

## DICKSTEINSHAPIRO<sub>LLP</sub>

1825 Eye Street NW | Washington, DC 20006-5403  
TEL (202) 420-2200 | FAX (202) 420-2201 | dicksteinshapiro.com

### By Electronic Filing

June 9, 2008

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Re: Supplement to Application (Resource Report 4)  
Floridian Natural Gas Storage Company, LLC  
FERC Docket No. CP08-13-000

---

Dear Ms. Bose:

In connection with the Application of Floridian Natural Gas Storage Company, LLC ("FGS") for a certificate of public convenience and necessity to construct, own and operate a new natural gas storage facility filed on October 31, 2007 (the "Application") in the above-referenced docket, FGS hereby submits the June 2, 2008 concurrence of the State Historical Preservation Officer and Director of the Florida Division of Historical Resources ("SHPO"). The SHPO concurrence concerns the May 1, 2008 report of Janus Research on its cultural resource survey of the Tampa Farms staging area and access road, which May 1 report was previously submitted to FERC on May 5, 2008 as Attachment B to FGS's Responses to DEIS Recommendations Requiring Information Prior to the End of the Comment Period. This June 2 SHPO concurrence supplements the previously submitted May 1 report, as well as the appendices to Resource Report 4 (in Volumes II-D and V of the Application).

FGS's submission contains only Public material and FGS is making this filing electronically. Electronic copies of this filing are being sent by email to all parties to this proceeding, as well as to the persons identified below.

If you have any questions about any of these submissions, please do not hesitate to contact me at (202) 420-2745 or Beth Webb at (202) 420-4782.

Sincerely,

/s/ Joan M. Darby  
Joan M. Darby  
(202) 420-2745  
darbyj@dicksteinshapiro.com

Ms. Kimberly D. Bose  
June 9, 2008  
Page 2

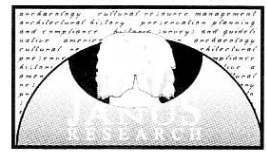
Enclosures

cc: All Parties  
Sheila Hernandez, FERC  
Charles Brown, FERC  
David Blaha, ERM  
Tim Gray, Florida Department of Environmental Protection  
John Wrublik, US Fish and Wildlife Service  
Ted Walden, US Environmental Protection Agency, Region 4  
Eric Reusch, U.S. Army Corps of Engineers  
Tom Colios, South Florida Water Management District  
Joseph Walsh, Florida Fish and Wildlife Conservation Commission

1. Letter dated May 21, 2008 from FDEP re  
Environmental Resource Permit Application for the pipelines

2. May 13, 2008 Response of FGS to FDEP RAI re:  
Industrial Wastewater Permit Application for discharge of hydrostatic test water





Frederick Gaske  
Floridian Natural Gas Storage Project Supplemental 1  
Tampa Farms Staging Area and Access Road  
Page 2

The staging area encompasses approximately 10.5 acres and the access road is approximately 1.15 miles. Currently, the staging area is being used as a hay field. The majority of the proposed access road is an existing paved, limerock, or hard packed earth road. A small section, less than 380 feet, is unimproved but has been previously cleared (Attachment B). A 2008 modern aerial illustrating this unimproved road and staging area is included in Attachment C (Telelistas 2008).

The staging area will be used to temporarily store vehicles, supplies, and construction equipment during the construction process. This process will involve minimal or no ground or subsurface disturbance.

The previously submitted report for the Floridian Natural Gas Storage Project (Janus Research 2007) included extensive background research regarding the history of the project area, its environmental setting, and pertinent cultural and historical contexts. Consequently, this information is not repeated here.

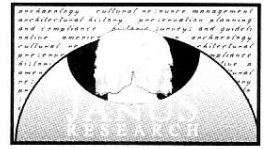
### ***Previous Surveys***

Six previously conducted cultural resource surveys have been conducted within or adjacent to the project area. These six surveys are described in Table 1.

**Table 1. Previously Conducted Cultural Resource Surveys within/adjacent to the Project Area**

<b>Survey #</b>	<b>Survey Name, Author(s), and Date</b>
2649	Cultural Resource Assessment Survey of the Proposed Indiantown Cogeneration Limited Plant Site and Pipeline Corridor (Janus Research 1990)
3273	A Cultural Resource Assessment Survey of the Proposed 12 Mile 230 kV Transmission Line Right-of-Way Between the Indiantown Substation and Martin Plant (Janus Research 1992)
4104	An Archaeological Survey of Martin County (Carr et al. 1995)
4818	Historic Architectural Survey of Martin County (Historic Property Associates 1997)
6039	A Phase II Archaeological Survey of Martin County (Carr et al. 1998)
14162	Cultural Resource Assessment Survey of the Floridian Natural Gas Storage Company Project (Janus Research 2007)

***Previously Recorded Cultural Resources.*** A search of the most current Florida Master Site File (FMSF) data revealed no previously recorded archaeological sites within 500 ft. of the staging area or access road. Additionally, no previously recorded historic resources were located within or adjacent to the staging area and access road.



Frederick Gaske  
Floridian Natural Gas Storage Project Supplemental I  
Tampa Farms Staging Area and Access Road  
Page 3

***Pre-Development Environment and Land Use.***

As described in the previous report (Janus Research 2007), the project area and its surroundings are located in a relatively rural setting. The current environment consists of wetlands interspersed with pine flatwoods and wet prairies. The surveyor's notes from the original 1854 government survey of Township 39 South, Range 38 East, in which the Project Area is located, reveals that most of Township 39 South, Range 38 East consisted originally of scattered ponds, sawgrass, pine, and cabbage hammocks. No hammocks are noted in or adjacent to the staging areas. No military forts, military forts, encampments, battlefields, trails, homesteads or farmsteads, or historical Native American villages were located within one mile of the proposed staging area and access road (Attachment D).

Historic aerials indicate the areas consisted predominantly of wetlands; no hammocks were identifiable on the 1940, 1958 or 1970 aerial (State University System of Florida [SUSF] 2004) (Attachment E).

***Archaeological Site Potential.***

Variables used to determine archaeological site potential zones include distance to fresh water sources (e.g., lakes, creeks, and wetlands), the presence of hardwood trees, relative elevation, and the drainage characteristics of the soils in the project area.

A review of topographic maps and the Martin County National Elevation Dataset (NED) Geographic Information Systems (GIS) data (United States Geological Survey 1999) obtained from the Florida Geographic Data Library (FGDL), the project area is not located in an area of particularly high elevation relative to its surroundings. The Martin County Soil Survey (United States Department of Agriculture [USDA] 1981) and GIS soil survey data obtained from FGDL (USDA1990) were also reviewed regarding soil drainage characteristics and native vegetation. Two soils were identified within the staging area and access road. Waveland sand is a poorly drained soil found in broad areas of flatwoods (FDEP 1981:20) while depressional Waveland sand is a very poorly drained soil found in depressions in the flatwoods (FDEP 1981:21). Both of these soil types are indicative of flatwoods and aquatic vegetation and neither soil type exhibits characteristics of hardwood or hammock vegetation.

The review of soil drainage characteristics and Barley Barber USGS quadrangle (1953 PR 1983) suggest no environmental factors that would have been attractive for pre-Columbian or early historic settlement. A review of the historic aerial photographs showed no hardwood hammocks that might have indicated small, isolated knolls that would have been suitable for habitation.



Frederick Gaske  
Floridian Natural Gas Storage Project Supplemental 1  
Tampa Farms Staging Area and Access Road  
Page 4

As noted, the proposed staging area and access road are adjacent to the previously surveyed Floridian Natural Gas pipeline route. Much of the area adjacent to the staging area and access road has been previously surveyed for archaeological sites, and no sites were identified during these previous surveys. Background research for the 2007 FNG survey indicated a low potential for archaeological sites, and subsurface testing of the 210 foot wide survey corridor confirmed a low potential for archaeological sites. A review of environmental variables for the Tampa Farms staging area and access road also indicated a low archaeological site potential.

#### ***Survey Methods and Results***

Janus Research conducted a pedestrian survey of the staging area and access road. Currently, there are no structures within the staging area or adjacent to the access road. The proposed staging area contains furrows, piles of compost and agricultural equipment. No natural vegetation exists. The area is currently planted with grass to be used for hay and also contains clusters of dog fennel and dandelion. Janus Research employees were met at the project area by an Environmental Representative for Tampa Farms who informed them that the staging area used to be very wet (this is also evident on the 1970 aerial) and even under water at one point in time. The representative explained that the site has since been drained, graded, and ditched. The representative also explained that the area had been used for composting and mulching until approximately four years ago since which it has been used as a hay pasture (Personal Communication April 2008).

Based on the pre-development environmental conditions, the land use history, the lack of previously recorded resources in adjacent areas, and the currently planned use of the property for surface storage, shovel testing was not deemed necessary. Representative photographs are included in Attachment F and the survey log is included in Attachment G. No further work is recommended.

