

December 12, 2013

Demarcus Marshall, M.P.A.
Super District 4
Lowndes County Commissioner
327 North Ashley Street, 3rd Floor
Valdosta, GA 31601

Re: Sabal Trail Project, Docket No. PF14-1-000
Questions from Lowndes County Commissioners and Constituents

Dear Mr. Marshall,

Thank you for the recent opportunity to meet with the Commissioners and constituents of Lowndes County to discuss the proposed Sabal Trail Project. We are in receipt of the e-mail from Joe Pritchard, Lowndes County Manager, containing a number of questions from citizens in your area and/or property owners located near the proposed pipeline and related facilities. These questions and Sabal Trail's responses are provided below.

Set 1 Questions – Two different routes

On the Sabal Trail website (sabaltrailtransmission.com/map) for the maps (<http://search.yahoo.com/search?p=sabal+trail&ei=utf-8&fr=b2ie7>) it show two different maps for the route of the pipeline, one that takes it through Georgia and another that does not.

- Why are there two different routes and why not communicated to this group?
 - To date only been told about one route from AL to FL through Georgia.
 - Alternate route from FERC filing does not go through the middle of Georgia.
 - Answer: *Several major route alternatives were initially investigated by Sabal Trail as part of the development of the pipeline route. Two of these routes were dismissed as viable routes early in the process due to the fact that they have greater environmental impacts than the route currently proposed (“primary route”). These two alternatives, the “Station 85 Route” and the “Hillabee Route,” are described in Resource Report 10 as well as the reasons why these routes are no longer being considered.*
- What is the current status of the route that does not go thru Georgia?
 - If this route is not longer being considered, what are the **specific** reasons as to why
 - Answers:
 - *The alternate routes – both the Station 85 Route and the Hillabee Route – are no longer under consideration due to an increase in*

impacts to the environment and stakeholders in comparison to the primary route.

- *The specific reasons as to why these routes are no longer being considered are described in detail in draft Resource Report 10.*
- Why wasn't this route presented to ALL stakeholders?
 - Why has there been no discussion with property owners about alternate route that we have suggested?
 - Answer: *Sabal Trail is in discussions with property owners regarding the alternate route suggested.*
 - At the compressor station meeting held in Albany on November 15th, I asked a Sabal Trail staff member and was advised that there was no such route.
 - Answer: *The alternate routes were no longer under consideration due to an increase in impacts to the environment and stakeholders in comparison to the primary route.*
 - Now it has been listed as the alternate route with the recent filing.
 - Answer: *See information above regarding alternate routes and the discussion in draft Resource Report 10.*
- I am requesting what the criteria was used to make this the alternate route and specifically why the route through Georgia is the preferred route
 - Answer: *The criteria used to compare the Station 85 alternative route with the primary route can be found in Table 10.5-1 of Resource Report 10 as filed with the Commission on November 15, 2013. Table 10.5-1 is attached hereto.*
- For the two routes, provide:
 - Exact distance from the AL station to FPL
 - Answer: *See attached Table 10.5-1*
 - Number of miles on public lands, thoroughfares or state owned property, and privately owned property
 - Answer: *See attached Table 10.5-1*
 - Number of individual property owners impacted by each
 - Answer: *See attached Table 10.5-1*
 - Number of rivers, wetlands and "green" properties involved in each
 - Answer: *See attached Table 10.5-1*
 - Number of compressor stations on each route
 - Answers:
 - *Current route: 3 compressor stations planned for the initial phase with 2 additional future compressors stations*
 - *Alternate route: 3 compressor stations for the initial phase with 3 additional future compressor stations*
 - Pipes that would be above ground for venting on each route

- Answer: *Compressor stations, meter stations, and mainline valve settings all have the capability for venting. However, compressor stations would be the primary location in the event venting is required.*

Set 2 Questions – Mapping

- Why unwilling to provide a copy of the maps displayed at the Open House meetings?
- I am expanding my request for the maps that have been displayed at every Open house along the route with immediate delivery.
 - Answer: *It's the FERC's practice that information that may identify specific landowners potentially affected by a proposed project is not made available to the public.*

Set 3 Questions – Co-location

- What are the specific reasons and areas where can't co-locate route?
 - According to the June 30, 2013, The Valdosta Daily Times, 70% of the route will parallel existing right of way such as power lines.
 - Answers:
 - *Sabal Trail's current route parallels other utilities for approximately 80% of the route.*
 - *There are areas along the proposed route where deviations must be made to avoid constructability issues such as terrain, houses, and environmental concerns. The remaining areas along the pipeline route that are not paralleling any existing utilities do not have any utilities in the immediate area to be paralleled. The ability to co-locate with existing utilities will be explored as the project progresses.*
- What negotiations/discussions have been made with Kinder Morgan about co-location of the proposed pipeline on Kinder Morgan existing easements? If you have been refused, by whom?
 - Answer: *Sabal Trail has been in discussions regarding parallel facilities with representatives of SONAT.*

Set 4 Questions – Safety/Materials to be used

- Will all of the information about Spectra safety history be disclosed to the stakeholders?
 - Answer: *We have a strong safety record. Our safety record is better than the industry average. We continually strive to improve our programs and safety record, and our ultimate goal is zero incidents. Our safety record is a matter of public record and available on line via the PHSMA web site. Further, safety will be discussed in draft Resource Report 11 when the complete set of draft resource reports is filed with FERC next year.*

- How many fail safe and manual valves will be involved and what is the distance between them?
 - Answer: *Compressor stations will be equipped with Emergency Shutdown Systems designed to quickly isolate the stations from the pipeline and vent gas within the station in the unlikely event of an emergency. Mainline block valves will be spaced in accordance with U.S. Dept. of Transportation (“USDOT”) regulations. Mainline block valves will be equipped for remote operation from our Control Room in Houston, TX in accordance with applicable USDOT regulation and Spectra Energy Procedures. Completion of the detailed design is required to finalize the specifics of pipeline valve design.*
- What schedule pipe will be used? Is it a seamless or seemed pipe? Where was the pipe manufactured?
 - Answer: *The pipeline is designed to meet or exceed all USDOT safety requirements and regulations. The equipment and material selection will be in accordance with these requirements and regulations over the course of the project execution.*
- What type of welding technique will be used and will it be x-rayed? Will it be machine or hand welded. Is the level of porosity that would cause the weld to be considered unsatisfactory?
 - Answer: *Sabal Trail will use a combination of mechanized and manual welding for the field welding on the pipeline. Each field weld will be ultrasonically or X-ray inspected to ensure each weld meets or exceeds all federal safety requirements and regulations.*
- What is the maximum pressure and volume going through this pipe?
 - Answers:
 - *Maximum operating pressure is planned to be 1456 psig (pounds per square inch gauge).*
 - *The Sabal Trail Project will have an initial capacity of 800,000 dekatherms per day (“Dth/d”) with an in-service date beginning May 1, 2017. Through a series of phased compressor expansions to meet the future capacity needs of Sabal Trail’s shippers, the Sabal Trail Project capacity will increase to approximately 1,100,000 Dth/d by 2021.*
- Is Spectra & Sabal Trail willing to hold themselves to the standards outlined in the Clean Air and Water act during the harvesting of the natural gas and the construction of the pipeline?
 - Answer: *Sabal Trail does not produce natural gas if that was the reference to “harvesting”. The construction and operation of the Sabal Trail pipeline will be in compliance with all applicable provisions of the federal Clean Water Act and*

Clean Air Act and will meet or exceed all federal safety requirements and regulations in the execution of the project.

- How long has the existing pipelines to FPL through the gulf been in place? Have there been incidents that caused repairs or replacement of sections to that pipeline?
 - Answers:
 - *The Gulfstream Natural Gas System is the only pipeline system located in the Gulf of Mexico providing service to FPL and was placed in service in 2002.*
 - *There has been no disruption of service since that time.*

Set 5 Questions – Communication and Format for Open House Meetings

- What is the format for the upcoming “Public Meetings” to be held by Sabal Trail. Are they open to suggestion or recommendation regarding the format of these meeting? The current format restrict open forum.
 - Answers:
 - *The purpose of the “Open Houses” to be held by Sabal Trail is to provide stakeholders with the opportunity to learn more about the Sabal Trail Project and to discuss specific issues and/or concerns with Sabal Trail subject matter experts. It is also an opportunity for Sabal Trail to listen to and understand the issues and/or concerns stakeholders may have on the project, including the primary project route.*
 - *The current format allows for more one on one engagement to ensure a wide variety of questions specific to a particular landowner are answered. This setting allows for all stakeholders to be comfortable asking their questions in a casual setting.*
 - *This format has been effectively utilized by interstate pipelines for multiple projects.*
 - *FERC will host scoping meetings in early 2014. The structure of those meetings is more formal and is managed by FERC.*
 - *Sabal Trail is open to participating in other community updates such as county commission meetings, etc.*
- I have made inquiries to several local citizens during my daily routines, ex. Eating out for lunch, shopping at stores, no one that I approached were aware of the Dec 16th meeting for Lowndes County. Is Sabal Trail willing to make UNBIASED announcements of these meetings using the following formats:
 - A. Full page AD in the local newspapers for that community **Andrea did commit to this, please provide more details as to what size ad and the frequency of the run
 - a. Answers:
 - i. *Sabal Trail did not commit to this*

- ii. *On December 2nd, Sabal Trail filed the information on the dates and locations for the Open Houses, previously filed on October 23rd and November 12th, as well as the newspaper(s) in which the advertisements for these meetings would be placed, including frequency of the run of advertisements.*
 - iii. *Where available, community calendar TV stations also ran the scheduled meeting information.*
 - B. *Billboard at high traffic locations in Valdosta, ex. the electronic billboards by Walmart and the mall on Norman Drive would be great.*
 - a. *Answer: This is not part of our communication plan.*
 - C. *Mass mailing to all residents of the County (maybe this could be coordinated with you)*
 - a. *Answer: This is not part of our communication plan. Letters are mailed to all landowners within the 600-foot corridor, public officials and other key stakeholders.*

Set 6 Questions – Benefits to Local Community vs. Others

- *Has any elected officials or private corporations petitioned for this line to run through our state? What is the amount of revenue to the state of Georgia that will come from this pipeline?*
 - *Answer: An economic benefit study has been performed. While it is early and dependent on the final route impact, the study estimates \$470 million in property taxes for taxing authorities in Georgia over a 60 year timeframe.*
- *Are there any contracts to supply Georgia businesses or residents from the proposed pipeline?*
 - *Answer: Sabal Trail is actively marketing transportation capacity along the entire primary pipeline route, including markets within Georgia.*
- *Is any of this natural gas from the proposed pipeline or gas that is currently being supplied through the existing pipeline to FPL going to be exported? Are there supplies being sent to export depots in Florida that could be purchased by FPL for their use? Is the current infrastructure being efficiently utilized to avoid the need to add additional pipeline.*
 - *Answers:*
 - *Sabal Trail is not aware that any of its shippers have or will request this authorization to export gas and is not aware that any gas it will transport for shippers will be exported.*
 - *Florida Power & Light has stated that the purpose of these new natural gas supplies is to fuel their reconstructed power plants as part of their modernization plans.*
 - *The two existing pipelines that serve Central and Southern Florida, Gulfstream and Florida Gas Transmission, are at or nearing full capacity.*

Set 7 Questions – ROW Agent Protocol and Hotline Calls

- What are the protocols for the agent interaction with property owners? Acceptable hours of contact and days of the week? Is it true that is we are unwilling to authorize the land survey; Sabal Trail will not listen to concerns about the route of the pipeline through the landowner's property?
 - Answer: *Agents attempt to contact landowners during business, early evening and weekend hours to ensure contact with landowners who may work during the day. Sabal Trail will restrict calling times as requested by landowners. All landowners are encouraged to participate in the pre-filing process, including the Open Houses. Understanding the concerns and issues of all stakeholders early on is a key element of the pre-file process. However, not giving permission for survey access inhibits our ability to fully evaluate and compare impacts with a proposed route and a landowner requested reroute. It also leaves Sabal Trail with the only option of eventually entering properties pursuant to state survey access laws. See response to Open House meetings above.*
- I called the HOTLINE requesting information on when they plan to file the Eminent Domain that I have been threatened with so much and through what court system. To date, I have not been contacted concerning the inquiry I made to the HOTLINE.
 - Answer: *We are investigating. Generally, hotline calls are responded to within 24 hours. Nonetheless, no one has been threatened with eminent domain. We have sent letter to landowners who have refused survey permission noting the right to enter properties under state survey laws which are part of the GA eminent domain statutes. However, these letters clearly state that entry under those survey laws is NOT a taking of property, only access for surveys. There are no specific plans pertaining to eminent domain as you have requested.*

Set 7 Questions – Regulatory/ Miscellaneous

- Has construction begun on the pipeline anywhere along the route? It has been rumored that it has begun along the Suwannee River, either in Hamilton and Suwannee County.
 - Answers:
 - *Only survey activities are occurring at this time. Construction of the pipeline and related facilities cannot begin until authorization is received from FERC and all necessary permits and environmental clearances have been obtained from federal, state and local agencies.*
 - *These numerous authorizations and permits are expected to be issued in early 2016.*
 - *Construction is not scheduled to commence until the first half of 2016.*
- Native Americans were not notified under the initial pre-filing request. What impact to the timeline does this exclusion of these stakeholders have? What considerations have been made to give this group an equal amount of time to review the proposal? How can

this process continue forward without sufficient time for those previously excluded stakeholders to have an equal amount of time to review the plan?

- Answers:
 - *Sabal Trail filed its request with the FERC to utilize the pre-filing review process on October 4, 2013. In that request, Sabal Trail provided an initial stakeholder list, including information on federal, state and local agencies and the required agency permits and approvals.*
 - *Sabal Trail sent consultation letters to 20 federally-recognized tribes on October 23, 2013 notifying them of the project and seeking their input. Sabal Trail filed an update to the stakeholder lists to include the Native American Tribes affected by the proposed pipeline route on October 28, 2013.*
 - *In addition, as required by FERC for projects utilizing the pre-filing review process, Sabal Trail filed an update to all of the stakeholder lists to reflect the current list of stakeholders, which change as the proposed route changes, on November 15, 2013.*
 - *The date on which these lists are filed with FERC are not an indication of the dates on which contacts with the various agencies and stakeholders has occurred. Rather, the filing dates merely reflect the dates on which the information is provided to FERC. During pre-filing, a process anticipated to last for approximately 12 months, the stakeholders potentially impacted by the Sabal Trail Project is subject to change as changes to the pipeline route occur.*
- What was the motivation behind doing business under the name of Sabal Trail and not under the parent company of Spectra?
 - Answer: *Sabal Trail Transmission, LLC is an independent legal entity owned by affiliates of Spectra Energy Partners and NextEra Energy. It is not a wholly-owned Spectra entity doing business under another name.*

I trust that the information herein is both responsive and helpful to you.

Best Regards,
Sabal Trail Transmission, LLC
By: Sabal Trail Management, LLC,
Its Operator

/s/ Brian C. Fahrenthold
Brian C. Fahrenthold
Director, State Government Affairs

cc: Joe Pritchard

TABLE 10.5-1

Comparison of Station 85 Route and Preferred Alignment

Factor	Primary Route	Station 85 Route	Difference (if Applicable)
Length of Corresponding Segments (miles)	204.92	370.04	165.12
Co-location with Existing ROW (miles)	137	139.9 (transmission)	2.9
Pipeline Land Requirements (acres) (construction/operation)	2,444.56	4,349.94	1,950.38
Property Owners Affected (number)	1,042	N/A	N/A
Occupied Structures within 50 feet of ROW (number)	13	37	24
Conservation / Public Land Crossed			
<i>State Land Crossed (number / linear feet)</i>	780	16,997	16,217
<i>Federal Land Crossed (number / linear feet)</i>	853	0	-853
<i>County / Local Land Crossed (number / linear feet)</i>	16	0	-16
Railroads Crossed (number)		13	
Roadways Crossed	387	558	171
Forested Land			
<i>Forested Land Crossed (miles)</i>	71.27	144.0	72.73
<i>Forested Land Impacts (acres) (construction/operation)</i>	863.93	1,745.5	881.57
Agricultural Land			
<i>Agricultural Land Crossed (miles)</i>	51.43	43.09	-8.34
<i>Agricultural Land Impacts (acres) (construction/operation)</i>	623.35	522.3	-101.05
Waterbody Crossings (number)			
<i>Perennial Waterbodies Crossed (number)</i>	110	250	140
<i>Intermittent Waterbodies Crossed (number)</i>	169	257	88
<i>Major Waterbodies Crossed (number)</i>	6	11	5
Wetland Crossings (number)			
<i>Wetland Distance Crossed (linear feet)</i>	68,572	235,911	167,339
<i>Wetland Impacts (acres) (construction/operation)</i>	118.1	406.18	288.08
<i>Forested Wetland Crossed (linear feet)</i>	59,370	219,067	159,697

TABLE 10.5-1

Comparison of Station 85 Route and Preferred Alignment

Factor	Primary Route	Station 85 Route	Difference (if Applicable)
<i>Forested Wetland Impacts (acres) (construction/operation)</i>	102.2	377.18	274.98
Karst Terrain Crossed (miles)*	153.94*	30.09 Long 3* 21.99 Short 4* 208.5 Short 5*	-123.85 Long 3* -131.95 Short 4* 54.56 Short 5*
Critical Habitat**	--	26.89 mi**	--
Aquatic Preserves	0	0	0
Special Flood Hazard Areas	60,092 ft. 11.38 mi.	137,569 ft. 26.05 mi.	77,477 ft. 14.67 mi.

* Long 3: Fissures, tubes, and caves over 1,000 ft. (300 m) long; 50 ft. (15 m) to over 250 ft. (75 m) vertical extent; in gently dipping to flat-lying beds of carbonate rock.
 * Short 4: Fissures, tubes and caves generally less than 1,000 ft (300 m) long; 50 ft. (15 m) or less vertical extent; in gently dipping to flat-lying beds of carbonate rock.
 * Short 5: Fissures, tubes and caves generally less than 1,000 ft (300 m) long; 50 ft. (15 m) or less vertical extent; in gently dipping to flat-lying beds of carbonate rock beneath an overburden of noncarbonate material 10 ft (3 m) to 200 ft. (60 m) thick.

** Red Cockaded Woodpecker consultation area. (Critical habitat data only available in Florida)