



July 18, 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 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 responses to the July 8, 2024 OEP Data Request. CIG notes that it is still finalizing its response to Question No. 9 and will provide its response to that specific question no later than Tuesday, July 23, 2024.

Filing Information

CIG is e-Filing this letter and attachments 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.
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ENVIRONMENTAL INFORMATION REQUEST

Resource Report 1: General Project Description

1. Section 1.10.3 of the application indicates that no “new projects” were identified as potentially contributing to cumulative impacts. Provide a table that identifies past and reasonably foreseeable future projects within the resource-specific geographic scopes. This table should also include the following information:
 - a. project name and sponsor/proponent;
 - b. a description of the project;
 - c. location (city/county);
 - d. approximate distance and direction of the project from the Totem Enhanced Deliverability Project facilities;
 - e. the nearest proposed project facility;
 - f. footprint/layout and quantitative impacts on specific resources, if available (acres of land/resource [wetlands, vegetation, habitat, etc.] affected);
 - g. any known permits/authorizations or environmental review required; and
 - h. the current status and schedule of the project.

Also, include qualitative and quantitative descriptions of cumulative and/or overlapping impacts these projects and the FERC Project would have on each environmental resource. Lastly, include a map showing the identified projects in relation to the Totem Enhanced Deliverability Project.

Understanding that knowledge of the specific characteristics of a project area may dictate an alternative geographic scope for the cumulative impacts analysis, you may suggest another geographic scope. However, include a detailed justification of why use of this scope is appropriate.

Response:

Table 1-1 below includes details of all known ongoing and reasonably foreseeable projects within Adams County, Colorado. Information regarding past projects was not available, but given the predominantly rural, agricultural nature of the Project area, it is reasonable to assume that no recent projects have occurred within the cumulative impacts assessment areas (other than being in the same county). The associated Figure 1-1 (provided behind this response) provides location data for projects occurring within 25 miles of the Project. Due to distance and for mapping purposes, projects identified in Adams County, Colorado but occurring greater than 25 miles from the Project were not mapped. As indicated in Table 1-1 and depicted on Figure 1-1, only a single project, the 88th Ave. Bridge Replacement over Wolf Creek, is in proximity to the Project. While falling within the same Census Block Group as the Project, this bridge project has no impact with any other

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cumulative impact assessment areas. It does not overlap with the Project area, falls within a different HUC 12 watershed, and is greater than 1 mile from the Project.

Additionally, as indicated in CIG's Resource Report 5, Socioeconomics, the census block group that Totem is located in is not considered an Environmental Justice Community, based on either minority or low-income populations; therefore, no potential cumulative EJ impacts are anticipated.

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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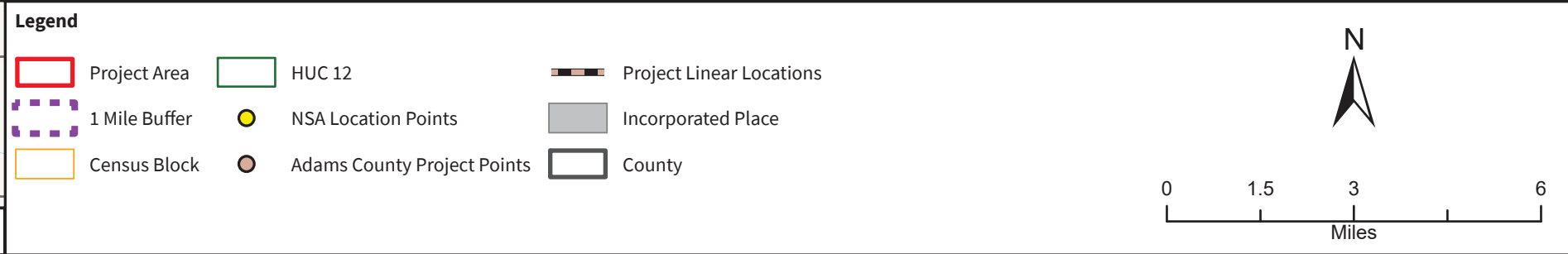
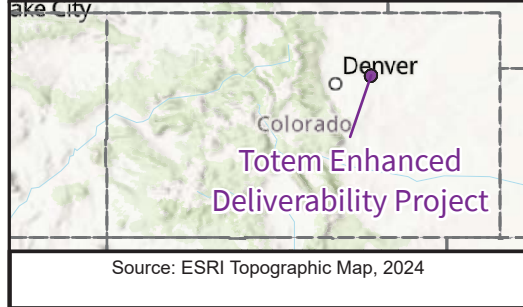
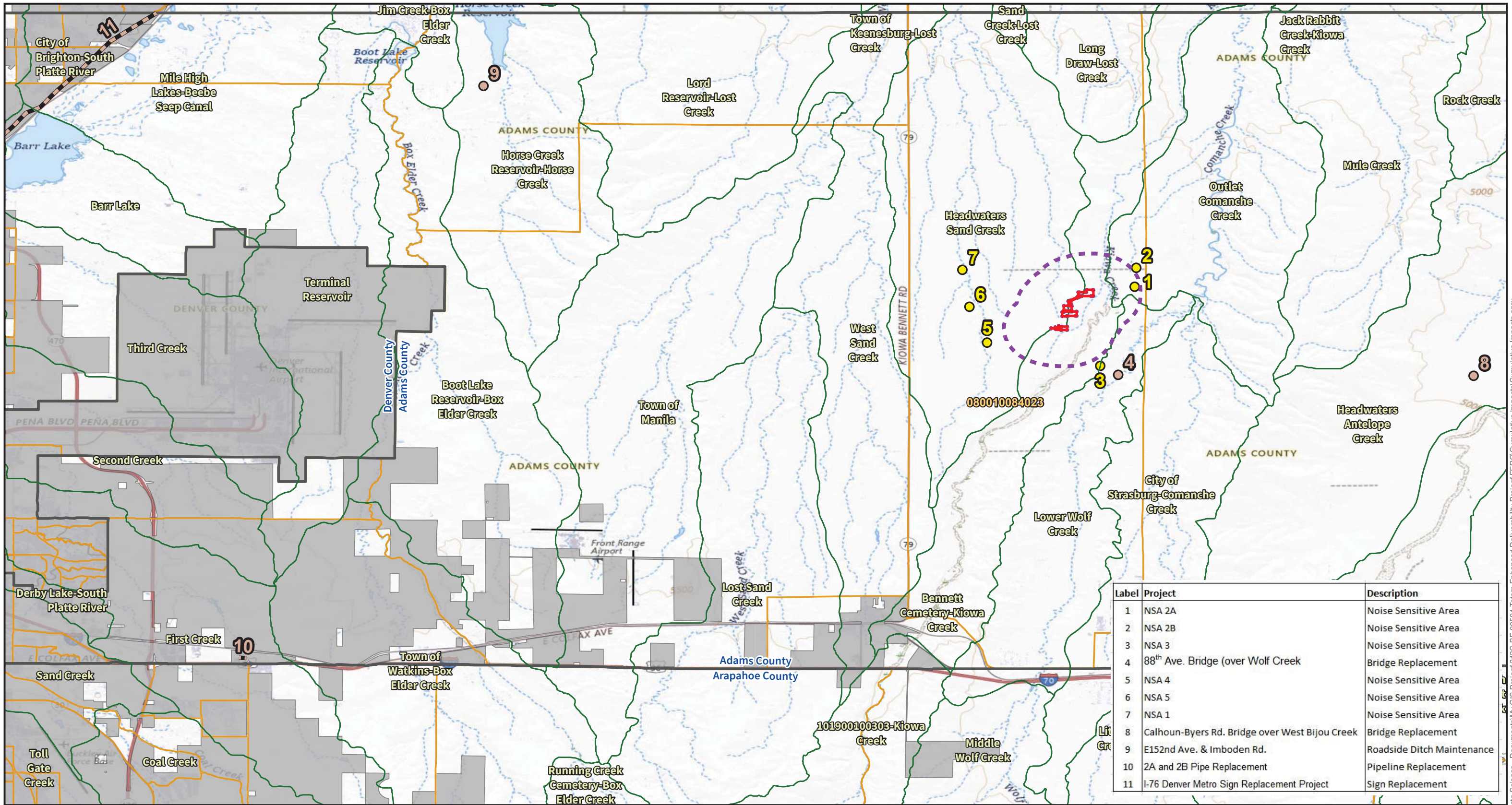
Table 1-1 – Reasonably Foreseeable Projects in Adams County						
Project	Description	Location (County)	Nearest Distance to Project Area & Direction	Current Status and Schedule	Footprint/Layout and Anticipated Impacts	Resources within Geographic Scope (Potentially Affected Resource Areas)
FERC Jurisdictional Projects						
2A and 2B Pipe Replacement	Replace approx. 783 feet on the 2A 20-inch pipeline and 845 feet on the 2B 20-inch pipeline. Pipe will be removed and replaced with new pipe.	Adams County (near Watkins)	Approximately 19.92 miles southwest from Project Area	May 31, 2025	No overlap with Project Area	Socioeconomics (Adams County)
CDOT Projects						
I-76 Denver Metro Sign Replacement Project	Sign replacement work will take place along I-76, from the end of I-70 all the way to Lochbuie. The sign replacement project will happen over a 6-week period on I-76, Mile Point 0 to MP 26	Adams County	Approximately 21 miles from the Project Area to I-76 MP 26 project terminus in Lochbuie	Ongoing – May 2024 through June 2024	No overlap with Project Area	Socioeconomics (Adams County)
Denver Metro Guardrail Project*	Work will take place along six different roadways; US Highway 285, Interstate Highway 25, US Highway 6, Interstate Highway 76, Colorado Highway 74, and Colorado Highway 86. The project will happen in 10 different phases.	Adams County, various locations along US Hwy 285, I-25, US Hwy 6, I-76, Colorado Hwy 74, and Colorado Hwy 86	Various locations along highways, all greater than 25 miles southwest or west of the Project Area	Ongoing until the end of July 2024	No overlap with Project Area	Socioeconomics (Adams County)
I-270 Bridge Preventative Maintenance*	Repairs to both eastbound and westbound bridges on I-270 over Vasquez Boulevard in Commerce City. This work is a continuation of the work which began in September of 2023. To prevent sudden emergency repairs, CDOT has identified areas to replace bridge decking, repair specific concrete panels and replace asphalt in some locations in the work zone.	Adams County, Eastbound and Westbound bridges on I-270 over Vasquez Boulevard in Commerce City.	Approximately 31 miles slightly southwest of the Project Area	Ongoing, September 2024 through end of summer 2024	No overlap with Project Area	Socioeconomics (Adams County)
US 85: I-76 to 124 th Avenue Environmental Assessment and Design Improvements*	CODOT has proposed the following future transportation improvements:	Adams County, US Hwy 85 from 124 th Avenue to I-76	Approximately 27 miles to the west of the Project Area	Future, proposed	No overlap with Project Area	Socioeconomics (Adams County)

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Table 1-1 – Reasonably Foreseeable Projects in Adams County						
Project	Description	Location (County)	Nearest Distance to Project Area & Direction	Current Status and Schedule	Footprint/Layout and Anticipated Impacts	Resources within Geographic Scope (Potentially Affected Resource Areas)
	1) Closure of the existing at-grade US 85/124th Avenue signalized intersection 2) Replacement of the existing at-grade US 85/120th Avenue intersection with a grade-separated diverging diamond interchange (DDI) 3) Extension and addition of left and right-turn lanes on 112th Avenue at the existing at-grade signalized US 85/112th Avenue intersection 4) Installation of rumble strips on the right and left shoulders, centerline cable barrier, additional lighting, and reflective signal backplates at the US 85/112th Avenue intersection, as appropriate 5) Closure of the existing at-grade unsignalized US 85/Longs Peak Drive ¾ movement intersection; 6) Replacement of the existing at-grade signalized US 85/104th Avenue intersection with a grade-separated diamond interchange 7) Extension and addition of left and right-turn lanes at the existing 104th Avenue/Brighton Road and 120th Avenue/Oakland Street intersections					
I-76 York to Dahlia Bridge Reconstruction*	Replace the aging I-76 bridges over York Street and reconstruct much of the driving surface on I-76 from York to Dahlia.	Adams County	Approximately 31 miles west of the Project area.	Ongoing from May 2022 to September 2024	No overlap with Project Area	Socioeconomics (Adams County)
Denver Metro Bus Rapid Transit*	The Colorado Department of Transportation has launched a new Bus Rapid Transit (BRT) program with routes	Adams County, various	Various future locations all greater than 30 miles west of	Future potential project	No overlap with Project Area	Socioeconomics (Adams County)

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Table 1-1 – Reasonably Foreseeable Projects in Adams County						
Project	Description	Location (County)	Nearest Distance to Project Area & Direction	Current Status and Schedule	Footprint/Layout and Anticipated Impacts	Resources within Geographic Scope (Potentially Affected Resource Areas)
	planned for sections of Federal Boulevard, Colorado Boulevard and eventually Colfax Avenue east of I-225. The program focuses on planning and developing a BRT system in collaboration with the community and agency partners. BRT is a high-capacity, efficient bus service that incorporates elements of light-rail.		the Project Area			
Adams County Projects						
88 th Ave. Bridge (over Wolf Creek)	Replacement of the 88th Avenue bridge over Wolf Creek. Reconstruction of the approach roadways and channel as needed to coordinate with the new bridge.	Adams County	Approximately 2.12 miles southeast of the Project Area	In design phase, future project	No overlap with Project Area	Socioeconomics (Adams County), Environmental Justice (Census Block Group)
Calhoun-Byers Rd. Bridge over West Bijou Creek	Replacement of the Calhoun-Byers Road bridge over West Bijou Creek. Reconstruction of the approach roadways and channel as needed to coordinate with the new bridge.	Adams County	Approximately 9.13 miles southeast of the Project Area	Final design complete, construction anticipated to begin Summer 2024	No overlap with Project Area	Socioeconomics (Adams County)
E152nd Ave. & Imboden Rd. (Roadside Ditch Maintenance)	Re-establish the roadside ditch capacity to prevent flooding of the ROW	Adams County	Approximately 13.64 miles northwest of the Project Area	Under construction	No overlap with Project Area	Socioeconomics (Adams County)
*-Denotes projects greater than 25 miles from the Totem Enhanced Deliverability Project which are not mapped on Figure 1-1.						



Totem Enhanced Deliverability Project
Figure 1-1
Cumulative Impacts Map
Adams County, Colorado

Prepared For: Colorado Interstate Gas Company, LLC	Sheet 1 of 1
Prepared By: TETRA TECH	Date: 7/15/2024

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2. Provide the existing capacity of the Totem Enhanced Deliverability Project.

Response:

CIG's Totem storage field has a current certificated maximum total inventory of 10,700,000 Mcf, a base gas capacity of 3,700,000 Mcf, a working gas capacity of 7,000,000 Mcf, a maximum withdrawal rate of 200 MMcf per day, and a maximum stabilized reservoir pressure of 2,800 psia. As part of the Project, CIG is requesting authorization to increase Totem's maximum total inventory from 10,700,000 Mcf to 11,700,000 Mcf, its certificated base gas capacity from 3,700,000 Mcf to 4,700,000 Mcf, and increase its maximum withdrawal rate from 200 MMcf per day to 250 MMcf per day. CIG notes there will be no changes to its working gas capacity or its maximum stabilized reservoir pressure.

Response prepared by or under the supervision of:

Jackie Raskay
Storage Project Manager
Kinder Morgan Gas Storage Engineering
719-520-4407

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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3. Provide a response to the Adams County comments filed in the docket under Accession Number 20240620-5201 regarding the alignment confirmation and whether the new proposed pipelines would utilize the existing pipeline corridors or would require the trenching of new routes.

Response:

CIG is generally utilizing existing gas storage and pipeline easements for the Project, and will only require new easements at certain limited locations described below in this response. CIG designed the Project pipelines to align with and utilize existing pipeline corridors if possible and where operationally practicable. Whether located within existing or new easements, all new pipelines will be located entirely within the boundaries of the Totem storage field.

All six new injection/withdrawal wells will require creating new ROW to interconnect with either the new 254-F1 pipeline or existing 254-F2 pipeline, resulting in 0.42 miles of new ROW

Modifications to existing north field well laterals will require establishment of approximately 0.07 miles of new ROW as CIG proposes to have each well tie directly into the gathering header (254F-1 pipeline), in order to improve operational efficiency of the piping system.

Similarly, modifications to existing south field well laterals will require establishment of approximately 0.22 miles of new ROW as CIG proposes to have each well tie directly into the gathering header (254F-2 pipeline).

CIG will co-locate approximately 3,267 feet of new 12-inch 254-F1 within the existing 254-F1 right-of-way while abandoning in place the existing 8-inch 254-F1 pipeline. Approximately 0.10 miles (525 feet) of new ROW will be required to extend the new 254-F1 pipeline to where it will gather gas from New Wells #25 and #27.

Response prepared by or under the supervision of:

Steven Gassman
Project Manager
Kinder Morgan
719-520-4475

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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Resource Report 6- Geological Resources

4. In section 1.4.2 of the application, CIG states it would use conventional construction methods to drill new wells. Respond to the request from Adams County clarifying the type of drilling mud that would be used during Project construction and address the County's concern regarding potential off-gassing emissions and intrusive odors from drilling fluids.

Response:

Potential off-gassing emissions and intrusive odors from drilling fluids typically is a byproduct of using a diesel or solvent-based drilling mud. However, CIG confirms that it will use a bentonite and water-based drilling mud during Project construction to reduce the potential for off gassing or intrusive odors.

Response prepared by or under the supervision of:

Jackie Raskay
Storage Project Manager
Kinder Morgan Gas Storage Engineering
719-520-4407

COLORADO INTERSTATE GAS COMPANY, L.L.C.
Responses to Data Request – OEP/DG2E/Gas Branch 2
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Resource Report 9: Air Quality and Noise

5. Provide an update on the serious and moderate nonattainment status of carbon monoxide and particulate matter less than 10 microns (PM10) address the Adams County's comments.

Response:

Based on further review, CIG concurs with Adams County's assessment and acknowledges that the Project area should be considered in attainment/maintenance for both carbon monoxide (CO) and particulate matter less than 10 microns (PM10).

Response prepared by or under the supervision of:

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

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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6. Confirm the Project's operational emissions implements continuous-bleed pneumatic controllers and reasonable control technologies for mitigation of methane emissions.

Response:

CIG confirms that all of the process controllers that will be procured for the Project will be designed to be either low bleed or zero bleed devices.

Response prepared by or under the supervision of:

Julie Griffin
Air Permitting Project Manager
Kinder Morgan EHS APC – Natural Gas & CO2
303-914-7577

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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7. Indicate if any air quality modeling impacts would exceed Significant Impact Levels (SILs) for any of the National Ambient Air Quality Standards. If so, identify the radius of impact for each pollutant that exceeds the SIL.

Response:

The Project emissions do not include increases from National Ambient Air Quality Standards regulated pollutants. A Title V permit modification application submitted to the Colorado Department of Public Health & Environment (“CDPHE”) addresses an increase in volatile organic compounds (“VOC”) emissions only. CDPHE did not require air quality modeling with the submittal of the modification application per the CDPHE Permit Modeling Unit guidance. Section 2.2 of the guidance states that sources proposing an increase only in VOC emissions will not require a modeling determination.

Response prepared by or under the supervision of:

Julie Griffin
Air Permitting Project Manager
Kinder Morgan EHS APC – Natural Gas & CO2
303-914-7577

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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8. Comments from Adams County indicated concerns with low frequency noise and vibration. Indicate how CIG would ensure that the operation of the storage facility would not result in any increase in perceptible vibration at any noise sensitive area (18 CFR 380.12 k(4)(v)(B)).

Response:

CIG acknowledges Adams County’s concerns with low frequency noise and vibration. CIG believes that once the Project is complete, the operation of the storage facility will not result in any increase in perceptible noise or vibration at any noise sensitive areas (“NSAs”). This conclusion is substantiated by the results of the Pre-Construction Sound Level Study that was prepared for the Project and included as Appendix 9B in CIG’s April 2024 application. This study not only addressed potential operational impacts associated with the Project, but also evaluated the potential for nighttime impacts associated with well drilling activities, as the proposed wells are considerably closer to NSAs than the Totem Storage Compressor Station (the “Totem CS”). As indicated in CIG’s Resource Report 9, Table 9.3.1, the nearest residence is nearly one mile from the closest proposed well, and over 8,000 feet from the Totem CS.

The Project will not change the operational horsepower at the Totem CS. Because there are no planned changes to mechanical equipment or horsepower rating of the existing compressors, sound levels are not expected to increase as a result of the Project. As detailed in Appendix 9B, the predicted station contributions at the closest receptors range from 26.4 to 36.1 dBA L_{dn} , which are well below measured background noise levels. Operations associated with the existing Totem operations were not audible at any of the measurement locations, and CIG does not anticipate any change from operation of the Project. With regard to the vibration concerns, CIG notes that to date there have been no identified vibration issues with the operation of Totem nor any complaints from any of the affected landowners. As noted in its application, CIG is only installing a liquids separator and bypass piping at the Totem CS and will not be making any modifications to the compressor itself that could result in vibrations.

CIG also evaluated potential noise impacts associated with construction activities. As detailed in Table 5-8 of Appendix 9B, predicts that temporary nighttime sound levels will only result in a temporary increase of less than 1 dBA above existing conditions and any of the identified NSAs, which will not be perceptible to the human ear.

Response prepared by or under the supervision of:

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

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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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:

CIG is finalizing its response to Question No. 9 and will provide its response no later than Tuesday, July 23, 2024.

COLORADO INTERSTATE GAS COMPANY, L.L.C.
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10. Address the Adams County comment regarding noise mitigation best management practices and control measures and identify which measures CIG would commit to implement for the potential noise impacts during construction activities.

Response:

Of the construction activities that are part of the Project, the drilling of new I/W wells 25, 26, and 27 are within 1 mile of one noise sensitive area, NSR 2 (see Table 9.3-1 in Resource Report 9). Based on CIG’s preliminary pre-construction noise survey (see Table 5-8 of Appendix 9B), contributions of combined construction noise and operational noise of existing equipment will result in a temporary increase of only 0.2 dBA above existing conditions, which will not be discernable by the human ear. Without any additional noise mitigation, calculated nighttime sound levels at all NSRs due to construction activities are below the FERC noise limit of 48.6 dBA Leq and are much less than 10 decibels over the measured background sound levels at NSR 2.

Despite modeling indicating that no discernable impacts will occur, CIG is committed to ensuring that there are no noise impacts during drilling operations. As such, CIG will commit to the deployment of continuous noise monitoring placed in the direction of NSR 2 during the drilling of new wells 25, 26, and 27. If noise levels associated with drilling operations result in an increase of 3 dBA or more at the NSR over background conditions between the nighttime hours of 7PM to 7AM (which is essentially the threshold at which noise differences can be discerned), CIG will commit to the use of noise mitigation measures deemed appropriate in the direction of NSR 2 to obstruct noise frequencies from drilling operations. CIG will report the status of its noise monitoring efforts during drilling operations in its construction status reports.

Response prepared by or under the supervision of:

Mike Bonar
Environmental Permitting Project Manager
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Resource Report 10: Alternatives

11. Provide a response to the Adams County request, filed June 19, 2024, regarding an alternative for removal of the 3,267-feet of pipeline 254F-1, and explain the rationale and justification for the abandonment-in-place of this section of pipeline rather than removal.

Response:

On a project by project basis where pipeline is being replaced, CIG determines to abandon in place or remove a pipeline based on a number of factors, including potential ground disturbance, contractual terms and conditions, landowner input, future use of the property, and environmental and safety factors. In this case, CIG determined that abandoning the 3,267 feet of pipeline 254F-1 in place was the better option because, among other things, removal would result in additional ground and landowner disturbance, increase environmental risks, unnecessarily expose CIG's employees and contractors to additional hazards, and not provide any discernable future benefit due to CIG's continued use of the pipeline corridor and operation of the Totem storage field.

Response prepared by or under the supervision of:

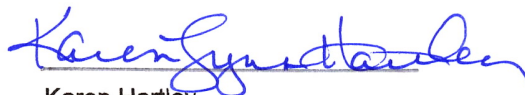
Steven Gassman
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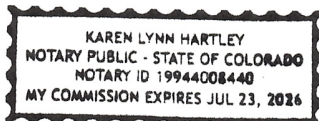
STATE OF COLORADO)
)
COUNTY OF EL PASO)

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 18th 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 18th day of July 2024.

/s/

Francisco Tarin

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