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By Electronic Filing

May 7, 2008

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

Re: Supplement to Application (Resource Reports 2 and 10
and Application Exhibit Z) and Response to Public Comment
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 advises FERC of an important milestone for the FGS Project that has been achieved and submits supplemental material.

The important milestone for the FGS Project is the affirmative four-to-one vote of the Commissioners of Martin County at their meeting held on May 6, 2008 to approve FGS's application to Martin County. That application was submitted to FERC with FGS's Application as Appendix 2-H to Resource Report 2 (in Volume II-H of the Application).

In addition, FGS submits the following.

First, by letter dated April 23, 2008, attached hereto, Nicki van Vonno, AICP, Growth Management Director for Martin County, Florida addressed a suggested alternative for siting the FGS Project in agricultural land use areas near the proposed project site. This submission may be considered an addition to a new Appendix 10-A to Resource Report 10 (in Volume II-E of the Application) or a response to a public comment suggesting this alternative siting that was made at the April 16, 2008 FERC public meeting on the Draft Environmental Impact Statement issued on March 21, 2008(see FGS's Supplement-Response to Public Comment filed April 25, 2008).

Second, in connection with FGS's application to Martin County, submitted with the Application as Appendix 2-H to Resource Report 2 (in Volume II-H of the Application), the Martin County Local Planning Agency held a public meeting on January 10, 2008. Attached hereto is an unofficial transcript of the public comments on the FGS Project made at that meeting. A video

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recording of the meeting concerning the FGS Project will be submitted to FERC in a separate filing.

Third, FGS supplements Exhibit Z to the Application with the following additional letters of support for the FGS Project which are attached hereto as Supplement to Exhibit Z:

12. State of Florida Division of Emergency Management
February 27, 2008
13. Indiantown Western Martin County Chamber of Commerce
April 9, 2008
14. Business Development Board of Martin County
April 17, 2008
15. Sister Teresa Auad, O. P.
April 18, 2008
16. Catherine Deninger
April 30, 2008

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

Enclosures

cc: All Parties
Sheila Hernandez, FERC
Charles Brown, FERC
David Blaha, ERM
Tim Gray, Florida Department of Environmental Protection

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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 April 23, 2008 from
Nicki van Vonno, AICP,
Growth Management Director
for Martin County, Florida



MARTIN COUNTY
BOARD OF COUNTY COMMISSIONERS
2401 S.E. MONTEREY ROAD • STUART, FL 34996

RECEIVED APR 29 2008

Telephone: (772) 288-5495
Fax: (772) 288-5960
Email: nikkiv@martin.fl.us

April 23, 2008

DOUG SMITH
Commissioner, District 1

SUSAN L. VALLIERE
Commissioner, District 2

LEE WEBERMAN
Commissioner, District 3

SARAH HEARD
Commissioner, District 4

MICHAEL DITERLIZZI
Commissioner, District 5

DUNCAN BALLANTYNE
County Administrator

STEPHEN FRY
County Attorney

Linda Hake
Gunster Yoakley
800 SE Monterey Commons Blvd., Suite 200
Stuart, FL 34996-3346

Dear Linda:

I understand that at the recent FERC hearing on the Floridian Natural Gas Storage Facility, comments were made about the ease of changing the facility's location. In response, I am providing information on Martin County's Comprehensive Plan requirements and its plan amendment process.

Martin County's Plan establishes specific future land use designation for various uses. Industrial uses, such as a natural gas storage facility are required to be located in the Industrial Land Use designation. Industrial uses are also considered urban uses under the County's Comprehensive Plan and are required to be located within the County's designated urban service district. A map illustrating the County's Future Land Use Designations and Urban Service Districts is attached.

To site an industrial use in an area not designated on the County's Future Land Use Map requires an amendment to its Comprehensive Plan. If the location were outside the County's urban service district, then a second concurrent amendment would be required.

Amending the County's Plan typically takes 13 months. Applicants may apply in the month of September annually. The process involves three local public hearings and State and regional agency review. While the County Commission can initiate amendments which speeds up the process slightly, the County Commission does not typically initiate amendments for private land owners.

In conclusion, the suggestion that the Floridian Natural Gas Storage Facility could be easily located in agricultural land outside of Indiantown reflects a lack of understanding of the County's Comprehensive Plan and the amendment process.

Sincerely,

Nicki van Vonno, AICP
Growth Management Director

NvV:pj

TELEPHONE
772-200-5400

WEB ADDRESS
<http://www.martin.fl.us>



Martin County

Urban Service Districts
Created By: Emily Kibler, GISD
Print Date: June 4, 2009

Urban Service District - Figure 4-5

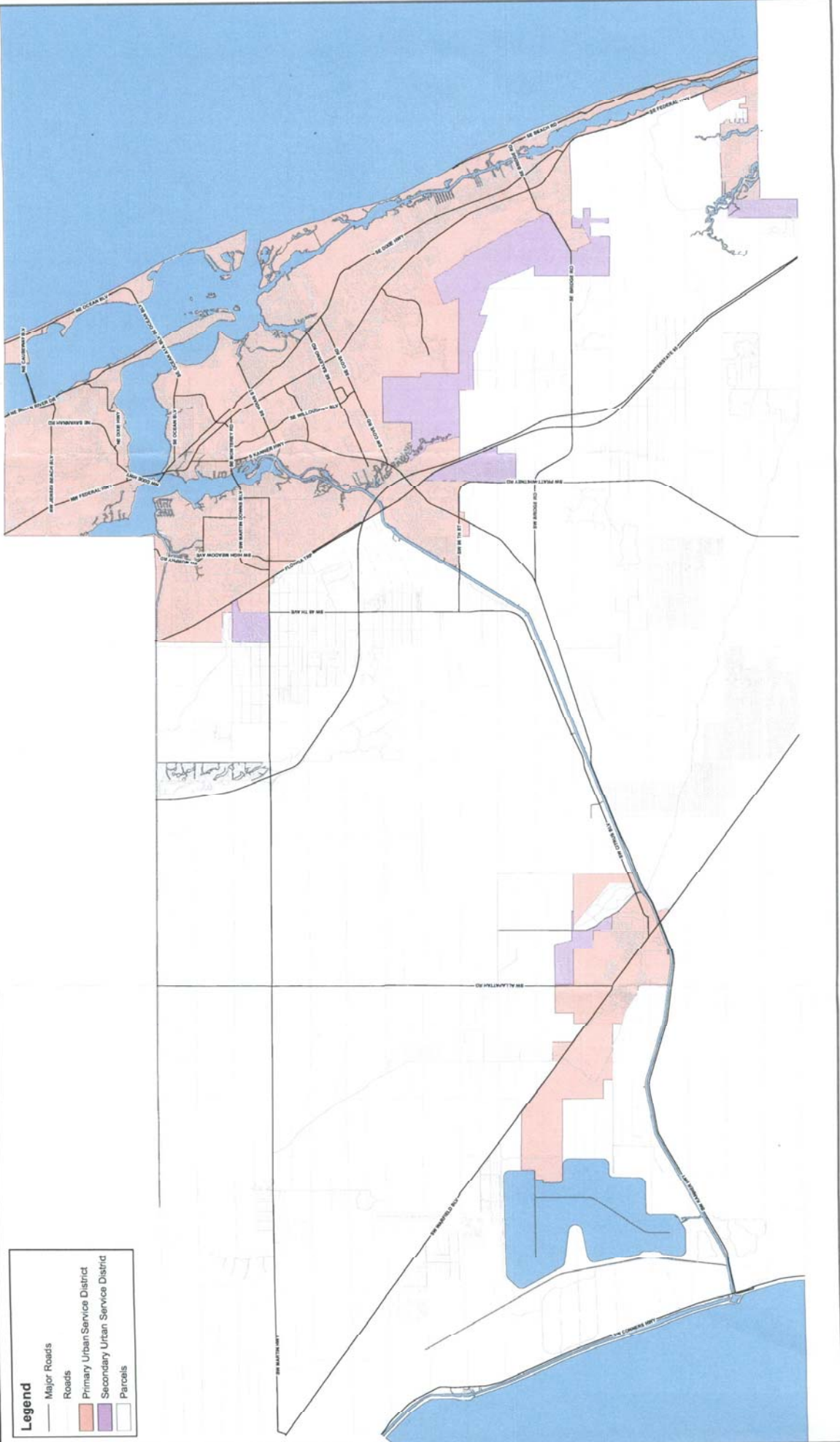


Location Map

Disclaimer: Geographic Information System (GIS) Products, including this Martin County (COUNTY) GIS Product, are provided as a public service and are not intended to be used for any purpose other than that for which they were created. The COUNTY does not warrant the accuracy, reliability, or completeness of any information contained in this product. The COUNTY does not assume any liability for any damage or loss of any kind, including consequential, incidental, or punitive damages, arising from the use of this information. The COUNTY is not responsible for any information obtained from the COUNTY in any manner.

Legend

- Major Roads
- Roads
- Primary Urban Service District
- Secondary Urban Service District
- Patrols



2. Unofficial Transcript of the January 10, 2008
Public Meeting of the Martin County Local Planning Agency

**Unofficial transcript of Floridian Natural Gas Storage
Company public comment at Martin County Local Planning
Agency meeting on January 10, 2008**

Scott Watson, Chairman of Indiantown-Western Martin County

Chamber of Commerce: I'm very happy to be here tonight. I'm here to tell you that the chamber wholeheartedly supports this project. We want it. It's a clean industry. It's an industry that's needed. Florida badly needs natural gas storage capacity. This project is going to provide hundreds of jobs during its three-year construction phase and I don't think I have to tell anybody right now how badly we need jobs. For your information, one of the major employers in Indiantown which was a roof tile manufacturing company just closed down its plant. We lost 70 jobs in Indiantown, that was just this past month. The best part of all about this thing is that this is going to be a tax paying machine -- \$2 million-plus to the tax base every year. It's a clean industry. We really, really want it. We really, really need it and we ask for your support tonight to pass this and move forward.

Dennis Armstrong: I began working with the folks from Ameristeel back in 1995 to bring this premier industrial site in Martin County to the market. As you have heard from Brad in his presentation, it is an EPA Superfund site, so, needless to say, there were a lot of hurdles to get through to finally be able to put it on the market. We finally passed all those though and we were able to put it on the market but, as you can imagine, there are a lot of criteria that have to be met and there are a lot of people who were interested in this site that just wouldn't fit the EPA requirements. We were fortunate enough, though, to find this group that seems like an ideal fit because of the proximity to gas lines that are there to feed the FPL plant. I've had the opportunity to work with Brad and Dave here for the last year-and-one-half, I really think they are a great asset for our community. They've really stepped up to the plate and tried to become involved in Martin County. The folks from Ameristeel are very supportive of this project. They have spent an excess of \$15 million of their own money to clean up the site, even though it's an EPA site. They've never taken a dime from the federal government. They've done all the clean-up work there themselves. I think you've seen some information about what they (Ameristeel) pay in taxes because of it being an EPA site, so the move to this use will be a great enhancement.

Rick Rhodes: Having been born and raised here in Martin County, a lifelong resident for 43 years, I couldn't see a better place to put this plant – out west, industrial area, former Superfund site that I've seen sit there for 20-plus years idle before they were able to clean it up. I think it's a great place for it and I would support moving forward with that.

Brian Powers: It's hard to beat what's already been said but I just want to reiterate again how important it is to us as a community. Scott said at a time when we have lost some jobs but, more than anything, as a community that's lived with this eyesore for quite a while, we're excited about the opportunity of having a clean industry that's going to be contributory as opposed to having it sit fallow. So that's the general interest of our support and we are glad to see it as well.

Shawn Keil, Executive Director of the YMCA Indiantown: Brad and Dave of Floridian Gas have been wonderful for the YMCA. I also serve as a Trustee for the Chamber of Western Martin County and I am in full agreement with Scott Watson. But I also want to speak on behalf of the 500-plus families we serve each year in Indiantown and some of the struggles they are up against. Floridian Gas stepped up and helped us create a program during our summer camp last summer and it was wonderful. It was called "Why You Matter" and involved a lot of the community leaders, getting them involved with our 10 to 13 year old age group. Also they are helping out with a sponsorship of our t-ball program that we are currently running. I'd love to see Brad and Dave and Floridian Gas here in Indiantown and I welcome them.

Art Matson: I am on the NAC and chamber and whatnot but I'd like to speak to you as a private citizen. One thing that they have done is come out anytime anybody had a question. They'll have a meeting, explain everything thoroughly in detail, answer any questions that anybody has – so there is really no reason in the world that anybody in Indiantown should have a question about what's going on. They've had several public meetings. I live in Indianwood and they've been out there to see the residents of Indianwood and so far have seen no major objections to this project. Most of the people are very happy to see it coming. I was very tickled to see that they spent \$15,000 to find out they were not in a tsunami zone. I mean, that's a big thing. But anyway, I just hope this is approved because I think Indiantown needs it and I think everybody in Indiantown is looking forward to its arrival.

Tammy Simoneau, Executive Director of the Economic Council: I have to agree with the previous speakers, I couldn't think of a better business to put on a Superfund site, it's just perfect. But before I get started, let me personally thank Dave and Brad. The fact that they are willing to make a \$300 million investment in our community at this time is just phenomenal and I think we should do everything we possibly can to help them. I'm going to kind-of give Brad's presentation because I think the same way he does. The first question I would ask is, "Is it safe?" and he pointed out to us, of course it is. It has double steel tanks, concrete shell, the added safety of a dike surrounded by the green buffer belt to ensure the safety. And, the fact that it's stored in the liquid form – not explosive, can't burn. The gas offers no danger whatsoever, it'll disperse into the atmosphere, sounds great. I know you guys always look for public benefit. As he pointed out, Florida's the only state in this region that has no gas storage and, with the hurricane history in Florida (not to mention our own Martin County

history), we would be better prepared in a crisis. Not only will we have gas available but having the storage right here means we don't have to pay the increased prices that Brad mentioned. I don't know that he did mention, but if there is an emergency, having that storage here provides enough power to generate for two million homes for 20 days – that's pretty awesome. They actually took the liberty to go to FAU and have this feasibility on the financials, it's really impressive. According to FAU's Center for Urban Environmental, FGS will result in the expenditures in excess of 300 million in Martin County over the five-year development/construction period. As FAU points out, as workers spend their income in the county to the local suppliers, it increases their sales. When the sales are increased, other jobs are created – like additional restaurants or cleaners or landscaper and retailers. This growth increases the total production in the county by a half billion dollars, those are FAU's numbers. That's the indirect income. The direct income that we pointed out is the 350 jobs during the construction phase – that's almost \$40 million in labor earnings in Martin County. After the construction phase, they mention 25 to 30 more jobs will be created in the operational. In big picture, this is adding more than 2000 jobs in 08/09 and more and 1000 jobs in 2010. Simply stated, the secondary impacts of this project will increase the payroll more than 70 million in 08/09 and 40 million in 2010. These aren't just ordinary jobs, these jobs will pay 20% over the current wages. For instance, the average wage in Indiantown is 32,500; here in Martin County, it's 34,500. These jobs are 42,500. This is greatly needed for Indiantown and Martin County. I can't remember when a major project has offered such significant economic impacts to Martin County. Let's make something great happen, please vote yes.

Aionie Millan, Business Development for Snelling Staffing: I know we've touched on it a few times tonight – how it's going to have such a great economic impact on the job market in the local area – so, I just wanted to say that again. It's very sad to see how many people come into our company every day looking for employment and it's good to see a company like this provide so many different jobs. They are also thinking about providing a training program for residents to train as welders and things like that – which a lot of the local residents don't have those skill sets. So, it's going to be a great asset to the local residents and I think it's a great idea.

Sandy Zweben, Local Planning Agency Member: I think it's the right place, it's the right time, it's a home run for Indiantown and a home run for Martin County and I would definitely vote for it.

3. Supplement to Exhibit Z to the Application:
Additional Letters of Support

SUPPLEMENT TO
EXHIBIT Z
ADDITIONAL LETTERS OF SUPPORT

12. State of Florida Division of Emergency Management
February 27, 2008
13. Indiantown Western Martin County Chamber of Commerce
April 9, 2008
14. Business Development Board of Martin County
April 17, 2008
15. Sister Teresa Auad, O. P.
April 18, 2008
16. Catherine Deninger
April 30, 2008



STATE OF FLORIDA

DIVISION OF EMERGENCY MANAGEMENT

CHARLIE CRIST
Governor

W. CRAIG FUGATE
Director

February 27, 2008

Brad Williams
David Sharp
Floridian Natural Gas Storage Company
1000 Louisiana Street
Suite 4361
Houston, TX 77002

Dear Mr. Williams and Mr. Sharp:

Congratulations on the progress that Floridian Natural Gas Storage Company is making to bring the first market area natural gas storage facility to the State of Florida. Thank you for bringing your project to our attention and for your continued work with our team to ensure that Florida has increased capabilities to respond and recover from disasters on behalf of the residents of the State of Florida.

As you know, our mission is to ensure that Florida is prepared to respond to emergencies, recover from them, and mitigate against their impacts. The rapidly increasing demand for natural gas may create greater risks for Florida and we recognize that power generation and local distribution companies will be more vulnerable to supply interruptions in the coming years. Natural gas storage is one well tested tool to mitigate those risks which compliments existing and new pipeline capacity into the State. From a system reliability, supply security, and infrastructure standpoint, we believe it is important that the state have increased resources to aid in disaster preparedness planning and that provide high daily deliverability during emergencies

We support and applaud your specific efforts and encourage participation by Florida companies in your project, as well as in all natural gas storage projects.

Respectfully,

A handwritten signature in black ink, appearing to read "W. Craig Fugate".

Craig Fugate, Director
Division of Emergency Management

cc: The Honorable Charlie Crist, Governor, State of Florida
The Honorable Ken Pruitt, President, Florida Senate
The Honorable Marco Rubio, Speaker, Florida House of Representatives



**INDIANTOWN WESTERN MARTIN COUNTY
CHAMBER OF COMMERCE**

P. O. Box 602
Indiantown, Florida 34956

Phone 772-597-2184
Fax 772-597-6063
www.indiantownfl.org
itowncc@onearrow.net

April 9, 2008

Marlene Brunot, ICR Coordinator
Treasure Coast Regional Planning Council
301 East Ocean Blvd.
Stuart, FL 34994

Subject: Draft Environmental Impact Statement, Floridian Natural Gas Storage Project
TCRPC Reference #08-MC-04-01
SAI#FL200803274137C

Dear Ms. Brunot:

On behalf of the Board of Directors of the Indiantown-Western Martin County Chamber of Commerce, I write in support of the proposed project identified above as one that will be extremely important to our community and it's long-term economic well being.

While we are not specialists in Environmental Impact Issues, the Chamber has a strong interest in this project and from what we have been shown and told, we are of the opinion that the only environmental impact this project will have on our community is a positive one. The planned adaptive re-use of a former superfund site is environmentally sound, economically necessary, socially acceptable and bears no resemblance to any other project planned or underway in the Indiantown area.

We urge your favorable review and support for this project that is so essential to a growing and healthy Indiantown community. The principals of the company have become as one with this community and keep us advised of progress as this project is reviewed by nearly everyone in officialdom. We trust that the day will soon come when all the talking and reviewing will be complete and construction may begin. We see no negatives and only positives with this project that enjoys our full support.

Respectfully submitted,

Allon R. Fish, IOM/AOM
President/CEO
Indiantown-Western Martin County
Chamber of Commerce



Business Development Board of Martin County, Inc.

1002 SE Monterey Commons Boulevard, Suite 203A ♦ Stuart, FL 34996
772-221-1380 ♦ Fax: 772-221-1381 ♦ www.bdbmc.org

MEMBER ORGANIZATIONS

City of Stuart
County of Martin
Economic Council of
Martin County
Florida Atlantic
University
Hobe Sound Chamber
of Commerce
HPS, Inc.
Indian River
Community College
Indiantown Chamber
of Commerce
Jensen Beach Chamber
of Commerce
Marine Industries Assoc.
of the Treasure Coast
Martin County Schools
Palm City Chamber
of Commerce
Realtor Association of
Martin County
Stuart/Martin County
Chamber of Commerce
Treasure Coast
Builders Association
Workforce Development
Board of the
Treasure Coast
**EX-OFFICIO
MEMBERS**
BDB Past President
City of Stuart
Manager
Martin County
County Administrator



April 17, 2008

Marlene Brunot
Treasure Coast Regional Planning Council
301 East Ocean Boulevard
Ste. 300
Stuart, FL 34994

RE: Floridian Natural Gas Storage Project - TCRPC Reference # 08-MC-04-01, SAI #
FL200803274137C

Dear Marlene Brunot:

In response to your memorandum of 4-4-08 regarding the Floridian Natural Gas Storage Project, please know that the BDBMC (Martin County's Official Economic Development Organization) is in strong support of the project as it is a major benefit to the economy of Indiantown, Martin County, and the State of Florida. Your memorandum on the topic did an excellent job of highlighting the many positive facets of the project: the major economic impact, the beneficial redevelopment of a brown field site, the minimal impact to the environment, the best possible alternative to achieve the deliverable, and the overall community support.

Lastly, to the extent possible, we feel that it is important that all entities involved in the process contribute their efforts to expedite the successful implementation of this operation. We stand ready to provide our support of this goal in the capacity and at the time you feel it is appropriate. Please let me know how the BDB can help facilitate and expedite this project, to the benefit of all.

Best regards,

Ronald Bunch
Executive Director

Cc: Greg Vaday
Floridian Natural Gas
Indiantown Chamber of Commerce

AN ENTERPRISE FLORIDA PARTNER

P.O. BOX 2005 *InDios Inc* INDIANTOWN, FL 34956

April 18, 2008

Chairman Doug Smith
Martin County Board of County Commissioners
2401 SE Monterey Road
Stuart FL 34996

Re: Floridian Natural Gas Storage Company

Dear Chairman Smith:

I regret that I am out-of-state and unable to attend the public hearing on May 6 for the Floridian gas storage project.

I have met with Brad Williams and Dave Sharp on several occasions and feel I am well informed about the project and the benefits the project will bring to Indiantown.

As you know, I have had the privilege of serving many hardworking but poor people in Indiantown over the past 25 years. This project offers Indiantown's people a chance for a better future. The tax benefits can be used to provide human services in Indiantown but the thousands of jobs Floridian's three-year construction period will create are even more important.

Even those who cannot participate as construction workers will benefit as new service jobs will be created throughout Indiantown to support those working construction on the plant. And, Floridian is also working with Indian River Community College to put together a welding training program that will offer a bright and prosperous future for those who participate and gain the skills and experience to earn good incomes as certified welders. One good income such as this can improve the lives of many.

Please help support the people of Indiantown by voting to approve the Floridian Natural Gas Storage Company's project.

Sincerely,



Sister Teresa Auad O.P.

cc: Commissioner DiTerlizzi
Commissioner Heard
Commissioner Valliere
Commissioner Weberman
County Administrator Duncan Ballantyne

Phone: 772-341-0455

Fax: 772-286-3079

April 30, 2008

Chairman Doug Smith
Martin County Board of County Commissioners
2401 SE Monterey Road
Stuart FL 34996

Dear Commissioner Smith:

I'm sorry that I won't be able to come to Stuart for the May 6th commission meeting, when you will be discussing the Floridian gas storage project.

Mr. Bradley Williams and Mr. David Sharp have been regular visitors to Indiantown and I feel I have an excellent understanding of the project, what the facility will look like and the benefits it will bring to our town, our county and our state.

I am a resident of Indianwood, so this facility will be built fairly close to my home. After all these years, I am relieved to know that this Superfund site will be used for a project that won't smell bad, look bad or keep me awake at night. Yes, I realize that the tanks will be large - but they aren't going to make noise or create a lot of traffic on 710 either. And, the project will create good jobs and pay a substantial amount of taxes that will benefit us all.

I'd also like to add that the gentlemen from Floridian Gas have already made a positive contribution to our community - the YMCA, Indiantown Non-Profit Housing, the Indiantown Education Coalition and the chamber. We look forward to continue having them as neighbors and partners in our community.

Please vote to approve the gas storage project.

Sincerely,



Catherine Deninger

16272 SW Indianwood Circle
Indiantown, FL 34956

cc: Commissioner DiTerlizzi
Commissioner Weberman
Commissioner Heard
Commissioner Valliere
Mr. Ballantyne