



May 7, 2025

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
Implementation Plan and Request for Partial Notice to Proceed with Construction

Dear Ms. Reese:

Colorado Interstate Gas Company, L.L.C. ("CIG") is hereby filing with the Federal Energy Regulatory Commission ("Commission") in Docket No. CP24-124-000, its Implementation Plan addressing each of the environmental conditions attached to the Order Issuing Certificate and Approving Abandonment ("Order") dated March 20, 2025¹. Concurrent with the submittal of its Implementation Plan and pursuant to Environmental Condition No. 9 of Appendix B to the Order, CIG is submitting a request to proceed with non-compressor station construction activities on the Totem Enhanced Delivery Project ("Project") as discussed below.

Description of Proceeding

On April 8, 2024, CIG submitted an application pursuant to sections 7(b) and 7(c) of the Natural Gas Act² and Part 157 of the Commission's regulations³ for authorizations to: (1) increase the maximum withdrawal rate by approximately 50 million cubic feet per day; (2) install six new injection and withdrawal wells; (3) replace and install various sections of storage pipeline; (4) reclassify one existing injection/withdrawal well to an observation well; (5) install various appurtenant and auxiliary facilities; and (6) inject approximately one billion cubic feet of additional base gas into the Totem storage field. On March 20, 2025, the Commission issued an Order granting CIG's requested authorizations.

Submittal of Implementation Plan and Request for Notice to Proceed with Construction

Pursuant to Ordering Paragraph (H) of the Order and in compliance with Environmental Condition No. 6 of Appendix B to the Order, CIG is submitting its Implementation Plan for review and written approval by the Director of the Office of Energy Projects. As part of the Implementation Plan being provided herein, CIG addresses each of the environmental conditions included in Appendix B to the Order.

¹ See *Colorado Interstate Gas Company, L.L.C.*, 190 FERC ¶ 62,174 (2025).

² 15 U.S.C. § 717(f)(b)-(c).

³ 18 C.F.R. §§ 157.1 – 157.218 (2025) (Part 157).

Additionally, pursuant to Condition No. 9 of Appendix B to the Order, CIG respectfully requests authorization from the Director of the Office of Energy Projects for a partial notice to proceed with certain construction activities related to the Project. Specifically, CIG requests authorization to begin construction on only the storage well and pipeline-related components of the Project. As noted in its Implementation Plan, final approval of the modifications to the Title V Operating Permit ("Permit") from the Colorado Department of Public Health and Environment is pending. This modification to the Permit was triggered based on CIG's plan to modify piping at the existing Totem Compressor Station site to facilitate the installation of a liquids separator and does not apply to the storage well and connecting lateral portions of the Project. In this regard, CIG will seek separate approval for construction activities at the Totem Compressor Station at a later date once it secures agency approval for its modified Permit. In this filing, CIG respectfully requests a notice to proceed with construction of the storage wells and pipeline-related work of the Project by May 15, 2025. Approval by this date will eliminate planning uncertainty for its construction contractors. As noted in Appendix B, CIG affirms that it has secured all applicable authorizations required under federal law including all necessary Section 7 and Section 106 consultation approvals for these requested construction activities.

Affirmation of Executed Transportation Service Agreements

Furthermore, pursuant to Ordering Paragraph (F) of the Order, CIG affirms that it has executed firm contracts for the capacity levels and terms of service represented in its filed precedent agreement. Accordingly, CIG affirms that it has complied with this requirement.

Filing Information

This filing and attachments are being filed 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 Tarín
Francisco Tarín
Director, Regulatory

Enclosures

Cc. Ms. Olubukola Pope, OEP
Ms. Sydney Harris, OEP

Totem Enhanced Deliverability Project

Docket No. CP24-124-000

Implementation Plan

Colorado Interstate Gas Company, L.L.C. (CIG)

May 7, 2025

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List of Appendices for Environmental Conditions

<u>Appendix</u>	<u>Condition</u>	<u>Title</u>	<u>Classification</u>
A	3	Affirmative Statement	Public
B	9	Federal Authorizations	Public
C	6h	Schedule Diagram	Public

1) **INTRODUCTION**

This Implementation Plan ("IP") was prepared in accordance with the Order's Environmental Condition No. 6, and any revisions or supplements to this IP will also be completed in accordance with this Environmental Condition. Documents that have not been, but are anticipated to be received, are discussed in this IP and will be provided to FERC as supplements to the IP along with a request for notice to proceed (NTP) prior to construction of the Totem Enhanced Delivery Project ("Project").

COMPLIANCE WITH ORDER ENVIRONMENTAL CONDITIONS

The following details CIG's responses to the environmental conditions set forth in the Order.

APPENDIX B TO THE ORDER – ENVIRONMENTAL CONDITIONS

Condition 1

CIG shall follow the construction and abandonment procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the environmental assessment (EA), unless modified by the Order. CIG must:

- a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);
- b. justify each modification relative to site-specific conditions;
- c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
- d. receive approval in writing from the Director of the Office of Energy Projects (OEP), or the Director's designee, before using that modification.

CIG's Response

CIG will comply with this condition.

CIG will follow the construction procedures and mitigation measures described in its application and supplemental filings, including responses to staff data requests, and as identified in the Commission's Order. In the event that additional modifications to the approved procedures and mitigation measures are determined to be necessary in the future, CIG will comply with the provisions in "a" through "d" above.

Condition 2

The Director of OEP, or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of environmental resources during construction and operation of the Project. This authority shall allow:

- a. the modification of conditions of the Order;
- b. stop-work authority;
- c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from project construction and operation.

CIG's Response

CIG recognizes the Director of OEP, or the Director's designee's delegated authority as stated above.

Condition 3

Prior to any construction, CIG shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, environmental inspectors (EIs), and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities.

CIG's Response

An affirmative statement signed by a senior company official which certifies that all company and contract personnel will be informed of the environmental inspector's ("EI") authority and have been or will be adequately trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities is included as **Appendix A to the IP**.

Condition 4

The authorized facility locations shall be as shown in the EA, as supplemented by filed alignment sheets and diagrams. **As soon as they are available, and before the start of construction,** CIG shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

CIG's exercise of eminent domain authority granted under NGA section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. CIG's right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of its natural gas pipeline/facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

CIG's Response

CIG commits to submitting any revised detailed survey alignment maps/sheets at a scale of not smaller than 1:6,000 with station positions for all facilities approved by the Order, as soon as they are available and before the start of construction.

CIG acknowledges that, if it chooses to exercise the right of eminent domain authority granted under the NGA section 7(h) in any condemnation proceedings related to this Order, such exercise must be consistent with these authorized facilities and locations. CIG further acknowledges that the right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of its natural gas pipeline to accommodate future needs or acquire a right-of-way ("ROW") for a pipeline to transport a commodity other than natural gas.

Condition 5

CIG shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP, or the Director's designee, **before construction in or near that area.**

This requirement does not apply to extra workspace allowed by the Commission's *Upland Erosion Control, Revegetation, and Maintenance Plan* and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;
- b. implementation of endangered, threatened, or special concern species mitigation measures;
- c. recommendations by state regulatory authorities; and
- d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

CIG's Response

CIG acknowledges that modifications including route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, or other areas that would be used or disturbed, that have not been previously identified in filings with the Secretary would be submitted to the Secretary on detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000. CIG will not commence activities in or near said modifications until written approval is granted by the Director of OEP, or the Director's designee.

Condition 6

Within 60 days of the authorization and before construction/abandonment begins, CIG shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP, or the Director's designee. CIG must file revisions to the plan as schedules change. The plan shall identify:

- a. how CIG will implement the construction procedures and mitigation measures described in their application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;
- b. how CIG will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;
- c. the number of EIs assigned, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;
- d. company personnel, including EIs and contractors, who will receive copies of the appropriate material;
- e. the location and dates of the environmental compliance training and instructions CIG will give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change);
- f. the company personnel (if known) and specific portion of CIG's organization having responsibility for compliance;
- g. the procedures (including use of contract penalties) CIG will follow if noncompliance occurs; and
- h. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:
 - i. the completion of all required surveys and reports;
 - ii. the environmental compliance training of onsite personnel;
 - iii. the start of construction; and
 - iv. the start and completion of restoration.

CIG's Response

CIG agrees to this condition and is accordingly filing for review and written approval by the Director of OEP, or the Director's designee, this Implementation Plan. CIG will file revisions to this plan if schedules change.

Implementation No. 6a

CIG is committed to protecting the environment. Compliance with the construction procedures and mitigation measures described in CIG's certificate application and supplemental filings (including responses to staff data requests), identified in the EA is crucial to the success of the Project. CIG will ensure all construction procedures and mitigation measures are implemented properly by incorporating implementation details into construction drawings and through proper

environmental compliance training for everyone associated with the Project. CIG's contractors will receive instructions and documentation during pre-construction meetings for the Project. This information will include relevant environmental permits that specifically address mitigation and restoration requirements. CIG's inspection team will diligently supervise compliance with these requirements. Daily construction meetings will emphasize environmental requirements and include discussions of concerns or issues to prevent and minimize potential noncompliance events. Daily reports will be prepared by CIG's Environmental Inspectors, and Chief Inspectors; non-compliance issues will be handled appropriately by the Environmental Inspectors, Chief Inspectors, and contractor representatives.

Implementation No. 6b

CIG has prepared this IP to ensure that construction of the Project complies with the mitigation measures identified in CIG's certificate application and supplemental filings, the EA, and measures identified by other federal, state, and local permitting agencies.

CIG's contractors will receive copies of this IP, the EA, and applicable landowner agreements identifying all specific environmental permit requirements, mitigation measures, obligations, and applicable landowner conditions.

CIG will require selected contractors to construct the Project according to its specifications, the construction alignment sheets/maps/drawings, project-specific plans, all environmental permit conditions/requirements, and the terms of the contract, which includes means to remedy unsatisfactory performance or noncompliance as further described in response to Environmental Condition No. 6g below. The contractor, CIG personnel, and environmental inspection personnel will jointly serve to enforce compliance with both the construction procedures and the mitigation measures outlined by the Certificate Order and the Conditions to the Order. Any penalty clauses and specifications will be clearly communicated during the Project orientation.

Implementation No. 6c

Ensuring environmental compliance during the construction process requires a unified, competent, and properly staffed EI Program. Prior to construction of the Project, CIG will retain an EI.

One EI will be assigned to construction of the pipeline and the major above ground facilities. If CIG determines additional environmental inspectors are required to ensure that environmental mitigation measures are sufficiently implemented during construction of the Project, CIG will adjust the number and/or work scope of the environmental inspectors as needed during the course of construction to maintain compliance.

Implementation No. 6d

CIG's construction chiefs, key contractor supervisory and foremen personnel, contractor crews, and EI will receive complete copies of the appropriate material, including but not limited to: this IP, construction alignment sheets/maps, typical and site-specific drawings, permits, and project-specific Plans. Additional copies of these materials will be kept in the construction field office and at the CIG headquarters.

Implementation No. 6e

All on-site Project personnel, including management, EI, inspectors, contractor supervisors, crew, foremen and laborers, and other Project field personnel will be required to attend an environmental training session before they will be allowed to begin work on the Project.

CIG will provide environmental training sessions prior to commencement of construction activities. The dates, times, and locations of the environmental training sessions have not been scheduled at this time; however, CIG will notify the OEP when environmental training is scheduled and provide the opportunity for OEP staff to participate in the training session(s). In-depth environmental training will be held when new crews arrive on-site. In addition, refresher and tailgate training sessions may be held at various times throughout Project construction to highlight sensitive environmental issues or to help resolve or prevent non-compliance issues.

With an overall focus on established, consistent application of environmental policies and procedures across the Project, the training will address and discuss in-depth, the Project-specific procedures (including variance procedures, non-compliance, and stop work authority), resource issues, construction specifications, Project construction limits and workspaces, and sensitive species, and, will include a cultural resources component. All environmental training sessions will include a discussion of the Project requirements associated with FERC requirements, erosion and sediment control, spill prevention and control, materials management plans, threatened and endangered species, cultural resource protection, and landowner and community relations. The training will also discuss the duties and authority of the EI, the Environmental Compliance Management Plan (ECMP), and the chain of communication among various Project personnel.

Following each environmental training session, all personnel will be required to acknowledge by signature that he/she understands the environmental compliance requirements pertinent to their job, as presented in the training session. No person will be allowed to begin working on the Project without proper documentation that they have attended environmental training.

Implementation No. 6f

The environmental inspection team will have responsibilities for all compliance with environmental requirements and provide overall coordination with FERC and all resource agencies.

Implementation No. 6g

CIG's standard construction contracts provide a way to remedy unsatisfactory and non-compliant work at the contractor's expense. If a contractor's performance is unsatisfactory, or non-compliant, the terms of the contract allow CIG to stop any work in progress and require the contractor to begin remedial work. If the contractor fails to remedy unsatisfactory work in a timely manner, CIG may, in accordance with the terms of the contract, take over the work and bring in another contractor to remedy unsatisfactory work at the original contractor's expense. A contractor is to be held liable for any and all penalties and fines assessed against CIG as a result of the contractor's violation of various permits issued in regard to this work.

In the event a non-compliance event occurs, the Chief Inspectors and the EI will coordinate with CIG to determine the appropriate resolution to the noncompliance issue. The issue will be corrected as soon as practicable. In addition, the EI will document the issue of non-compliance, the corrective measure that was implemented (or the date the measure will be implemented) and

whether the corrective measure was successful for inclusion in the status reports submitted to the Commission.

Implementation No. 6h

CIG is providing as Appendix C to the IP, a schedule diagram for the activities outlined in Environmental Condition No. 6h associated with the Project. Training will be scheduled in accordance with the major work components of the Project and mobilization of the construction crews.

Condition 7

CIG shall employ at least one EI for the Project. The EI shall be:

- a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
- b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document;
- c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
- d. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
- e. responsible for maintaining status reports.

CIG's Response

CIG will employ at least one EI for the Project. If CIG determines that additional environmental inspectors or environmental crew laborers are required to ensure that environmental mitigation measures are adequately implemented, CIG will increase the number of environmental inspectors, and contractor crews as needed during the course of construction.

The EI will be a full-time position separate from all other activity inspectors whose responsibilities will include those listed in Environmental Conditions No. 7a through 7e.

Condition 8

Beginning with the filing of its Implementation Plan, CIG shall file updated status reports with the Secretary on a **monthly** basis until all construction, abandonment and restoration activities are complete. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:

- a. an update on CIG's efforts to obtain the necessary federal authorizations;
- b. the construction status of each spread, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally sensitive areas;
- c. a listing of all problems encountered, and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
- d. a description of the corrective actions implemented in response to all instances of all noncompliance;
- e. the effectiveness of all corrective and remedial actions implemented;
- f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and
- g. copies of any correspondence received by CIG from other federal, state, or local permitting agencies concerning instances of noncompliance, and CIG's response.

CIG's Response

CIG acknowledges that it must file status reports with the Secretary on a monthly basis for the Project until all construction and restoration activities are complete. CIG's monthly reports will provide the following construction information to FERC:

- an update on CIG's efforts to obtain the necessary federal authorizations;
- the construction status of each facility/spread, work planned for the following reporting period, and any schedule changes for environmentally sensitive areas;
- a listing of all problems encountered, and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
- a description of the corrective actions implemented in response to all instances of noncompliance, and their cost;
- the effectiveness of all corrective actions implemented;
- a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and

- copies of any correspondence received by CIG from other federal, state, or local permitting agencies concerning instances of non-compliance, and CIG's response.

Condition 9

CIG must receive written authorization from the Director of OEP, or the Director's designee, **before commencing construction or abandonment activities**. To obtain such authorization, CIG must file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).

CIG's Response

CIG acknowledges that it must receive written authorization from the Director of OEP, or the Director's designee, before commencing construction of any Project facilities. CIG has applied for all authorizations required under federal law for the Project. The table in Appendix B to the IP summarizes the status of all authorizations required under federal law that have been obtained or will be obtained prior to construction of the Project. CIG notes that at the time of this filing, CIG has not received approval of its modified Title V air permit from the State of Colorado that is required for the scope of work related to the Totem Compressor Station. CIG will file an updated table as Appendix B along with a copy of the air permit once received. As noted in its transmittal letter included with this filing, CIG respectfully is seeking authorization from the Director of OEP, for a notice to proceed with construction of the storage well and pipeline-related work of the Project by May 15, 2025. A partial notice to proceed by this date will eliminate planning uncertainty for its construction contractors. Further, CIG affirms that no work at the Totem Compressor Station would be undertaken as part of this request.

Condition 10

CIG must receive written authorization from the Director of OEP, or the Director's designee, before placing the Project into service. Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way and other areas affected by the project are proceeding satisfactorily.

CIG's Response

CIG acknowledges that it must receive written authorization from the Director of OEP, or the Director's designee, before placing the Project into service. CIG recognizes such authorization will only be granted following a determination that rehabilitation and restoration of areas affected by the Project are proceeding satisfactorily.

Condition 11

Within 30 days of placing the authorized facilities in service, CIG shall file an affirmative statement with the Secretary, certified by a senior company official:

- a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
- b. identifying which of the conditions in the Order CIG has complied with or will comply with. This statement shall also identify any areas affected by the project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.

CIG's Response

Within 30 days of placing any Project facilities in service, CIG will file an affirmative statement with the Secretary that the facilities have been constructed in compliance with all applicable conditions and continuing activities will be consistent with all applicable conditions. The statement will also identify any areas affected by the Project where compliance measures were not properly implemented, if not identified in previously filed status reports, and the reason for noncompliance.



Colorado Interstate
Gas Company, L.L.C.
a Kinder Morgan company

**COLORADO INTERSTATE GAS COMPANY, L.L.C.
TOTEM ENHANCED DELIVERABILITY PROJECT
DOCKET NO. CP24-124-000**

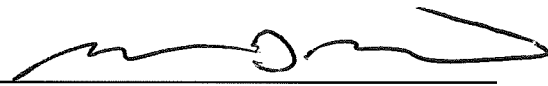
IMPLEMENTATION PLAN

APPENDIX A – ENVIRONMENTAL CONDITION 3


AFFIRMATIVE STATEMENT

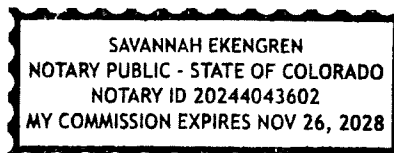
STATE OF COLORADO)
)
COUNTY OF EL PASO)

WILLIAM D. WIBLE, being first duly sworn, on oath, says that he is the Vice President of the Regulatory Department of Colorado Interstate Gas Company, L.L.C.; that he has read the foregoing letter containing the Affirmative Statement in compliance with Environmental Condition No. 3 of Appendix B to the Certificate of Public Convenience and Necessity and Abandonment Authorization (Order) issued March 20, 2025 in Docket No. CP24-124-000, that he is familiar with the contents thereof; that, as such Officer, he has executed the same for and on behalf of said Company with full power and authority to do so; and that the matters and facts set forth therein are true to the best of his information, knowledge and belief.

By 
William D. Wible
Vice President, Regulatory

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 23rd day of April, 2025.


Savannah Ekengren
Notary Public, State of Colorado
My Commission Expires: November 26, 2028





Colorado Interstate
Gas Company, L.L.C.
a Kinder Morgan company

**COLORADO INTERSTATE GAS COMPANY, L.L.C.
TOTEM ENHANCED DELIVERABILITY PROJECT
DOCKET NO. CP24-124-000**

IMPLEMENTATION PLAN

APPENDIX B - ENVIRONMENTAL CONDITION 9

FEDERAL AUTHORIZATIONS

Agency	Permit/Approval/ Consultation/ Notification	Approval Status
Federal Energy Regulatory Commission ("FERC"), Office of Energy Projects	Section 7(c) Natural Gas Act - Certificate of Public Convenience and Necessity	FERC Certificate of Public Convenience and Necessity issued on March 20, 2025.
United States Environmental Protection Agency ("USEPA"), Region 4	Compliance with Sections 401, 402, and 404 of the Clean Water Act	N/A – No 401 or 402 permit required due to no wetlands or waterbodies on site.
United States Army Corps of Engineers ("USACE"), Omaha Regulatory District, Denver Regulatory Office	Section 404 Clean Water Act / Section 10 Rivers and Harbors Act Permit	N/A – CIG did not consult with the USACE due to no wetlands or waterbodies located on the Project site.
United States Fish and Wildlife Service ("USFWS"), Colorado Ecological Services Office	Consultation under Endangered Species Act, Bald and Golden Eagle Protection Act, and Migratory Bird Treaty Act	Initial notification letter / request for review of federally listed species survey list sent January 29, 2024. E-mail response indicating "no concerns" received on February 13, 2024.
Advisory Council on Historic Preservation ("ACHP")	National Historic Preservation Act (NHPA), Section 106 Consultation	No adverse impacts to historic resources identified therefore the ACHP was not involved.
Colorado State Historic Preservation Office (CO SHPO)	Section 106 of the NHPA of 1966, as amended – cultural resources consultation and clearance	No historic properties affected determination obtained on October 22, 2024.
Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division	Modification to Title V Operating Permit Number 21OPAD443	Permit Pending.
Colorado Department of Public Health and Environment (CDPHE), Water Quality Division	Permit COR400000; Certification Number COR427362 (Construction Storm Water Permit)	Permit received April 29, 2025.



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TOTEM ENHANCED DELIVERABILITY PROJECT
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IMPLEMENTATION PLAN





















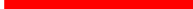



APPENDIX C - ENVIRONMENTAL CONDITION 6h

SCHEDULE

ID	Task Name	Duration	Start	Finish	2024												2025												2026																							
					Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug													
1	1 Project Planning & Pre-Construction	539 days	Wed 10/18/23	Thu 12/4/25	Project Planning & Pre-Construction																																															
2	1.1 Kinder Morgan	437 days	Tue 10/31/23	Wed 7/23/25	Kinder Morgan																																															
3	1.1.1 KM Business Development	1 day	Tue 10/31/23	Tue 10/31/23	KM Business Development																																															
5	1.1.2 KM Project Management	106 days	Mon 11/6/23	Mon 4/8/24	KM Project Management																																															
10	1.1.3 KM Corporate	19 days	Wed 11/22/23	Wed 12/20/23	KM Corporate																																															
12	1.1.4 KM Regulatory	264 days	Mon 4/8/24	Tue 4/22/25	KM Regulatory																																															
17	1.1.5 Develop/File Implementation Plan	16 days	Fri 4/18/25	Fri 5/9/25	Develop/File Implementation Plan																																															
18	1.1.6 Receive FERC Project Approval Wells/Partial NTP	15 days	Mon 5/12/25	Mon 6/2/25	Receive FERC Project Approval Wells/Partial NTP																																															
19	1.1.7 Receive FERC Project Approval Totem CS/Full NTP	21 days	Mon 6/23/25	Tue 7/22/25	Receive FERC Project Approval Totem CS/Full NTP																																															
20	1.1.8 Issue KM Regulatory Approval - Wells	1 day	Mon 6/2/25	Mon 6/2/25	Issue KM Regulatory Approval - Wells																																															
21	1.1.9 Issue KM Regulatory Approval - Totem CS	1 day	Wed 7/23/25	Wed 7/23/25	Issue KM Regulatory Approval - Totem CS																																															
22	1.1.10 KM Environmental	292 days	Mon 3/25/24	Fri 5/16/25	KM Environmental																																															
25	1.1.11 Environmental Training	1 day	Tue 6/3/25	Tue 6/3/25	Environmental Training																																															
26	1.1.12 Air Permit - Modified Title V	306 days	Mon 4/8/24	Fri 6/20/25	Air Permit - Modified Title V																																															
31	1.1.13 KM Air Permitting	1 day	Mon 6/23/25	Mon 6/23/25	KM Air Permitting																																															
33	1.1.14 KM Land/ROW	379 days	Mon 12/4/23	Mon 6/2/25	KM Land/ROW																																															
39	1.1.15 KM Reservoir Services	23 days	Fri 12/29/23	Thu 2/1/24	KM Reservoir Services																																															
41	1.1.16 KM Design Engineering	63 days	Wed 12/13/23	Wed 3/13/24	KM Design Engineering																																															
43	1.2 Contracting	510 days	Wed 10/18/23	Wed 10/22/25	Contracting																																															
110	1.3 Material Procurement	270 days	Fri 11/8/24	Thu 12/4/25	Material Procurement																																															
134	2 Project Construction	183 days	Tue 6/3/25	Thu 1/8/26	Project Construction																																															
135	2.1 Construction - General	183 days	Tue 6/3/25	Thu 1/8/26	Construction - General																																															
145	2.2 New Injection/Withdrawal Wells (Multiple AFEs)	100 days	Sat 6/7/25	Sun 9/14/25	New Injection/Withdrawal Wells (Multiple AFEs)																																															
146	2.2.1 New Well #28	44 days	Sat 6/7/25	Sun 7/20/25	New Well #28																																															
154	2.2.2 Well #28 - Restoration/Re-Spread Topsoil	3 days	Mon 7/21/25	Wed 7/23/25	Well #28 - Restoration/Re-Spread Topsoil																																															
155	2.2.3 New Well #25	52 days	Sat 6/7/25	Mon 7/28/25	New Well #25																																															
163	2.2.4 New Well #27	42 days	Wed 6/25/25	Tue 8/5/25	New Well #27																																															
170	2.2.5 Wells #25, #27 - Restoration/Re-Spread Topsoil	3 days	Wed 8/6/25	Fri 8/8/25	Wells #25, #27 - Restoration/Re-Spread Topsoil																																															
171	2.2.6 New Well #26	58 days	Sun 6/22/25	Mon 8/18/25	New Well #26																																															

Task		Rolled Up Critical Task		Project Summary		Duration-only		External Tasks	
Critical Task		Rolled Up Milestone		Group By Summary		Manual Summary Rollup		External Milestone	
Milestone		Rolled Up Progress		Inactive Milestone		Manual Summary		Progress	
Summary		Split		Inactive Summary		Start-only		Deadline	
Rolled Up Task		External Tasks		Manual Task		Finish-only			

ID	Task Name	Duration	Start	Finish
179	2.2.7 Well #26 - Restoration/Re-Spread Topsoil	3 days	Tue 8/19/25	Thu 8/21/25
180	2.2.8 New Well #29	76 days	Tue 6/17/25	Sun 8/31/25
188	2.2.9 Well #29 - Restoration/Re-Spread Topsoil	3 days	Mon 9/1/25	Wed 9/3/25
189	2.2.10 New Well #30	77 days	Fri 6/27/25	Thu 9/11/25
196	2.2.11 Well #30 - Restoration/Re-Spread Topsoil	3 days	Fri 9/12/25	Sun 9/14/25
197	2.3 New Well-Head Facilities (AFE #234421)	135 days	Thu 7/24/25	Fri 1/2/26
198	2.3.1 New Well-Head #28 Metering/Filtration Station	43 days	Thu 7/24/25	Fri 9/12/25
206	2.3.2 New Well-Head #25 Metering/Filtration Station	41 days	Sat 8/16/25	Fri 10/3/25
214	2.3.3 New Well-Head #27 Metering/Filtration Station	34 days	Wed 9/10/25	Sat 10/18/25
222	2.3.4 New Well-Head #26 Metering/Filtration Station	35 days	Fri 10/3/25	Wed 11/12/25
230	2.3.5 New Well-Head #29 Metering/Filtration Station	35 days	Mon 10/27/25	Mon 12/8/25
238	2.3.6 New Well-Head #30 Metering/Filtration Station	35 days	Wed 11/19/25	Fri 1/2/26
246	2.4 Laterals (AFE #234421)	82 days	Mon 7/7/25	Fri 10/10/25
247	2.4.1 South Area Laterals	69 days	Mon 7/7/25	Thu 9/25/25
248	2.4.1.1 South Area Existing Well Lateral Modifications	43 days	Mon 7/7/25	Mon 8/25/25
256	2.4.1.2 New Well #28 Lateral (Approx 226')	7 days	Tue 8/26/25	Wed 9/3/25
259	2.4.1.3 New Well #29 Lateral (Approx. 693')	12 days	Thu 9/4/25	Wed 9/17/25
262	2.4.1.4 New Well #30 Lateral (Approx. 225')	7 days	Thu 9/18/25	Thu 9/25/25
265	2.4.2 North Area Laterals	68 days	Wed 7/23/25	Fri 10/10/25
266	2.4.2.1 CIG 254F-1 Gathering Mainline (Approx. 3,792')	38 days	Wed 7/23/25	Fri 9/5/25
270	2.4.2.2 North Area Existing Well Lateral Modifications	30 days	Sat 8/9/25	Sat 9/13/25
276	2.4.2.3 New Well #25 Lateral (Approx. 305')	9 days	Mon 9/15/25	Wed 9/24/25
279	2.4.2.4 New Well #27 Lateral (Approx. 168')	7 days	Thu 9/25/25	Thu 10/2/25
282	2.4.2.5 New Well #26 Lateral (Approx. 200')	7 days	Fri 10/3/25	Fri 10/10/25
285	2.5 Totem Compressor Station Modifications (AFE #234704)	135 days	Fri 7/18/25	Fri 12/26/25
286	2.5.1 Station Modifications	125 days	Fri 7/18/25	Sat 12/13/25
287	2.5.2 Loop Checking	5 days	Mon 12/15/25	Fri 12/19/25
288	2.5.3 Station Commissioning/PSSR	5 days	Sat 12/20/25	Fri 12/26/25
289	3 Project Closeout	314 days	Fri 1/2/26	Tue 3/30/27

Developed by: Steve Gassman, PM steven_gassman@kindermorgan.com 719.520.4475	Task		Rolled Up Critical Task		Project Summary		Duration-only		External Tasks	
	Critical Task		Rolled Up Milestone		Group By Summary		Manual Summary Rollup		External Milestone	
	Milestone		Rolled Up Progress		Inactive Milestone		Manual Summary		Progress	
	Summary		Split		Inactive Summary		Start-only		Deadline	
	Rolled Up Task		External Tasks		Manual Task		Finish-only			

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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 7th day of May 2025.

/s/

Francisco Tarín

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