

March 27, 2019

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Kimberly D. Bose, Secretary

Re: Colorado Interstate Gas Company, L.L.C.;
Docket No. CP19-56-000;
Supplemental Environmental Information

Dear Ms. Bose:

On March 26, 2019, Colorado Interstate Gas Company, L.L.C. ("CIG") received an informal request for additional information and clarification from the Office of Energy Projects ("OEP") related to its proposed CIG High Plains Kiowa Lateral Expansion Project. Accordingly, CIG is herein filing with the Federal Energy Regulatory Commission ("Commission") in Docket No. CP19-56-000, responses associated with that request.

Description of Proceeding

On January 24, 2019, CIG filed a prior notice request to Sections 157.205(b), 157.208(b), and 157.210 of the Commission's Regulations under the Natural Gas Act for authorization to construct and operate two laterals and metering facilities located in Weld County, Colorado. The project is referred to as the "CIG High Plains Kiowa Lateral Expansion Project".

Description of Information Being Filed

CIG is herein submitting its responses to the OEP's March 26, 2019 request.

Filing Information

CIG is e-Filing this letter and attachment with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

Respectfully submitted,
COLORADO INTERSTATE GAS COMPANY
L.L.C.

By _____ /s/ _____
M. Catherine Rezendes
Director, Regulatory

Enclosures

Cc: Ms. Dawn Ramsey, OEP

COLORADO INTERSTATE GAS COMPANY, L.L.C.
Responses to OEP Data Request
Dated March 26, 2019 in Docket No. CP19-56-000
CIG High Plains Kiowa Lateral Expansion Project

1. In its March 8, 2019 response to our environmental information request (question 1 in Resource Report 6), CIG made reference to its “Spill Prevention, Containment, and Countermeasures Plan”. We have not been provided a copy of a spill plan with this title. Clarify if CIG intended to refer to its Waste and Spill Management Plan, or file a copy of the referenced Spill Prevention, Containment, and Countermeasures Plan.

Response:

In its March 8, 2019 response, CIG inadvertently referred to a “Spill Prevention, Containment, and Countermeasures Plan”. CIG has no such plan and intended to refer to its Waste and Spill Management Plan that was included as part of CIG’s original application.

Response prepared by or under the supervision of:

Mike Bonar
Environmental Project Manager
719-520-4817

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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CIG High Plains Kiowa Lateral Expansion Project

2. CIG's HDD Inadvertent Returns Contingency Plan states "CIG will require the HDD contractor to use only NSF 60 compliant additives and polymers, and to submit Safety Data Sheets (SDSs) to verify." However, many of the drilling fluid additives that CIG has indicated they may use (CIG's March 8, 2019 response to our environmental information request, General question 5) are not compliant with NSF/ANSI 60. Rectify this discrepancy.

Response:

CIG confirms that they will stipulate and require that the HDD contractor will use only NSF/ANSI 60 compliant additives and polymers for the project's HDD operations.

Response prepared by or under the supervision of:

Claudia Leal
Project Manager
303-914-4626

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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Dated March 26, 2019 in Docket No. CP19-56-000
CIG High Plains Kiowa Lateral Expansion Project

3. Clarify as to whether existing roads being used as part of the project that were not part of the environmental survey corridor, will not be improved and only used for ingress and egress only.

Response:

CIG confirms that the access roads were not included in the environmental survey corridor will not be improved and will only be used for ingress and egress.

Response prepared by or under the supervision of:

Claudia Leal
Project Manager
303-914-4626

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4. The following questions and comments apply to CIG's proposed alternative methods to FERC's Plan and Procedures:
- a) For IV.B.1, CIG will need to get landowner approval and FERC would need CIG to agree to terms similar to what is outlined below that was done for a similar project. *(Outline has been removed for purposes of this response but after conferring with OEP, CIG was requested to describe the environmental inspector's role and how they will preserve topsoil and ensure proper topsoil handling throughout the project.)*
 - b) For IV.B.3, FERC will not agree to the alternative methods of "Topsoil from the ditch line will be placed immediately next to the ditch line on the working side and will be leveled and compacted in a lift located under the skids and the string of pipe."
 - c) For V.A.4, provide an explanation as to how these alternative methods are different than methods provided in FERC's Procedures.
 - d) For II.B.9, FERC will agree to 4 inches in depth, not 6 inches.
 - e) For V.D.3.c, FERC will agree to these alternative methods if CIG commits to reseed during the NRCS-recommended seeding window.
 - f) For IV.F.4.a, CIG needs to provide FERC with a copy of the 2012 communications with NRCS.

Response:

- 4a. CIG proposes to strip and segregate topsoil from the ditch line only, except in cut areas where the ROW or additional temporary workspace areas must be leveled for safe construction. In such areas CIG would strip the full ROW. CIG's Environmental Inspector (EI) will work closely with the Chief Inspector and the contractor to ensure proper topsoil handling throughout the duration of the Project. CIG's EI will monitor for potential topsoil degradation in areas where it is not stripped from the working side of the construction ROW. CIG's EI would require that the contractor change its procedures to strip topsoil from both the ditch line and the working side of the ROW if topsoil in these areas becomes powdered or pulverized to a depth of 4 inches and is being mixed with subsoil, or if wind is

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CIG High Plains Kiowa Lateral Expansion Project

moving topsoil off the ROW regardless of dust control measures applied. The topsoil would be stored separately and not allowed to mix with subsoil. To further minimize potential impacts to soil resources, topsoil would not be stripped from areas used for subsoil stockpiles. Less disturbance of topsoil generally equates to improved reclamation success, decreases the opportunity for the introduction of invasive species and less topsoil loss which is important in areas of shallow topsoil. CIG would continue this expanded topsoil stripping procedure until construction encounters areas with coarser soils having greater cohesiveness. Within these areas limited topsoil stripping of the ditch line only could be resumed if approved by CIG's EI.

- 4b. After conferring with the OEP, CIG requests that the alternative method be allowed based on the following reason: It has been CIG's experience that placement of the topsoil on the working side of the ditch line and under the pipeline skids protects it from inadvertent damage from equipment and vehicles moving along the ROW. Based on this consideration CIG requests that the proposed alternative method be allowed.
- 4c. CIG has reviewed this alternative method and agrees to comply with V.A.4 of the FERC's Plan as written with no alternative methods. The alternatives previously suggested by CIG were no more protective than those provided in FERC's Plan.
- 4d. CIG commits to the following: If rutting exceeds four (4) inches in depth, significantly increasing the chance of topsoil mixing with subsoils, work will continue, and the rutted area will be covered with at least an adequate volume of new topsoil to replace mixed soils and subsoils. This topsoil will be purchased in the immediate vicinity. This variance would allow for continuation of construction during inclement weather at the cost of supplying new topsoil. This departure from the FERC Plan will not apply to rangeland.
- 4e. CIG anticipates completing construction-related activities to include clean-up activities in late July. Given that the start of the seeding window begins in November, CIG requests the ability to seed the project using the recommended seed mix once clean-up is complete. Though this may be outside the recommended seeding window, CIG notes that this will allow at least some vegetation to prevent wind or water erosion. CIG acknowledges that this does not relieve CIG of its responsibility to achieve acceptable reclamation after construction and will provide FERC with photo documentation of reclamation success in its annual report of blanket-type activities for 2019 that will be filed with

COLORADO INTERSTATE GAS COMPANY, L.L.C.
Responses to OEP Data Request
Dated March 26, 2019 in Docket No. CP19-56-000
CIG High Plains Kiowa Lateral Expansion Project

FERC in 2020. CIG acknowledges that any areas that need reseeding in 2020, CIG would seed in accordance with the recommended seeding window.

- 4f. CIG is providing behind this response, a copy of the 2012 communications with NRCS.

Responses prepared by or under the supervision of:

Claudia Leal
Project Manager
303-914-4626

Mike Bonar
Environmental Project Manager
719-520-4817

From: Kendrick Moholt [bioresources@eoni.com]
Sent: Tuesday, June 26, 2012 3:17 PM
To: 'Sievers, Levi - NRCS, Greeley, CO'
Subject: RE: Reclaim seed mix for weld county

Excellent- thanks I got the seed mix attachment!

On another reclamation issue.-We generally recommend 1.5 tons/acre for mulching but like to have your concurrence. This rate is greater than what we have gotten as a minimum from you in the past but after the ground has been subjected to a bit of wind it usually results in the required 70% cover. A few years back when I consulted with Eugene Backhaus he gave me these specks:

Required mulch is specified in the Colorado NRCS Standard for Mulching (484). For erosion control when mulching with cereal grain straw or grass hay, apply in sufficient amounts to provide 70% ground cover. In the Colorado Specification for Range Planting (550) the required residue pounds for seeding is based on soil "I" factor. An "I" factor of 86 requires 2000 lbs/acre and an "I" factor of 134 requires 2250 lbs/acre.

Eugene Backhaus
Resource Conservationist
NRCS - CO
720-544-2868

In your opinion would the 1.5 ton/acre (3000 lb/acre) be acceptable?

Thanks again,
Kendrick Moholt
Bio-Resources, Inc
Cell- (503) 502-8620
Office- (541) 426- 7200
Fax- (541) 426-7202

From: Sievers, Levi - NRCS, Greeley, CO [levi.sievers@co.usda.gov]
Sent: Wednesday, June 27, 2012 7:16 AM
To: Kendrick Moholt
Subject: RE: Reclaim seed mix for weld county

Kendrick,

I personally have not ever ran into an "I" factor in weld county that required over 3000 pounds per acre so that should be more than enough to maintain cover until the grass is established. The 1.5 tons/acre would be adequate cover for us to certify both standards and specs for mulching and range planting.

Levi J. Sievers
Soil Conservation Technician
NRCS-USDA Greeley Field Office
4302 W. 9th St. Rd.
Greeley, CO 80634
ph-(970)-356-8097 ext-#114

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing documents to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 27th day of March 2019.

/s/

M. Catherine Rezendes

Two North Nevada Avenue
Colorado Springs, Colorado 80903
(719) 667-7517