



October 4, 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  
Response to Environmental Data Request – OEP/DG2E/Gas Branch 2

Dear Ms. Reese:

On September 19, 2024, Colorado Interstate Gas Company, L.L.C. (“CIG”), received an environmental data request (“Data Request”) in Docket No. CP24-124-000 from the Office of Energy Projects (“OEP”) seeking information related to CIG’s Totem Enhanced Deliverability Project. CIG filed its responses to all of the questions with the exception of Question Nos. 5, 7, 8, 9 and 10, on September 24, 2024. In its responses filed on September 24, 2024, CIG indicated that it would file its responses to the remaining questions by October 4, 2024. CIG is herein filing with the Federal Energy Regulatory Commission (“Commission”) its responses to the Data Request Question Nos. 5, 7, 8, 9 and 10.

### **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**

CIG is herein submitting its responses to Question Nos. 5, 7, 8, 9 and 10 of the September 19, 2024 OEP Data Request.

**Filing Information**

CIG is e-Filing this letter and responses 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. Sydney Harris, OEP

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**ENVIRONMENTAL INFORMATION REQUEST**

**Resource Report 5: Environmental Justice**

5. Provide a discussion regarding impacts on environmental justice communities (if any exist) for all resources affected by the project where there is a nexus with the environmental justice community, and whether any of those impacts would be disproportionately high and adverse.

**Response:**

Potentially adverse environmental effects on surrounding communities associated with the Project will be avoided, minimized, and/or mitigated, where possible as discussed in CIG's resource reports. The analyses discussed in resource reports confirm that Project impacts are expected to be less than significant, and therefore will not have disproportionate and adverse impacts on populations in the Project area, including minority or low-income populations.

**Visual Impacts**

No special or unique features or viewsheds are present in or near the Project area. However, construction activities could be visible to a nearby resident (located about 1 mile east/northeast of the Project area) as well as to passing motorists. CIG notes that this resident is not located in a block group considered an environmental justice community. The nearest residence within an environmental justice community is approximately 2.1 miles away and is screened from the Project by both distance and topography. Therefore, visual impacts on environmental justice communities would be non-existent or less than significant.

**Traffic-Related Impacts**

CIG is proposing to use existing public roads to the Totem Storage Field along with existing access roads inside the Totem Storage Field to access work sites. Project construction may result in temporary impacts on traffic near active work sites, especially during peak construction periods. Construction activities associated with access points and additional traffic generated by commuting construction workers could affect local traffic flow and volume. However, due to the small workforce (anticipated total peak construction workforce of approximately 40-60 personnel) as noted in the resource reports, the Project is unlikely to significantly contribute to short-term impacts on traffic flow and volume or result in congestion delays for flow-through traffic and commuting workers. Following construction, Project operations would not result in any discernable change to the number of workers or vehicles traveling to Project sites from current levels. Therefore, traffic-related impacts on environmental justice communities would be non-existent or less than significant.

**Air Quality Impacts**

Emissions generated during construction would be intermittent and temporary. Fugitive dust could occur from clearing, grading, excavation, and vehicle traffic on paved and unpaved roadways. Operational sources of air emissions at the Totem Storage Field would include fugitive emissions from leaks, valves, and connectors; pneumatic devices; tanks; and blowdowns. Application of mitigation measures during construction of the Project would reduce emissions and fugitive dust. Specific mitigation measures are

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noted in the resource reports, specifically the Spill Prevention, Control, and Countermeasure and Fugitive Dust Control Plans. Therefore, construction of the Project will result in temporary, short-term emissions of air pollutants that will be restricted to the construction period. Emissions will terminate once construction has been completed. Insofar as operational emissions, there are no operational emissions from the Project that trigger applicable air regulations or increase emissions from any facility. Because the Project does not involve the construction and operation of new compression, CIG does not anticipate that direct operational emissions from this Project would have the potential to contribute to cumulative impacts. Based on these mitigation measures, both construction and operation air emissions impacts on environmental justice communities would be less than significant.

**Noise Impacts**

Construction noise would vary due to the types of equipment used; equipment noise would be localized to the vicinity of the Project work areas and would attenuate rapidly with increasing distance from the noise source. The closest Noise Sensitive Area is a residence located about 1 mile east/northeast of the Project area that is not in a block group considered to be an environmental justice community. The nearest residence within an environmental justice community is approximately 2.1 miles away and is not expected to be impacted by noise based on both distance and topography. Based on the noise analysis provided in Resource Report 9, CIG anticipates that all construction-related noise levels to be well below the 55 dBA noise requirement. As for operational-related noise impacts, CIG is not installing any new compression as part of its project and does not anticipate any operational noise increases. Therefore, construction and operational noise impacts on environmental justice communities would be less than significant.

Response prepared by or under the supervision of:

Mike Bonar  
Environmental Permitting Project Manager  
Kinder Morgan EHS Project Permitting  
719-520-4817

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7. Provide an expanded project mailing list that includes addresses for environmental justice stakeholders who may be interested in the project, including but not limited to: civic associations; minority business associations; environmental and environmental justice organizations; legal aid providers; homeowners', tenants', and neighborhood watch groups; rural cooperatives; business and trade organizations; community and social service organizations; universities, colleges, vocational and other schools; labor organizations; civil rights organizations; local schools and libraries; senior citizens' groups; public health agencies and clinics; religious organizations; and other places where people gather in the community.

**Response:**

CIG is providing behind this response, a list identifying potential environmental justice stakeholders/groups who may be interested in the Project or places where people gather in the community located within 20 km of the project. The list is tailored specifically to low-income support groups, as no minority environmental justice communities were identified within 20 km of the project.

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**List of Potential Environmental Justice Stakeholders within 20 km of the Project**

Name	Address	Type
Adams County Health Department	4430 Adams County Parkway Brighton, CO 80601	Social Services
Adams County Workforce and Business Center	3155 Chambers Road, Unit C Aurora, CO 80011	Unemployment
Bennett Baptist Church	555 1 <sup>st</sup> ST. Bennett CO 80102	Religious Organization
Bennett Christian Fellowship	670 Colfax, Bennett CO 80102	Religious Organization
Bennett Community Center	110 East Colfax Ave. Bennett, CO 80102	Community Organization
Bennett Food Bank	1100 W. Colfax Avenue Bennett, CO 80102	Food Bank
Bennett Preschool	805 Washington Way Bennett, CO 80102	Education
Bennett School District 29J	615 7 <sup>th</sup> St., Bennett CO 80102	Education
Christ Our Redeemer Lutheran Church	275 S. Ash ST. Bennett CO 80102	Religious Organization
United for a New Economy (UNE)	7190 Colorado Blvd, Suite 400, Commerce City, CO 80022	Non-Profit

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8. Describe public outreach efforts conducted for environmental justice communities. For example, provide:
- a. a list of environmental justice stakeholders (e.g., civic associations; minority business associations; environmental and environmental justice organizations; legal aid providers; homeowners', tenants', and neighborhood watch groups; rural cooperatives; business and trade organizations; community and social service organizations; universities, colleges, vocational and other schools; labor organizations; civil rights organizations; local schools and libraries; senior citizens' groups; public health agencies and clinics; religious organizations; and other places where people gather in the community) contacted;
  - b. a summary of outreach conducted prior to filing the application (include the date, time, and location of any public meetings);
  - c. a summary of key issues identified by community organizations or groups; and
  - d. planned future outreach activities (e.g., project notifications via mail or providing notices and project materials at frequently visited community locations).

**Response:**

Based on its initial environmental justice review that considered a one-mile radius, CIG did not identify any block groups with affected environmental justice communities. However, upon receiving the latest data request requesting CIG consider a 20 km radius for an evaluation on potential impacts on environmental justice communities, the broader distance radius now includes block groups that encompass the Towns of Bennet and Strasburg which are located over 6-miles away. Notably, neither of these towns are considered to meet the threshold for environmental justice communities. Nonetheless, given rural characteristics of the area, CIG has identified and provided in its response to Question No. 7, a list of potential environmental justice stakeholders/groups within Adams County to include the Town of Bennet that could support low-income communities within the 20 km range of the Project area. CIG plans to reach out to these stakeholders identified on the list via project notification letters. CIG intends to have all of these letters mailed in the near future.

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9. Identify sensitive receptor locations (e.g., schools, daycare centers, playgrounds, and medical facilities, etc.) closest to the proposed facility(s) and construction access roads within identified environmental justice communities, provide their distances from project facilities, and describe any proposed mitigation measures to avoid or minimize impacts.

**Response:**

There are no sensitive receptor locations located within 5 miles of CIG's existing Totem Storage Field. CIG is proposing to use existing public roads and highways to access the Totem Storage Field and will rely on existing access roads to access the storage facilities. New access roads will essentially be extensions of the existing access roads currently used to access well facilities sited within the Totem Storage Field.

CIG anticipates that most construction traffic will travel from Interstate 70 or Highway 36, and travel north on Highway 79 (Kiowa Bennett Road). From Highway 79, construction traffic would travel east via either East 104<sup>th</sup> Avenue or East 96<sup>th</sup> Avenue. Highway 79 serves as the census block group divide between Block Group 80010084023 (non-EJ block group) and Block Group 80010084011 (defined as a low-income EJ block group).

Distance from the Project area to Highway 79 is approximately 3.25 miles. While not an EJ block group, no sensitive receptors were identified between the Project area and Highway 79. Scattered rural residences are situated on both East 104<sup>th</sup> Avenue and East 96<sup>th</sup> Avenue.

CIG identified the closest sensitive receptors: the Muslim Garden Islamic Cemetery and the Mount View Cemetery. The Muslim Garden Islamic Cemetery is located approximately 5 miles south of the Project area. The Mount View Cemetery is located 7.5 miles south of the Project area and outside identified EJ block groups. No other sensitive receptors were identified between the Town of Bennett and the Project area along Highway 79.

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10. Provide a description of visual impacts (e.g. impacts from construction activities, presence of the new facilities) on sensitive receptors (e.g. nearby residences, users of nearby roadways, and users of nearby recreational areas, if any) during construction and operation of the facilities. Include the following (as applicable):
  - a. Distance to the nearest residences within environmental justice communities from the aboveground structures. State whether the structure is visible and identify any existing screening between the structure and the residence.
  - b. Distance to nearest non-residential sensitive receptors within environmental justice communities. State whether the structure is visible and identify any existing screening between the structure and the sensitive receptor.
  - c. Provide a visual simulation of the proposed aboveground structures from the nearest residences.

**Response.**

- a. The distance to the nearest residence that is located within an environmental justice community from the aboveground structures is located approximately 2.1 miles to the east/southeast. The structures are not visible from this residence due to topography and distance.
- b. The nearest non-residential sensitive receptor within an environmental justice community is the Strasburg Five Acres Sports Park located approximately 10 miles south of the Totem Storage Field. Due to the distance from the Project area the aboveground structures are not visible from this park.
- c. Figure 10-1 and associated Photos 10-1 through 10-4 provide a visual simulation of the proposed aboveground structures from the nearest residences. (Figure 10-1 depicts the location of Photos 10-1 and 10-2.) The nearest residence is located approximately 1 mile to the east/northeast of the Project area. Since CIG did not have access to this property, Photo 10-1, was taken immediately adjacent to this residence from Highway 39 facing west toward the Totem Storage Field, and shows that topography prevents the existing facilities to be seen from that location. Photo 10-2 was taken from approximately 0.5-miles south of this residence along East 104<sup>th</sup> Avenue in order to gain an observation point similar to that of the nearest residence. Within Photo 10-2, the Totem Storage Compressor Station, denoted by the blue arrow, is 1.1 miles west of the photo point and just discernable in the photo along the horizon line.

The proposed activities associated with Totem Enhanced Reliability Project will be within the existing Totem Storage Field and within the existing Totem Storage Compressor Station and the total viewshed will be similar to what is currently shown.

For reference purposes, Photo 10-3 shows the existing Totem Storage Compressor Station from East 104<sup>th</sup> Avenue. Photo 10-4 shows the existing above ground structures associated with existing Well No. 7, which will be similar to the new facilities proposed as part of the Project. The adjacent vehicle provides scale.

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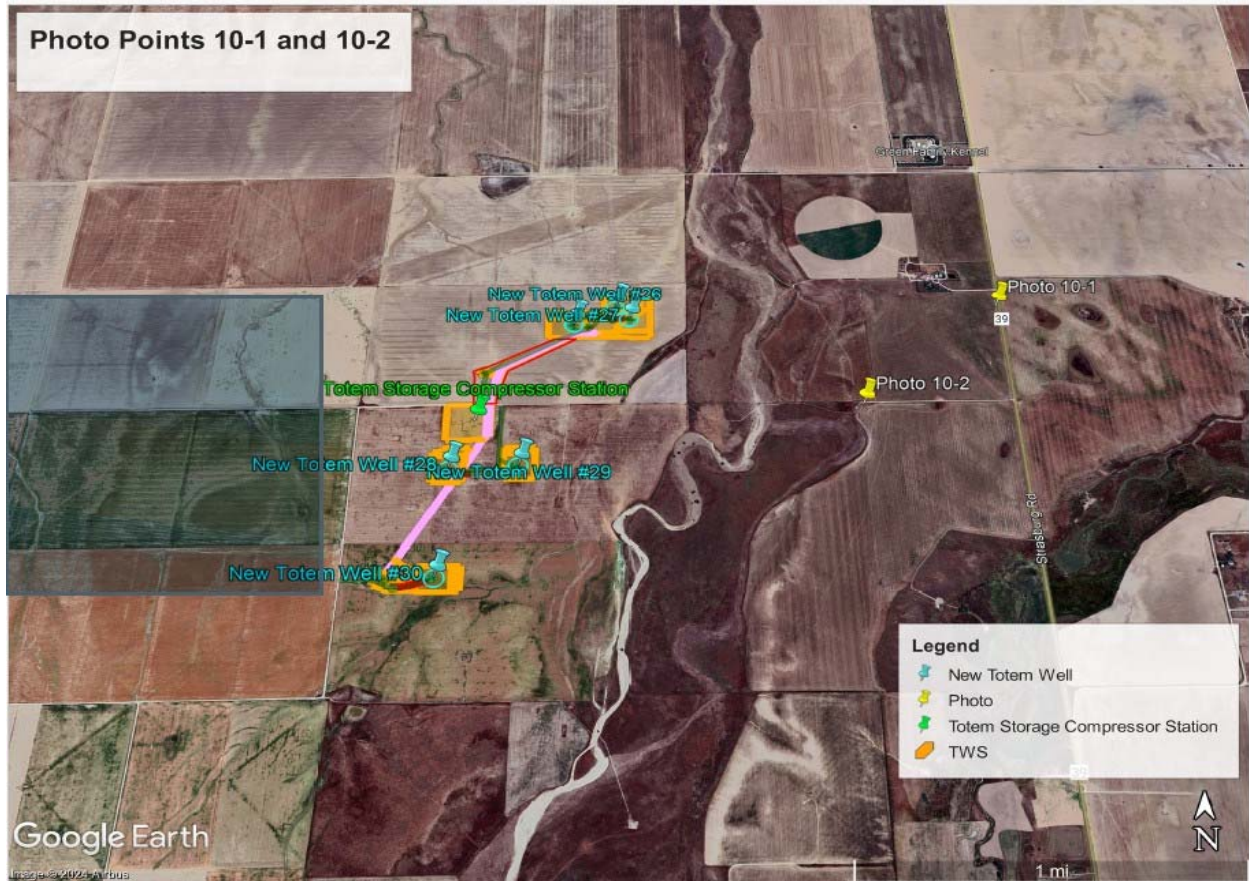


Figure 10-1 – Photo Point Locations

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**Photo 10-1** – Looking West from Highway 39 – Topography blocks view of Totem Storage Field. Photo taken approximately 1.65 miles east from the Totem Storage Field station facilities. Residence shown is approximately 0.2 miles from the photo location.

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**Photo 10-2** – Blue Arrow denotes Compressor Station, Orange Arrow denotes existing injection withdrawal well field north of Compressor Station. Picture taken approximately 1.1 miles east from the Totem Storage Field station facilities.

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**Photo 10-3** – Existing Totem Compressor Station. All proposed modifications will be interior, with no significant modification following construction of the Project.

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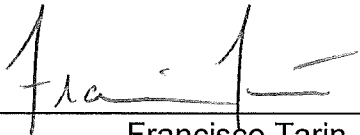
**Photo 10-4** - Above Ground Structures associated with Existing Well No. 7. Representative of new above ground facilities to be constructed as part of the Project.

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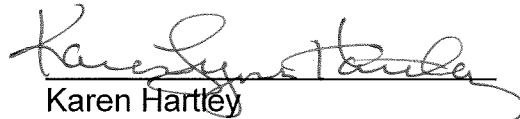
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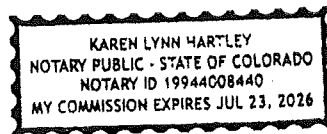
STATE OF COLORADO )  
 )  
COUNTY OF EL PASO )

FRANCISCO TARIN, being first duly sworn, on oath, says that he is the Director of the Regulatory Department of Colorado Interstate Gas Company, L.L.C.; that he has read the foregoing Response to the Office of Energy Projects' Data Request dated September 19, 2024 in Docket No. CP24-124-000, that as such he is authorized to verify the Response, that he is familiar with the contents thereof; and that the matters and facts set forth therein are true to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
Francisco Tarin

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 4<sup>th</sup> day of October 2024.

  
Karen Hartley  
Notary Public, State of Colorado  
My Commission Expires: July 23, 2026



**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 4<sup>th</sup> day of October 2024.

/s/

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Francisco Tarin

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Colorado Springs, Colorado 80903  
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