



September 24, 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 is herein filing with the Federal Energy Regulatory Commission (“Commission”) its responses to the Data Request.

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 response to the September 19, 2024 OEP Data Request. CIG notes that provided herein are responses to Question Nos. 1, 2, 3, 4 and 6. CIG requires additional time to complete responses to Question Nos. 5, 7, 8, 9 and 10 and anticipates filing its responses by October 4, 2024.

Filing Information

CIG is e-Filing this letter and response 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: Socioeconomics

1. Provide an estimate of the total number of average daily trips generated by construction activities at each pipeline spread and each above ground facility.

Response:

Based on CIG's anticipated construction schedule, the Project will not be constructed in terms of typical construction projects with spreads or above ground facilities. Rather, all construction will occur within a very localized basis within the existing Totem Storage Field and will be based on distinct construction crews that will be working simultaneously toward Project completion.

CIG is proposing four distinct construction crews for 1) well drilling activities; 2) well lateral installation and modifications; 3) well head facilities; and 4) modifications within the existing Totem Compressor Station. Separate crews will work concurrently on these activities through the construction phase of the Project. In addition to the construction crews, CIG will also maintain a suite of inspection staff overseeing the various construction activities. Round trips associated with each unique construction crew is discussed below.

1. **Well drilling:** As indicated in the application, CIG estimates that a work crew of 15-20 workers will be required for the well drilling. Assuming 20 workers that, on average, 2 workers will travel to and from the worksite per vehicle, well drilling activities will result in 10 daily vehicle trips.

CIG estimates that well drilling activities will require 225 workdays, resulting in a total number of base crew round trips of 2,250. In addition to the base crew, CIG assumes 3 additional trips per day (on average) for equipment/material pick-up, travel off-site, etc. which would account for an additional 675 round trips. Hence, the total number of round trips associated with the well drilling activities is estimated to be 2,925.

2. **Well lateral installation and modifications:** CIG estimates that 8-10 workers will be required for the well lateral work. Assuming 10 workers and that, on average, 2 workers will travel to and from the worksite per vehicle, well lateral installation and modifications will result in 5 daily vehicle trips.

CIG estimates that well lateral work will require 222 workdays, resulting in a total number of base crew round trips of 1,110. In addition to the base crew, CIG assumes an additional 2 trips per days (on average) for equipment/material pick-up, travel off-site, etc. which would account for an additional 444 round trips. Hence, the total number of round trips associated with well lateral installation and modifications is estimated to be 1,554.

3. **Well head facilities:** CIG estimates that 8-10 workers will be required for the well head facility work. Assuming 10 workers and that, on average, 2 workers will travel to and from the worksite per vehicle, well head facility construction will result in 5 daily vehicle trips.

CIG estimates that well lateral work will require 192 workdays, resulting in a total number of base crew round trips of 960. In addition to the base crew, CIG assumes 2 additional trips per day (on

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average) for equipment/material pick-up, travel off-site, etc. which would account for an additional 384 round trips. Hence, the total number of round trips for well head facilities work is estimated to be 1,344.

4. **Totem Station modifications:** CIG estimate of 10-20 workers will be required for the work associated with Totem Station modifications. Assuming 20 workers and that, on average, 2 workers will travel to and from the worksite per vehicle, modification work at the Totem Station will result in 10 daily vehicle trips.

CIG estimates that the compressor station modifications will require 138 workdays, resulting in a total number of base crew round trips of 1,380. In addition to the base crew, CIG assumes 2 additional trips per day (on average) for equipment/material pick-up, travel off-site, etc. which would account for an additional 276 round trips. Hence, the total number of round trips for the Totem Storage Compressor Station modifications is estimated to be 1,656.

- 5 **CIG Inspections:** CIG assumes that on average 10 CIG inspectors (i.e., utility inspectors, the environmental inspector, as well as on-site visits conducted by CIG staff) each using their own vehicles will oversee construction activities. that would have their own vehicle. Assuming a planned project duration of 236 days, the total number of round trips associated with CIG inspections is estimated to be 2,360.

Response prepared by or under the supervision of:

Steve Gassman
Project Manager
Kinder Morgan
719-520-4475

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Resource Report 5: Environmental Justice

2. Provide an updated table of racial, ethnic, and poverty statistics for each block group within **20 km** of the project facilities. The table should include the following information from the U. S. Census Bureau for each state, county, and block group (for low-income data, use the most recent U.S. Census American Community Survey 5-year estimates File # B17017 and for race and ethnicity data, use the most recent U.S. Census American Community Survey 5-year estimates File# B03002):
 - a. total population;
 - b. percentage of each racial and ethnic group (White Alone Not Hispanic, Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, some other race, two or more races, Hispanic or Latino origin [of any race]);
 - c. total minority population including individuals of Hispanic or Latino origin (percentage of total population); and
 - d. percentage of total population below poverty level; and
 - e. headers for each of the project facilities.

Response:

Table 2-1 provides racial, ethnic, and poverty statistics for each block group within **20 km** of the project facilities.

References

U.S. Census Bureau. 2022a. "Hispanic or Latino Origin by Race." *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B03002*. Available online: https://data.census.gov/table/ACS5Y2022.B03002?q=b03002&g=040XX00US08_050XX00US08001_1500000US080010084023. Accessed on September 20, 2024.

U.S. Census Bureau. 2022f. "Poverty Status in the Past 12 Months by Household Type by Age of Householder." *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B17017*. Available online: https://data.census.gov/table/ACS5Y2022.B17017?q=b17017&g=040XX00US08_050XX00US08001_1500000US080010084023. Accessed on September 20, 2024.

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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Table 2-1 Racial/Ethnic Mix Statistics for the Communities within 20 km of the Project Area

State/County	Total Population	White Alone, not Hispanic (percent)	African American (percent) ^b	American Indian/ Alaska Native (percent) ^b	Hispanic or Latino (percent)	Asian (percent) ^b	Native Hawaiian and Other Pacific Islander (percent) ^b	Some Other Race (percent) ^b	Two or More Races (percent) ^b	Total Minority (percent)	Below Poverty Level (percent) ^{c, d}
Colorado	5,770,790	66.2	3.8	0.4	22.1	3.1	0.1	0.4	3.8	33.8	9.6
Adams County	520,149	47.5	3.4	0.4	41.4	3.8	0.1	0.4	3.1	52.5	9.1
Block Group 1, 80010084011	1,327	82.4	0.8	0.0	14.9	0.6	0.0	0.0	1.2	17.6	10.1
Block Group 2, 80010084012	2,704	73.9	1.9	0.7	18.3	0.3	0.0	0.0	5.0	26.1	8.5
Block Group 3, 80010084013	1,410	74.5	0.0	0.0	21.3	1.8	0.0	2.4	0.0	25.5	0.0
Block Group 1, 80010084021	1,410	63.8	3.0	0.0	20.1	0.0	0.0	1.4	11.7	36.2	9.4
Block Group3, 80010084023	2,078	84.1	1.9	0.0	12.7	0.0	0.0	0.0	1.3	15.9	8.1
Arapahoe County	654,453	57.8	10.6	0.3	20.2	6.1	0.2	0.3	4.5	42.2	7.9
Block Group1, 80050071011	2,433	82.2	2.8	0.2	9.6	1.0	0.0	3.0	1.2	17.8	18.9
Weld County	331,466	63.7	1.2	0.2	30.3	1.6	0.1	0.3	2.4	36.3	9.1
Block Group 3, 81230025023	838	78.2	0.0	0.6	19.9	0.0	0.0	0.0	1.3	21.8	20.6
Block Group 4, 81230025024	601	82.0	0.0	0.0	13.3	0.0	0.0	0.0	4.7	18.0	19.2

Source: USCB 2022a, USCB 2022f (Tables B17017 and B03002)

^a Census block group crossed by the proposed Project and within 20 km of the proposed aboveground facilities.

^b Minority classifications account for the percentage of people who self-report their race according to the column header their ethnicity and are who non-Hispanic/non-Latino. Individuals who do self-report as a minority race and as Hispanic/Latino are captured in the Hispanic/Latino column.

^c The unit of observation for this metric is based on households.

^d Metrics highlighted in blue exceed the thresholds for minority and/or low-income populations.

*Due to rounding differences in the dataset, the totals may not reflect the sum of the addends.

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3. Using the data obtained in response to the question 1 above, identify potential Environmental Justice populations by block group. For minority populations, use the 50 percent and the meaningfully greater analysis methods. If the minority population of the block groups in the affected area exceeds 50 percent OR the minority population in the block group affected is 10 percent greater than the minority population percent in the county, then an environmental justice community is present.

For low-income populations, use the **low-income threshold criteria** method. If the percent low-income population in the identified block group is equal to or greater than that of the county, then an environmental justice community is present.

Response:

As identified in Table 2-1 above, there are no block groups within 20 kilometers of the project area that qualify as environmental justice minority populations. However, there are five environmental justice low income block groups. The block groups highlighted in blue in Table 2-1 exceed the thresholds for low-income populations.

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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4. Provide maps depicting the project facilities in relation to minority and low-income populations (using block group data) at **20km radius around compressor station(s), one mile radius around each injection well**, and mapping for each block group crossed by the pipeline near the Project areas. Denote on the map if the block group is identified as an environmental justice community based on the minority threshold, low-income threshold, or both.

Response:

Due to the concentrated location of proposed Project facilities, mapping of Environmental Justice communities is based on a 20 kilometer radius from the limits of disturbance of the entire Project. Figure 4-1 documents that there are no minority environmental justice communities within 20 kilometers of the Project. Figure 4-2 identifies the five block groups having low-income populations within 20 kilometers of the Project.

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

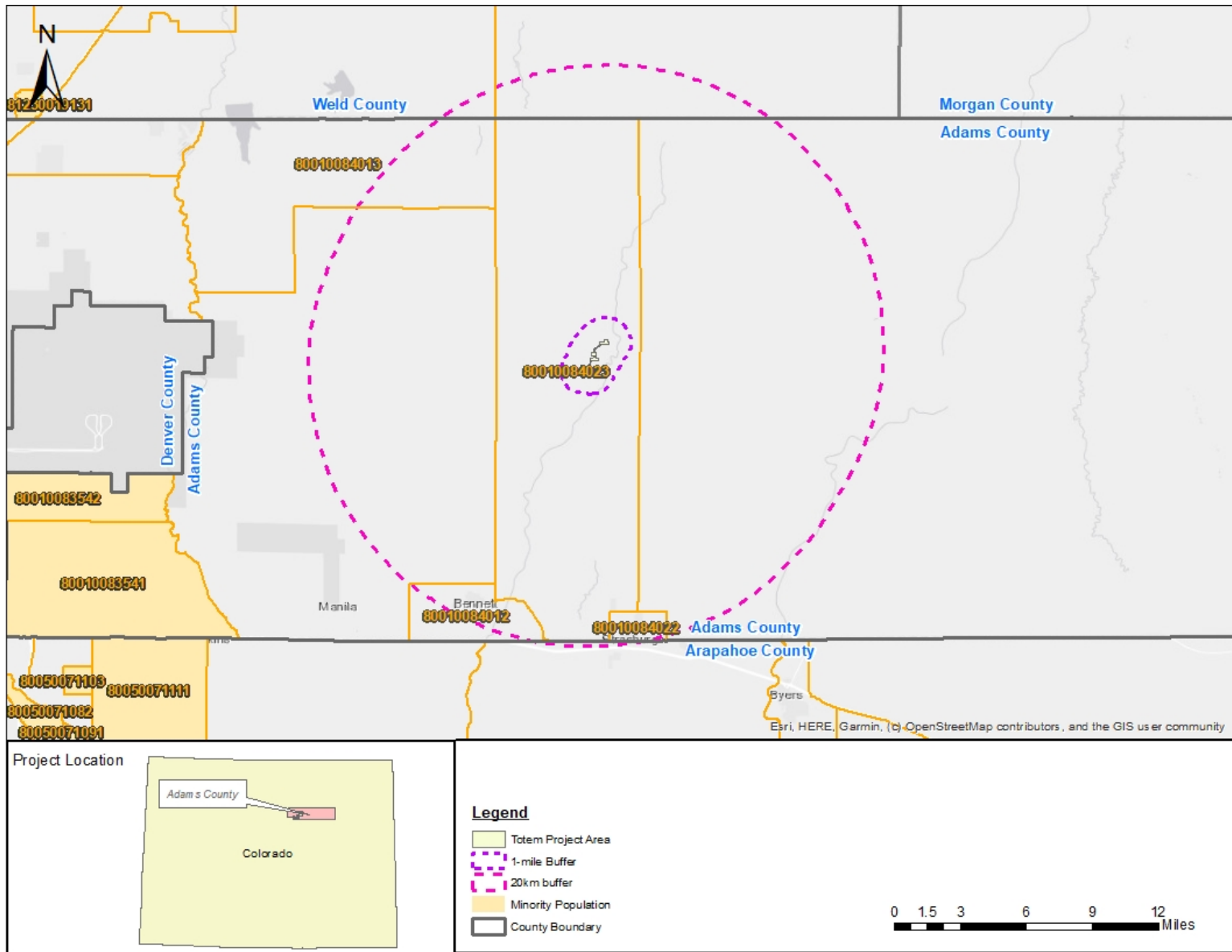


Figure 4-1 Minority Populations within the Project Area

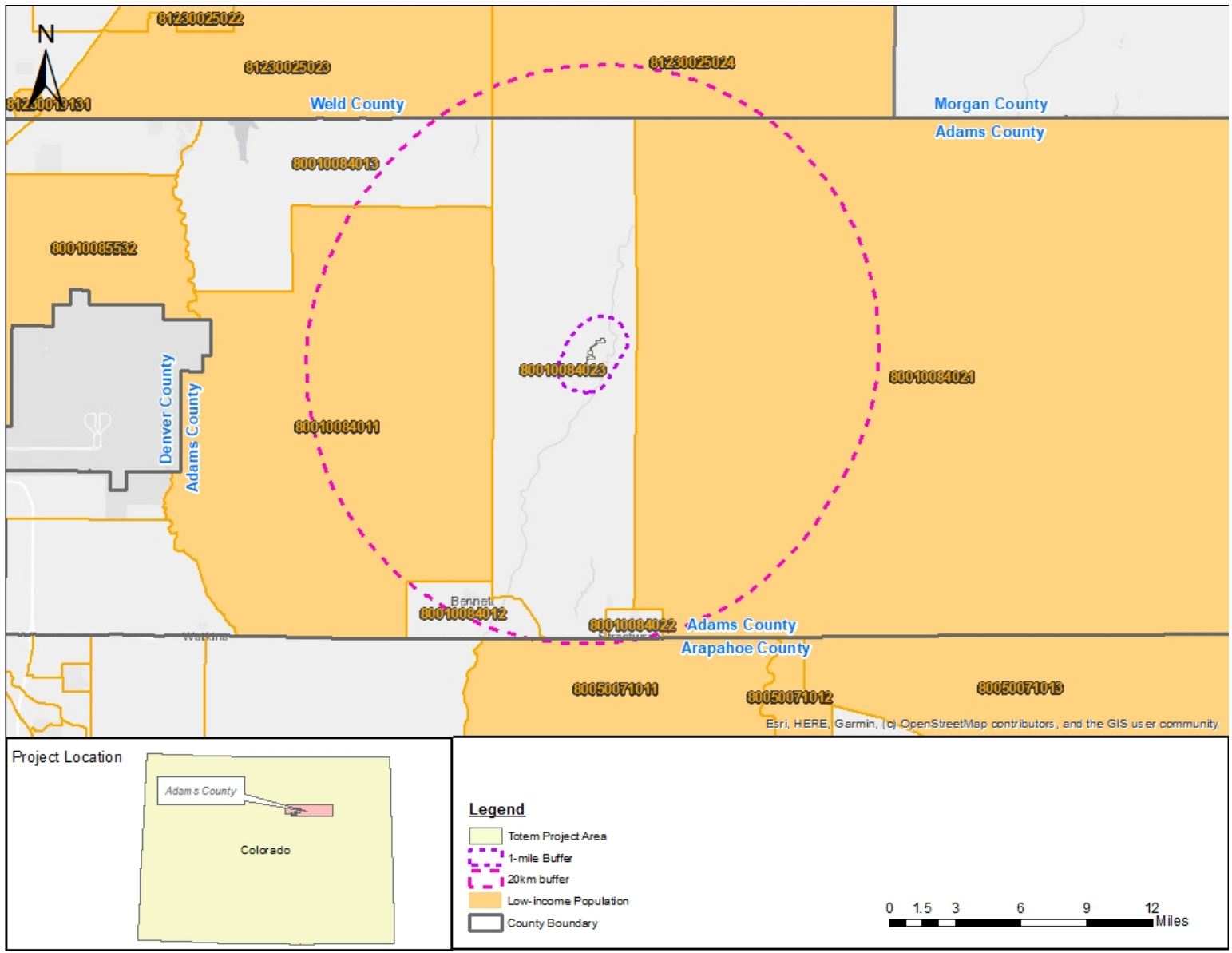


Figure 4-2 Low-income Populations within the Project Area

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6. Identify any non-English speaking groups (use the most recent U.S. Census American Community Survey 5-year estimates File # C16002) that would be affected by the project. Describe efforts to identify and communicate with these groups and individuals.

Response:

Using the most recent U.S. Census American Community Survey 5-year estimates File # C16002, the Project facilities are within a block group in which none of the population is linguistically isolated. All the remaining Adams County, Arapahoe County, and Weld County census block groups within 20 km of the Project similarly had zero (or less than 1 percent) linguistically isolated populations.

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

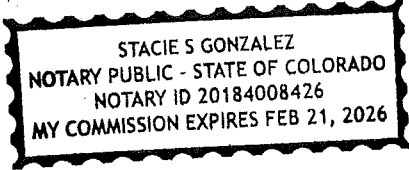
STATE OF COLORADO)
)
COUNTY OF EL PASO)

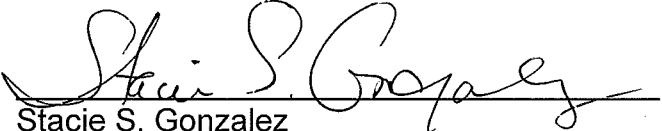
FRANCISCO TARIN, being first duly sworn, on oath, says that he is the Director of the Regulatory Department of Colorado Interstate Gas Company, L.L.C.; that he has read the foregoing Response to the Office of Energy Projects' Data Request dated September 19, 2024 in Docket No. CP24-124-000, that as such 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 24th day of September 2024.





Stacie S. Gonzalez
Notary Public, State of Colorado
My Commission Expires: February 21, 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 24th day of September 2024.

/s/

Francisco Tarin

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