



November 1, 2024

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

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

Re: Colorado Interstate Gas Company, L.L.C.
Docket No. CP24-124-000
Supplemental Environmental Information

Dear Ms. Reese:

On October 31, 2024, CIG received an informal inquiry from the Office of Energy Projects (“OEP”) seeking clarification on two matters related to CIG’s proposed Totem Enhanced Deliverability Project. CIG is herein filing with the Commission its responses as described below.

Background

On April 8, 2024, Colorado Interstate Gas Company, L.L.C. (“CIG”) filed an application in the docket referenced above, pursuant to Section 7(c) and (b) of the Natural Gas Act, and Part 157.5, et seq., of the Federal Energy Regulatory Commission’s (“Commission”) 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” or “Project”.

Description of Filing

CIG is providing the following responses to the Commission Staff October 31, 2024 informal inquiry:

1. In CIG’s Data Request Response from 5-31-2024, the Commission wanted the Significant Impact Levels (SILs) provided for the modeling analysis. CIG’s response stated that the 2010 modeling did not have SILs but did show NAAQS compliance. Please provide a table of SILs and identify the radius of impact (ROI) for any pollutants that exceed the SILs.

Response:

CIG would like to confirm herein that there are no pollutants that exceed the SILs. The SIL is a preliminary limit that a project must meet to determine if it must show full NAAQS compliance through a Cumulative Impact Analysis (“CIA”). The air modeling info used, did not include a SIL analysis and went straight to showing NAAQS compliance through the CIA. The proposed Project estimates an increase in VOCs only, from fugitive valve components. As there is not a SIL standard for VOC, neither Project emissions nor the model analysis result in an exceedance of the SILs.

2. Provide the schedule for the E 152nd Ave. & Imboden Rd. (Roadside Ditch Maintenance) Project.

Response:

In response to an OEP data request dated July 8, 2024, CIG provided Table 1-1 identifying past and reasonably foreseeable future projects within the resource-specific geographic scope of the Project. One of the referenced projects included an Adams County, Colorado road maintenance project called the East 152nd Avenue and Imboden Road (Roadside Ditch Maintenance) Project that was described as being under construction. CIG has confirmed with local county officials that this project was completed on October 27, 2023.

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
Ms. Robin Griffin, OEP

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 1st day of November 2024.

/s/

Francisco Tarin

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