



July 22, 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  
Responses to Environmental Data Request – OEP/DG2E/Gas Branch 2

Dear Ms. Reese:

On July 8, 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 No. 9, on July 18, 2024. In its response filed on July 18, 2024, CIG indicated that it would file its response to Question No. 9 no later than July 23, 2024. CIG is herein filing with the Federal Energy Regulatory Commission (“Commission”) its response to the Data Request Question No. 9.

### **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 Question No. 9 of the July 8, 2024 OEP Data Request.

### **Filing Information**

CIG is e-Filing this letter 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

COLORADO INTERSTATE GAS COMPANY, L.L.C.  
Responses to Data Request – OEP/DG2E/Gas Branch 2  
Dated July 8, 2024 in Docket No. CP24-124-000  
Totem Enhanced Deliverability Project

**ENVIRONMENTAL INFORMATION REQUEST**

9. Respond to the U.S. Environmental Protection Agency comment (Accession Number 20240621-5116), regarding how CIG would consider resiliency and adaptation measures for future climate impacts for the Project.

**Response:**

The Project primarily involves drilling new injection/withdrawal wells (subsurface) in an existing storage field, replacing and abandoning existing facilities, and installing limited new surface facilities within Totem's existing boundaries. Accordingly, the Project will not materially change Totem's current or future climate-related risk or the resiliency and adaptation measures that may be required to mitigate such risks. Further, as CIG noted in its application, the purpose of the Project is to support its customer's (PSCo's) efforts to adapt and transition its power generation portfolio to include more renewable energy sources.

CIG implements comprehensive, intentional, and routine risk management practices and procedures in the design, construction, operation, and maintenance of its assets, including Totem and the Project facilities. Such practices and procedures promote thoughtful design and continuous improvements and adjustments to address various conditions, including climate conditions (*e.g.*, prolonged drought conditions, increased air temperatures, and severe weather events), that may impact CIG's assets. Such practices and procedures include:

- Identifying critical infrastructure and taking appropriate measures to mitigate identified risks.
- Engaging with regulators, industry organizations, NGOs, and communities to share knowledge and coordinate on regulatory proposals, compliance efforts, and industry practices.
- Monitoring regulatory proposals and implementing compliance programs.
- As further detailed in Kinder Morgan Inc.'s 2023 Sustainability Report, performing high-level physical risk analysis based on various scenarios, including scenarios consistent with the Representative Concentration Pathway 8.5 (RCP8.5) 4 °C scenario presented in the IPCC's 2014 Fifth Assessment Report.
- Monitoring the integrity of CIG's assets and the operating conditions affecting such assets, including climate-related conditions, and actively performing preventative maintenance and implementing integrity management procedures.
- Evaluating (and adopting where appropriate) new technologies that may improve asset integrity, performance, efficiency, reliability, and/or resiliency.

COLORADO INTERSTATE GAS COMPANY, L.L.C.  
Responses to Data Request – OEP/DG2E/Gas Branch 2  
Dated July 8, 2024 in Docket No. CP24-124-000  
Totem Enhanced Deliverability Project

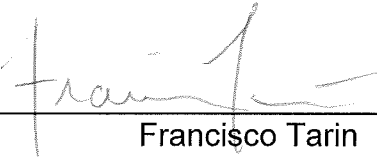
By continuing to implement these practices and procedures, CIG will be well positioned to identify and mitigate the impacts that climate-related events may have on the Project.

Response prepared by or under the supervision of:

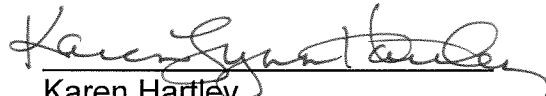
Francisco Tarin  
Director, Regulatory  
Colorado Interstate Gas Company, L.L.C.  
719-667-7517

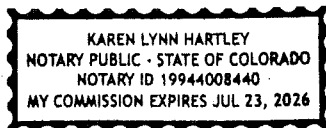
STATE OF COLORADO )  
 )  
COUNTY OF EL PASO )

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 July 8, 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 22<sup>nd</sup> day of July 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 22<sup>nd</sup> day of July 2024.

/s/

---

Francisco Tarin

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