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By Electronic Filing

May 13, 2008

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

Re: OEP/DG2E/Gas Branch 3
Response to April 22, 2008 Geotechnical Data Request
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 in the above-referenced docket, FGS hereby files a partial response to the FERC's Geotechnical Data Request dated April 22, 2008.

The Geotechnical Data Request dated April 22, 2008 set forth two Geotechnical Information Requests. The attached FGS Response to Geotechnical Information Request 1 is the response to the first of the two requests. FGS anticipates that it will be able to file the response to the second of the two requests no later than Friday, May 16, 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

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Enclosures

cc: All Parties
Charles Brown, FERC
Terry Turpin, 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

RESPONSE TO
GEOTECHNICAL INFORMATION REQUEST 1

1. The proposed surcharge for the tank foundation is indicated as a stockpile at least 20 feet high and is expected to contain about 75,000 cubic yards of soil. The weight of the soil assuming a unit weight of 110 pounds per cubic foot (pcf) is about 222,750 kips. Based on the loading used in the settlement calculation by Golder, the total weight of the product and tank is about 317,200 kips which means the surcharge is only about 70% of the anticipated load from the tank and the product (i.e., $222,750/317,200 = 0.7$). Typical practice would have the surcharge weight equaling at least the weight of the tank and the product at full capacity. This would require the surcharge to be about 40% more than proposed, or about 28 feet high. In light of the above, please justify the height of 20 feet in the proposed surcharge program or increase the height of the surcharge to equal at least the weight of the tank and product and resubmit the revised surcharge program.

Response:

The required total and differential settlements would be achieved by the proposed surcharge height. Specifically, the analysis set forth in the Final Geotechnical Investigation (Golder, July 2007) (see Appendix J to Resource Report 13) concluded that a surcharge height of 20 feet is needed to reduce the total and differential settlements by approximately 40 percent and thus to reduce the angular distortion to about 0.001. The key fact is that that level of angular distortion satisfies the foundation design criteria and can be accomplished without the surcharge weight being equal to the anticipated load. The surcharge weight and height may be increased depending on the availability and need for additional materials during construction, but doing so is not necessary to satisfy the design criteria for total and differential settlements.