



September 21, 2021

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

Docket # CP17-40-000 / Spire STL Pipeline Project

RE: Restoration Issues and Non-Compliance Conditions

Dear Ms. Bose:

On March 18, 2021, the FERC filed an Order on Environmental Compliance instructing Spire to address many types of restoration issues that have not been corrected.

On July 20, 2021, the FERC Office of Energy Projects filed their restoration report detailing numerous properties facing erosion, soil impacts, grade issues, contours not being restored, and large slips and unstable slopes near the pipeline and inside the Spire workspace. Please view the restoration report [here](#).

Attached below you will find Central Land's responses to Spire's Corrective Action Status Report No. 26 for period of September 10 to September 17, 2021. CLC has serious concerns with Spire's comments and lack of reporting the facts in their status reports.

Please free to contact (330) 312-1060 with any questions or for further assistance.

Respectfully Submitted,

/s/ Nate Laps

Nate Laps,
President of Operations
Central Land Consulting, LLC

Landowner Name	Tract Number	Spire Remediation Plan	Spire STL Comments	CLC/Landowner Updated Responses
Betty & Keith Jefferson	IL-SC-003.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Betty & Keith Jefferson	IL-SC-008.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Kenneth Davis	IL-SC-018.000	Spire STL has provided a remediation plan to the landowner, specific to the area south of stream SIL- CDK-033.	Spire STL requested clarification from CLC and outside counsel as to the position of landowner if they were amenable to Spire STL's remediation plans and schedule. CLC generally responded that it believes the proposed remediation work lacks appropriate corrective actions and that CLC will be updating Spire STL on steps moving forward. Spire did complete remediation as reported in CASR 25 and will continue to monitor the restoration.	CLC and landowner have visited the property numerous times with Spire and have communicated the ongoing restoration issues, including remediation of the slip FERC OEP has identified, this issue is not a monitoring process, but will need corrective action. There are altered drainage issues, compaction, contour issues, and mixing of the soils. CLC has relayed numerous times Spire's restoration plan does not address or mitigate the appropriate measures to regain compliance and began the monitoring phase. CLC and the landowner are requesting the FERC OEP to assist in the appropriate measures for either Spire to mitigate restoration issues or the landowner to self perform.
William Ballard and Mark Ryan	IL-SC-019.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Anne M. & Matthew J. Clayton	IL-GC-022.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Anne M. & Matthew J. Clayton	IL-GC-022.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Forrest Neal Jones	IL-GC-029.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Kenneth R Willis Gayle P Willis	IL-GC-030.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Hart Farms LLC	IL-GC-041.001	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Gregory Farm Trust	IL-GC-063.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Gregory Farm Trust	IL-GC-065.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Darrell Mansfield, deceased Jo Ann Mansfield	IL-GC-068.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues

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Bernard H Meyer Trust #9-11, Mary Lois Meyer trust #9-11	IL-GC-093.000	Spire STL has provided an updated remediation plan to the landowner.	Spire STL requested clarification from CLC and outside counsel as to the position of landowner if they were amenable to Spire STL's remediation plans and schedule. CLC generally responded that it believes the proposed remediation work lacks appropriate corrective actions and that CLC will be updating Spire STL on steps moving forward.	CLC has relayed numerous times Spire's restoration plan does not address or mitigate the appropriate measures to regain compliance and began the monitoring phase. CLC and the landowner are requesting the FERC OEP to assist in the appropriate measures for either Spire to mitigate restoration issues or the landowner to self perform.
Bernard H Meyer Trust #9-11, Mary Lois Meyer Trust #9-11	IL-GC-094.000			
Jacob D. Gettings, Mildred L. Gettings, Jacob "Jay" Gettings TTE Land Trust	IL-JC-149.000	Spire STL has provided an updated remediation plan to the landowner.	Spire STL had planned to begin remediation activities on the Gettings property on Monday, September 13, 2021. However, on Friday, September 10, 2021, Spire STL was notified by Central Land Consulting LLC that Mr. Gettings would not grant Spire STL off-right-of-way access to commence such restoration work.	The landowner and CLC have relayed the importance of taking the appropriate measures to make progress in remediation work. Due to the severely mixed soils, systematic drain tiles, and contour issues it is crucial the appropriate measures are taken to carefully restore the land and not cause additional impacts. We feel Spire's restoration plan will not progress restoration, but increase issues causing further damage. We intend to involve the FERC OEP to assist Spire in coming up with a restoration plan that will not cause additional damages and progress in the outstanding remediation issues.
Dannie Malone	IL-JC-179.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Sinclair Family Farm, Brandon Sinclair and Brent Sinclair	IL-JC-183.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Sinclair Family Farm, Brandon Sinclair and Brent Sinclair	IL-JC-183.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Sinclair Family Farm, Brandon Sinclair and Brent Sinclair	IL-JC-183.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Sinclair Family Farm, Brandon Sinclair and Brent Sinclair	IL-JC-183.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
4850 Longhorn LLC	IL-JC-200.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
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Greg and Connie Stout	IL-JC-223.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Sheila Segraves	IL-JC-220.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues

Landowner Name	Tract Number	Spire Remediation Plan	Spire STL Comments	CLC/Landowner Updated Responses
Dennis & Virginia Schaeffer	MO-SC-312.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Cletus Kampmann Jr	MO-SC-319.000	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Eugene and Joyce Weidner	880L-011.00	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Corgat LLC, Cori Patricia Christiansen, Barry Michael Corona	880L-014.00	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Alan & Barbara Schlemmer	880L-023.00	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues
Margaret G Bell Trustee	880L-024.01	CLC/Landowner have not received updated remediation plan	No comments were included in the last status report regarding this tract	CLC/Landowner have communicated outstanding issues to Spire and have filed to the FERC current outstanding issues

Spire STL is hopeful that, in light of FERC's September 14, 2021 Order Issuing Temporary Certificate, which granted Spire STL a temporary (90-day) certificate of public convenience and necessity, pursuant to section 7(c)(1)(B) of the Natural Gas Act,7 Spire STL will be able to re-engage with landowners and schedule and perform the necessary corrective actions discussed in the March 18 Order. Even though Spire STL has not been successful in securing consent from the landowners subject of the March 18 Order, Spire STL remains committed to furthering restoration efforts for the remaining other portions of the right of way.

Specifically, Spire STL has completed restoration on the properties this week and is scheduled to perform restoration on certain properties next week in furtherance of the Commission's Temporary Certificate Order.8 In addition, Spire STL's restoration work on other properties during the August timeframe will be included in its next monthly

Spire claims they have not been successful in consent from landowners. CLC couldn't agree more. This is due to Spire's interpretation how Spire would perform restoration work. CLC and the landowners know the properties better than anyone and are very reluctant to agree on Spire's restoration plan. The plan does not address the issues at hand and could potentially cause additional damages that the landowner might not be able to ever restore. In fact, it was Dave Feeman who mentioned Spire isn't going to fix every issue, Spire will only repair work that FERC has told them to fix.