



FEDERAL ENERGY REGULATORY COMMISSION RESTORATION INSPECTION REPORT

Date	June 28, 2021 – July 1, 2021	
Project	Spire STL Pipeline Project Scott, Greene, and Jersey Counties, Illinois St. Charles and St. Louis Counties, Missouri Docket Nos.: CP17-40-000 CP17-40-001	
FERC Staff	Office of Energy Projects	John Peconom
State Agency Attendee	Illinois Department of Agriculture	Brian Rennecker (June 28 and 29)
Landowners Present (during individual property inspections)		Messrs. and Mrs. Brown (June 28) Mark Steckel (June 28) Michael Dahman (June 29) Kenneth Davis (June 29) Mark Ryan (June 29) Mr. Hart (June 29) Jay Gettings (June 29) Mr. Meyer (June 29) Ray Sinclair (June 30) Messrs. Parker (June 30) Greg Stout (June 30) Messrs. Schlemmer (June 30) Mr. Bell (June 30)
Spire Representatives (Varied Participation)		Doug Sipe (June 28 - July 1) Lori Ferry (June 29 – July 1) Stevie Whitson (June 29 – July 1) Todd Gibson (June 29 – July 1) Jodi Harness (June 30) Alex Sammet (June 29) Dave Feeman (June 29) Josh Edgell (June 29 – July 1)
Other	Central Land Consulting, LLC	Rob Squire (June 28 – June 30)

Introduction

On August 3, 2018 the Federal Energy Regulatory Commission (FERC or Commission) authorized an Order Issuing Certificates to Spire STL Pipeline, LLC (Spire) for the Spire STL Project (Project). The Project includes the construction, restoration, and operation of a new 65-mile-long interstate natural gas pipeline system in Scott, Greene, and Jersey Counties, Illinois and St. Charles and St. Louis Counties, Missouri. The Project also includes three new, aboveground, meter and regulation stations; the installation of pig¹ launchers and receivers; and the installation of three mainline valve assemblies and other appurtenant facilities.

Restoration Background and FERC Environmental Staff Monitoring Efforts

On November 14, 2019, the Commission's environmental staff authorized Spire STL Pipeline, LLC (Spire) to commence service of the Mainline, North County Extension, REX Receipt Station, Laclede/Lange Delivery Station, and the Chain of Rocks Delivery Station; determining that Spire had adequately stabilized the construction workspaces and that restoration was proceeding satisfactorily. Subsequently, Commission environmental staff and its representatives conducted field inspections to ensure restoration continued to proceed satisfactorily and to investigate landowner restoration concerns. In the first quarter of 2020, all Commission field inspections were suspended due to the COVID-19 pandemic. However, Spire continued to file in the Commission's administrative record reports (including photographs) documenting its restoration efforts and the status of restoration on affected lands. Commission environmental staff continued to monitor restoration efforts through Spire's reports and address landowner concerns brought to its attention.

On March 18, 2021, the Commission issued an Order on Environmental Compliance (Order) in response to the findings of the Illinois Department of Agriculture (IDOA) concerning Spire's compliance with the Agricultural Impact Mitigation Agreement (AIMA) executed between IDOA and Spire. In this Order, the Commission addressed the IDOA's findings and directed Spire to take corrective actions on seven specific properties.

Restoration Field Inspection

In the second quarter of 2021, Commission environmental staff resumed field inspections. Due to ongoing restoration concerns and landowner complaints, an inspection of Spire's restoration efforts was prioritized, and scheduled to be one of the first inspections conducted after the shutdown due to the COVID-19 pandemic.

Mr. John Peconom, Environmental Biologist - Commission environmental staff, conducted a restoration inspection of the Project during the week of June 28, 2021. The purpose of the inspection was to assess current conditions on lands affected by the Project, assess the field conditions of the seven properties addressed in the March 18 Order, and document these conditions in the Commission's administrative record. Additionally, Mr. Peconom was instructed to consider landowner concerns, communicate to landowners and other concerned parties that may be present the purpose of the inspection, and inform them that other Commission staff would be reviewing the inspection's findings and considering them while addressing previously raised landowner concerns.

In the days preceding the inspection, the Project area received considerable rain. As a result, field conditions during the inspection were wet and agricultural properties were saturated. Light to moderate

¹ A "pig" is a tool that moves through the pipeline, and is used for cleaning, internal inspections, or other purposes. A launcher/receiver is an aboveground structure used to install/retrieve pigs from the pipeline.

periods of rain persisted throughout the week of the inspection. Otherwise, conditions were sunny with temperatures ranging from the low-70s to the mid-90s (degrees Fahrenheit).

Beginning on Monday afternoon, June 28, 2021, and concluding on Thursday morning, July 1, 2021, Mr. Peconom visited over 30 properties/tracts affected by the Project (see list below). For approximately 20 of these property/tract visits, Mr. Peconom was accompanied by Mr. Rob Squire – Central Land Consulting, LLC (CLC). CLC is supporting numerous landowners with their efforts to have their properties restored, and the inspection included review of the properties represented by CLC. Additionally, numerous landowners (as identified above) were present for the visits to their respective properties. Lastly, Spire representatives were present throughout the week. Mr. Brian Rennecker of the IDOA was also present for the visits to the Steckel and Gettings properties.

Almost all of the properties/tracts visited were planted with soybeans or corn. Growth levels varied. Some properties/tracts were specifically excluded by the landowner from this growing (and preceding) season(s).

Landowner Restoration Concerns

Numerous landowners including those represented by CLC have raised a variety of concerns in the Commission's administrative record about Spire's restoration efforts on affected lands. These documented concerns include loss of topsoil, soil mixing, compaction, excess rock content, improper contour/grade, low-spots/ponding, erosion, insufficient vegetation (crop) growth, and unwanted construction debris. As described below, these concerns, in various degrees, were observed during the inspection. Additionally, many landowners during the course of the inspection expressed a preference for personally addressing/remediating their respective restoration issues. These landowners felt they could do a better job than Spire and/or its contractors of restoring their lands.

Inspection Findings

Over the course of the inspection, which spanned the length of the entire mainline and numerous aboveground facility locations, a variety of restoration conditions were observed. The status of restoration across properties visited ranged from successful restoration of the properties to properties that require attention - additional monitoring and/or further restoration activities to ensure compliance. Many properties have been successfully stabilized and restored, and many properties are on track to be successfully restored, but still require attention due to instances of low-spots, rill erosion, or discarded construction debris. Lastly, some properties cannot be fully restored without additional attention from Spire. The restoration conditions observed by Commission staff on affected lands are known to Spire and have been previously documented by Spire in its reporting to the Commission's administrative record. These conditions have also been documented by affected landowners.

As demonstrated in the representative photos below; low-spots/ponding along isolated locations and grade/contours that were inconsistent with adjacent lands were observed along the mainline right-of-way of affected lands (photo numbers [no.] 1, 5, 10, 12, 13, 15, and 18); rill erosion was evident at several isolated locations along the mainline right-of-way (photo nos. 4, 11, and 16); excess rock and remaining construction debris were present on several of the properties visited (photo no. 2); minor trenchline subsidence was observed on multiple properties (photo no. 8); revegetation was not consistent with the surrounding area on a few properties (photo nos. 12 and 14); and several properties included slopes and streambanks that have slipped/sloughed and require remediation (photo nos. 6, 7a, 9, and 17). These conditions were observed at numerous locations along the entire length of the mainline in varying degrees. Some affected lands possessed all these issues and exhibited moderate to severe conditions whereas on other lands none of these issues or only one or two of these conditions were observed and

exhibited only mild examples of these conditions. Additionally, on two observed properties that have been stabilized, examples of modified surface flow were observed, which have resulted in new drainage patterns that may require further attention (photo nos. 7 a/b).

Lastly, outside of the identified concerns several areas were observed to be, or on track to being, successfully restored [photo nos. 3, 19, 20).

Many landowners stated that the amounts of topsoil present on their respective properties did not match pre-construction levels, their subsoils and topsoils were mixed, and the soils on their properties were compacted. Landowners offered verbal accounts of pre-construction conditions and demonstrated to staff what they contend are insufficient conditions, including mixed topsoil/subsoil and compacted soils.; Prior to in-service of the Project, staff found that, overall, Spire was in compliance with the topsoil/subsoil segregation, subsoil/topsoil replacement, and with the decompaction requirements included in the AIMA and the Commission's Upland Erosion Control, Revegetation, and Maintenance Plan (Plan). Determining the amount of topsoil present, potential mixing, and amount of compaction during a field inspection on a restored right-of-way is difficult, and staff was unable to conclusively determine that these conditions were present during the inspection. We note that Spire's compliance with the AIMA and the Commission's Plan regarding soil mixing and compaction were addressed in the Commission's March 18, 2021 Order.

Conclusions and Recommendations

The Commission's environmental staff finds that restoration of affected lands, which is a process that occurs over multiple years, is proceeding satisfactorily. In general, initial restoration of the construction and permanent right-of-way occurs after backfill of the pipeline trench during the construction phase, the process to full and successful revegetation and restoration typically occurs over two or more growing seasons. For this reason, the Commission's Plan requires follow-up restoration inspections after the first and second growing season, at a minimum. Following initial restoration and throughout the restoration process, the most common issues of low spots/ponding, compaction, lack of adequate vegetation or poor crop productivity may present themselves and the Project Proponent is required to coordinate with the landowner(s) to correct these issues in order to reach successful revegetation and restoration. For minor instances of low spots or ponding, these may self-correct with continual working of the soils in between crop harvesting although Commission staff expects that the Project Proponent would still coordinate with the landowner(s) to ensure the right-of-way returns to pre-construction conditions as soon as practical and right-of-way agreements are met. For moderate to severe restoration issues, coordination between the Project Proponent and the landowner(s) on remediation and resolution is key to positive progress towards successful restoration.

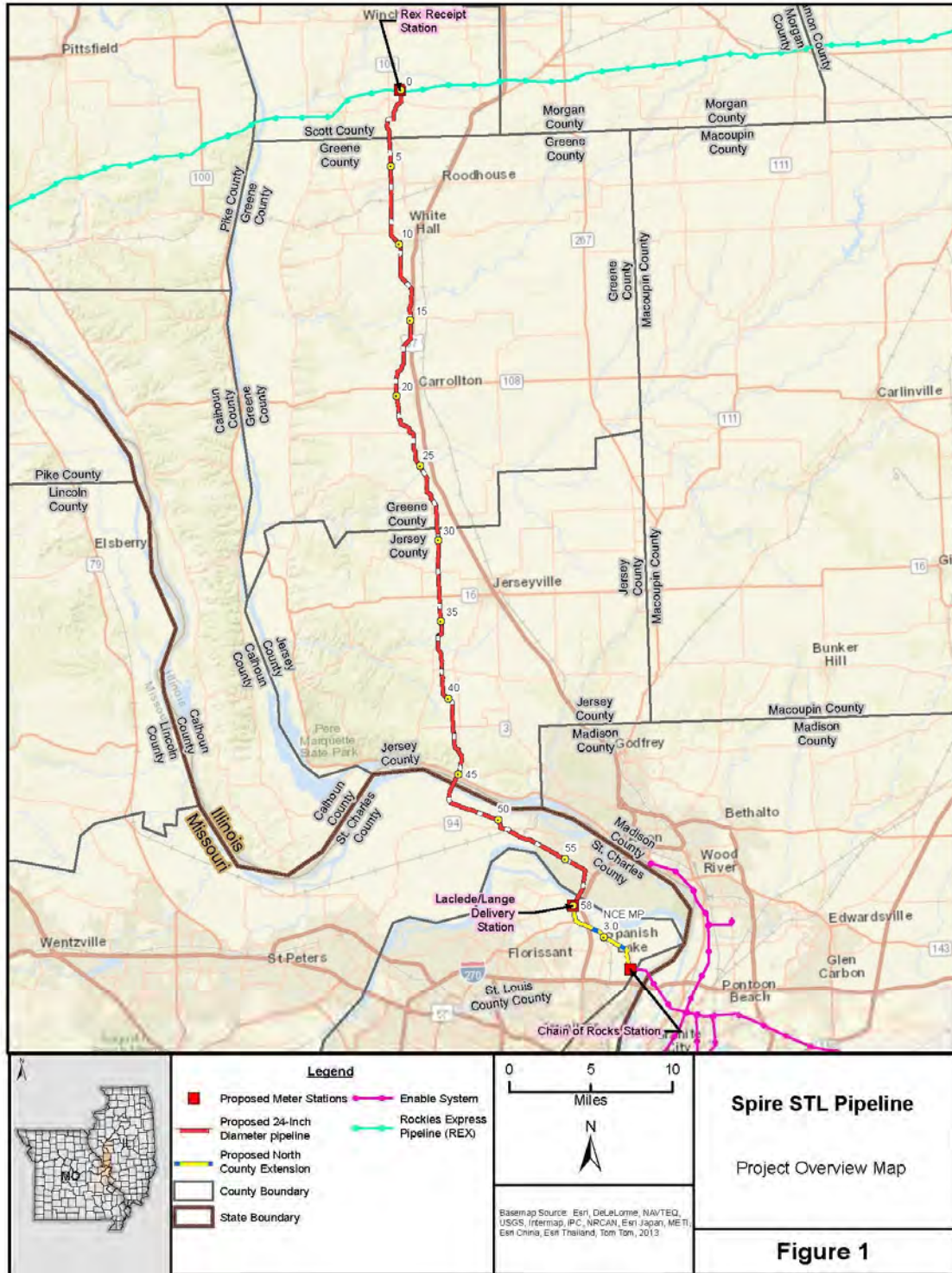
Evidence was observed in the field indicating that additional restoration efforts are required by Spire to ensure that affected lands are stabilized and successful restoration is eventually reached. Many of the specific areas requiring additional restoration efforts were previously identified by Spire and included in its restoration status reports filed in the Commission's public record (see Spire's May 21, 2021 restoration status report [status report 86]). However, newly identified isolated locations on several properties were identified during the inspection and the Commission staff communicated these findings to Spire's representatives and directed the company to add these to its list of areas requiring further restoration repairs and monitoring. Staff also directed Spire to promptly make the required restoration repairs once conditions are suitable (i.e., saturated field conditions subside), to ensure that the repairs are overseen by an agricultural inspector, and to ensure that the repairs are completed in consultation with the landowners' farming operations. As noted in Spire's corrective action status reports filed in response to the March 18 Order and per FERC staff's communications with landowners during the inspection,

several of the landowners prefer to make the restoration repairs themselves, and based on Spire's documented filings, Spire and the landowners continue to engage in ongoing settlements regarding several of the properties requiring further restoration repairs.

Staff directed that Spire: 1) continue to work with landowners to address their restoration concerns; 2) within 30 days, prepare and file a detailed list of all outstanding restoration issues to ensure that restoration is successful, including those newly identified areas observed and documented during the inspection, and include in the filing a proposed schedule for completing the identified restoration work. Spire's filing must also explain any proposed delays in completing the restoration work, whether those delays are based field conditions (e.g., unsuitable soil conditions), and provide documentary evidence of those conditions. Commission environmental staff plans to conduct a follow-up restoration inspection dependent on Spire's schedule to complete the restoration efforts, or no later than Fall 2021. Note: an inspection conducted prior to Fall 2021 may not be conducive to observing restoration issues due to agricultural land use of affected lands.

List of Tracts Visited

IL-SC-003.000	IL-SC-008.001
IL-SC-011.000	IL-SC-018.000
IL-SC-019.000	IL-GC-022.000
IL-GC-041.001	IL-GC-068.000
IL-GC-078.000-IL-GC-081.000	IL-GC-091.000/IL-GC-092.000/
IL-GC-093.000/ IL-GC-094.000	IL-GC-110.000/ IL-GC-111.000
IL-GC-116.000	IL-JC-149.000
IL-JC-179.000	IL-JC-183.000
IL-JC-200	IL-JC-223
IL-JC-220.000	MO-SC-312.000
MO-SC-330.000	MO-SC-318.000
880L-023.00	880L-024.01
IL-JC-226.000	MO-SC-306.000
MO-SC-319.000	MO-SC-324.000
MO-SC-349.001	MO-SC-350.000
IL-JC-226.00	MO-SC-329.001



**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Spire STL Pipeline, LLC

Docket No.: CP17-40-000 and CP17-40-001

Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 1

MP/Sta. No.: 14.2/745+00 (Brown property)

Direction: North

Assessment: Problem area, previously identified.

Comments: Low-spot, grade/contour issues. Brown property contained numerous issues including low-spots, inconsistent grade/contour, rill erosion (minor – severe), rock and construction debris and modified surface flow. Mr. Brown provided pictures depicting soil mixing and also expressed concern about a nearby well.



Photo No.: 2

MP/Sta. No.: 14.15/744+00 (Brown property)

Direction: North

Assessment: Problem area, previously identified.

Comments: Remaining construction debris. Representative photo - one instance of many locations where construction debris was not adequately removed from affected lands.

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Photo No.: 3

MP/Sta. No.: 0.69/36+00 (Jefferson property)

Direction: North

Assessment: Acceptable.

Comments: Returned to agricultural land use. Vegetation growth is generally consistent across affected and unaffected lands. A minor low-spot was observed on the right-of-way ; Spire should discuss potential remediation actions with the landowner, whether performed by Spire or whether this low-spot will self-correct after crop harvest and reworking of the soil in between growing seasons.



Photo No.: 4

MP/Sta. No.: 24.1/1272+00 (Steckel property)

Direction: West

Assessment: Problem area, previously identified.

Comments: Rill erosion. Numerous instances of rill erosion were observed throughout the multi-day inspection. This is an example of moderate rill erosion.

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Company: Spire STL Pipeline, LLC

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Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 5

MP/Sta. No.: 0.55/28+00 (Jefferson property)

Direction: North

Assessment: Problem area, previously identified.

Comments: Numerous low-spots were observed on this property and throughout the lands affected by the project. Restoration conditions of the remaining right-of-way on this property were progressing satisfactorily.



Photo No.: 6

MP/Sta. No.: 1.35/66+00 (Dahman property)

Direction: Southwest

Assessment: Acceptable.

Comments: Slope repair. The project crossed numerous slopes. The slope photographed had slipped and was being restored by Spire at the time of inspection. Restoration conditions of the remaining right-of-way on this property were progressing satisfactorily.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Spire STL Pipeline, LLC

Docket No.: CP17-40-000 and CP17-40-001

Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 7a and 7b

MP/Sta. No.: 2.75/151+00

Direction: East

Assessment: Problem area, newly identified.

Comments: Slope instability/slip. The grade/contours/slope on Mr. Davis' property were stabilized and restored; however, it appears these efforts resulted in changes to drainage and waterflow which may have contributed to adjacent slope instability. Mr. Davis' property also contained low-spots, excessive rock, and rill erosion at several locations. Continued monitoring is necessary and additional remediation may be required.



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PHOTOGRAPHIC RECORD**

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Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 8

MP/Sta. No.: 2.8/158+00 (Ballard property)

Direction: South

Assessment: Problem area, newly identified.

Comments: Minor trench subsidence and sparse vegetation. The property also contained rill erosion and grade issues. Restoration conditions of the remaining right-of-way on this property were progressing satisfactorily.



Photo No.: 9

MP/Sta. No.: 3.45/180+00 (Clayton property)

Direction: South

Assessment: Problem area, newly identified.

Comments: Minor slip on stream bank requiring attention. Representative of other stream banks observed throughout inspection. Restoration conditions of the remaining right-of-way on this property were progressing satisfactorily.

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Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 10

MP/Sta. No.: 6.5/351+00 (Hart property)

Direction: North

Assessment: Problem area, previously identified.

Comments: One of numerous low-spots on this property. Restoration conditions of the remaining right-of-way on this property were progressing satisfactorily.



Photo No.: 11

MP/Sta. No.: 11.3/597+00

Direction: North

Assessment: Problem area, previously identified.

Comments: In addition to rill erosion, low-spots throughout property. Restoration conditions of the remaining right-of-way on this property were progressing satisfactorily.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Spire STL Pipeline, LLC

Docket No.: CP17-40-000 and CP17-40-001

Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 12

MP/Sta. No.: 18.15/958+00 (Meyer property)

Direction: South

Assessment: Problem area, previously identified.

Comments: Mr. Meyer's property included low-spots, grade issues, and spots lacking vegetation.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Spire STL Pipeline, LLC

Docket No.: CP17-40-000 and CP17-40-001

Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 13

MP/Sta. No.: 30.2/1592+00
(Gettings property)

Direction: South

Assessment: Problem area,
previously identified.

Comments: Mr. Gettings' property
includes low-spots and grade issues.



Photo No.: 14

MP/Sta. No.: 35.5/1879+00
(Malone property)

Direction: North

Assessment: Problem area, newly
identified.

Comments: Cattle pasture with
vegetation that is inconsistent with
adjacent lands.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Spire STL Pipeline, LLC

Docket No.: CP17-40-000 and CP17-40-001

Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 15

MP/Sta. No.: 36.0/1900+00
(Sinclair property)

Direction: North

Assessment: Problem area,
previously identified.

Comments: Low-spots, rill erosion,
construction debris all present on Mr.
Sinclair's property.



Photo No.: 16

MP/Sta. No.: 41.3/2190+00
(Longhorn, LLC property)

Direction: South

Assessment: Problem area, newly
identified.

Comments: Erosion deposition.
Slope and rill erosion, construction
debris, creek bank slip, and lack of
vegetation observed on the Longhorn
property.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Spire STL Pipeline, LLC

Docket No.: CP17-40-000 and CP17-40-001

Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 17

MP/Sta. No.: 41.6/2196+00
(Longhorn, LLC property)

Direction: North

Assessment: Problem area, newly identified.

Comments: Representative streambank slip.



Photo No.: 18

MP/Sta. No.: 43.85/2316+00
(Seagraves property)

Direction: South

Assessment: Problem area, previously identified.

Comments: Low-spot. Restoration conditions of the remaining right-of-way on this property were progressing satisfactorily.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

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Project: Spire STL Pipeline

Spread: Mainline



Photo No.: 19

MP/Sta. No.: 45.1/2380+00
(Principia)

Direction: North

Assessment: Successful restoration.

Comments: Slope stabilized and revegetated. No environmental concern observed.



Photo No.: 20

MP/Sta. No.: 51.3/2708+00
(Thomas property)

Direction: North

Assessment: Successful restoration.

Comments: Road crossing. No environmental concern observed. Grade and vegetation growth appear consistent with off-right-of-way lands.

Document Content(s)

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