

DICKSTEINSHAPIRO_{LLP}

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

December 13, 2007

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

Re: Supplemental Response to November 23, 2007 Environmental Data Request
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 files the attached FGS Supplemental Response to November 23, 2007 Environmental Data Request.

The FGS Supplemental Response to November 23, 2007 Environmental Data Request includes a CD. One copy of the CD, which contains only Public material, is attached for the public file; additional copies of the CD are being provided directly to Charles Brown, OEP Environmental Project Manager, and Barbara Mohrmann of ERM, the third party environmental contractor for this Project. Electronic copies of this filing, excluding the CD, are being served by email to all Parties, as well as to those persons listed below.

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

Sincerely,



Joan M. Darby

Enclosures

cc: All Parties
Charles Brown, FERC
Barbara Mohrmann, ERM
Eric Reusch, US Army Corps of Engineers
John Wrublik, US Fish and Wildlife Service
Tom Colios, South Florida Water Management District
Joseph Walsh, Florida Fish and Wildlife Conservation Commission

**Floridian Natural Gas Storage (FGS) Project
Docket No. CP08-13-000**

**SUPPLEMENTAL FGS RESPONSE TO
NOVEMBER 23, 2007
ENVIRONMENTAL DATA REQUEST**

27. Several LNG tank foundation ground improvement options are described in Section 1.1 and Sections 7.4, 7.5 and 7.6 of Appendix J of RR 13. Which option has FGS selected for design and how does FGS's predicted LNG tank foundation settlements for the selected option compare with the CB&I guidance values provided on page 41 of Appendix J of RR 13? Please also provide settlement analysis calculations that provide justification for the predicted settlements for the selected option.

Supplemental Response:

Draft design guidelines for liquefied natural gas tanks have been developed by FERC (Bachman et al. 2007) which provide recommended foundation angular distortions (a function of total differential settlement). CB&I has provided Golder with recommended threshold values for total and differential settlement. From the analysis completed and assuming that the Hawthorn Group only contains up to 50% highly plastic silt and clay, the maximum total settlement is 6.2 inches and the maximum differential settlement is 2.2 inches. These values meet the FERC settlement thresholds and slightly exceed CB&I thresholds. Ground improvements as described in Appendix J of RR13 and the attached settlement analysis will reduce the total and differential settlement such that all applicable thresholds are met. Most of the differential settlement is from the loose sand layers within the first 50 feet of foundation. In fact, approximately 1.8 inches of the 2.2 inches comes from the sand layers.

A CD containing settlement analysis calculations that provide justification for the predicted settlement is attached.

28. Although FGS has stated that the vault is not part of the property to be acquired for the storage facility site, most of the drawings and figures in the Resource Reports show the vault within the FGS property line. Provide revised drawings/figures that show the correct FGS site boundary.

Supplemental Response:

As stated and shown on the facility plot plan, the vault is not part of the property to be acquired for the storage facility Site. A CD containing revised figures depicting the proper facility boundary, including the cut out for the vault area, is attached.