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October 29, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

ORIGINAL

RE: Comment
FERC Docket No. PF14-1-000
Southeast Market Pipelines Project

Dear Ms. Bose:

On behalf of the Board of Commissioners of Dougherty County, Georgia, I am herein enclosing a certified copy of Resolution No. 14-019 passed by the Board of Commissioners on a 6-0 vote at a Regular Session meeting on October 27, 2014. As your Commission will note, this Resolution is in opposition to the construction of the proposed pipeline and attendant compressor station within the County of Dougherty.

Please have the Resolution properly filed and recorded under FERC Docket No. PF14-1-000. Thank you for your help and should you need additional information, please contact me.

Sincerely,



W. Spencer Lee, IV, Attorney for
Dougherty County, Georgia

WSLIV:srt

Enclosure

cc: Board of Commissioners of Dougherty County, Georgia
Richard C. Crowdis, County Administrator
Jawahn Ware, County Clerk

FILED
SECRETARY OF THE
FEDERAL ENERGY
REGULATORY COMMISSION
OCT 31 2014 P 3:23

14-019

**A RESOLUTION
ENTITLED**

**A RESOLUTION IN OPPOSITION TO THE 465 MILE INTERSTATE NATURAL GAS
PIPELINE PROPOSED BY SABAL TRANSMISSION, LLC AS SAID PIPELINE
TRAVERSES THROUGH DOUGHERTY COUNTY; REPEALING RESOLUTIONS OR PARTS
OF RESOLUTIONS IN CONFLICT HERewith; AND FOR OTHER PURPOSES.**

WHEREAS, by Letter Order dated October 16, 2013, Sabal Trail Transmission, LLC ("Sabal Trail") was granted approval by the Federal Energy Regulatory Commission ("FERC") to utilize FERC's Pre-Filing Environmental Review Process for the proposed Sabal Trail Project ("Project") with the Project being assigned Docket No. PF14-1-000; and

WHEREAS, the Members of the Dougherty County Board of Commissioners ("Board" or the "Commissioners") have been both listening and responding to concerns expressed by Dougherty County landowners and citizens affected by the proposed project; and

WHEREAS, those concerns have been expressed publicly through the approval by the Board of several letters (copies attached) written on behalf of the Board as follows:

- (a) September 30, 2013 letter from the Board to Pete V. Sheffield, Vice-President Government Affairs and Energy Policy, and Ed Gonzales, Project Director for Sabal Trail Transmission, LLC.
- (b) February 24, 2014 letter from the Board to the Federal Energy Regulatory Commission.
- (c) April 11, 2014 letter from the Board to the Federal Energy Regulatory Commission.
- (d) August 25, 2014 letter from the Board to the Federal Energy Regulatory Commission.

; and

WHEREAS, in order to better understand the concerns of our citizens and the project itself, the Board of Commissioners of Dougherty County and the Board of Commissioners of the City of Albany scheduled a Public Information Meeting for September 29, 2014. At that four hour meeting, the general public and the Commissioners heard from Sabal Trail representatives, community activists and representatives, the Federal Energy Regulatory Commission and various state departments and elected office holders; and

WHEREAS, based on all of the information gleaned by and submitted to the Board, we have become increasingly concerned that the health and welfare of our community will be severely compromised by the construction of the pipeline and any associated compressor stations within Dougherty County; and

WHEREAS, it is clear to the Board that, to this date, Sabal Trail has not articulated a justifiable need for the pipeline as it traverses Dougherty County.

NOW THEREFORE, BE IT RESOLVED by the Board of Commissioners of Dougherty County and it is hereby resolved by Authority of same as follows:



BOARD OF COMMISSIONERS
DOUGHERTY COUNTY
ALBANY, GEORGIA

September 30, 2013

COUNTY COMMISSION:
JEFF "BODINE" SNEYARD, CHAIRMAN
GLORIA GAINES, VICE CHAIR
JOHN HAYES
LAMAR HUGHES
CLINTON JOHNSON
EWELL LYLE
JACK STONE

COUNTY ADMINISTRATOR
RICHARD CROWDIS

Mr. Pete V. Sheffield, Vice President
Government Affairs and Energy Policy
Spectra Energy Corp
Post Office Box 1642
Houston, TX 77251-1642

Mr. Ed Gonzales, Project Director
Sabal Trail Transmission, LLC
2701 N. Rocky Point Drive, Suite 1050
Tampa, FL 33607

RE: Proposed 465 Mile Interstate (Alabama, Georgia and Florida) Natural Gas Pipeline
Project by Florida Power and Light Company

Dear Vice President Sheffield and Project Director Gonzales:

On September 16, 2013, Brian Fahrenthold, Director of the State Government Affairs Office of Sabal Trail Transmission, LLC ("Sabal Trail") appeared before the Board of Commissioners of Dougherty County, Georgia (the "Commission") in order to provide the Commission and our citizens with an overview of the Sabal Trail Transmission Project (the "Project"). At that meeting, Mr. Fahrenthold heard from a number of our citizens outlining their concerns relative to the Project. As a follow-up to that meeting the undersigned members of the Commission wish to memorialize those representations made by Mr. Fahrenthold and our understanding of the Project approval process; thus, we will address three major concerns, to-wit: (1) process rules, regulations and guidelines involving the Federal Government and local and state agencies, (2) reasonable alternate routes to the proposed corridor, and (3) safety issues involving the construction and location of a compressor station.

1. National Environmental Policy Act ("NEPA") and Other Acts and Agencies

Mr. Fahrenthold represented that the Federal Energy Regulatory Commission ("FERC") has primary jurisdiction over the proposed project. Under the Natural Gas Act ("NGA"), it is our understanding that FERC has exclusive authority over the siting, construction and operation of interstate natural gas pipelines such as the Sabal Trail project. FERC is to comply with the procedural requirements of NEPA and is the lead agency in conducting the NEPA review of the project. It is our understanding that Sabal Trail intends to commence the FERC Pre-Filing process in the near future. Mr Fahrenthold

represented that during the certification application process, the public will have multiple opportunities to comment on the project and formally participate in the proceedings. We understand that Sabal Trail will also be holding landowner informational meetings in the near future and will host Open Houses once the FERC Pre-Filing Process begins. It is also our understanding that FERC will be conducting Scoping Meetings to solicit public comments during the scoping period. We understand that the FERC process will involve accepting public comments at various times during the NEPA review. The public is to have access to comments on the draft resource reports that have to be submitted by Sabal Trail and access to comments on the draft Environmental Impact Statement which will be prepared and issued by FERC. In addition, Sabal Trail will seek review from numerous other federal agencies, including the U. S. Army Corps of Engineers, U.S. Fish and Wildlife Service and all appropriate agencies of the State of Georgia including the Environmental Division of the Department of the Georgia Department of Natural Resources. If we are wrong in these assessments of the process, please let us know.

In summary, the Commission has the understanding that Sabal Trail will move forward with the siting, construction and operation of the Interstate Natural Gas Pipeline according to all federal, state and local regulations which process includes ample opportunities for all of our citizens to have considered input as to the project. We strongly request that you keep both this Commission and the community, especially those landowners affected by the siting of the pipeline, apprised of all opportunities for public comment and the dates of all filings.

2. Alternative Routing of the Pipeline

Mr. Fahrenthold stated that while Sabal Trail is reviewing a proposed corridor, it will evaluate reasonable routing alternatives pursuant to both NEPA regulations and FERC requirements. We believe that the alternatives analyses is one of critical importance to all landowners affected by the proposed corridor. It is our understanding that FERC will be required to conduct an objective evaluation of all reasonable alternatives and that no viable alternative will be excluded from consideration. Further, it is our understanding that the public will have multiple opportunities to comment on these alternatives and FERC's evaluation for each of them.

We request that Sabal Trail keep this Commission and all affected landowners informed as to how and when to present the proposed corridor route alternatives and to approve a route that is the least invasive to our landowners.

3. Compressor Station Siting and Design

Mr. Fahrenthold informed the Commission that a Compressor Station is proposed to be sited within the County in order to adequately handle the pipelines required flow and required volumes of natural gas. Mr. Fahrenthold assured the Commission and the

general public that the siting of the facility would not create any significant environmental or safety impact to the County and that Sabal Trail will construct and operate the station in accordance with the appropriate governmental authorizations as required by law. Mr. Fahrenthold attempted to answer citizens questions dealing with the safety of the compressor station in regard to tornadoes, hurricanes and sabotage. It is our understanding that the design and siting of the compressor station will take into consideration those concerns as expressed.

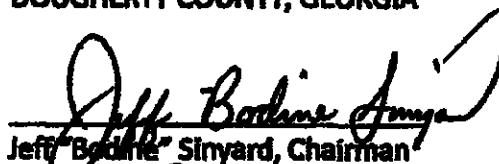
The Commission requests that Sabal Trail inform both the Commission and the general public of the proposed location/locations of the compressor station and furnish both us and the affected landowners with a copy of the specs and design of said structure. We request that Sabal Trail work with all of the county's safety inspectors to ensure that the compressor station will not have a negative impact on our citizens.

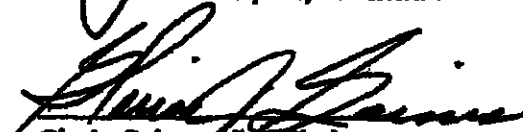
In summary, the Commission requests that Sabal Trail, as Project Manager in the siting, construction and operation of the Interstate Natural Gas Pipeline, (1) follow all federal, state and local rules, regulations and guidelines, (2) notify both the Commission and the affected landowners of any and all public hearings and required governmental filings, (3) in an effort to provide the least invasive route to our landowners, consider all reasonable alternative locations for both the pipelines and the compressor station and, in general, (4) keep this Commission and the public fully informed through transparency and verification of all public hearings and company filings.

We look forward to hearing from you relative to these requests and please know that we do appreciate Mr. Fahrenthold's cooperation in providing the Commission, our concerned citizens and the general public with an overview of the project.


Respectfully submitted,

BOARD OF COMMISSIONERS OF
DOUGHERTY COUNTY, GEORGIA


Jeff Bortone Sinyard, Chairman


Gloria Gaines, Vice-Chairman
District 5


Lamar Hudgins, Commissioner
District 1


John Hayes, Commissioner
District 2


Clinton Johnson, Commissioner
District 3


Ewell Lyle, Commissioner
District 4


Jack Stone, Commissioner
District 6

cc: Brian Fahrenthold,
Sabal Trail Transmission, LLC

Kitty Maidens, Right-of-Way Manager,
Sabal Trail Transmission, LLC

James Carswell, Fire Chief/EMA Director
Albany-Dougherty Fire Department

Judson H. Turner, Director,
Georgia Environmental Protection Division

Gil Norman, Local Project Manager
Sabal Trail Transmission, LLC

Anton C. Porter, Executive Director
Federal Energy Regulatory Commission



BOARD OF COMMISSIONERS
DOUGHERTY COUNTY
ALBANY, GEORGIA

February 24, 2014

COUNTY COMMISSION:

JEFF "BOBBIE" SNEYARD, CHAIRMAN
JACK STONE, VICE CHAIR
JOHN HAYES
HARRY JAMES
LAMAR HUGHES
CLINTON JOHNSON
EWE L LYLE

Federal Energy Regulatory Commission
Office of External Affairs
888 First Street N.E.
Washington, DC 20426

COUNTY ADMINISTRATOR
RICHARD CROWDIS

RE: Proposed 465 mile interstate (Alabama, Georgia and Florida)
Natural Gas Pipeline Project

Prefiling Docket Number PF14-1-000

Dear Commission Members:

By letter order dated October 16, 2013, Sabal Trail Transmission, LLC ("Sabal Trail") was granted approval by the Federal Energy Regulatory Commission ("FERC" or the "Commission") to utilize the Commission's Pre-filing review process for the proposed Sabal Trail Project ("Project"). The project has been assigned Docket Number PF14-1-000.

Prior to and since that date, we, the undersigned members of the Board of Commissioners of Dougherty County ("Board") have been both listening and responding to concerns expressed by Dougherty County landowners affected by the proposed Project. On behalf of the citizens of our community, our Board will continue (a) to closely monitor the Pre-application, scoping and Post-application process (b) provide input to FERC and later to PHMSA regarding Dougherty County public interests, and (c) facilitate communication to FERC and PHMSA of issues relative to the interests of Dougherty County citizens.

With the above in mind, we are enclosing a copy of a September 30, 2013 letter signed by each of us to Pete V. Sheffield, Vice President of the Government Affairs and Energy Policy of Spectra Energy Corporation and Ed Gonzales, Project Director of Sabal Trail Transmission, LLC expressing three major concerns on behalf of our citizens. In that correspondence, we requested "...that Sabal Trail as Project Manager in the siting, construction and operation of the Interstate Natural Gas Pipeline, (1) follow all federal, state and local rules, regulations and guidelines, (2) notify both the Board and the affected landowners of any and all public hearings and required governmental filings, (3) in an effort to provide the least invasive route to our landowners, consider all reasonable alternative locations for both the pipelines and the compressor station and, in general, (4) keep this Board and the public fully informed through transparency and verification of all public hearings and company filings." We are hopeful that one of the proposed alternate locations rerouting the pipeline corridor either out of Dougherty County or out of the State of Georgia altogether will be

the adopted route. Ed Gonzales, Project Director of Sabal Trail in the enclosed October 29, 2013 letter to the Board of Commissioners of Dougherty County responded to our request.

It is now our understanding that FERC has, through an official Notice of Intent, set the date of March 3, 2014 to host a scoping meeting in order to determine environmental issues and attempt to resolve other issues pertaining to the siting of the Project. Thus, the reason for enclosing a copy of the September 30, 2013 letter to both Spectra and Sabal Trail is to ask you to assure that Sabal Trail adequately addresses all of our landowners concerns contained therein and any others that may arise.

We will continue to use Dougherty County resources in order to provide any and all information needed by our citizens in order to obtain a safe, equitable and least invasive solution to the proposed Project. We understand that our input and the input of our landowners and citizens will be both considered and addressed by FERC in environmental documents and in a Final Order. We ask that you please place the Board on a mailing list to receive environmental documents to the following person and at the following address:

Richard C. Crowdis, County Administrator
Board of Commissioners of Dougherty County, Georgia
Post Office Box 1827
Albany, Georgia 31702

Thank you for your consideration.

Respectfully submitted,

BOARD OF COMMISSIONERS OF
DOUGHERTY COUNTY, GEORGIA

JS

Jeff "Bodine" Sinyard, Chairman

JS

Jack Stone, Vice-Chairman
District 6

JS

Lamar Hudgins, Commissioner
District 1

JS

John Hayes, Commissioner
District 2

CS/

Clinton Johnson, Commissioner
District 3

CS/

Ewell Lyle, Commissioner
District 4

CS/

Gloria Gaines, Commissioner
District 5

cc: John V. Peconom, Environmental Biologist
Federal Energy Regulatory Commission

Pete V. Sheffield, Vice President,
Spectra Energy Corp

Judson H. Turner, Director,
Georgia Environmental Protection Division

Brian Fahrenthold, Director, State Government Affairs,
Sabal Trail Transmission, LLC



BOARD OF COMMISSIONERS
DOUGHERTY COUNTY
ALBANY, GEORGIA

April 11, 2014

COUNTY COMMISSION:
JEFF "BODINE" SINYARD, CHAIRMAN
GLORIA GAINES, VICE CHAIR
JOHN HAYES
LAMAR HUGHINS
CLINTON JOHNSON
EWELL LYLE
JACK STONE

COUNTY ADMINISTRATOR
RICHARD CROWDIS

Federal Energy Regulatory Commission
c/o Kimberly D. Bose, Secretary
888 First Street NE, Room 1A
Washington, D.C. 20426

RE: Southeast Market Pipelines Project
FERC Docket Nos. PF14-1-000, PF14-2-000 and PF 14-6-000

Dear Commissioners:

On behalf of myself as Chairman of the Board of Dougherty County, Georgia and on behalf of all Commission Members, this letter is being written as a follow-up to our February 24, 2014 correspondence to the Federal Energy Regulatory Commission (copy attached with attachments) in order to continue to facilitate communication with FERC relative to the interests of our Dougherty County citizens. As noted in the February 24, 2014 correspondence our effort on behalf of our citizens is to have Sabal "...provide the least invasive route to our landowners, consider all reasonable locations for both the pipelines and the compressor station and, in general, (4) keep this Board and the public fully informed through transparency and verification of all public hearings and company filings." It has now come to our attention through representatives of our local Kiokee-Flint Group and their attorney that there is a great deal of concern as to a lack of transparency from Sabal in providing the information they requested during the ongoing scoping process. Concern has also been expressed that Sabal has not paid ample attention to providing the least invasive route to our landowners. Documentation has been provided that requests for information and documents from Sabal have been timely made and, to this date, not provided.

Without the information requested our community is not in a position to make meaningful comment as part of the scoping process relative to Sabal's preferred route as well as to any other potential alternative routes. In order to provide both Sabal and the Commission with one or more alternative pipeline routes in an effort to significantly reduce the disturbance in taking of land, Kiokee-Flint Group and its attorneys must have access to the information and documents previously requested.

With the scoping comment period set to expire on April 20, 2014 it is imperative that information requested be immediately transmitted to Kiokee-Flint Group through its attorney and that the scoping comment period be extended for thirty (30) days from the date of April 20, 2014 in order to allow the Kiokee-Flint Group time to analyze the data and propose alternate routes for both

Sabal and the Commissions review. The objective for all concerned is to obtain a safe, equitable and least invasive solution to the proposed project.

Our request is twofold: (1) We ask that you require Sabal to provide all of the requested non-confidential information in a timely manner, and (2) extend the scoping comment period from the date of April 20, 2014 through the date of May 20, 2014.

Thank you for your consideration.

Respectfully submitted,

**BOARD OF COMMISSIONERS OF
DOUGHERTY COUNTY, GEORGIA**

BY: Jeff "Bodine" Sinyard
Jeff "Bodine" Sinyard, Chairman

**cc: Lamar Hudgins, Commissioner
John Hayes, Commissioner
Clinton Johnson, Commissioner
Ewell Lyle, Commissioner
Jack Stone, Commissioner
Former Commissioner Gloria Gaines
Commissioner Elect Harry James
Richard Crowdis, County Administrator**



BOARD OF COMMISSIONERS
DOUGHERTY COUNTY
ALBANY, GEORGIA

August 25, 2014

COUNTY COMMISSION:

JEFF "BOBBIE" SINYARD, CHAIRMAN
JACK STONE, VICE CHAIR
JOHN HAYES
HARRY JAMES
LAMAR HUDGINS
CLINTON JOHNSON
EWE L LYLE

COUNTY ADMINISTRATOR
RICHARD CROWDER

Federal Energy Regulatory Commission
c/o Kimberly D. Bose, Secretary
888 First Street NE, Room 1A
Washington, D.C. 20426

RE: Southeast Market Pipelines Project
FERC Docket Nos. PF14-1-000, PF14-2-000 and PF 14-6-000

Dear Commissioners:

Based on information the Board of Commissioners of Dougherty County ("Board of Commissioners") is receiving from our local stakeholders, we grow increasingly concerned that Sabal Transmission, LLC ("Sabal Trail"), a joint venture of Spectra Energy Corp. and Nextera Energy, Inc. is not being transparent with those citizens directly affected by the project and our citizenry in general relative to possible harmful effects of a compressor station located in Dougherty County. With that in mind, we are enclosing a three (3) page stakeholders write-up dealing with (1) Public health hazards from the compressor station (2) Landowners issues (3) Local ordinances for consideration (4) Request for the County to write a letter to the Federal Energy Regulatory Commission ("FERC") (5) Needed answers and (6) Needed documentation.

In addition, please find enclosed a copy of an August 14, 2014 *Albany Herald* news story of a meeting held by the South Dougherty Community League. This meeting is only one example of the numbers of meetings that have been held throughout southwest Georgia relative to the location of the pipeline. At each meeting, discussion, in addition to the harmful effects of the pipeline, revolves around moving the location to a less invasive one and certainly a more remote one. Our citizens do not feel that adequate and realistic consideration has been given by Sabal Trail to a less invasive location.

As to the proposed compressor station to be located in Dougherty County, enclosed please find a copy of a recorded **LIMITED WARRANTY DEED** showing a purchase price of \$890,900.00 paid by Sabal Trail to Down Home Plantation, LLC conveying 79.184 acres of property located in Dougherty County. Apparently, this is the location wherein Sabal Trail plans to construct a compressor station. The Board of Commissioners is currently in receipt of information and evidence to the effect that the compressor station would be a major emitter of nitrogen oxide, volatile organic compounds and other harmful air pollutants. We are under the impression that there will be an estimated 80 tons of carcinogenic pollutants emitted from the compressor

station annually. Based on the information we have received, the Board of Commissioners remains on high alert to the possible danger in having our community suffer negative health consequences because of the construction of the pipeline. Those negative health consequences also include inordinate disturbing sound being emitted from the compressor station. We do not want to see any of our citizens breathe dirty air either in the short term or long term. It just simply appears to make no sense to put a compressor station in such a populated area and county.

We sincerely ask that the Federal Energy Regulatory Commission thoroughly address these issues prior to the issuance of an Environmental Impact Statement. We look forward to hearing from you.

Sincerely,

DOUGHERTY COUNTY, GEORGIA



Jeff "Boogie" Sinyard, Chairman




Jack Stone, Vice-Chairman
District 6



Lamar Hudgins, Commissioner
District 1



John Hayes, Commissioner
District 2



Clinton Johnson, Commissioner
District 3



Ewell Lyle, Commissioner
District 4



Harry James, Commissioner
District 5

Enclosures



Albany - Dougherty County

P. O. BOX 1827 - ALBANY, GEORGIA 31703-5301



PUBLIC INFORMATION MEETING

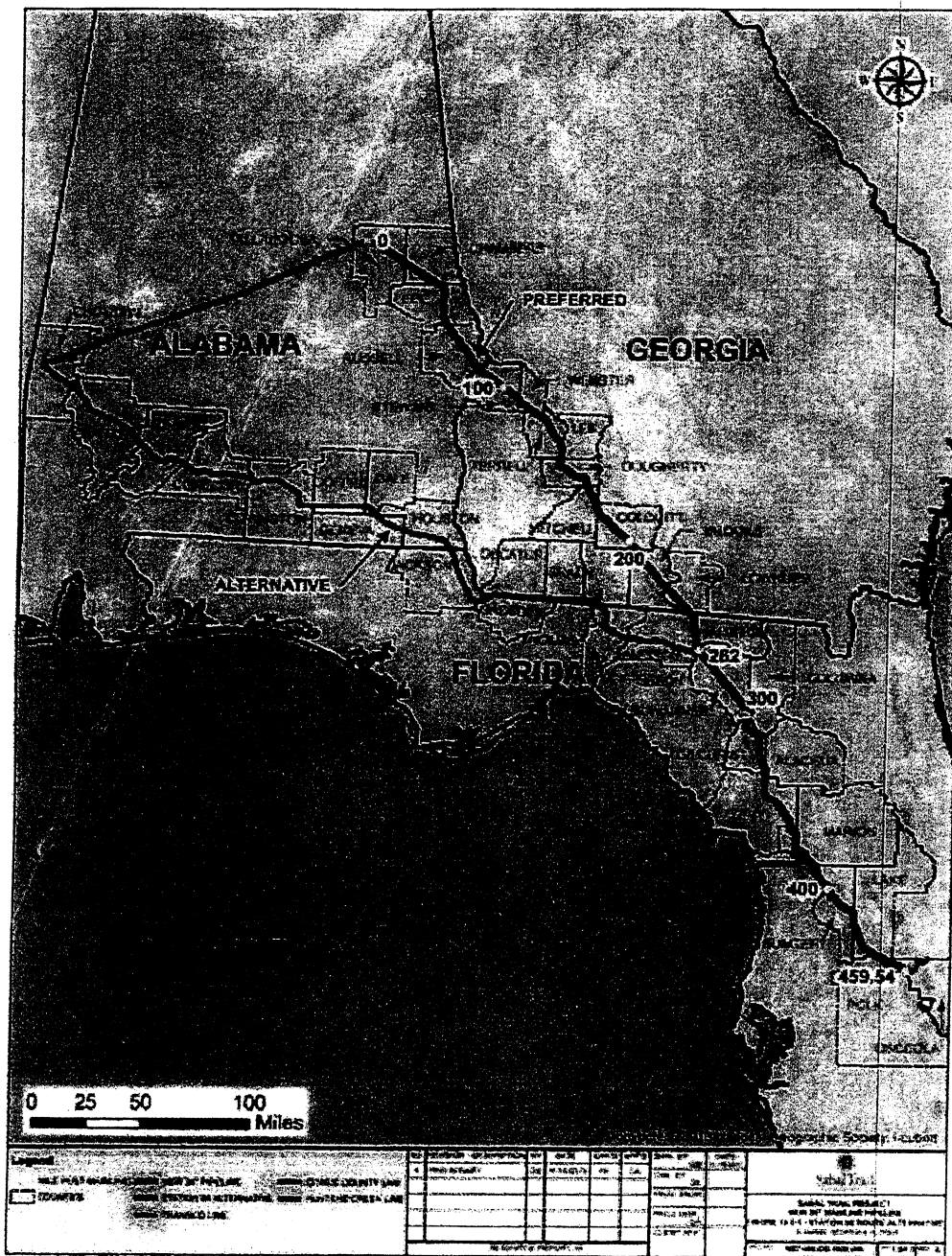
**To Be Held By the Board of Commissioners of Dougherty County and
The Board of Commissioners of the City of Albany**

Sabal Transmission, LLC has proposed a four hundred sixty five (465) mile interstate (Alabama, Georgia & Florida) natural gas pipeline project which will be located somewhere in eight (8) Georgia counties. One of the counties is Dougherty County. In addition to the pipeline, Dougherty County is slated for a Compressor Station which would be utilized to house natural gas fired engines, turbines or electric motors that drive compressors to compress or pump natural gas to move it through the system. The proposed location for the Compressor Station is seventy-nine (79) acres of land fronting on Newton Road south of the airport. Our citizens have voiced a number of concerns relative to the project.

In order to better understand those concerns and the project itself, the Board of Commissioners of Dougherty County and the Board of Commissioners of the City of Albany have scheduled a Public Information Meeting for September 29, 2014 at 10:00 o'clock am in Room 100 of the Government Center located at 222 Pine Avenue. At that time, we expect to hear from Sabal Trail representatives, the designated community activists or representatives and the Federal Energy Regulatory Commission relative to the proposed project. The meeting should last approximately 2 to 2 ½ hours and representatives from Sabal Trail, organizations in opposition to the trail and Federal Energy Regulatory Commission representatives will be available after the meeting to discuss any issues with anyone who is interested. Representatives from various state departments and federal agencies will also be in attendance.

Please call either the County Commission office at 229.431.2121 or the City Commission office at 229.431.2161 for further information.

Individuals with disabilities who require certain accommodations in order to allow them to observe and/or participate in this meeting, or who have questions regarding the accessibility of the meeting or the facilities are required to contact the ADA Coordinator at 229-431-2121 promptly to allow the County to make reasonable accommodations for those persons.



Station 85 Panhandle Alternative, Florida, in Alternatives, by Sabal Trail Transmission, for FERC Docket No. PF14-1-000, 15 November 2013, converted by SpectraBusters

SABAL TRAIL PROJECT, DRAFT RESOURCE REPORT 10, Alternatives, FERC Docket No. PF14-1-000, Initial Pre-Filing Draft, November 2013

Document Content(s)

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