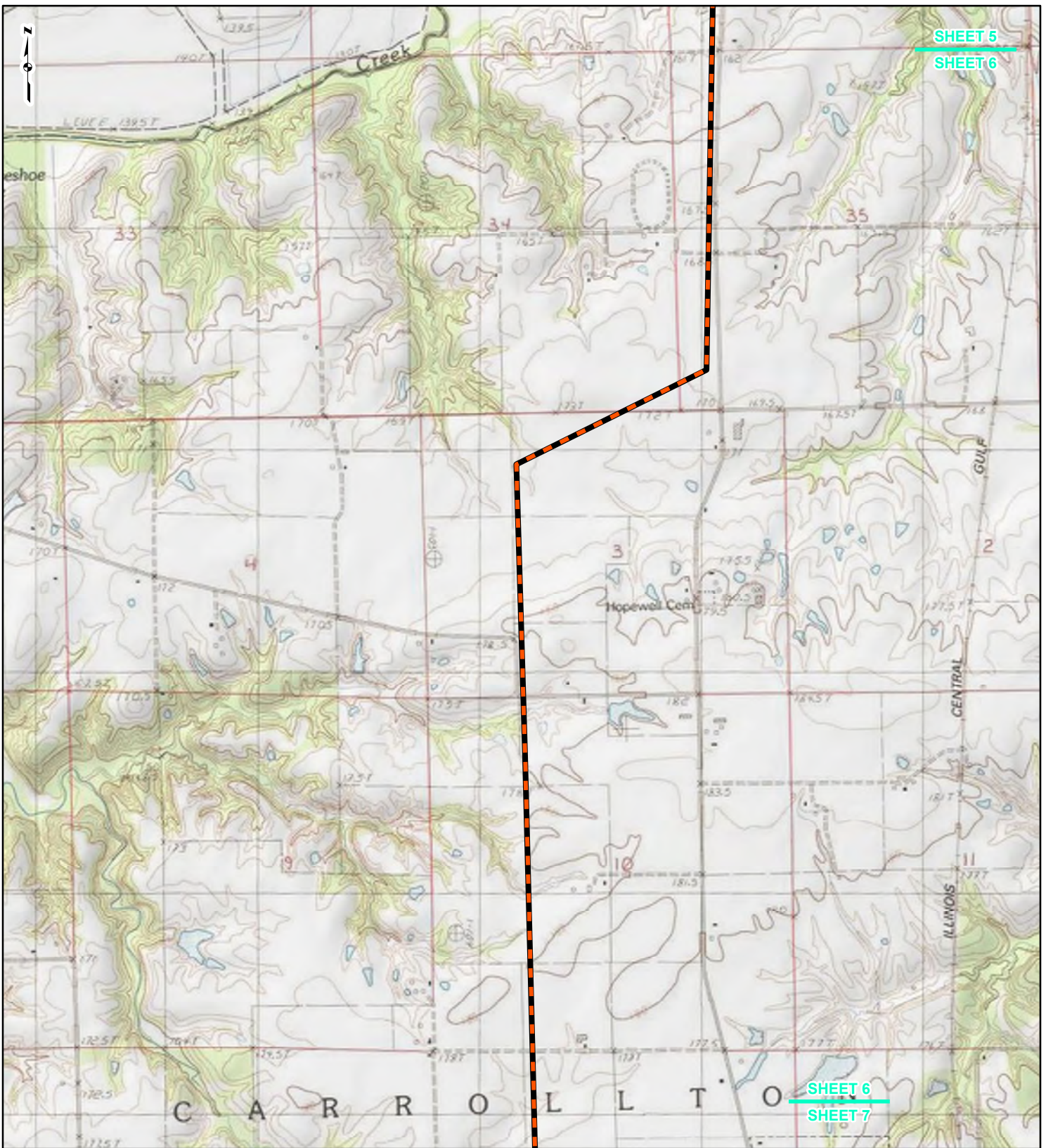
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 5 OF 21**

**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

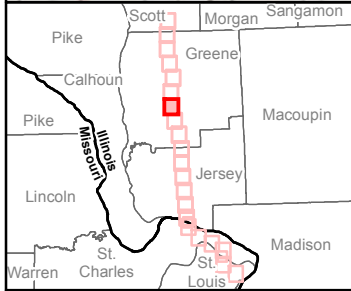
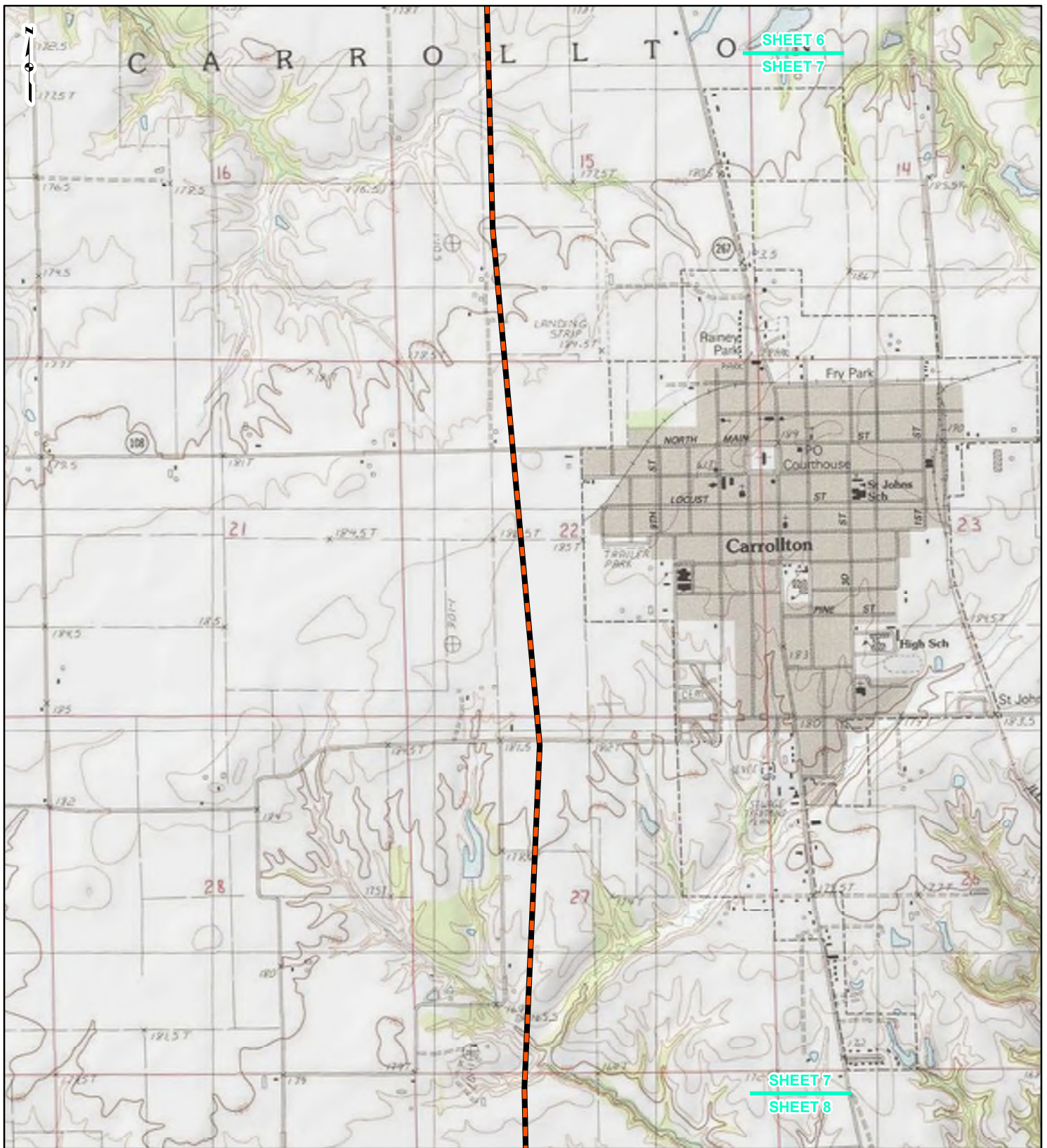
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 6 OF 21**

**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

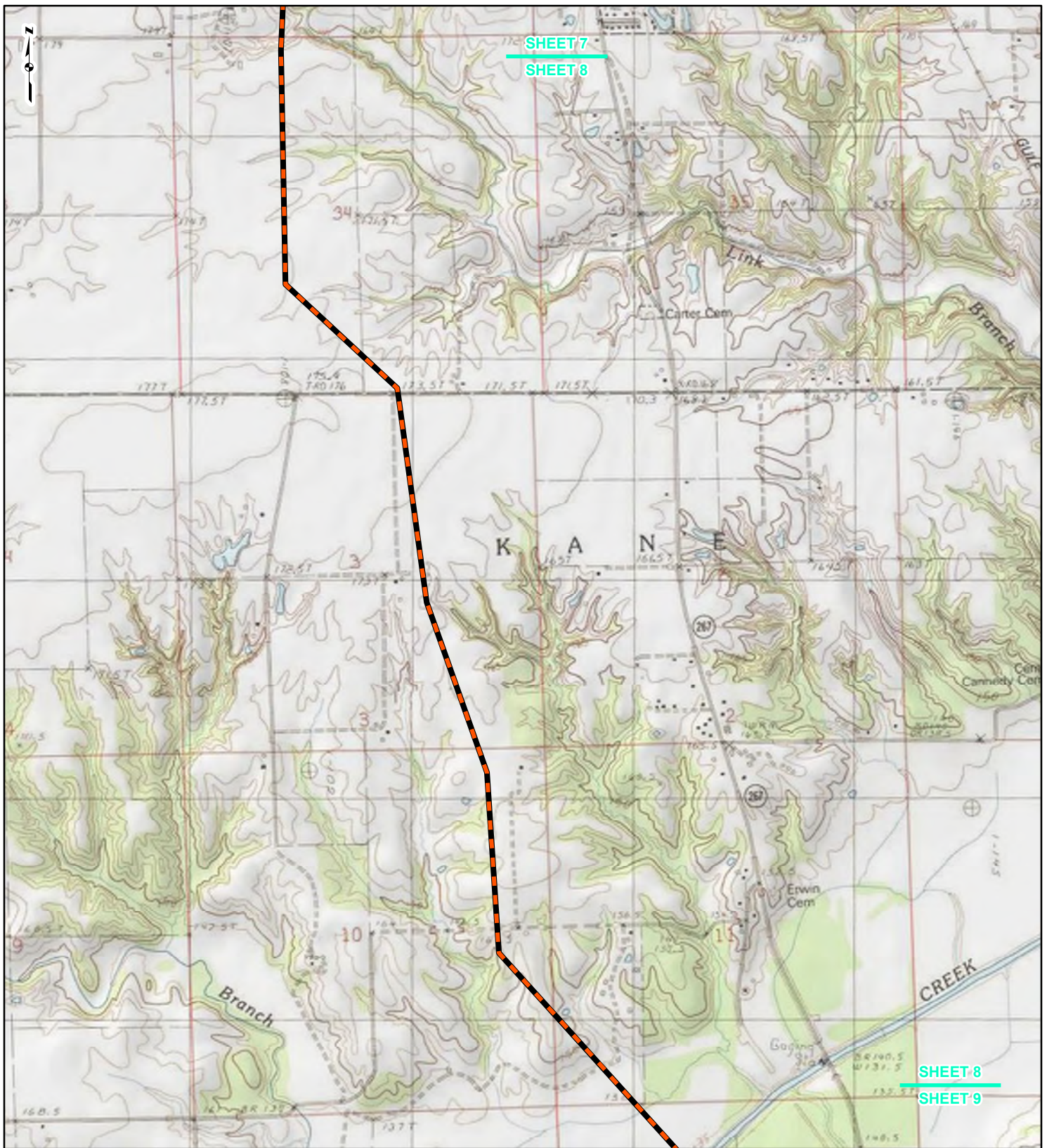
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 7 OF 21**

**Spire STL Pipeline**

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

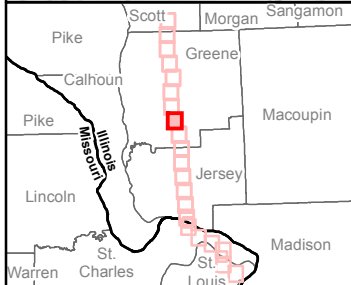
REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLOISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI,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





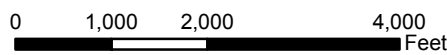
SHEET 7  
SHEET 8

SHEET 8  
SHEET 9



**LEGEND**

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



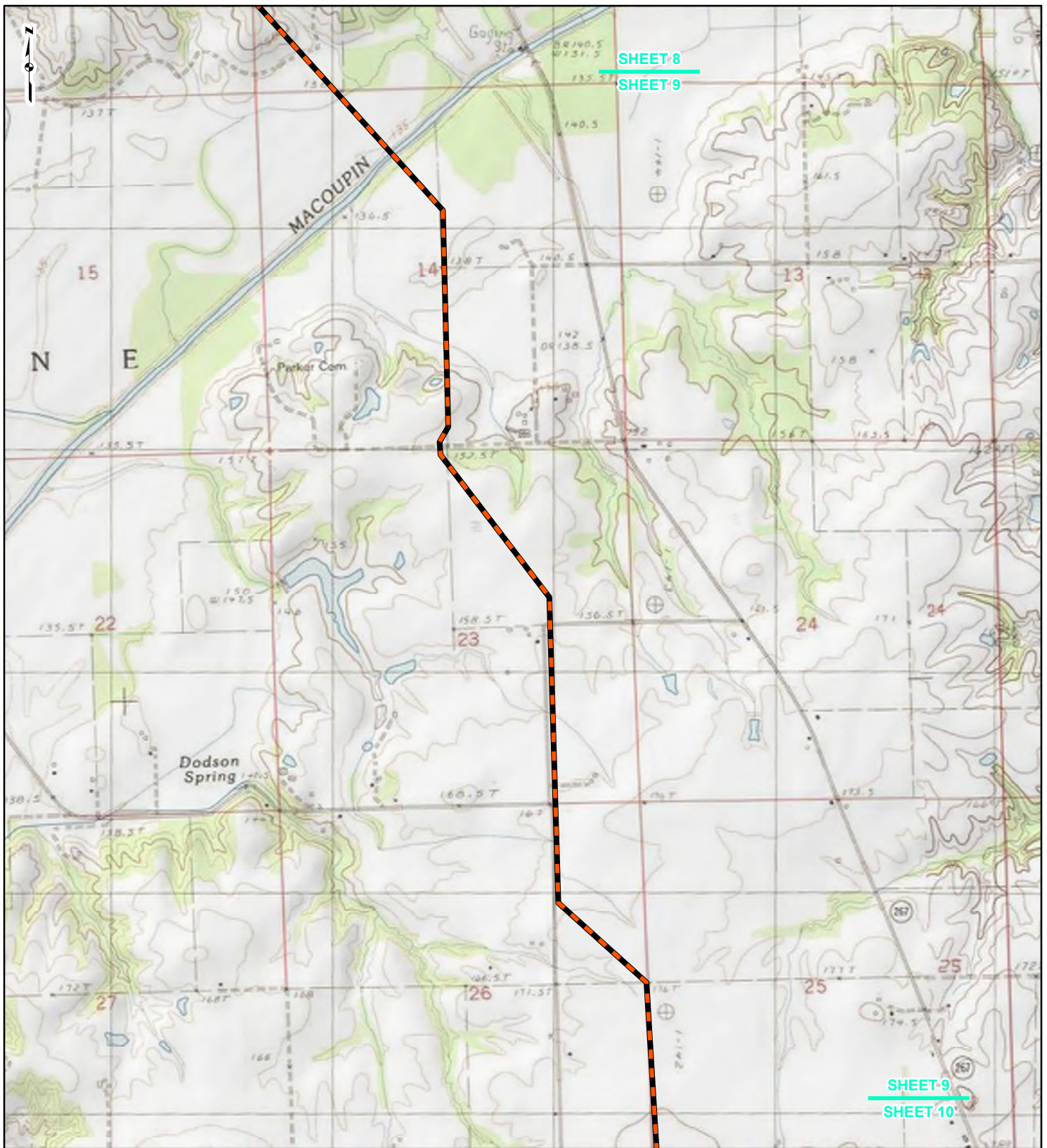
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 8 OF 21**



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.









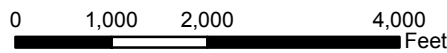
SHEET 8  
SHEET 9

SHEET 9  
SHEET 10



**LEGEND**

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



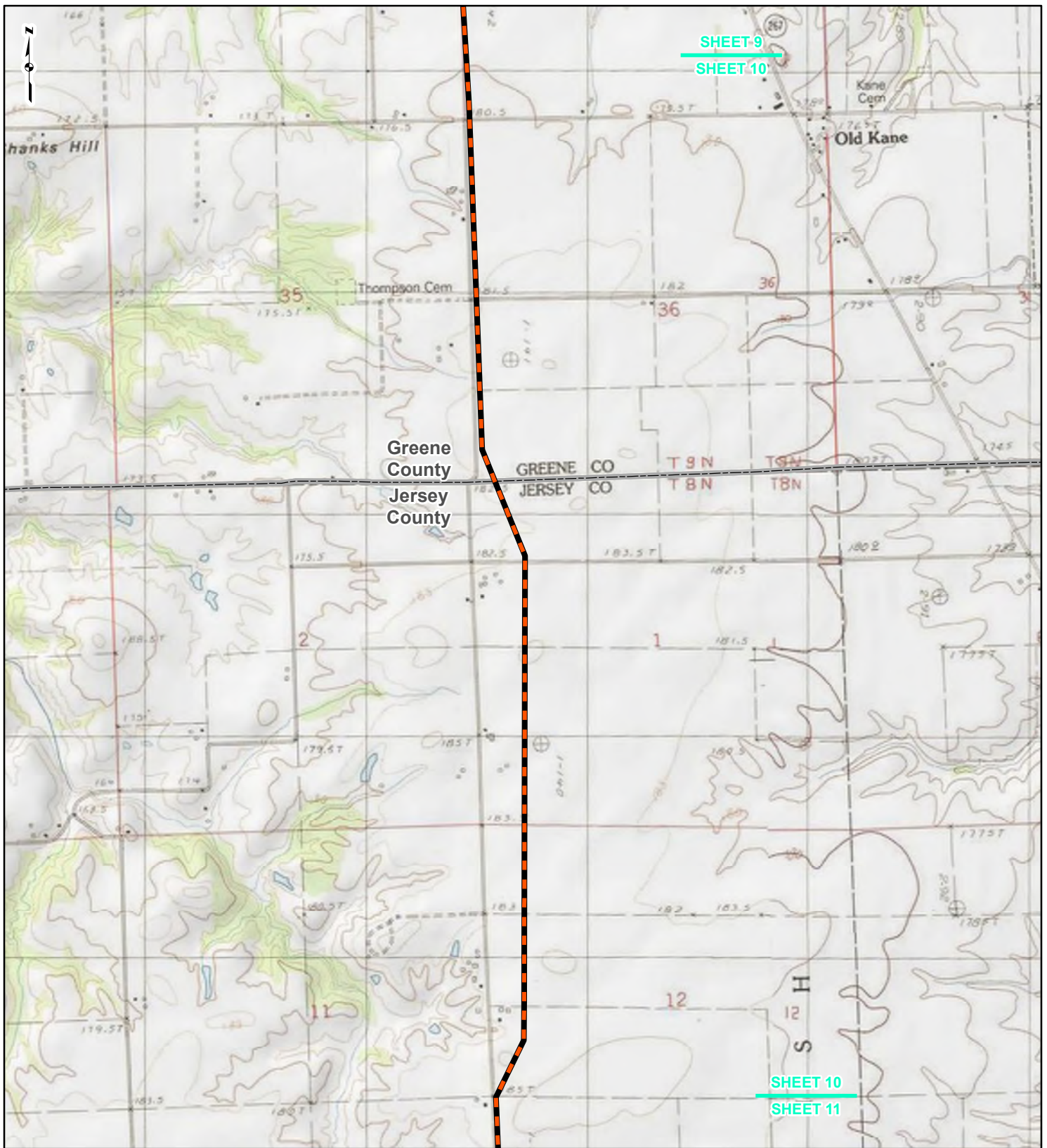
**FIGURE 1  
LOCATION MAP  
SHEET 9 OF 21**



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.





**LEGEND**

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

0      1,000      2,000      4,000  
Feet

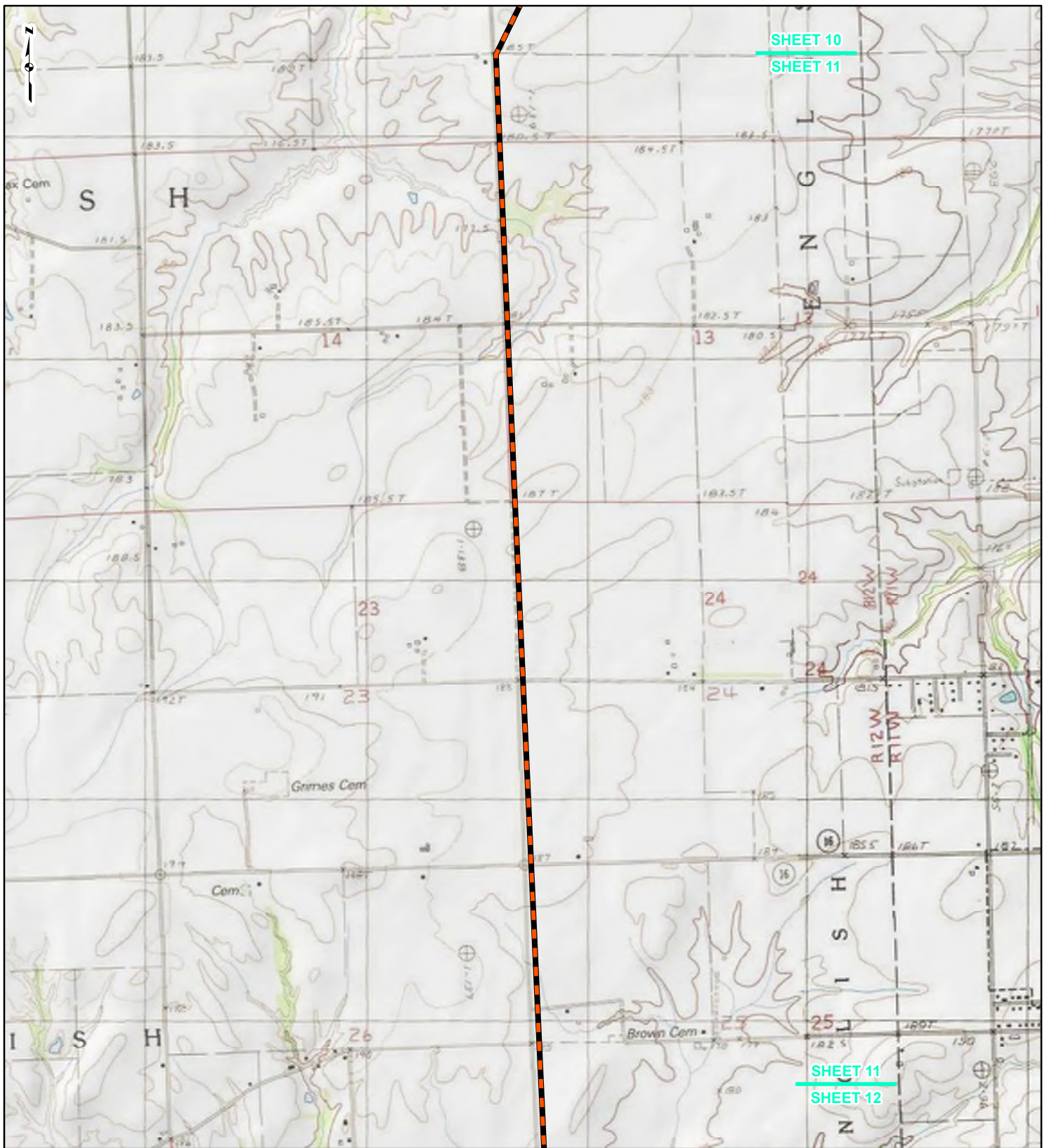
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 10 OF 21**

**Spire STL Pipeline**

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

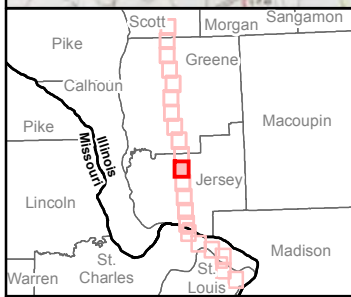
REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI,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









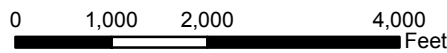
SHEET 10  
SHEET 11

SHEET 11  
SHEET 12



**LEGEND**

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



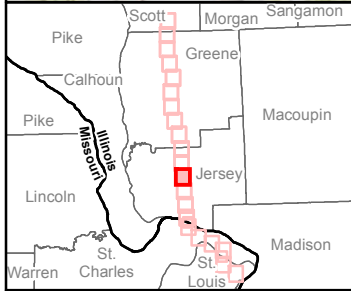
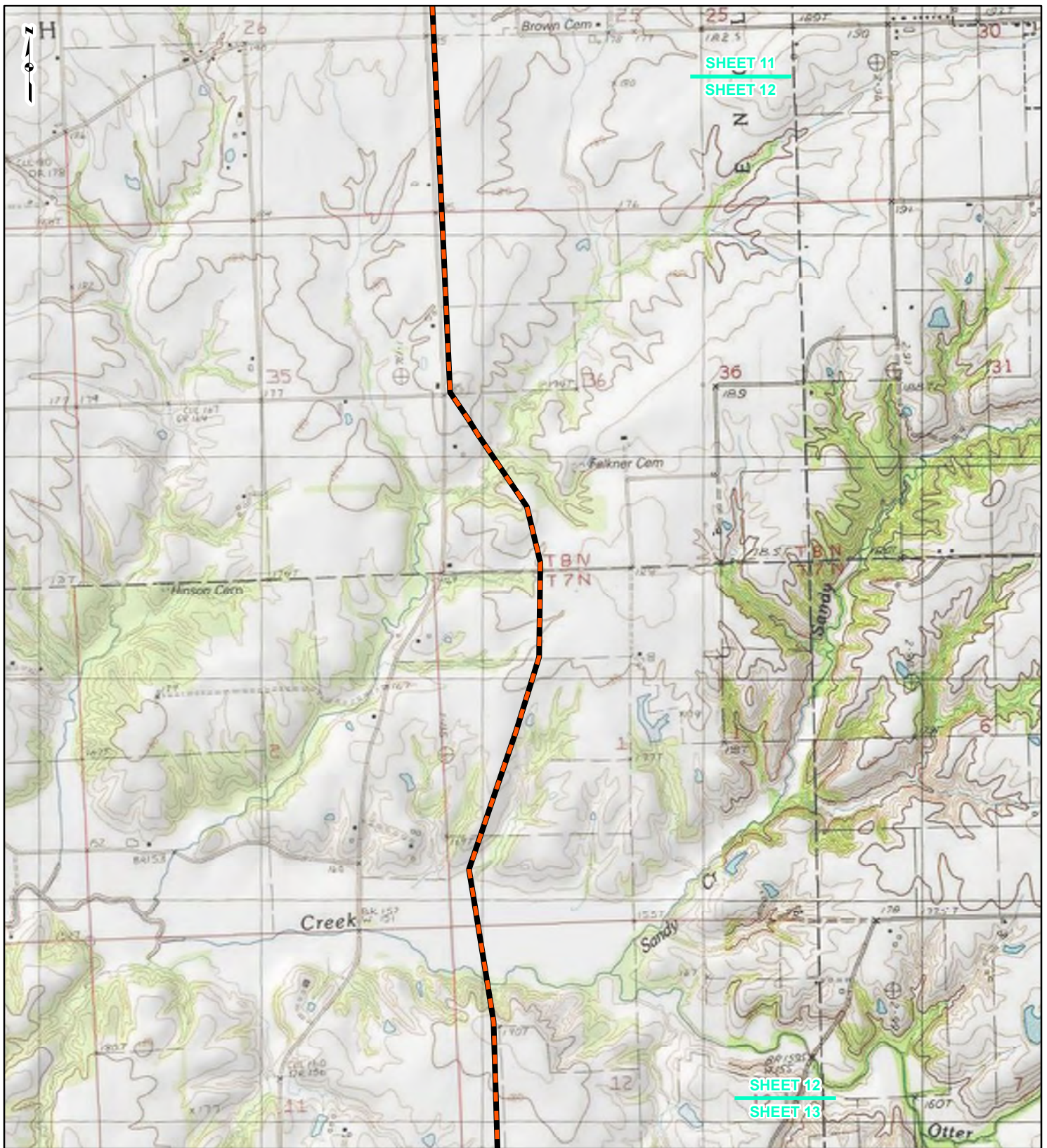
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 11 OF 21**



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

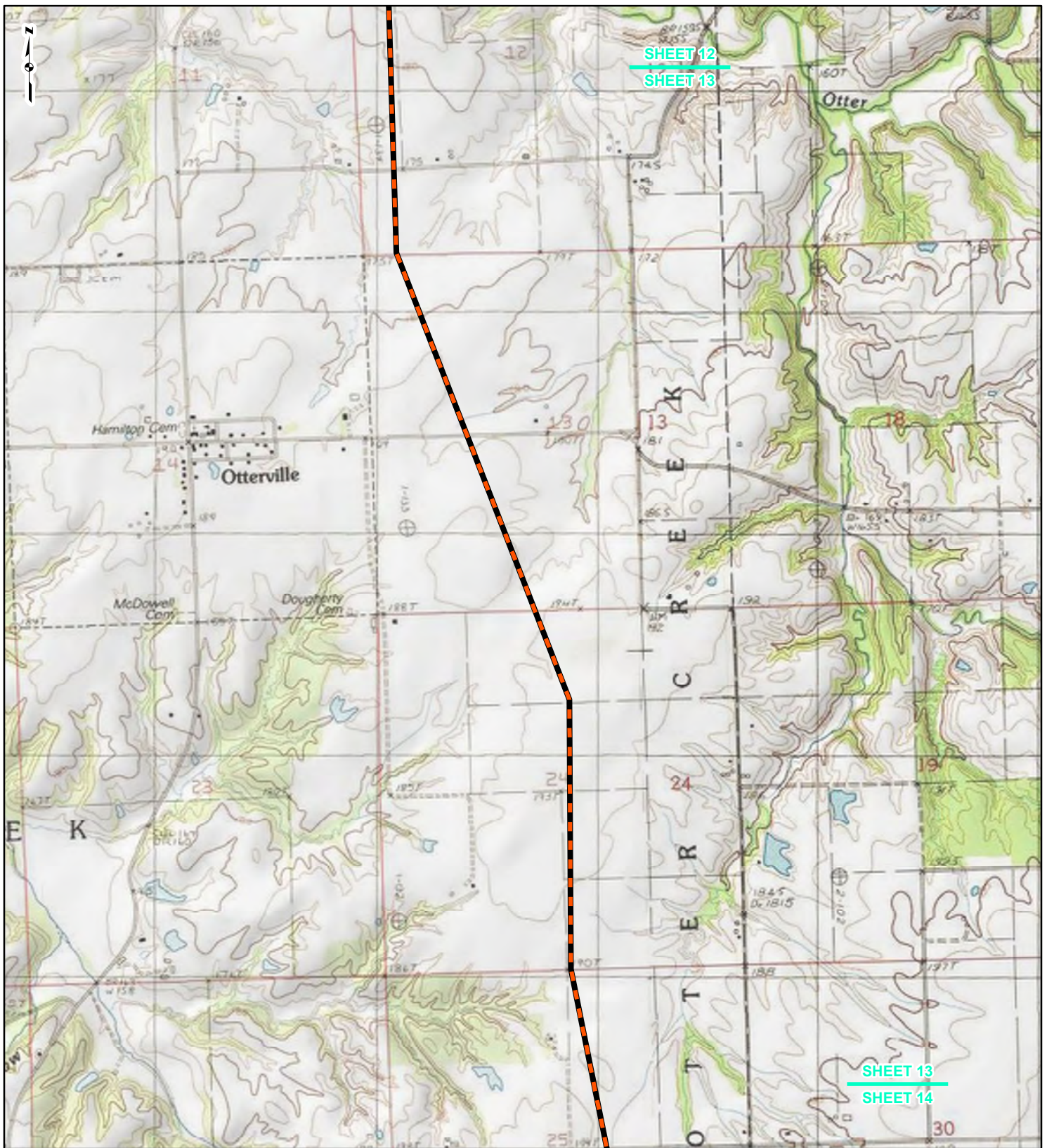
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 12 OF 21**

**Spire STL Pipeline**

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

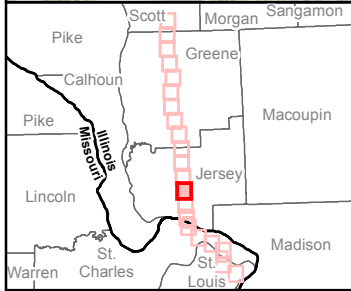
REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ALSEY (1983), ALTON (1994), BOYER CREEK (1983), CARROLLTON (1983), COLUMBIA BOTTOM (1999), ELSAH (1995), FLORISSANT (1999), GRAFTON (1995), JERSEYVILLE NORTH (1983), JERSEYVILLE SOUTH (1983), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, 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

0    1,000    2,000    4,000  
Feet

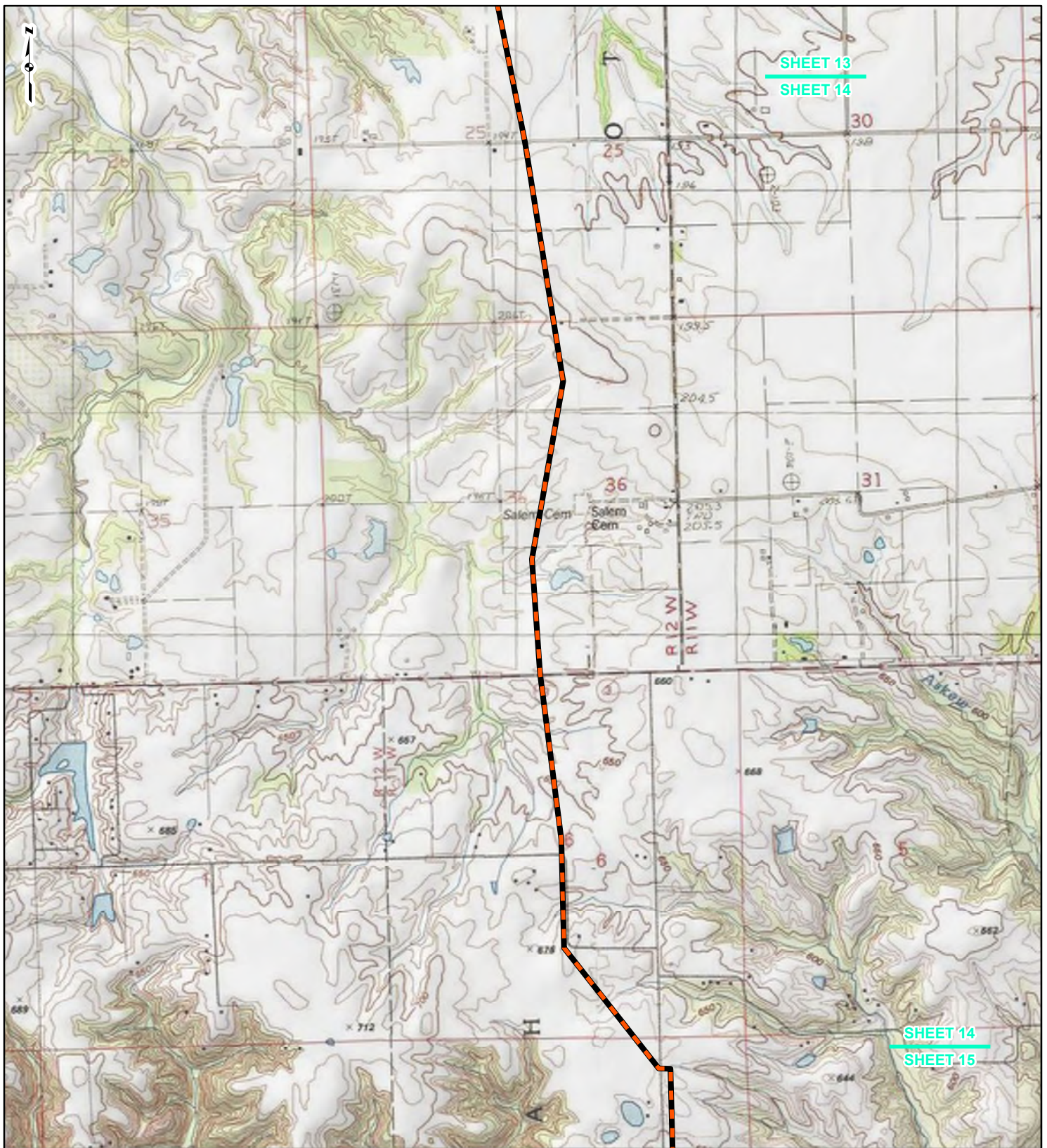
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 13 OF 21**

**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.









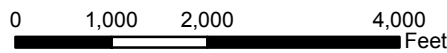
SHEET 13  
SHEET 14

SHEET 14  
SHEET 15



**LEGEND**

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



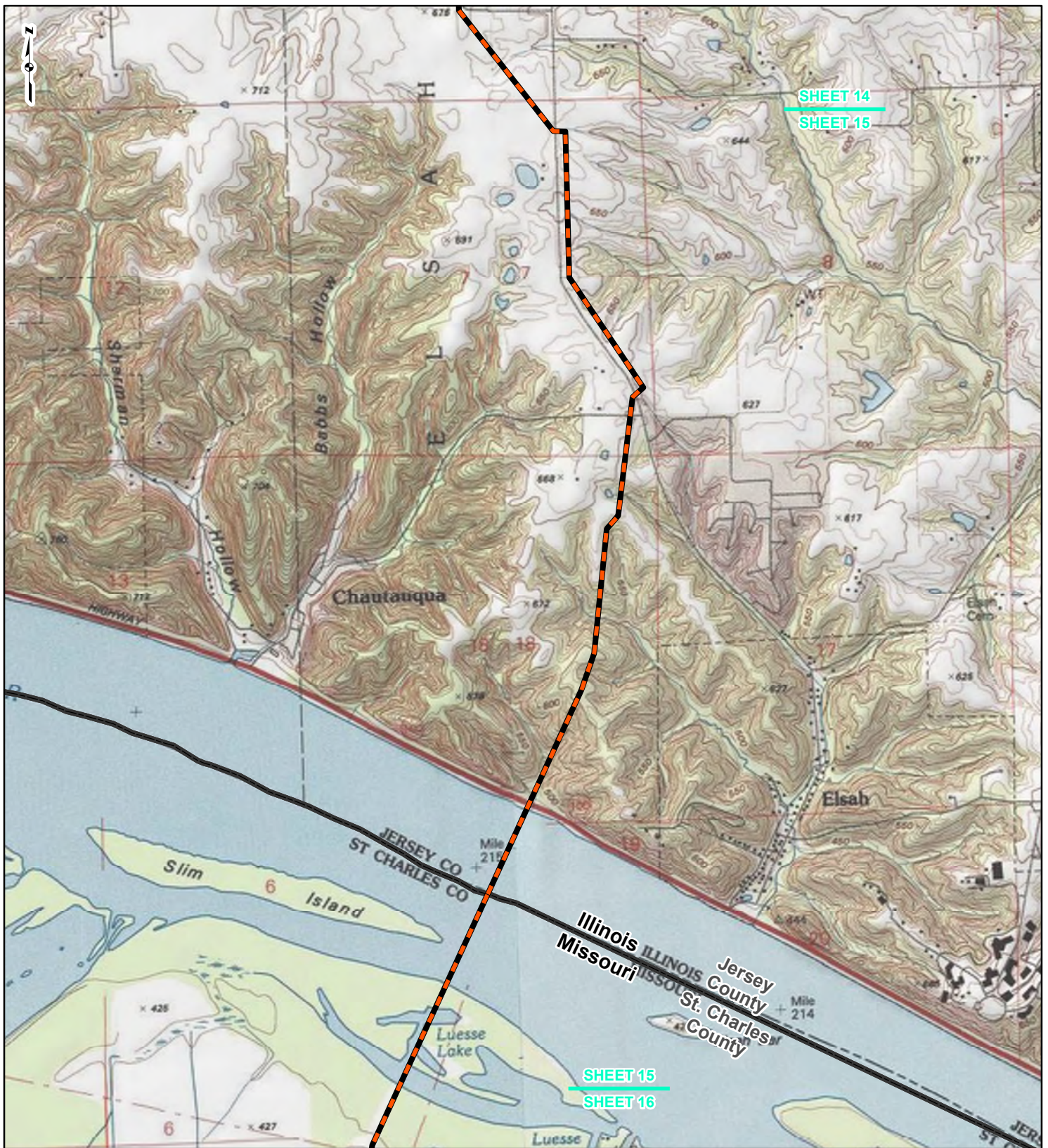
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 14 OF 21**



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

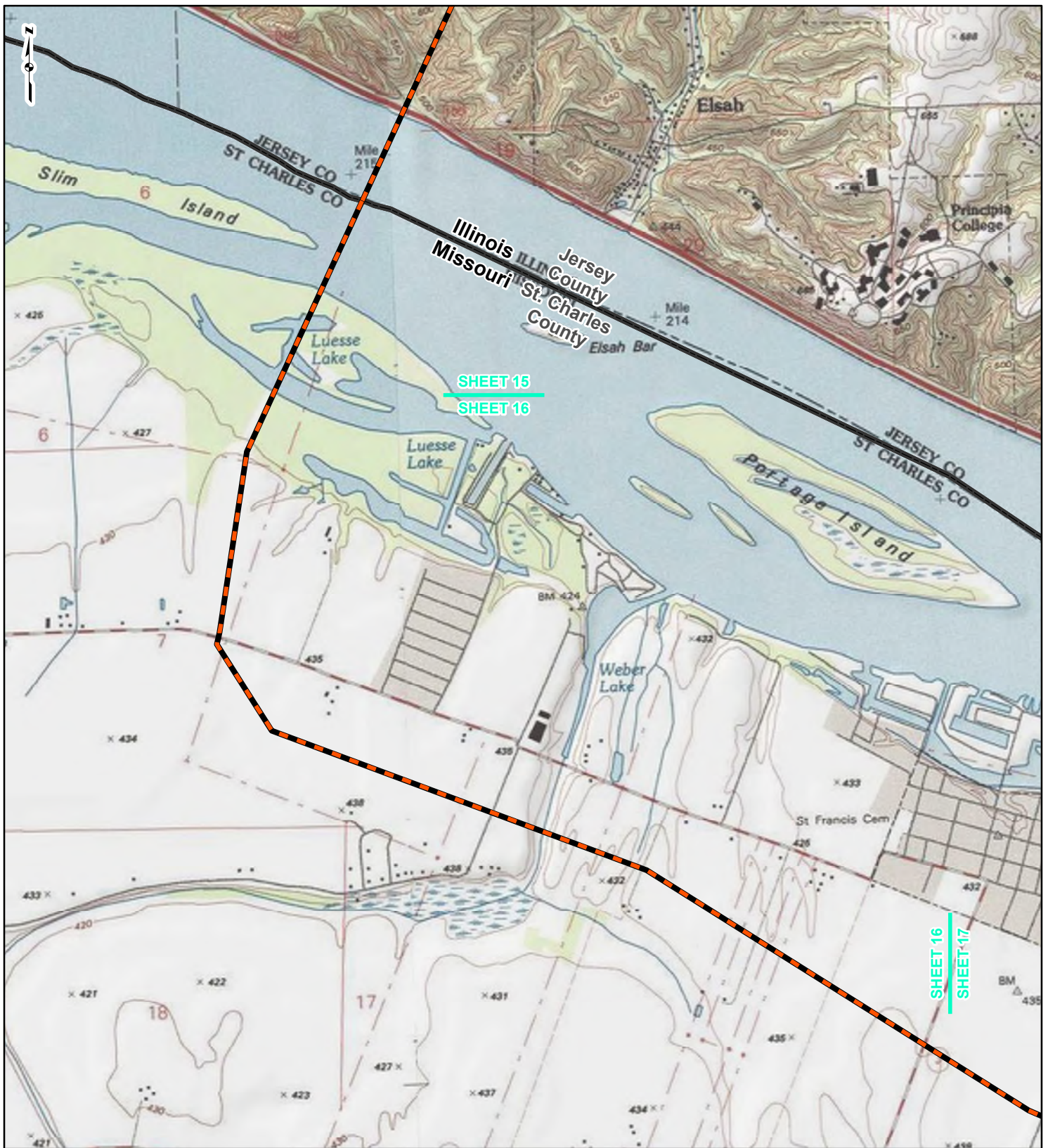
0      1,000      2,000      4,000  
Feet

**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 07/2016.





**LEGEND**

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

0      1,000      2,000      4,000  
Feet

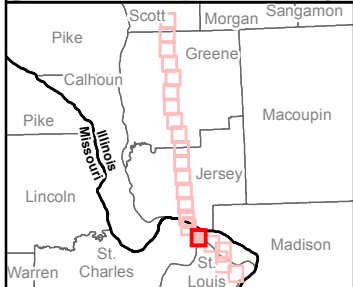
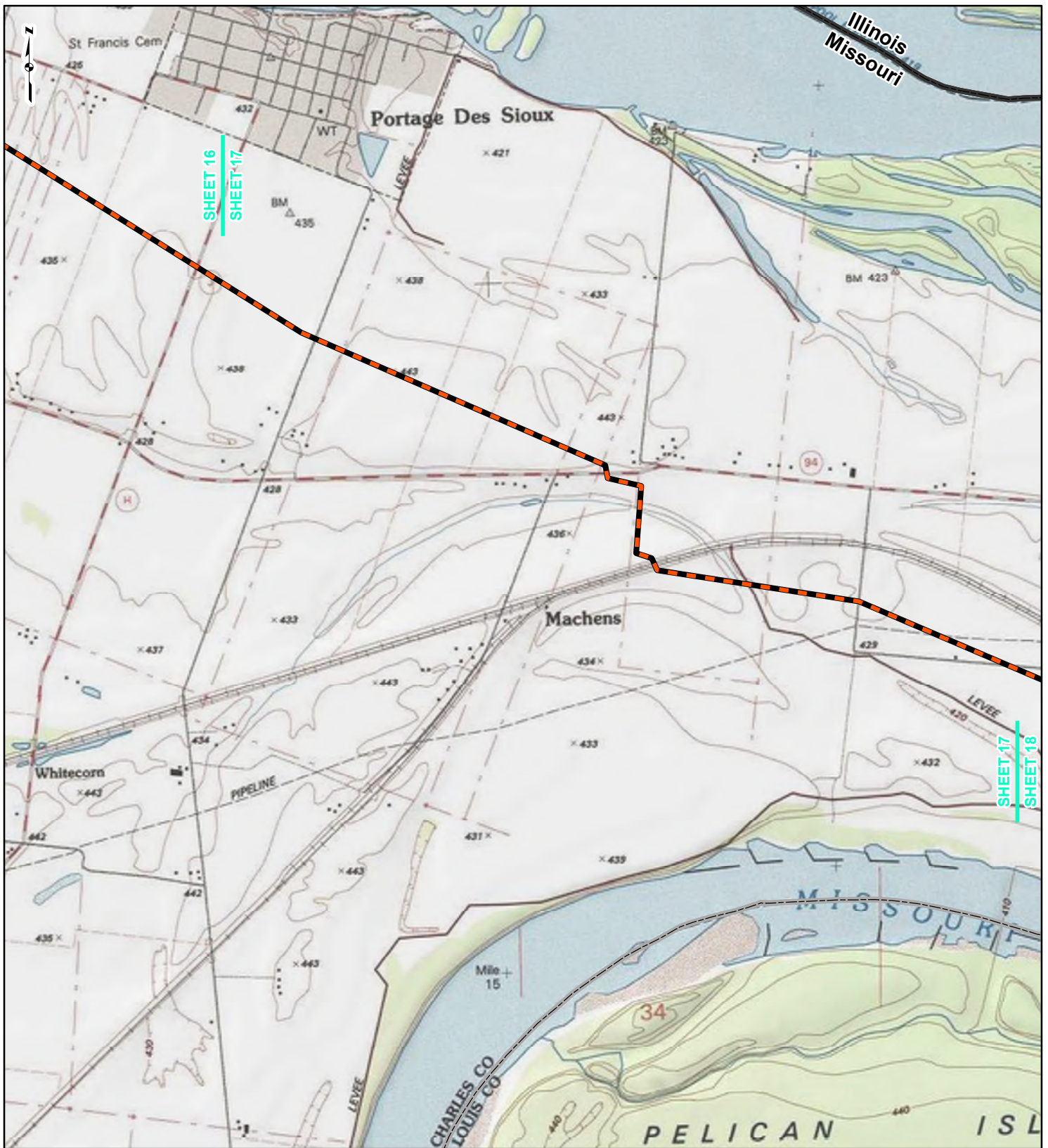
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 16 OF 21**

**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

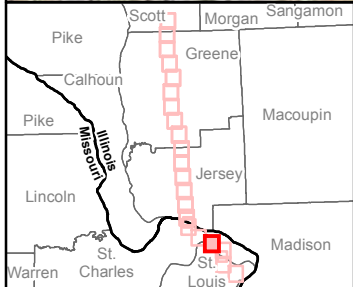
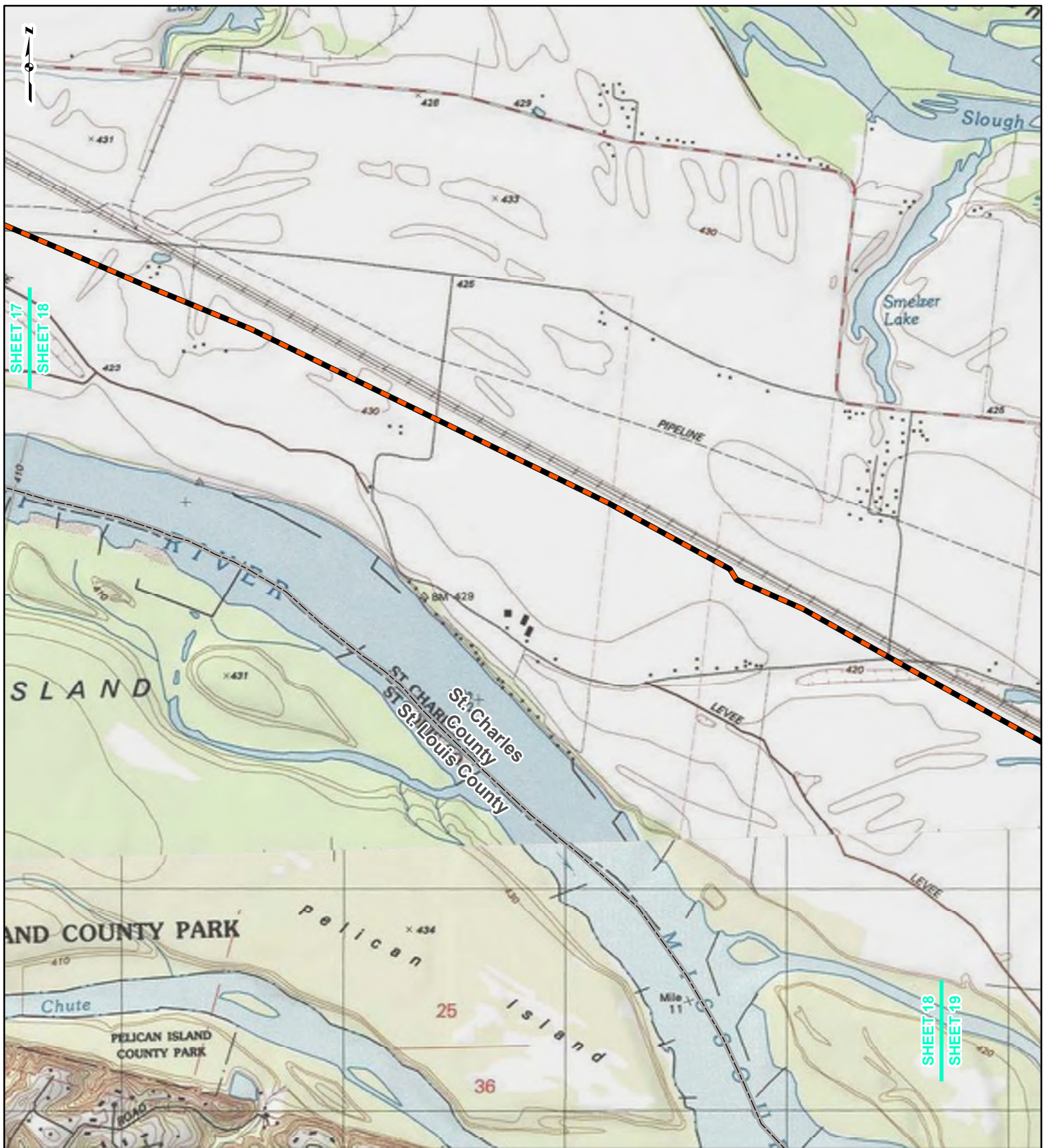
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 17 OF 21**



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

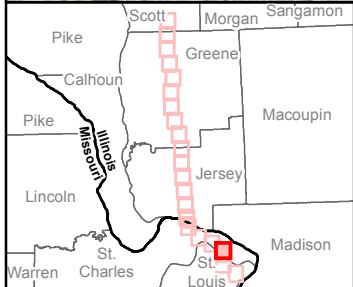
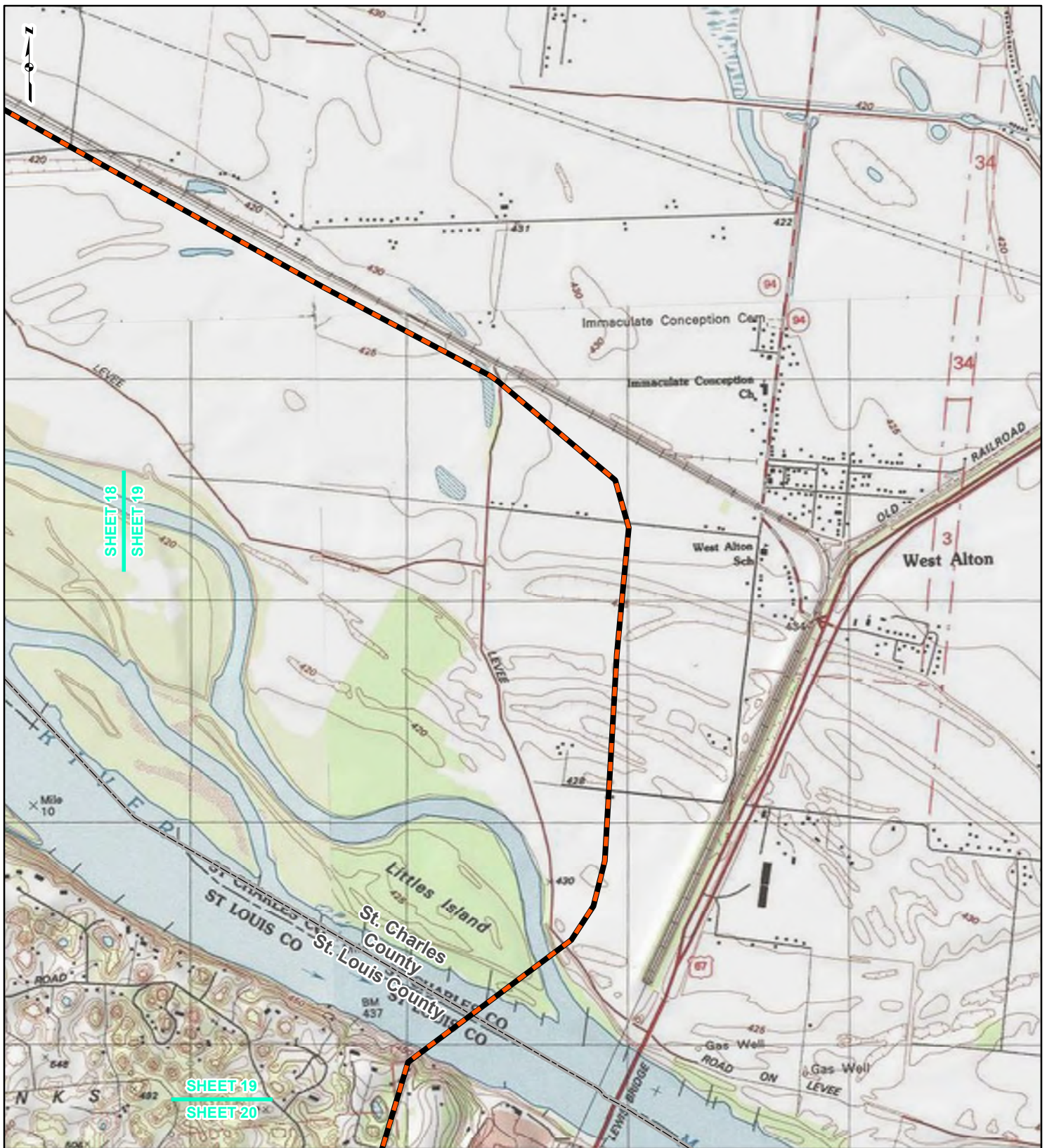
0      1,000      2,000      4,000  
Feet

**FIGURE 1**  
**LOCATION MAP**  
**SHEET 18 OF 21**

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

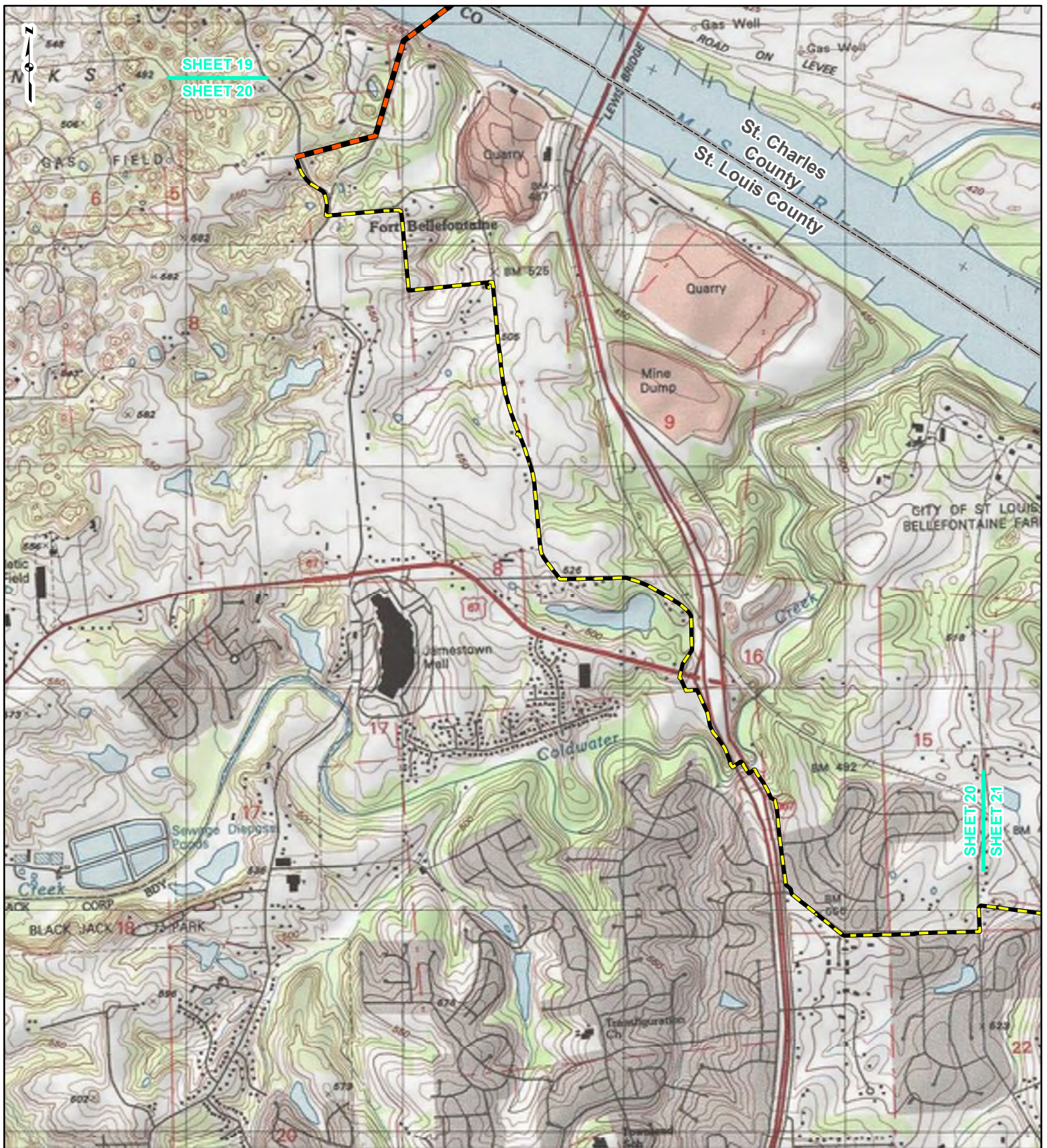
**FIGURE 1**  
LOCATION MAP  
SHEET 19 OF 21

**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 19  
SHEET 20

SHEET 20  
SHEET 21



**LEGEND**

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

0      1,000      2,000      4,000  
Feet

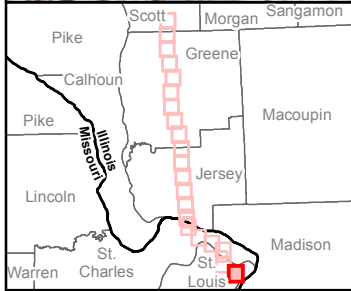
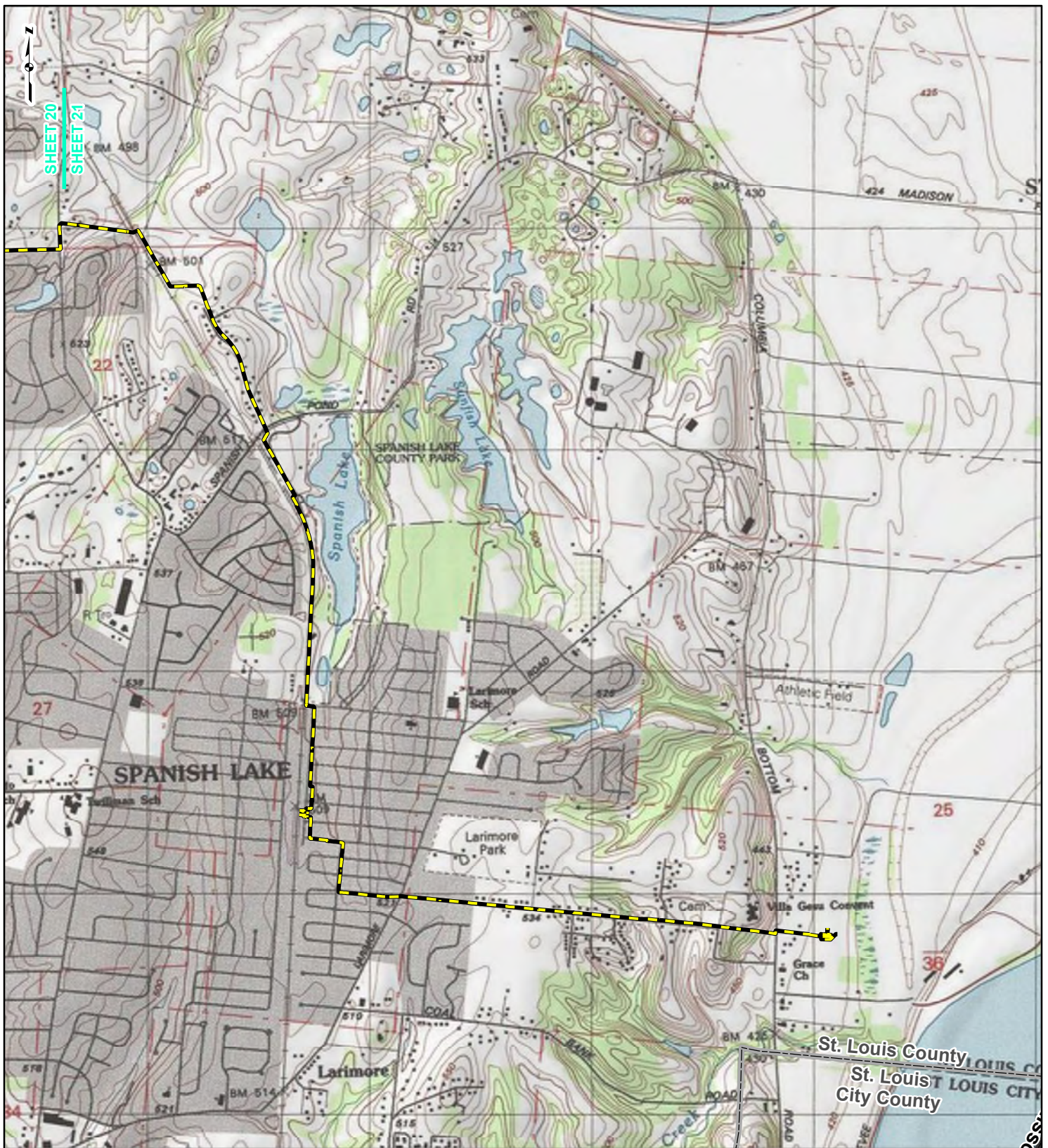
**FIGURE 1**  
**LOCATION MAP**  
**SHEET 20 OF 21**



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), OTTERTVILLE (1983) AND ROODHOUSE WEST (1983), ILLINOIS AND MISSOURI, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND I-CUBED, ACCESSED 07/2016.