



August 5, 2024

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

Attention: Ms. Debbie-Anne A. Reese, Acting Secretary

Re: Colorado Interstate Gas Company, L.L.C.;  
Docket No. CP24-124-000  
Clarification to Pro-Forma Tariff Records

Dear Ms. Reese:

On July 30, 2024, Colorado Interstate Gas Company, L.L.C. (“CIG”), received an informal inquiry from the Office of Energy Projects (“OEP”) pertaining to Exhibit P in the April 8, 2024 application for the Totem Enhanced Deliverability Project. CIG is herein filing with the Federal Energy Regulatory Commission (“Commission”) minor clarifying pro-forma tariff record updates in Docket No. CP24-124-000 intended to update a section of the original pro forma tariff records submitted on April 8, 2024, all as described herein.

### **Description of Proceeding**

On April 8, 2024, CIG filed an application, pursuant to Section 7(c) and (b) of the Natural Gas Act, and Part 157.5, et seq., of the Commission’s Regulations for a certificate of public convenience and necessity and abandonment authorization to modify and enhance its existing Totem storage field located in Adams County, Colorado in order to increase the maximum withdrawal rate by approximately 50 million cubic feet per day. Specifically, CIG proposes to: (1) install six new injection and withdrawal wells; (2) replace and install various sections of storage pipeline; (3) reclassify one existing injection/withdrawal well to an observation well; (4) install various appurtenant and auxiliary facilities; and (5) inject approximately one billion cubic feet of additional base gas into the Totem storage field. The proposed project, is referred to as the “Totem Enhanced Deliverability Project”.

### **Description of Information Being Filed**

On July 30, 2024, CIG received an informal inquiry from the Office of Energy Projects (“OEP”) pertaining to the Totem Available Daily Withdrawal Quantity Rules and Formula and Table that were originally included in the General Terms and Conditions (“GT&C”), Section 8.3 of the pro-forma tariff records filed as part of Exhibit P on the April 8, 2024 for the Totem Enhanced Deliverability Project. Based on that inquiry and a review of the tariff language, CIG determined that minor, clarifying updates were required to align the formulas and the table with the Totem Available Daily Withdrawal Quantity curve. Accordingly, CIG is providing herein the applicable marked and clean pro forma tariff records showing updates to Totem Available Daily Withdrawal Quantity Rules and Formula and Table that are intended to replace the

previous filed versions. The applicable updates are highlighted in the pro forma tariff records provided and listed below as follows:

- Part IV: GT&C; Section 8.3 - THE TOTEM AVAILABLE DAILY WITHDRAWAL QUANTITY RULES AND FORMULA;
  - a) If the %TMAC is <60.0% and > or = 39% (added “ or =” to 39%)
  - b) If the %TMAC is <39% and > 0% (deleted the “≤” for 39%); and
  
- Part IV: GT&C; Section 8.3 – TOTEM AVAILABLE DAILY WITHDRAWAL QUANTITY TABLE
  - a) On the % TMAC, changed the second 60 to 59.9
  - b) Changed the 36 to 38.9 and changed 69 to 77

CIG notes that these changes will not alter the proposed Totem storage field available daily withdrawal quantity capabilities that are described in its Application. CIG will include the revised pro forma tariff records in any filing necessary to implement the pro forma records pursuant to any Commission order.

**Filing Information**

CIG is e-Filing this letter and revised pro-forma tariff records 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/ Francisco Tarin            
Francisco Tarin  
Director, Regulatory

Enclosures

Cc. Ms. Nicole Huang, OEP

8.3 Storage Service (continued)  
(c) (ii) (continued)

THE TOTEM AVAILABLE DAILY WITHDRAWAL QUANTITY RULES AND FORMULA

$$\%TMAC = \text{Current Inventory}/TMAC$$

-----  
If the %TMAC is > or = to ~~6039.0%~~  
then set the %TMDWQ = to 100%

-----  
If the %TMAC is < ~~6039.0%~~ and > ~~or =~~ to ~~390%~~  
then set the %TMDWQ = to 80%

-----  
~~$$\%TMDWQ = (12.9741) + (\%TMAC * 1.1726) +$$~~  
~~$$(\%TMAC^2 * 0.0267)$$~~  
-----

-----  
If the %TMAC is < ~~39%~~ and > 0%  
then ~~%TMDWQ = (9.3) + (%TMAC \*.977) +~~  
~~$$(\%TMAC^2 * .0196)$$~~  
-----

-----  
If the %TMAC is < or = to 0%  
then set the %TMDWQ = to 0%

-----  
TADWQ Calculation

$$TADWQ = (\%TMDWQ/100) * TMDWQ$$

Rounded to the nearest whole Dekatherm (an integer)

-----

- Notes:
- (1) In the context of this formula, the %TMAC and %TMDWQ values are taken as whole numbers, and not as decimal only numbers (i.e., use 40.0 not 0.40 or use 36.1234 not 0.361234).
  - (2) The coefficients are entered with four decimal places, and the table is calculated with four decimal places, and then rounded for display purposes.
  - (3) All calculations are initially performed utilizing four decimal places. The final TADWQ, however, is rounded to the nearest whole number.

8.3 Storage Service (continued)  
 (c) (ii) (continued)

TOTEM AVAILABLE DAILY WITHDRAWAL QUANTITY TABLE

<del>%TMAC</del>	<del>%TMDWQ</del>	<del>%TMAC</del>	<del>%TMDWQ</del>	<del>%TMAC</del>	<del>%TMDWQ</del>
<del>100.0</del>	<del>100.0</del>	<del>37.1</del>	<del>93.2</del>	<del>9.0</del>	<del>25.7</del>
<del>6097.1</del>		<del>100.0</del>	<del>34.2</del>	<del>84.3</del>	<del>7.9</del> <del>23.9</del>
<del>59.9</del> <del>94.3</del>	<del>80</del> <del>100.0</del>	<del>31.4</del>	<del>76.1</del>	<del>6.8</del>	<del>22.2</del>
<del>3988.6</del>		<del>80</del> <del>100.0</del>	<del>28.5</del>	<del>68.1</del>	<del>5.9</del> <del>20.8</del>
<del>38.9</del>	<del>82.8</del>	<del>77</del> <del>100.0</del>	<del>25.6</del>	<del>60.5</del>	<del>5.0</del> <del>19.5</del>
<del>2977.1</del>		<del>53</del> <del>100.0</del>	<del>23.0</del>	<del>54.1</del>	<del>4.1</del> <del>18.2</del>
<del>721</del>	<del>1.4</del>	<del>39</del> <del>100.0</del>	<del>20.6</del>	<del>48.5</del>	<del>3.3</del> <del>17.1</del>
<del>14</del> <del>65.7</del>	<del>27</del> <del>100.0</del>	<del>18.4</del>	<del>43.6</del>	<del>2.6</del>	<del>16.2</del>
<del>760.0</del>		<del>17</del> <del>100.0</del>	<del>16.5</del>	<del>39.6</del>	<del>1.9</del> <del>15.3</del>
<del>0</del> <del>54.2</del>		<del>0</del> <del>100.0</del>	<del>14.7</del>	<del>36.0</del>	<del>1.2</del> <del>14.4</del>
<del>48.5</del>	<del>100.0</del>	<del>13.1</del>	<del>32.9</del>	<del>0.6</del>	<del>13.7</del>
<del>42.8</del>	<del>100.0</del>	<del>11.6</del>	<del>30.2</del>	<del>0.0</del>	<del>0.0</del>
<del>39.9</del>	<del>100.0</del>	<del>10.3</del>	<del>27.9</del>		

- (iii) "Totem Maximum Available Capacity" or "TMAC" shall mean the maximum quantity of Gas (expressed in Dth) that Transporter is required to accept under Rate Schedule TSB-T for injection into Totem Storage during the Injection Period on Shipper's behalf.
- (iv) "Totem Maximum Daily Injection Quantity" or "TMDIQ" shall mean the maximum quantity of Gas (expressed in Dth) per Day that Transporter shall be required to inject into Totem Storage on Shipper's behalf and shall be limited to 1/46.6667 of Shipper's TMAC at full development of the field; provided however, during the Month of November the TMDIQ shall be limited to some lesser quantity when and to the extent required by Totem Storage for operational conditions and maintenance. The TMDIQ available during injection periods prior to full development of the field will be determined by field flow test and operating data gathered prior to each Injection Period. As the field is developed and operating experience gained, it is possible that these parameters will require modification.
- (v) "Totem Maximum Daily Withdrawal Quantity" or "TMDWQ" shall mean the maximum daily quantity of Gas (expressed in Dth) that Transporter shall be required to withdraw from Totem storage on a firm basis on Shipper's behalf. Shipper's TMDWQ shall equal to 1/~~2835~~ of Shipper's TMAC at full development of the field. The TMDWQ available during withdrawal periods prior to full development of the field will be determined by field flow test and operating data gathered prior to each Withdrawal Period. As the field is developed and operating experience gained, it is possible that these parameters will require modification.

8.3 Storage Service (continued)  
(c) (ii) (continued)

THE TOTEM AVAILABLE DAILY WITHDRAWAL QUANTITY RULES AND FORMULA

$$\%TMAC = \text{Current Inventory}/TMAC$$

-----  
If the %TMAC is  $\geq$  to 60.0%  
then set the %TMDWQ = to 100%

-----  
If the %TMAC is  $<$  60.0% and  $\geq$  to 39%  
then set the %TMDWQ = to 80%

-----  
If the %TMAC is  $<$  39% and  $>$  0%  
then  $\%TMDWQ = (9.3) + (\%TMAC * .977) +$   
 $(\%TMAC^2 * .0196)$

-----  
If the %TMAC is  $<$  or = to 0%  
then set the %TMDWQ = to 0%

-----  
TADWQ Calculation

$$TADWQ = (\%TMDWQ/100) * TMDWQ$$

Rounded to the nearest whole Dekatherm (an integer)

-----

- Notes:
- (1) In the context of this formula, the %TMAC and %TMDWQ values are taken as whole numbers, and not as decimal only numbers (i.e., use 40.0 not 0.40 or use 36.1234 not 0.361234).
  - (2) The coefficients are entered with four decimal places, and the table is calculated with four decimal places, and then rounded for display purposes.
  - (3) All calculations are initially performed utilizing four decimal places. The final TADWQ, however, is rounded to the nearest whole number.

8.3 Storage Service (continued)  
 (c) (ii) (continued)

TOTEM AVAILABLE DAILY WITHDRAWAL QUANTITY TABLE

%TMAC	%TMDWQ
100	100
60	100
59.9	80
39	80
38.9	77
29	53
21	39
14	27
7	17
0	0

- (iii) "Totem Maximum Available Capacity" or "TMAC" shall mean the maximum quantity of Gas (expressed in Dth) that Transporter is required to accept under Rate Schedule TSB-T for injection into Totem Storage during the Injection Period on Shipper's behalf.
- (iv) "Totem Maximum Daily Injection Quantity" or "TMDIQ" shall mean the maximum quantity of Gas (expressed in Dth) per Day that Transporter shall be required to inject into Totem Storage on Shipper's behalf and shall be limited to 1/46.6667 of Shipper's TMAC at full development of the field; provided however, during the Month of November the TMDIQ shall be limited to some lesser quantity when and to the extent required by Totem Storage for operational conditions and maintenance. The TMDIQ available during injection periods prior to full development of the field will be determined by field flow test and operating data gathered prior to each Injection Period. As the field is developed and operating experience gained, it is possible that these parameters will require modification.
- (v) "Totem Maximum Daily Withdrawal Quantity" or "TMDWQ" shall mean the maximum daily quantity of Gas (expressed in Dth) that Transporter shall be required to withdraw from Totem storage on a firm basis on Shipper's behalf. Shipper's TMDWQ shall equal to 1/28 of Shipper's TMAC at full development of the field. The TMDWQ available during withdrawal periods prior to full development of the field will be determined by field flow test and operating data gathered prior to each Withdrawal Period. As the field is developed and operating experience gained, it is possible that these parameters will require modification.

**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 5<sup>th</sup> day of August 2024.

/s/

---

Francisco Tarin

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