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REFER TO FILE

December 4, 2013

Via Overnight Delivery and U.S. First Class Mail

Matthew J. Calvert, Esq.
Hunton & Williams, LLP
Suite 4100
600 Peachtree Street, NE
Atlanta, Georgia 30308-2216

RE: Larry Rodgers Investments, LLC's Response to Sabal Trail Transmission, LLC's ("Sabal Trail") November 26, 2013 Survey Permission Request for Natural Gas Pipeline (the "Pipeline"), FERC Docket No. PF14-1-000, located on Tract No. 3219.000, Parcel Id. No. 0099 024 in Lowndes County, Georgia (the "Property")

Dear Mr. Calvert,

The undersigned and this law firm represent Larry Rodgers Investments, LLC ("Rodgers Investments"). We are in receipt of Sabal Trail's November 26, 2013 letter referenced above (the "Request") requesting to perform certain civil, environmental and cultural resource surveys on the Property. Rodgers Investments respectfully denies Sabal Trail's request to enter the Property for the reasons set forth below.

Thank you for pointing us to O.C.G.A. § 22-3-88 which addresses the eminent domain rights of pipeline companies. We agree that the cases you cite in your letter provide the general rule of law with respect to survey rights of an entity vested with eminent domain authority. However, we disagree that the cases are on point in this matter. None of the cases cited (Oglethorpe Power Corporation v. Goss, 253 Ga. 644 (1984), Walker, et. al v. City of Warner Robins, 262 Ga. 551 (1992), and Ware v. Henry County Water and Sewerage Authority, 258 Ga. App. 778 (2002)) pertain to pipeline companies, which are governed specifically by O.C.G.A. § 22-3-80, et seq. In fact the legislature has specifically stated that "there are certain problems and characteristics indigenous to such pipelines which require the enactment and implementation of special procedures and restrictions on petroleum pipelines and related facilities as a condition of the grant of the power of eminent domain to petroleum pipeline companies." O.C.G.A. § 22-3-80.

In that regard, our review of the law suggests that one of these "special procedures" requires pipeline companies to obtain a Certificate of Public Convenience and Necessity, pursuant to O.C.G.A. § 22-3-82(c), prior to conducting the type of surveys you describe in your Request. Until