

# DICKSTEINSHAPIRO<sub>LLP</sub>

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Do Not Release

## By Electronic Filing

May 15, 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  
and  
Supplemented Response to February 20, 2008 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 the following responses to FERC Data Requests:

- (1) The second part of FGS's Response to FERC's Geotechnical Data Request dated April 22, 2008, namely, FGS's Response to Geotechnical Information Request 2. That Request 2 called for the revision of Attachment C-1 (Seismic Design Methodology and Seismic Design Calculations) to FGS's March 17, 2008 Response to FERC's Data Request dated February 20, 2008 to be consistent with updated seismic design ground motion parameters.
- (2) FGS's Supplement to its March 17, 2008 Response to FERC's Data Request dated February 20, 2008. In February FERC had requested that the horizontal and vertical ground motions of the seismicity analysis include analyses based on Site Class D. In response thereto, FGS filed on March 17, 2008 replacement pages, with the requested revisions of the texts of RR No. 6 and RR No. 13, Appendix I. Updated figures for RR No. 6 and RR No. 13 Appendix I were inadvertently omitted from the submission and are being provided herewith.

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FGS's filing consists of two parts. The first part is Public material and consists of this cover letter, the public portion of FGS's Response to the FERC's April 22, 2008 Geotechnical Information Request 2 and FGS's Supplement to its March 17, 2008 Response to FERC's Data Request dated February 20, 2008.

The second part is comprised of the revised Attachment C-1 (Seismic Design Methodology and Seismic Design Calculations), which is being filed as FGS's Response to the FERC's April 22, 2008 Geotechnical Information Request 2; this Attachment constitutes Privileged Information and is marked "Privileged Information -- Do Not Release." It is designated as Privileged because this document was prepared by CB&I for FGS and contains confidential and proprietary information, which is commercially sensitive. Release of this information could cause substantial competitive harm to CB&I, as well as FGS, and this information would be exempt from disclosure under FOIA. In accordance with the Commission's regulations, 18 C.F.R. §388.112, FGS requests that this part of the Response be placed in a non-public file and treated as privileged.

FGS is making this filing electronically. All Parties to this proceeding, as well as the persons identified below, are being served by email with a copy of the Public part of this filing. In addition, FGS is providing the complete filing to Charles Brown, FERC OEP Environmental Project Manager, Terry Turpin, Chief, LNG Engineering Branch, and David Blaha, the Project Manager at ERM, the third party environmental contractor for this Project. ***Complete copies of the Response are being provided to the Staff and ERM with the specific request and understanding that the Privileged Information will be kept in a non-public file and treated as Privileged Information at all times.***

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  
Charles Brown, FERC  
Terry Turpin, FERC  
David Blaha, ERM

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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) FGS's Response to FERC's April 22, 2008  
Geotechnical Information Request 2**

RESPONSE TO  
GEOTECHNICAL INFORMATION REQUEST 2

2. The proposed Seismic Design Methodology and Seismic Design Calculations provided in Attachment C-1 are based on the seismic ground motion parameters that were provided in the original Seismic Hazard Evaluation (Resource Report 6, Appendix I). These seismic ground motion parameters were based on a presumed Site Class B. The actual soil profile for the site designates it as Site Class D which modifies the ground motion design parameters. The seismic ground motion parameters which are to be used for design corresponding to Site Class D have since been added to Report 6, Appendix I via a series of responses to FERC data requests. Therefore, please revise and resubmit Attachment C-1 to be consistent with the current seismic design ground motion parameters (found in the revised Resource Report 6, Appendix I) for the site based on Site Class D.

***Response:***

See Revision 1, dated May 14, 2008, of Attachment C-1 (Seismic Design Methodology and Seismic Design Calculations), which is being filed herewith separately as Privileged Information.

Revision 1, dated May 14, 2008, of Attachment C-1  
(Seismic Design Methodology and Seismic Design Calculations)

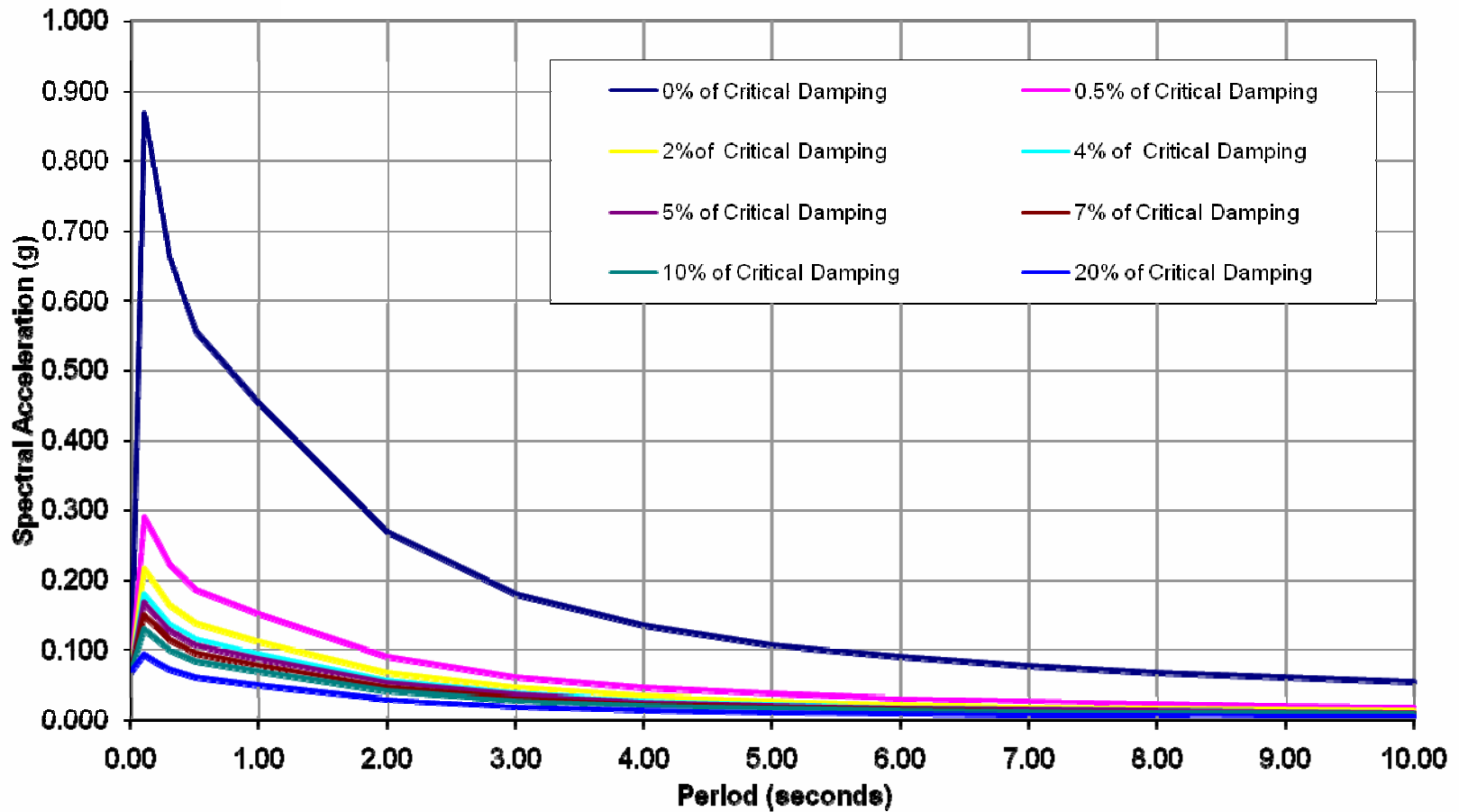
***Contains Privileged Information  
Do Not Release***

***Removed and Submitted in  
Privileged Information Part of Response***

**(2) FGS's Supplement to its March 17, 2008 Response to  
FERC's Data Request dated February 20, 2008**

## **Updated Figures for RR No. 6**

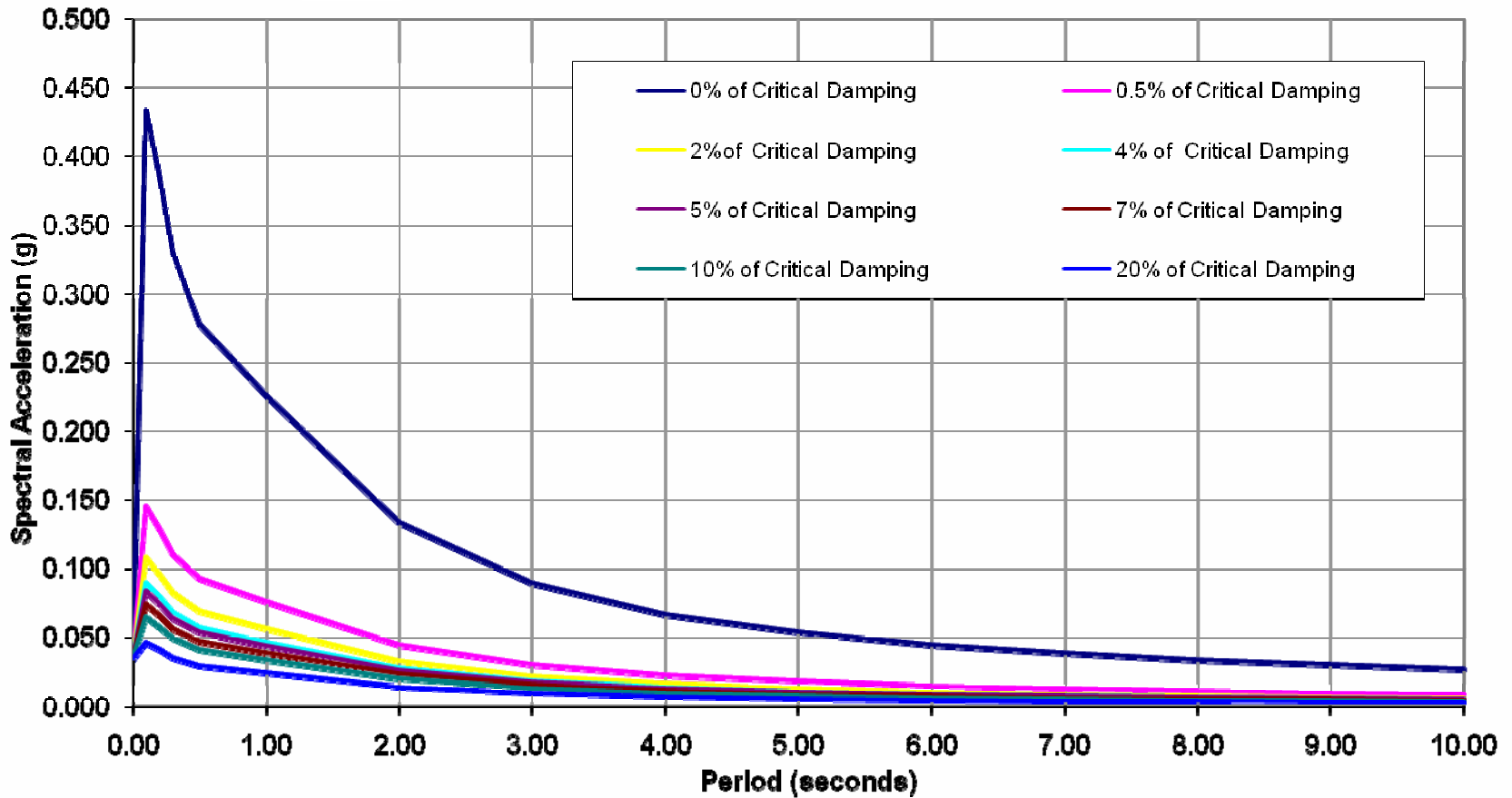
### Acceleration Response Spectra - Safe Shutdown Earthquake - Site Class D



Source: United States Geological Survey/Earthquake Model Data

PROJECT			
FLORIDIAN NATURAL GAS STORAGE MARTIN COUNTY, FLORIDA			
TITLE			
Acceleration Response Spectra For SSE Event			
 Golder Associates	PROJECT No 063-9587	SCALE AS SHOWN	REV. 0
	Design CJB 26 Mar 07		
	Map CJB 26 Mar 07		
	Check CJB 26 Mar 07		
	Review TA 28 Mar 07	Figure 6.1-1	

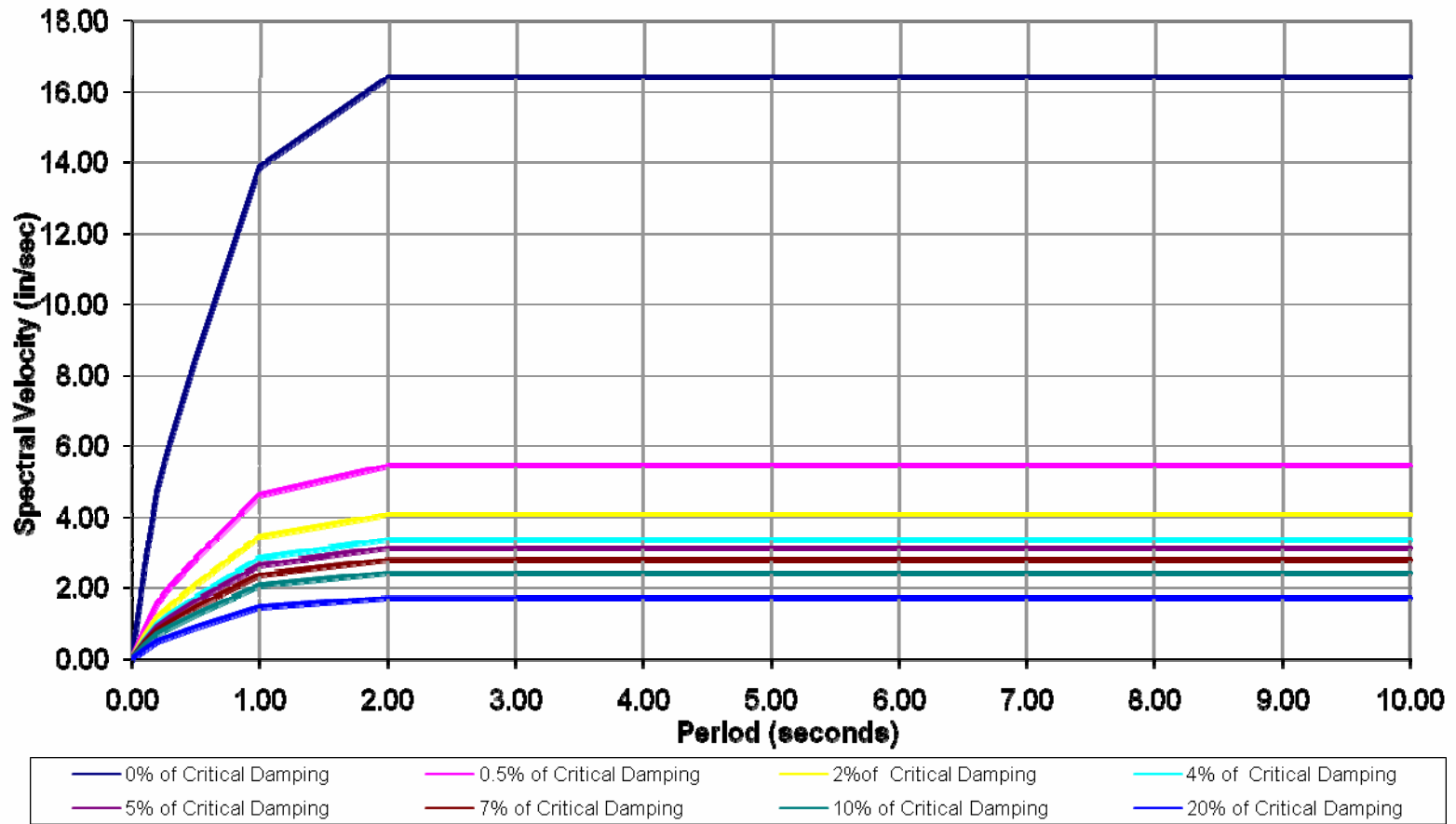
### Acceleration Response Spectra - Operating Basis Earthquake - Site Class D



Source: United States Geological Survey/Earthquake Model Data

<b>PROJECT</b>	FLORIDIAN NATURAL GAS STORAGE MARTIN COUNTY, FLORIDA		
<b>TITLE</b>	<b>Acceleration Response Spectra For OBE Event</b>		
 <b>Golder Associates</b>	PROJECT No 063-9587	SCALE AS SHOWN	REV. 0
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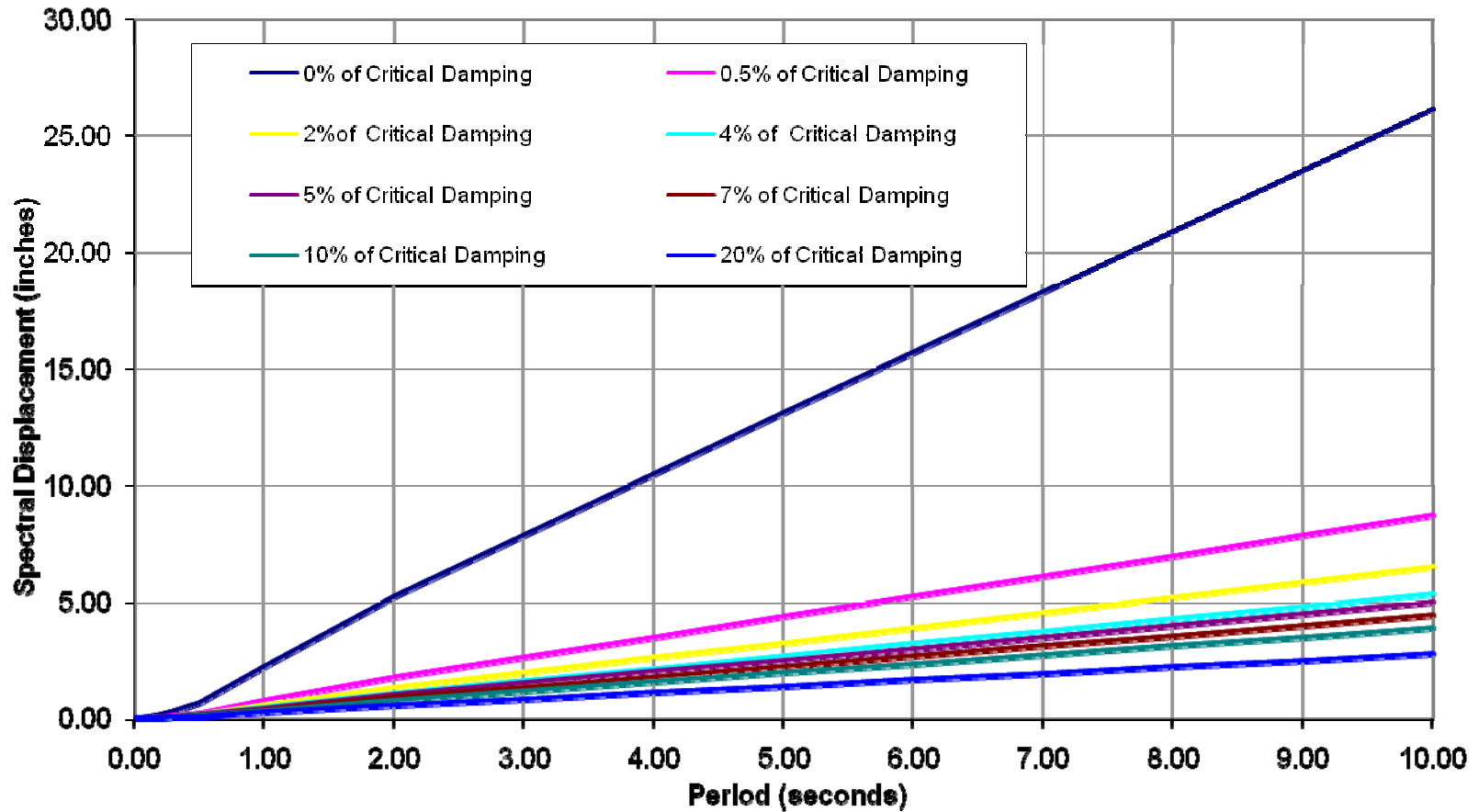
### Velocity Response Spectra - Operating Basis Earthquake - Site Class D




Source: United States Geological Survey/Earthquake Model Data

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TITLE		<b>Velocity Response Spectra For OBE Event</b>	
 <b>Golder Associates</b>	PROJECT No 063-9587	SCALE AS SHOWN	REV. 0
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	Check CJB 26 Mar 07		
Review TA 28 Mar 07			

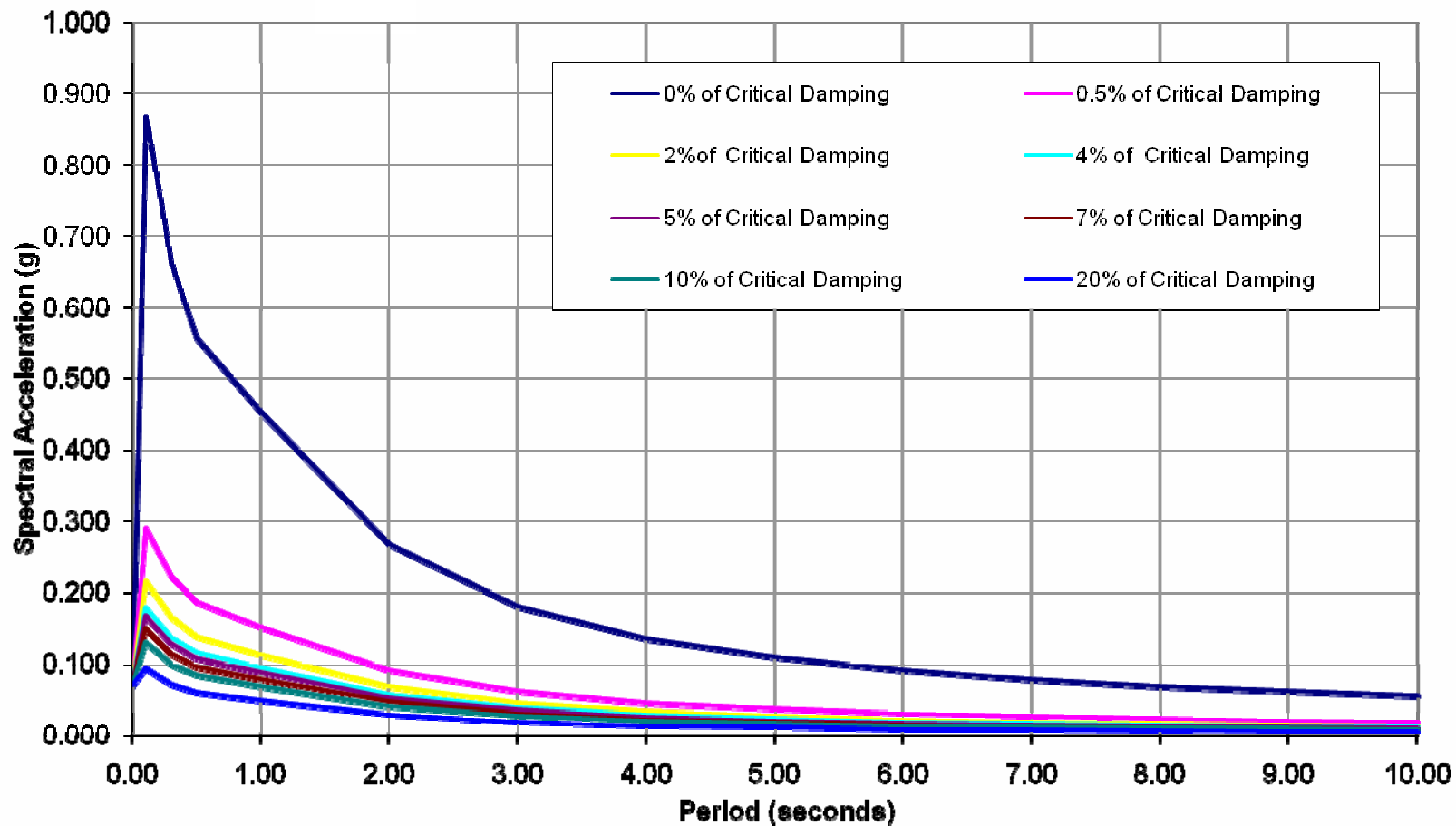
### Displacement Response Spectra - Operating Basis Earthquake - Site Class D



Source: United States Geological Survey/Earthquake Model Data

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TITLE		Displacement Response Spectra For OBE Event	
 <b>Golder Associates</b>	PROJECT No	063-9587	SCALE AS SHOWN
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	Map	CJB 26 Mar 07	<b>Figure 6.6-4</b>
	Check	CJB 26 Mar 07	
Review	TA 28 Mar 07		

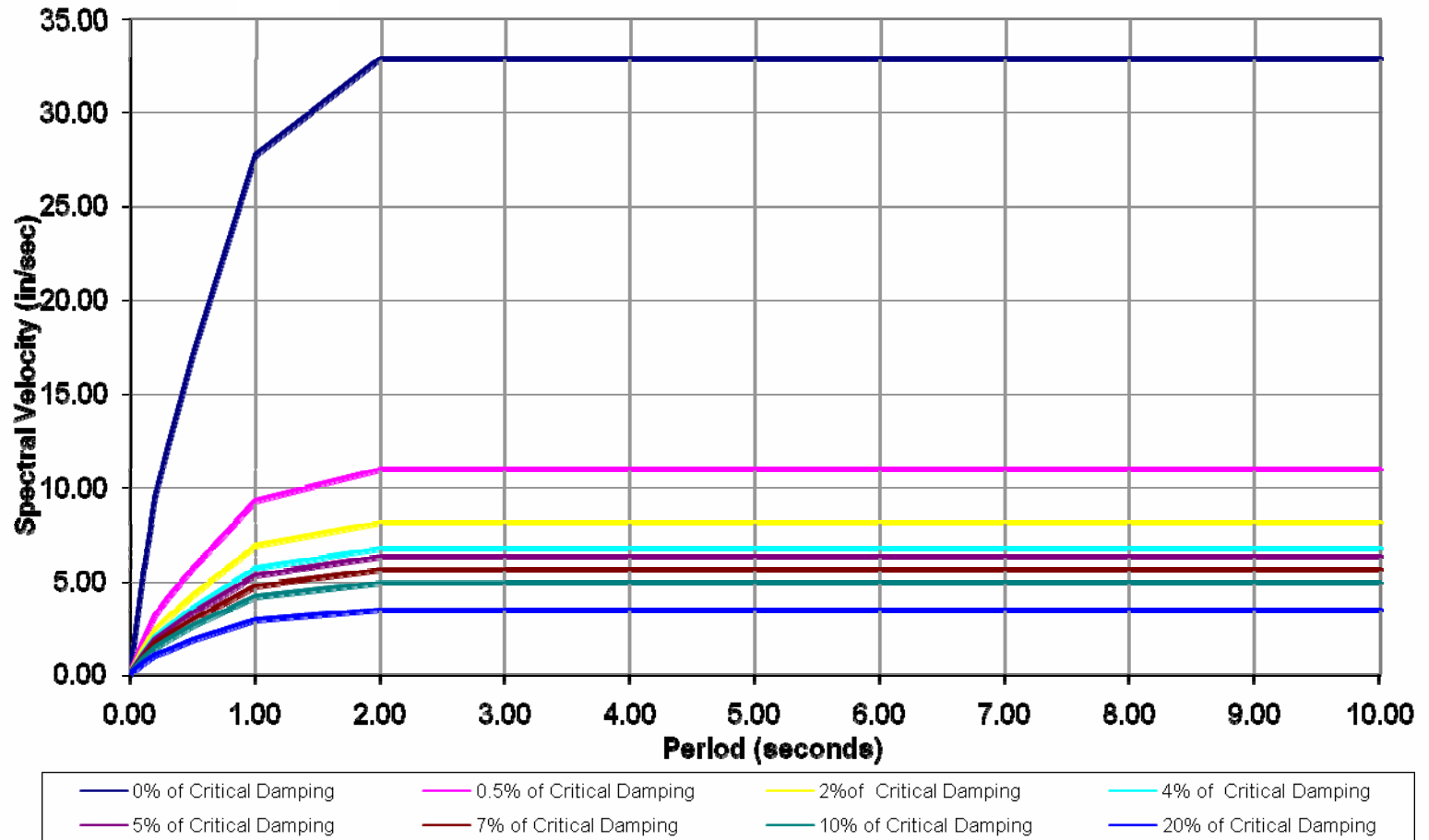
### Acceleration Response Spectra - Safe Shutdown Earthquake - Site Class D




Source: United States Geological Survey/Earthquake Model Data

PROJECT FLORIDIAN NATURAL GAS STORAGE MARTIN COUNTY, FLORIDA			
TITLE <b>Velocity Response Spectra For SSE Event</b>			
 Golder Associates	PROJECT No 063-9587	SCALE AS SHOWN	REV. 0
	Design CJB 26 Mar 07		
	Map CJB 26 Mar 07		
	Check CJB 26 Mar 07		
	Review TA 28 Mar 07	Figure 6.6-5	

### Displacement Response Spectra - Safe Shutdown Earthquake - Site Class D

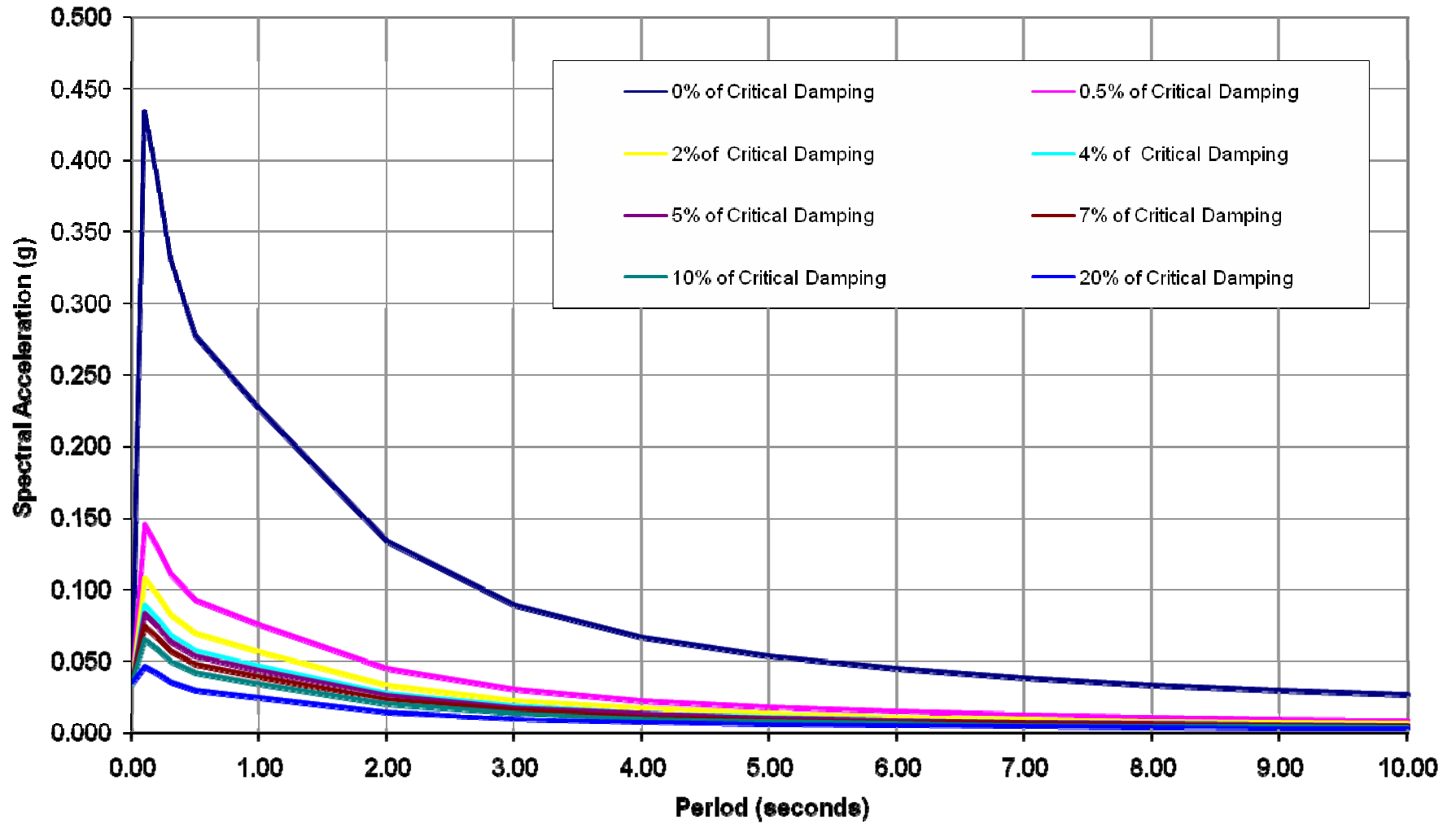


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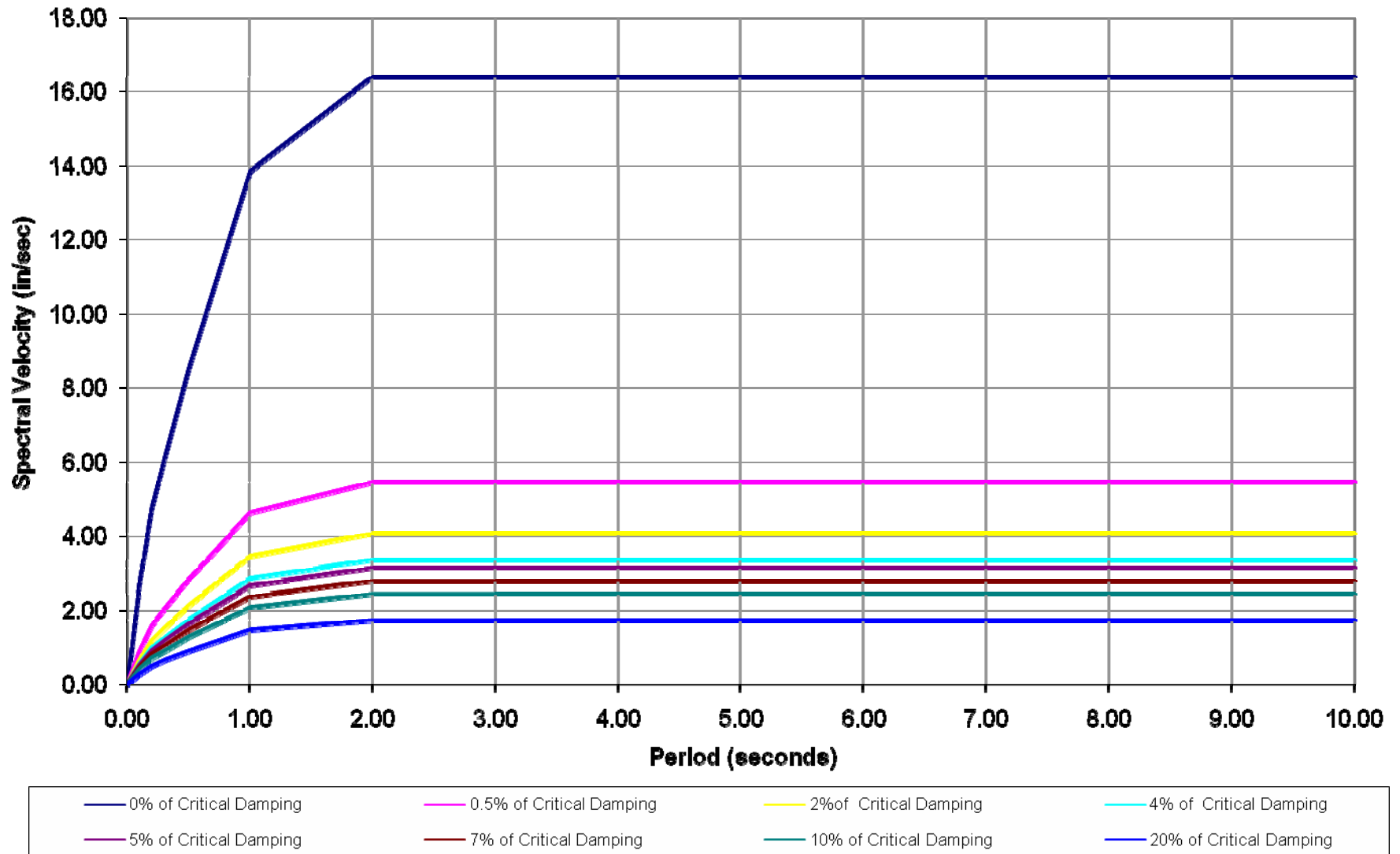
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TITLE		Displacement Response Spectra For SSE Event	
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**Updated Figures for RR No. 13, Appendix I**

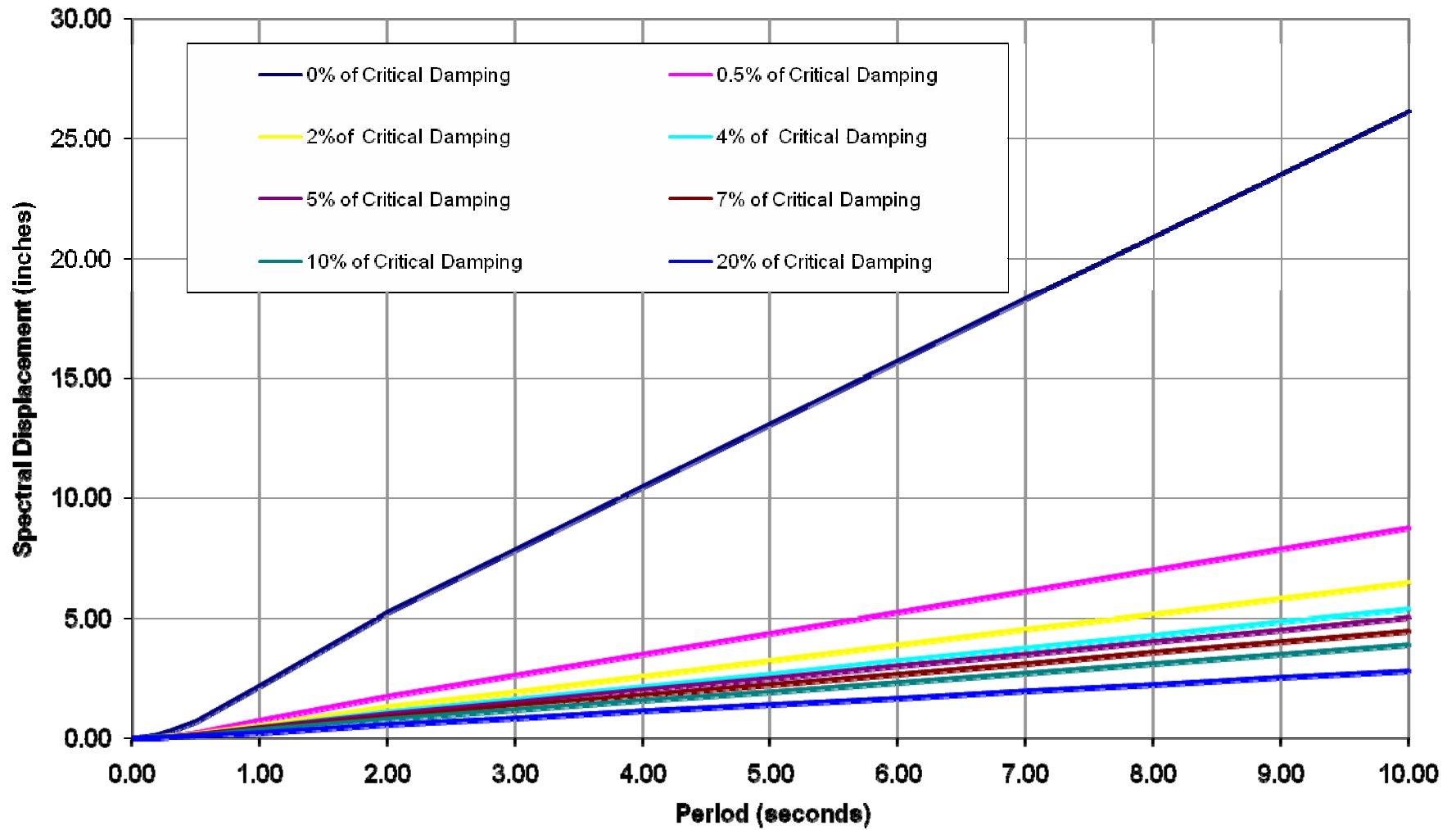
**Figure 1. Acceleration Response Spectra - Operating Basis Earthquake - Site Class D**



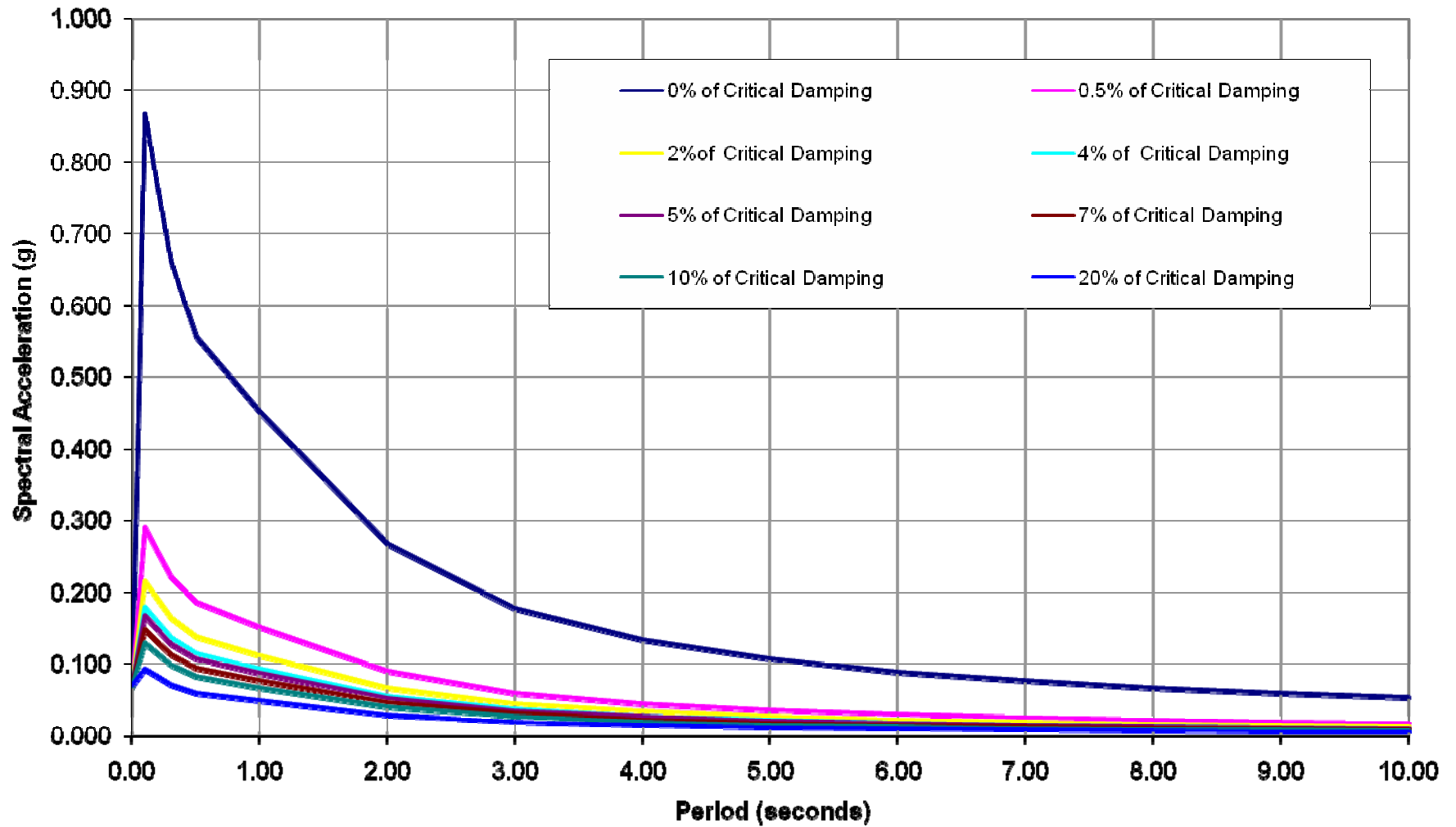
**Figure 2. Velocity Response Spectra - Operating Basis Earthquake - Site Class D**



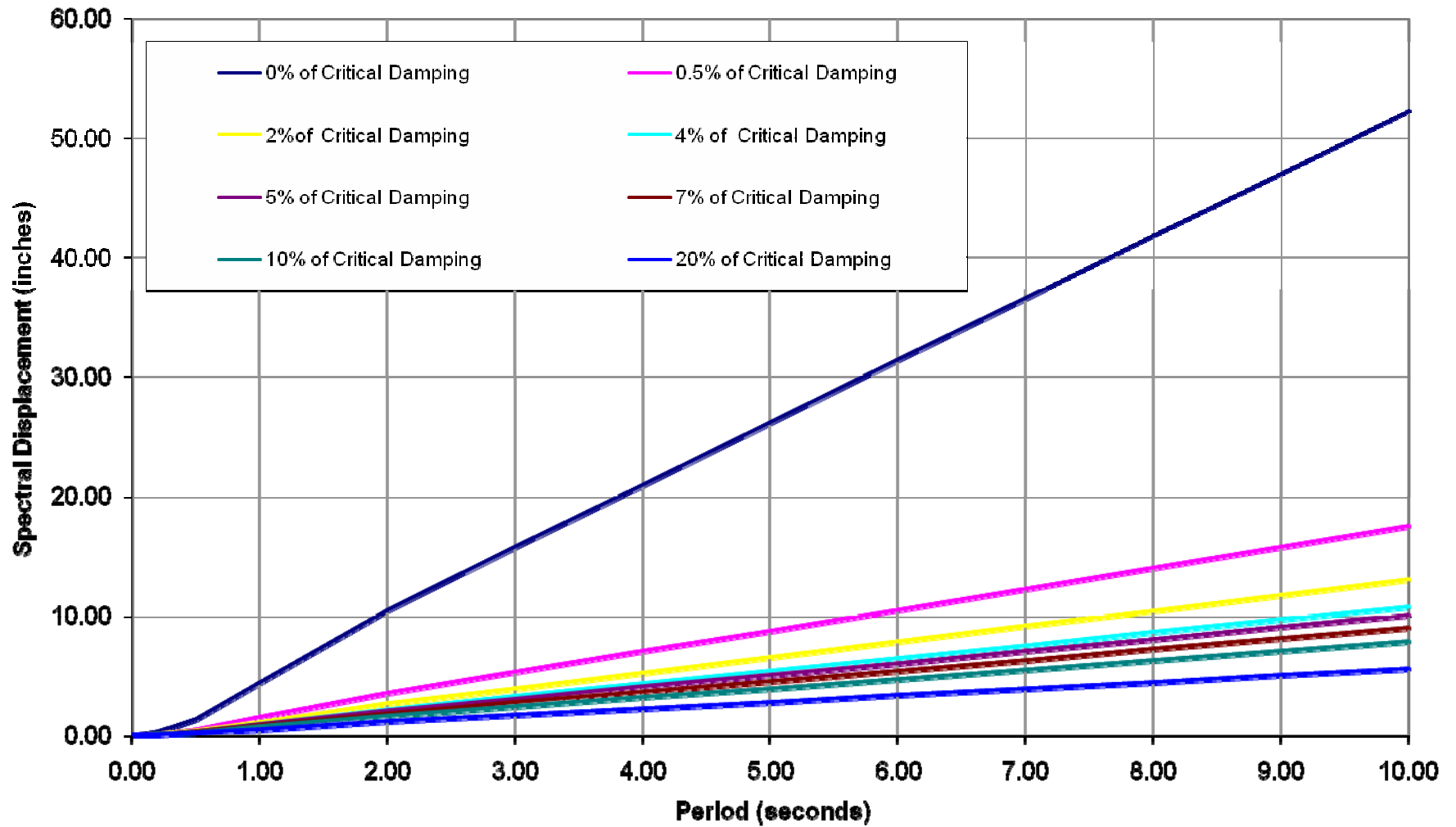
**Figure 3. Displacement Response Spectra - Operating Basis Earthquake - Site Class D**



**Figure 4. Acceleration Response Spectra - Safe Shutdown Earthquake - Site Class D**



**Figure 5. Velocity Response Spectra - Safe Shutdown Earthquake - Site Class D**



**Figure 6. Displacement Response Spectra - Safe Shutdown Earthquake - Site Class D**

