



August 18, 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
Request for Variance Approval No. 2

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, a variance request in accordance with Environmental Condition No. 5 of Appendix B to the March 20, 2025 Commission Order issued in this proceeding, all as more fully described below.

Description of Proceeding

On April 8, 2024, CIG submitted an application seeking authorizations pursuant to sections 7(b) and 7(c) of the Natural Gas Act¹ and Part 157 of the Commission's regulations² for its Totem Enhanced Delivery Project ("Project") which as designed to increase the maximum withdrawal rate by approximately 50 million cubic feet per day by installing: (1) six new injection and withdrawal wells; (2) replacing and installing various sections of storage pipeline; (3) reclassifying one existing injection/withdrawal well to an observation well; (4) installing various appurtenant and auxiliary facilities; and (5) injecting approximately one billion cubic feet of additional base gas into the Totem storage field. The Commission issued an Order on March 20, 2025 granting CIG's requested authorizations.³ On May 14, 2025, the Commission approved CIG's Implementation Plan filed on May 7, 2025 and issued CIG a partial notice to proceed with construction of the storage wells and pipeline related work of the Project; followed by a second notice to proceed with full construction activities related to the compressor station on July 23, 2025.

Request for Variance

After further refining its Project construction activities, CIG is herein proposing certain minor modifications that are designed to better accommodate various well head installations and will facilitate future operations and maintenance activities at the new I/W well locations. Specifically, CIG has refined and adjusted certain project well pad dimensions and is seeking variance approval from the Director of the Office of Energy

¹ 15 U.S.C. § 717(f)(b)-(c).

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

³ See *Colorado Interstate Gas Company, L.L.C.*, 190 FERC ¶ 62,174 (2025).

Projects for the following changes: (1) implement minor realignments to well pad dimensions associated with its new I/W Well Nos. 25, 26, 27, 28, 29, and 30; (2) relocate pigging facilities; and (3) install three (3) emergency shut-off panels for the new I/W wells, all located in Adams County, Colorado.

Realignment of Well Pad Facilities:

In order to better facilitate the installation of the well heads as well as future operations and maintenance activities, CIG is proposing minor shifts to the well pad spaces for I/W Well Nos. 25, 26, 27, 28, 29, and 30. The proposed minor shifts would mostly consist of shifts of up to 10 feet. In the case of I/W Well No. 27, CIG is proposing to rotate the well pad approximately ninety-degrees. These changes will allow CIG to better access its well facilities that are slightly affected by terrain slope.⁴ The topographical maps provided under Tab 1, depict the realignments at each of the new I/W well pads superimposed on the currently approved I/W well pad dimensions in order to better illustrate the proposed changes. Even though the permanent right-of-way ("ROW") easements around each of the I/W well pads will not change from its originally approved 135-foot by 100-foot area as a result of the minor realignments, CIG will increase the fenced pad area from a 40-foot by 75-foot pad size to a 50-foot by 90-foot pad. Additionally, the topographical maps illustrate corresponding changes to the associated cathodic protection ROWs that are adjusted as a result of well pad realignments and the new permanent easement acreage necessary for the cathodic protection ROWs decrease from **0.35 acres** to **0.31 acres** as reflected in the revised land disturbance table, Table 8.2-1 provided under Tab 3.

Relocation of Pig Receiver:

In order to provide better access for future maintenance and operations to existing I/W Well No. 7 as well as the new I/W Well No. 27, CIG is proposing to move the proposed pig receiver facility location. CIG requests variance approval to shift the location of the pig receiver facility (currently approved to be located between existing I/W Well No. 7 and the new I/W Well No. 27 along the Line 254F-1 ROW) approximately 150 feet southwest of where it is currently approved to be located. CIG notes that the workspace dimensions previously identified for the pigging receiver in its application will not change and the requested relocation site will remain within the ROW of Line 254F-1 as depicted in the topographical maps provided under Tab 1. The connecting access road to the pig receiver facility will need to be extended within the Line 254F-1 ROW. The access road extension will increase the Project total access road new permanent easement/operations acreage from **0.45 acres** to **0.49 acres**.⁵ As reflected in the revised land disturbance table, Table 8.2-1 provided under Tab 3, shifting the pig receiver facility slightly increases the total Project lateral tap valves new permanent easement/operations calculations from **0.03 acres** to **0.04 acres** while decreasing the

⁴ CIG notes that the physical locations of the well heads for each of the I/W wells will not change as a result of this proposed well pad space realignments, therefore, no additional engineering or geological analysis would be required.

⁵ Note that the pig receiver facility was originally co-located with three new lateral tap valves for existing I/W Well No. 7 and the new I/W Well Nos. 25 and 27 inside the new Line 254F-1 ROW. The three lateral tap valves will remain where previously planned as depicted on the attached topographical maps provided under Tab 1.

total Project new Line 254F-1 permanent easement calculations from **0.65 acres** to **0.61 acres**.⁶

Installation of Emergency Shut-off Panels:

CIG also seeks variance approval to install three (3) emergency shut-off control panels related to the new I/W wells. CIG will install one emergency shut-off panel in the northern end of the Totem storage field intended to provide emergency shut-off capabilities to the new I/W Well Nos. 25, 26, and 27; one panel in the middle portion of the storage field to serve I/W Well Nos. 28 and 29; and one panel in the southern end of the storage field to serve I/W Well No. 30. The three emergency shut-off panels will be co-located and fenced on current sites within the existing ROW that contains existing emergency shut-off panels for the Totem storage field and therefore will not require any additional temporary or permanent workspace to the Project as reflected in the revised land disturbance table, Table 8.2-1 provided under Tab 3.

In support of this request for variance approval, CIG notes that the minor realignments of the I/W well pads, the relocation of a pigging facility, and the installation of the three emergency shut-off control panels described herein will occur entirely within the boundaries of the Project area that was previously surveyed and reviewed for biological and cultural resources. As such; no additional agency consultations would be required for this variance request. From a land impact perspective, the proposed changes will result in less overall land disturbance as noted in Table 8.2-1. Lastly, CIG notified the affected landowners and did not receive any objections to the modifications contemplated in this variance request.⁷ Based on these facts and consistent with Environmental Condition No. 5 of Appendix B to the March 20, 2025 Commission Order, CIG respectfully requests variance approval from Director of the Office of Energy Projects for the changes described herein.

Description of Information Being Filed

CIG is herein submitting this variance request for its Project and providing the following information in support:

- **Tab 1:** Topographical maps depicting the proposed realignments of new I/W well pads for Well Nos. 25, 26, 27, 28, 29, and 30; the proposed relocation of the pigging facility; and the locations for the three (3) new emergency shut-off panels depicting the aforementioned changes superimposed on the currently approved configurations.
- **Tab 2:** A revised aerial alignment sheet set showing the realignments of the new I/W well pads.

⁶ In fact, CIG's variance request proposed herein results in a slight Project decrease (**0.03 acres**) to new permanent easement/operations acreage from **6.22 acres** to **6.19 acres**. Additionally, there will be no change to the Project's temporary workspace for construction acreage as a result of this variance request.

⁷ CIG notes that the proposed workspace and facility modifications are changes allowed by the existing underground storage lease agreements between CIG and the affected landowners, thus, no changes to the agreements were required.

- **Tab 3:** Revised land disturbance Table 8.2-1 - Land Use Affected by Construction and Operation of the Project in Acres.

CIG respectfully requests approval of the variance request described herein by no later than August 21, 2025.

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

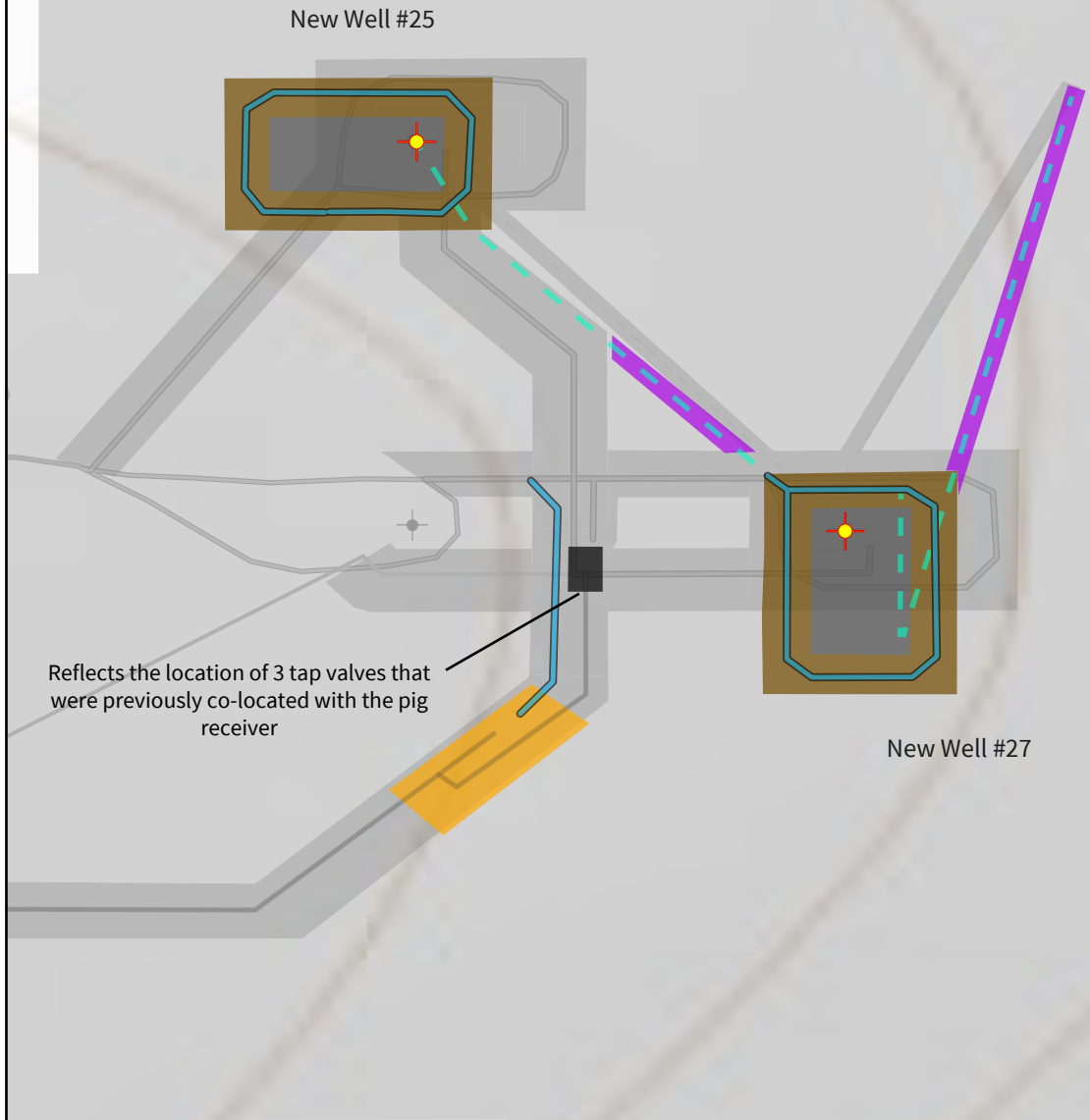
Enclosures

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

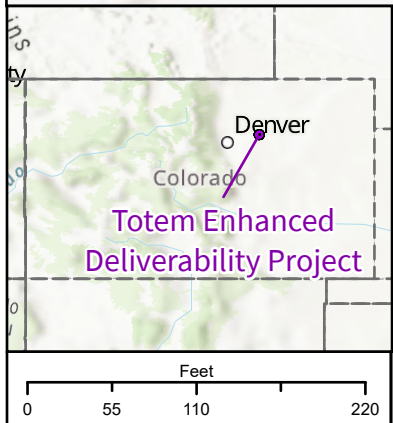
TAB 1



* Due to the nature of projection coordinate system North American 1983 (NAD83), the reoriented permanent easements of Well #25 and Well #27 may look visually different but are in fact, identical in shape (135' x100').



Reflects the location of 3 tap valves that were previously co-located with the pig receiver

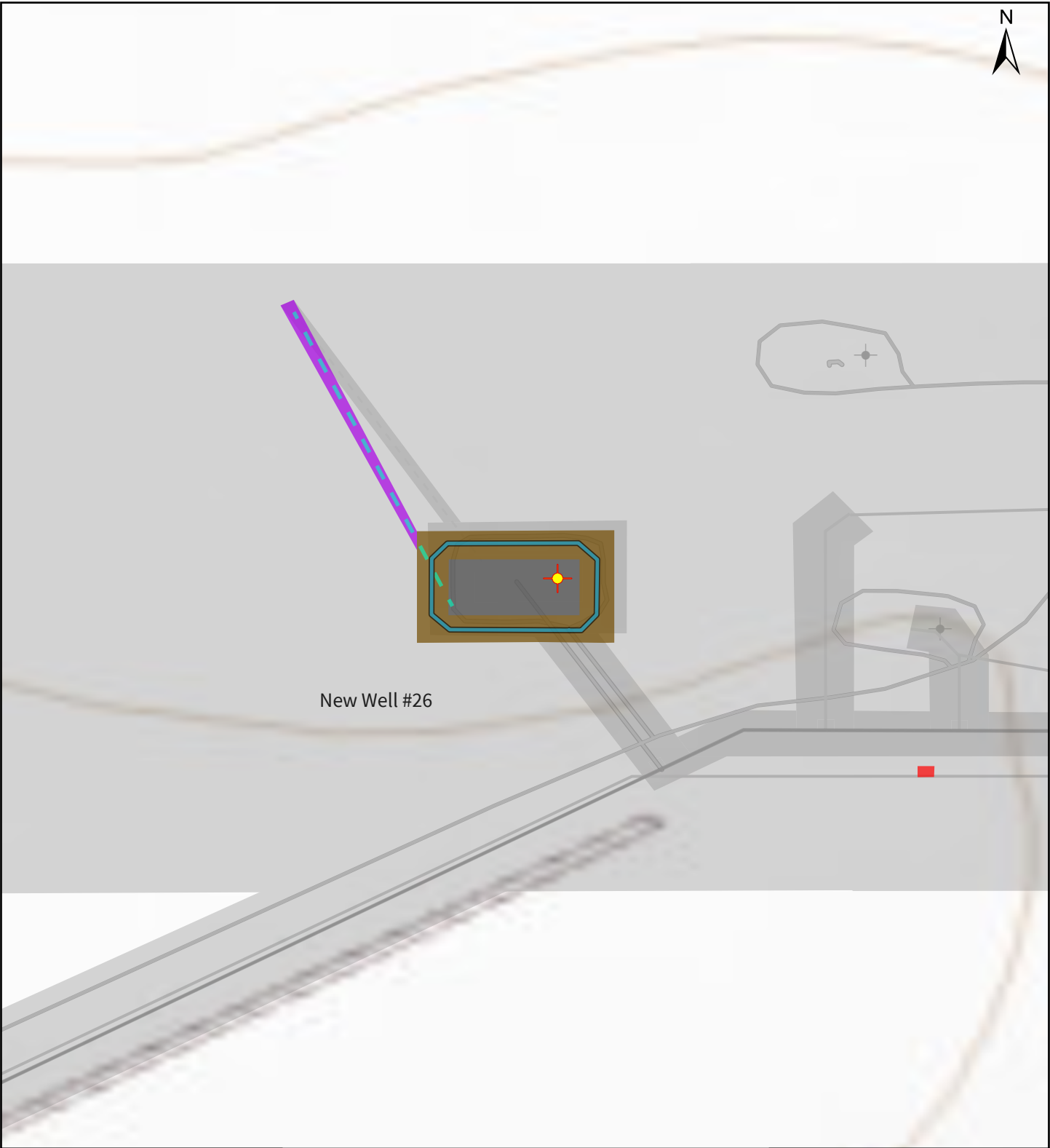


Legend	
Well	Above Ground Facility (Tap Valve) - No change
Anode Lead	Modified Cathodic Protection ROW
New PAR	Proposed Relocated Pig Receiver
Original Temporary Workspace	Realigned Fenced Pad (90'x50')
Original Permanent - Approved ROW	Realigned Permanent Easement (135'x100')

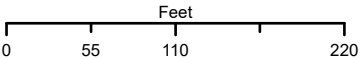
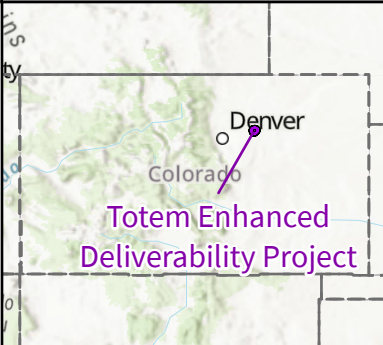
Basemap: ESRI, USGS Topographic (2023)

Totem Enhanced Deliverability Project Variance Well #25 and Well #27 USGS 7.5 Minute Cell Grid Adams County, Colorado
Sheet 1 of 5 Prepared For: Colorado Interstate Gas Company, LLC Prepared By: TETRA TECH
<div>0 16.5 33 66</div> Meters

Document Path: C:\Users\danielle.dooty\Tetra Tech, Inc\My Data Science - My PCP\212C-BF-00504 Totem Enhanced Deliverability Project\FERC\CIG_Totem_Figures.aprx



New Well #26



Basemap: ESRI, USGS Topographic (2023)

Legend

Operational Workspace

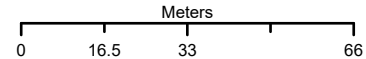
- Well
- Anode Lead
- Modified PAR
- Original Temporary Workspace
- Original Permanent - Approved ROW
- Modified Cathodic Protection ROW
- Proposed Fenced Emergency Shut-off Panel
- Realigned Fenced Pad (90'x50')
- Realigned Permanent Easement (135'x100')

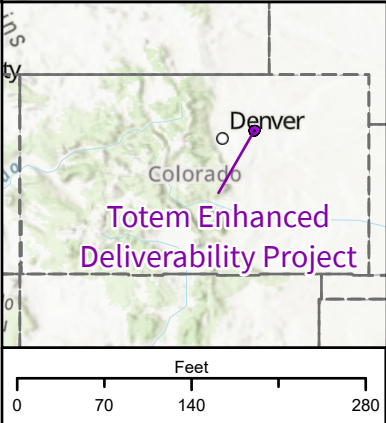
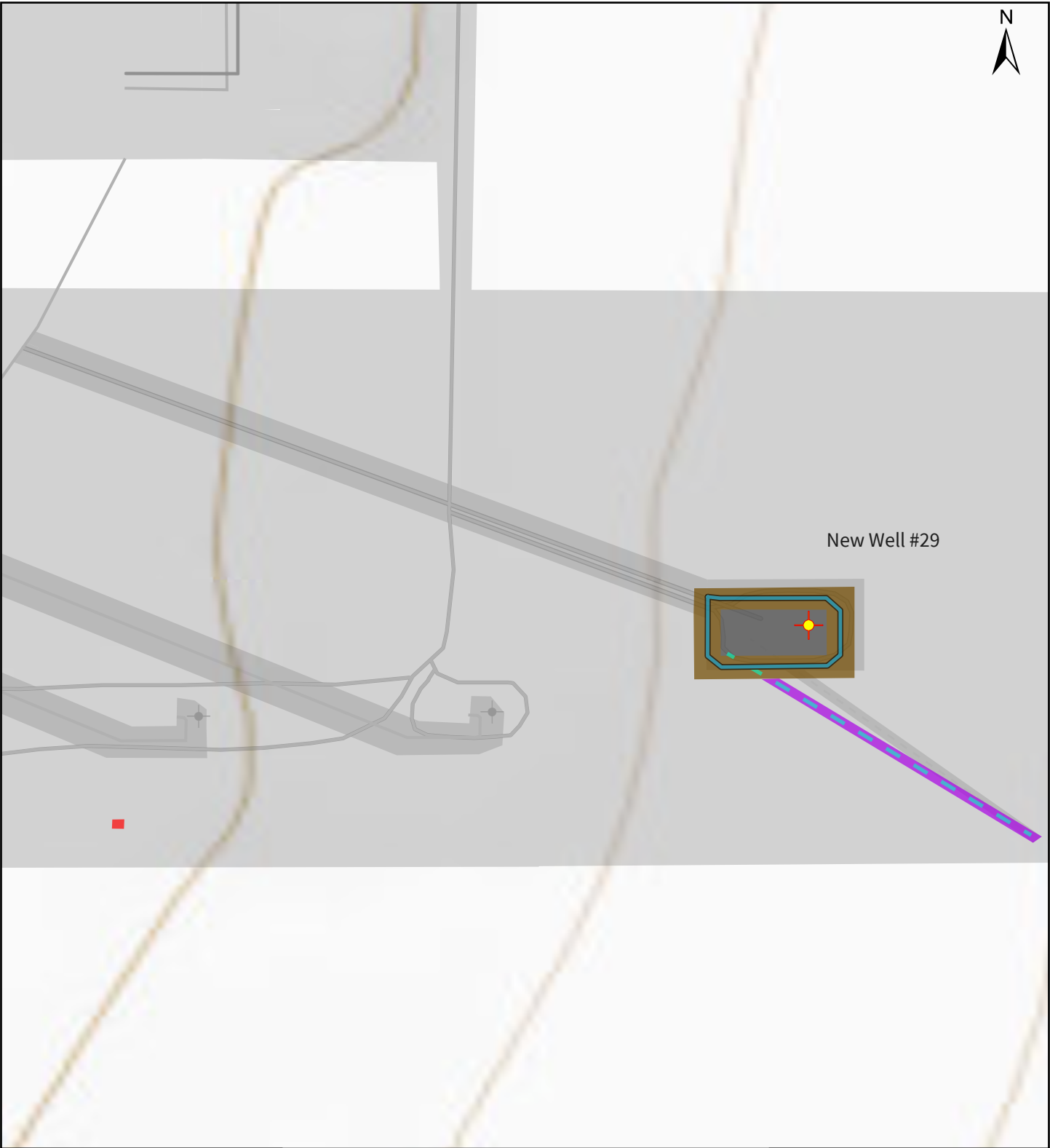
Totem Enhanced Deliverability Project

Variance
Well # 26
USGS 7.5 Minute Cell Grid
Adams County, Colorado

Sheet 2 of 5

Prepared For:
Colorado Interstate Gas Company, LLC
Prepared By:

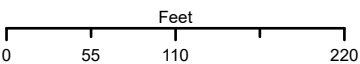
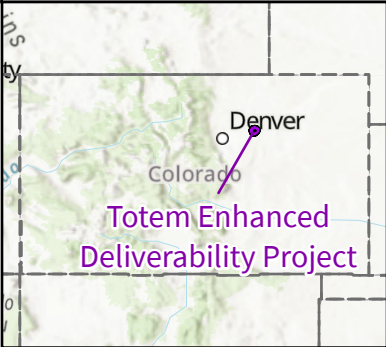




<ul style="list-style-type: none">WellAnode LeadModified PAROriginal Temporary WorkspaceOriginal Permanent - Approved ROW	Legend Operational Workspace <ul style="list-style-type: none">Modified Cathodic Protection ROWProposed Fenced Emergency Shut-off PanelRealigned Fenced Pad (90'x50')Realigned Permanent Easement (135'x100')
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Totem Enhanced Deliverability Project Variance Well# 29 USGS 7.5 Minute Cell Grid Adams County, Colorado	Sheet 3 of 5
Prepared For: Colorado Interstate Gas Company, LLC	
Prepared By: TETRA TECH	
<div>Basemap: ESRI, USGS Topographic (2023)</div> <div>0 20.5 41 82 Meters</div>	

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Legend	
Operational Workspace	
Well	Modified Cathodic Protection
Anode Lead	ROW - No Change
Modified PAR	Realigned Fenced Pad (90'x50')
Original Temporary Workspace	Realigned Permanent Easement (135'x100')
Original Permanent - Approved ROW	

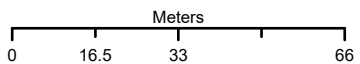
Basemap: ESRI, USGS Topographic (2023)

Totem Enhanced Deliverability Project
Variance
Well# 28
USGS 7.5 Minute Cell Grid
Adams County, Colorado

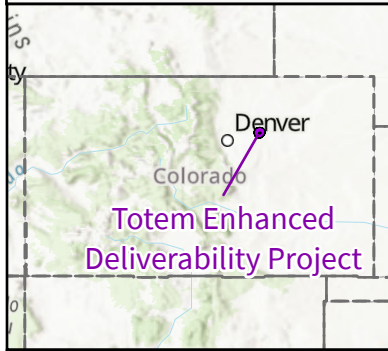
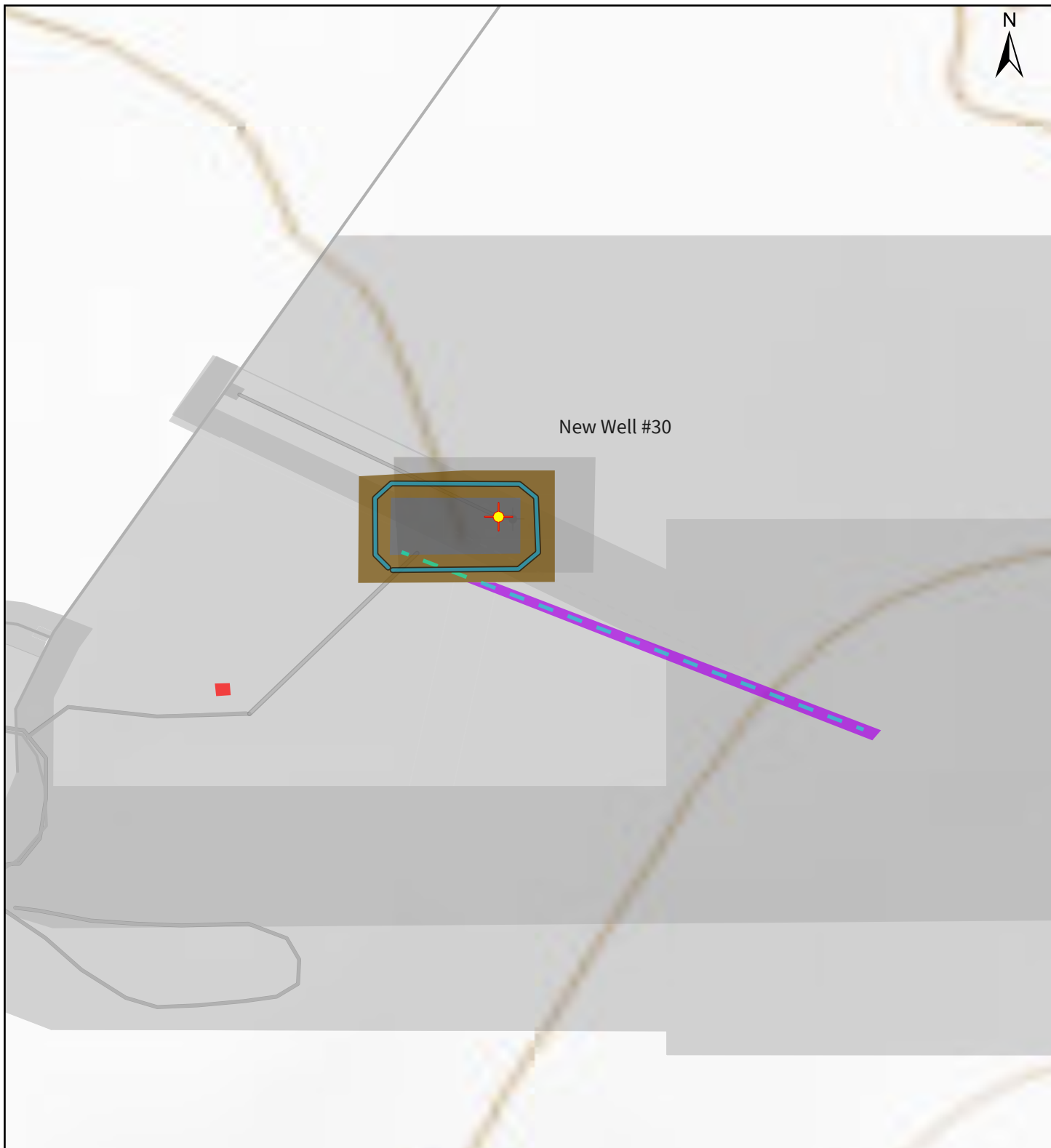
Sheet 4 of 5

Prepared For:
Colorado Interstate Gas Company, LLC

Prepared By:
 TETRA TECH

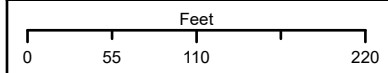


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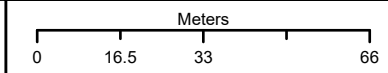


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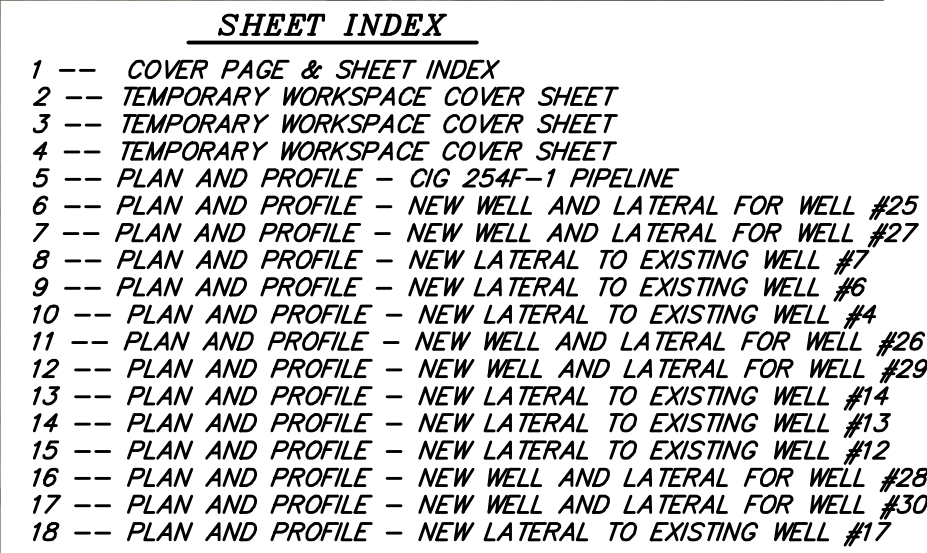
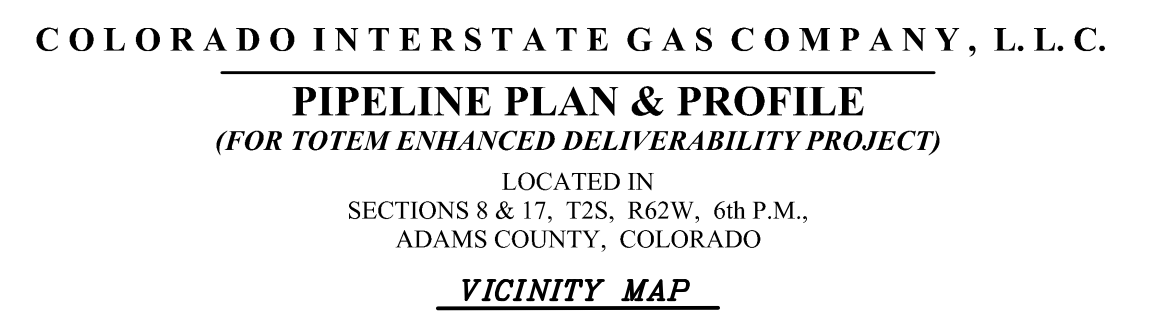
Totem Enhanced Deliverability Project Variance Well# 30 USGS 7.5 Minute Cell Grid Adams County, Colorado	Sheet 5 of 5
Prepared For: Colorado Interstate Gas Company, LLC Prepared By: 	



Basemap: ESRI, USGS Topographic (2023)



TAB 2



<div>LEGEND</div> <div><div><div></div></div><div>C/L PROPOSED PIPELINE</div></div> <div><div><div></div></div><div>PROPERTY LINE</div></div> <div><div><div></div></div><div>SECTION LINE</div></div> <div><div><div></div></div><div>1/16 SECTION LINE</div></div> <div><div><div></div></div><div>1/4 SECTION LINE</div></div> <div><div><div></div></div><div>ENVIRONMENTAL SURVEY CORRIDOR</div></div> <div><div><div></div></div><div>PROPOSED ACCESS ROAD</div></div>	<div>GENERAL INFORMATION</div> <div><div><div><div><div></div></div><div>• AN ATTEMPT HAS BEEN MADE TO LOCATE EXISTING UTILITIES ADJACENT TO AND CROSSING THE PROPOSED PIPELINE ROUTE, BUT THERE IS NO GUARANTEE THAT ALL LINES HAVE BEEN LOCATED. THE CONTRACTOR SHALL DETERMINE THE EXACT LOCATION OF ALL PIPELINES AND FOREIGN UNDERGROUND OBSTRUCTIONS BEFORE COMMENCING WORK. THE CONTRACTOR AGREES TO BE FULLY RESPONSIBLE FOR ANY AND ALL DAMAGES WHICH MAY OCCUR DUE TO CONTRACTORS FAILURE TO ACCURATELY LOCATE AND PRESERVE THESE UNDERGROUND UTILITIES. CONTRACTOR IS TO NOTIFY ALL FOREIGN LINE OWNERS ADJACENT TO OR CROSSING THEIR LINES BEFORE CONSTRUCTION COMMENCES.</div></div></div><div><div><div><div><div></div></div><div>• CONTRACTOR TO VERIFY IN THE FIELD THE LOCATION OF ALL UTILITIES ABOVE AND BELOW GROUND PRIOR TO CONSTRUCTION.</div></div></div><div><div><div><div><div></div></div><div>• IN ORDER TO ENSURE THE SAFETY OF ALL PARTIES, THE CONTRACTOR SHALL CONTACT THE BLUE STAKES OF UTAH A MINIMUM OF 48 HOURS PRIOR TO THE COMMENCEMENT OF ANY EXCAVATION (GOING, DREDGING, SETTING, HYDROCAVING, ETC.)</div></div></div><div><div><div><div><div></div></div><div>• LINE MARKERS SHALL BE PLACED AND INCLUDE LINE OF SIGHT AT ALL POINT OF INTERSECTION LOCATIONS, BOTH SIDES OF ROAD CROSSINGS, FENCE LINES & STREAM CROSSINGS.</div></div></div><div><div><div><div><div></div></div><div>• BASIS OF BEARINGS ARE GRID BEARINGS BASED ON COLORADO STATE PLANE COORDINATE SYSTEM, SOUTH ZONE, NAD83 FROM GPS OBSERVATIONS OCCUPYING A UELS CONTROL POINT.</div></div></div><div><div><div><div><div></div></div><div>• DISTANCES SHOWN ARE GRID DISTANCES. TO OBTAIN GROUND DISTANCES MULTIPLY BY THE COMBINATION SCALE FACTOR OF 1.000159206.</div></div></div><div><div><div><div><div></div></div><div>• VERTICAL DATUM IS NAVD 88. BASED ON ELEVATION DERIVED FROM THE OPUS SOLUTION AT THE UELS CONTROL POINT.</div></div></div></div></div></div></div></div></div></div>	<div>REVISION</div> <table><thead><tr><th>NO.</th><th>DESCRIPTION</th><th>DATE</th></tr></thead><tbody><tr><td>1</td><td>CLIENT STANDARDS UPDATE</td><td>02-26-24 C.D.L.</td></tr><tr><td>2</td><td>PIPELINE RE-ROUTE</td><td>03-21-24 C.D.L.</td></tr><tr><td>3</td><td>WELL #30 PIPELINE RE-ROUTE</td><td>04-11-25</td></tr><tr><td>4</td><td>WELL #30 TEMPORARY WORKSPACE CHANGE</td><td>05-22-25 J.L.</td></tr><tr><td>5</td><td>UPDATE FOOTAGES</td><td>05-28-25 J.L.</td></tr><tr><td>6</td><td>UPDATE PAD AND PIPELINE LOCATIONS</td><td>07-21-25 C.D.L.</td></tr></tbody></table>		NO.	DESCRIPTION	DATE	1	CLIENT STANDARDS UPDATE	02-26-24 C.D.L.	2	PIPELINE RE-ROUTE	03-21-24 C.D.L.	3	WELL #30 PIPELINE RE-ROUTE	04-11-25	4	WELL #30 TEMPORARY WORKSPACE CHANGE	05-22-25 J.L.	5	UPDATE FOOTAGES	05-28-25 J.L.	6	UPDATE PAD AND PIPELINE LOCATIONS	07-21-25 C.D.L.	<div>SUMMARY OF MATERIALS</div> <table><thead><tr><th>ITEM NO.</th><th>LINEAR FEET</th><th>DESCRIPTION</th></tr></thead><tbody><tr><td>1</td><td>585</td><td>3.500" OD, 0.300" WT, X42</td></tr><tr><td>2</td><td>902</td><td>4.500" OD, 0.337" WT, X42</td></tr><tr><td>3</td><td>2,186</td><td>6.625" OD, 0.432" WT, X42</td></tr><tr><td>4</td><td>3,769</td><td>12" STEEL</td></tr><tr><td>5</td><td></td><td></td></tr><tr><td>6</td><td></td><td></td></tr></tbody></table>		ITEM NO.	LINEAR FEET	DESCRIPTION	1	585	3.500" OD, 0.300" WT, X42	2	902	4.500" OD, 0.337" WT, X42	3	2,186	6.625" OD, 0.432" WT, X42	4	3,769	12" STEEL	5			6			<div><div><div><div></div><div>UINTAH</div><div>ENGINEERING & LAND SURVEY, P.C.</div></div></div><div><div>UELS, LLC</div><div>Corporate Office * 85 South 200 East</div><div>Vernal, UT 84078 * (435) 789-1017</div></div><div><div>LOCATED IN</div><div>SECTIONS 8 & 17, T2S, R62W, 6th P.M.,</div><div>ADAMS COUNTY, COLORADO</div></div></div>	<div>ISSUED FOR BID</div> <div>COLORADO INTERSTATE GAS COMPANY, L.L.C.</div> <div>TOTEM ENHANCED DELIVERABILITY PROJECT</div> <div>PIPELINE PLAN & PROFILE</div>		
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SHEET: 1 OF 18		FILE: K-2102																																																	

PIPELINE PLAN & PROFILE *(FOR TOTEM ENHANCED DELIVERABILITY PROJECT)*


VICINITY MAP

PIPELINE PLAN & PROFILE
(FOR TOTEM ENHANCED DELIVERABILITY PROJECT)

LOCATED IN
SECTIONS 8 & 17, T2S, R62W, 6th P.M.,
ADAMS COUNTY, COLORADO

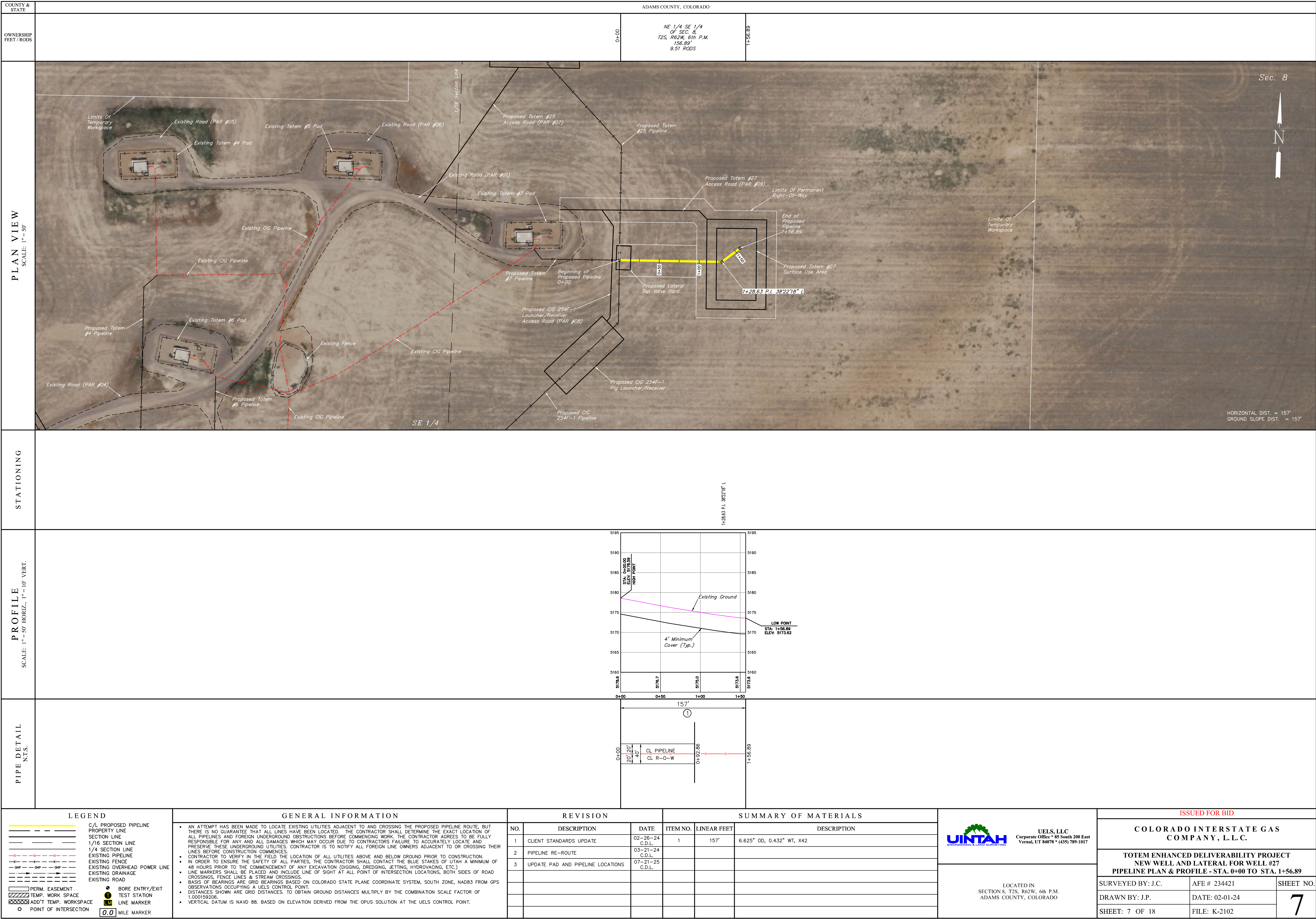
VICINITY MAP



LEGEND		GENERAL INFORMATION		REVISION		SUMMARY OF MATERIALS				<div><div>UINTECH ENGINEERING & LAND SURVEY, INC.</div><div>UELS, LLC Corporate Office * 85 South 200 East Vernal, UT 84078 * (435) 789-1017</div></div> <div>LOCATED IN SECTIONS 8 & 17, T2S, R62W, 6th P.M., ADAMS COUNTY, COLORADO</div>		ISSUED FOR BID																																													
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SHEET: 3 OF 18						FILE: K-2102																																																			

PIPELINE PLAN & PROFILE *(FOR TOTEM ENHANCED DELIVERABILITY PROJECT)*

VICINITY MAP

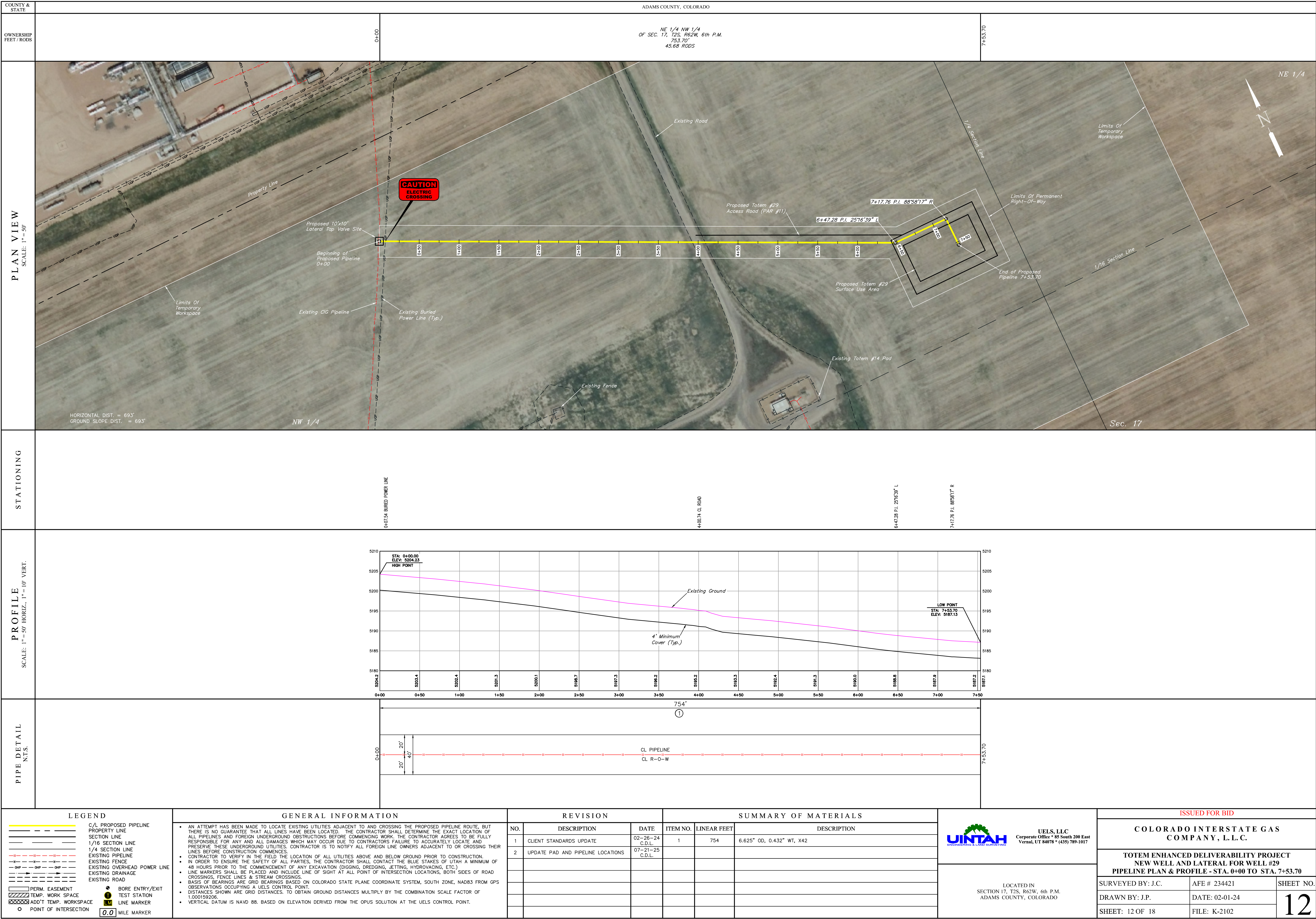




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GENERAL INFORMATION

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- VERTICAL DATUM IS NAVD 88. BASED ON ELEVATION DERIVED FROM THE OPUS SOLUTION AT THE UELS CONTROL POINT.



COUNTY & STATE
ADAMS COUNTY, COLORADO

OWNERSHIP FEET / RODS
E 1/2 NW 1/4 OF SEC. 17, T2S, R62W, 6th P.M.
189.24' 11.47 RODS

PLAN VIEW
SCALE: 1" = 50'

HORIZONTAL DIST. = 189'
GROUND SLOPE DIST. = 189'

NE 1/4

Sec. 17

STATIONING
SCALE: 1" = 50' HORIZ., 1" = 10' VERT.

PROFILE
SCALE: 1" = 50' HORIZ., 1" = 10' VERT.

PIPE DETAIL
N.T.S.

LEGEND

GENERAL INFORMATION

REVISION

SUMMARY OF MATERIALS

UINTEAH ENGINEERING & LAND SURVEY, INC.

UELS, LLC
Corporate Office * 85 South 200 East
Vernal, UT 84078 * (435) 789-1017

LOCATED IN
SECTION 17, T2S, R62W, 6th P.M.,
ADAMS COUNTY, COLORADO

ISSUED FOR BID

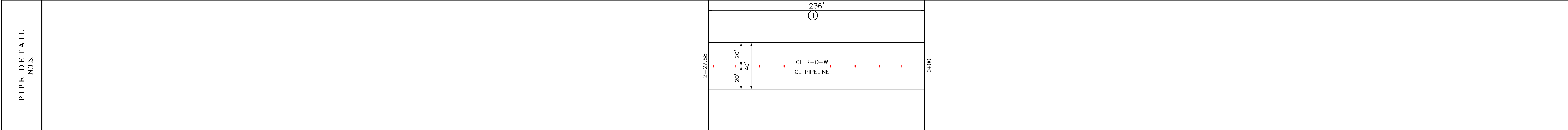
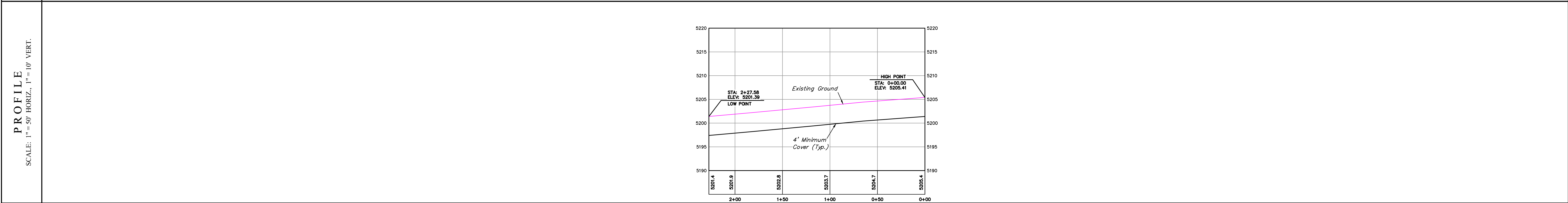
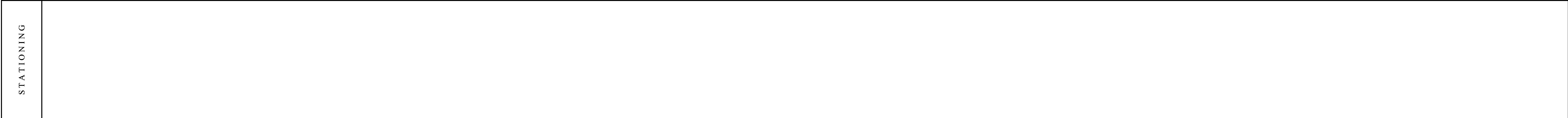
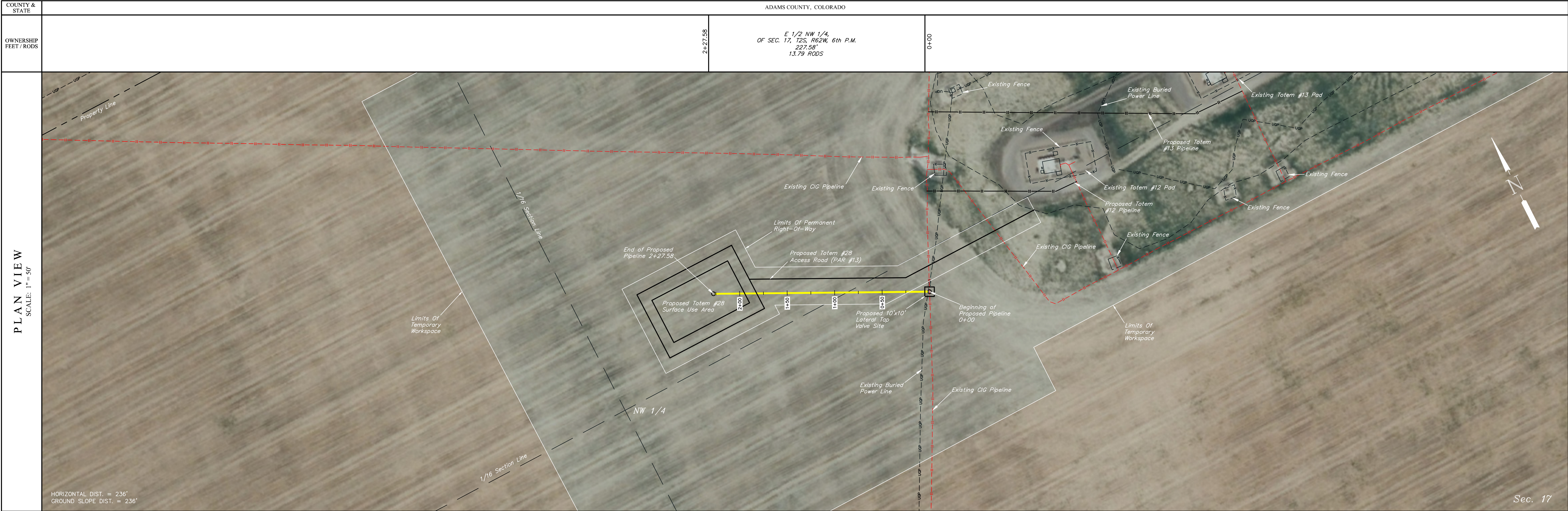
COLORADO INTERSTATE GAS COMPANY, L.L.C.

TOTEM ENHANCED DELIVERABILITY PROJECT
NEW LATERAL TO EXISTING WELL #12
PIPELINE PLAN & PROFILE - STA. 0+00 TO STA. 1+89.24

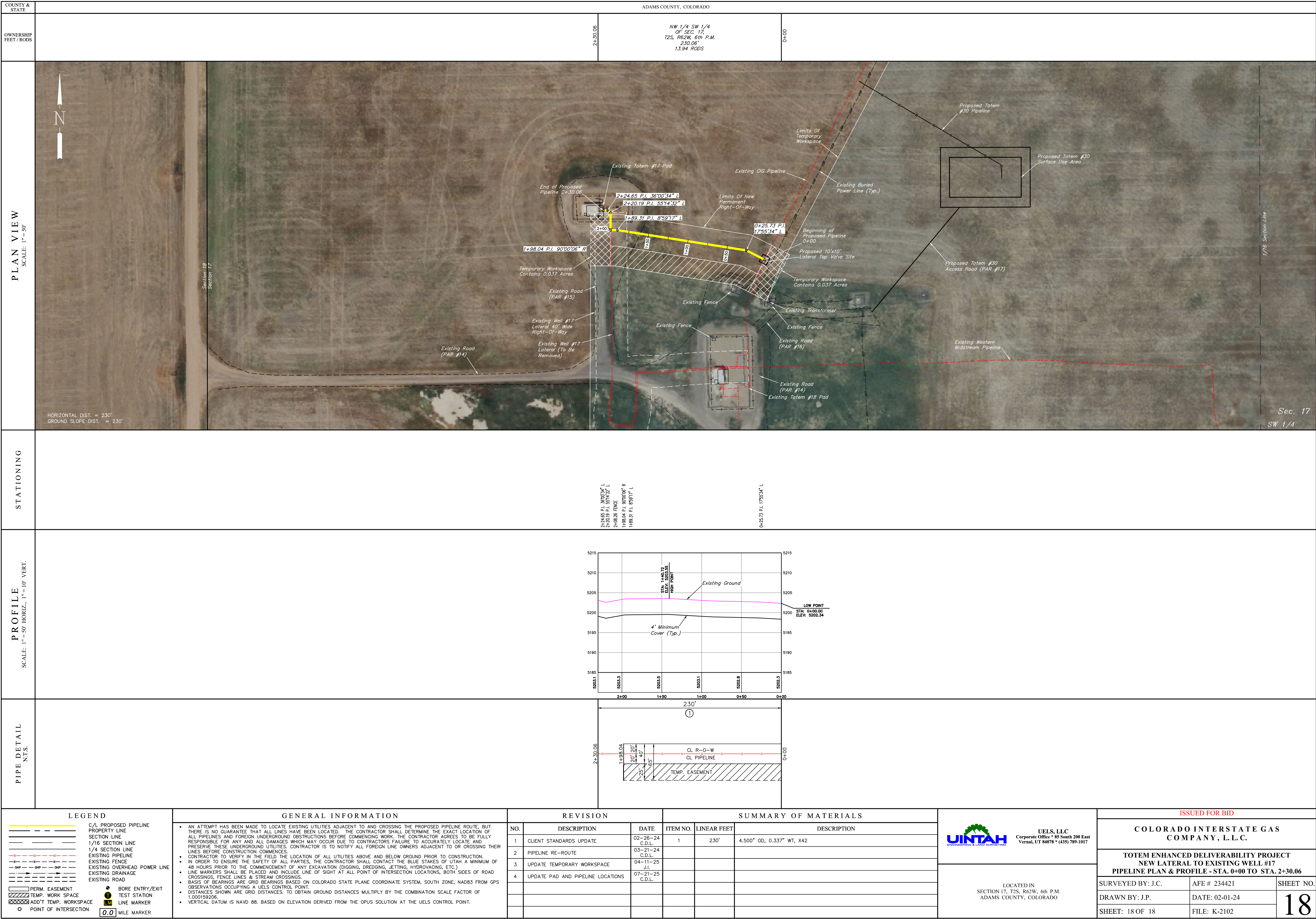
SURVEYED BY: J.C. AFE # 234421 SHEET NO.

DRAWN BY: J.P. DATE: 02-01-24

SHEET: 15 OF 18 FILE: K-2102



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		<div><div><div><div></div></div><div>2</div></div><div><div><div></div></div><div>UPDATE PAD AND PIPELINE LOCATIONS</div></div><div><div><div></div></div><div>07-21-25 C.D.L.</div></div></div>								SURVEYED BY: J.C. AFE # 234421 SHEET NO.				
								DRAWN BY: J.P. DATE: 02-01-24						
								SHEET: 16 OF 18 FILE: K-2102						
								16						



TAB 3

Revised Table 8.2-1

Land Use Affected by Construction and Operation of the Project (in acres)

Facility Type and Name ^a	Previously Approved Total Project Workspace (Updated based on Relocation of Well #30 Variance Request approved on 6/13/25)		Total New Project Workspace Based on Relocation of Wells	
	Temporary Workspace for Construction (acres)	New Permanent Easement/Operations (acres)	Temporary Workspace for Construction (acres)	New Permanent Easement/Operations (acres)
Storage Field Well and Pipeline Facilities				
New Storage Wells	44.17	1.9	44.17	1.9
New Line 254F-1 ^c	5.58	0.65	5.58	0.61
Laterals to New Wells	0.12	1.26	0.12	1.26
New Laterals to Existing Wells ^b	16.99	1.49	16.99	1.49
Well #09 Reclassification and Line 254F-7 Abandonment	0.62	0	0.62	0
Storage Field Subtotal	67.48	5.30	67.48	5.26
Section 2.55 (a) Auxiliary Installations and other Work Areas				
Totem Storage CS Facilities	10.67	0	10.67	0
New Pig Receiver ^d	0	0.09 ^e	0	0.09
Lateral Tap Valves (n=14) ^g	0	0.03 ^e	0	0.04
Emergency Shut-off Panels ^g	0	0	0	0
Cathodic Protection ^h	0	0.35 ^e	0	0.31
Contractor Yard	2.35	---	2.35	---
Access Roads	3.76	0.45	3.76	0.49
2.55(a) and Other Work Areas Subtotal	16.78	0.92	16.78	0.93
PROJECT TOTAL	84.26	6.22	84.26	6.19

Notes:

a-Impacts for various components overlap. For calculation purposes, any given impact area is included in only one category to avoid double counting of impacts.

b-Temporary workspaces for the new laterals to existing wells encompass larger areas which will provide workspace connectivity between the larger well workspaces.

c-Easement for the new Line 254F-1 largely overlaps with easement for existing Line 254F-1. New easement is largely limited to the extension to the pig receiver location.

d-Temporary workspaces for the pig receiver and tap valves are calculated with the impacts for the proposed laterals and New Line 254F-1.

e-Permanent acreage for lateral tap valves for new wells #25 and #27 and existing well #07 included with acreage for pig receiver.

f-Temporary workspaces for the cathodic protection facilities are calculated under impacts for new storage wells.

g-Emergency shut-off panels for the Project are colocated with existing shut-off panels within the existing Totem Storage Field.

h- Permanent easement for cathodic protection facilities encompasses new easement outside easement for new storage wells.

i-Construction impacts for access roads only capture portions of access roads that fall outside other defined temporary workspaces and will not equal totals presented in Resource Report 1, Table 1.2-6 of CIG original application.

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 18th day of August 2025.

/s/

Francisco Tarín

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