

SABAL TRAIL TRANSMISSION, LLC
5400 Westheimer Court
Houston, TX 77056



March 9, 2018

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

Re: *Sabal Trail Transmission, LLC*, Docket No. CP15-17-000
Response to February 6 Letter
OEP/DG2E/Gas 3

Dear Ms. Bose:

Sabal Trail Transmission, LLC (“Sabal Trail”) hereby submits for review and written approval by the Director of Office of Energy Projects (“OEP”) its response to the letter issued by the Federal Energy Regulatory Commission on February 6, 2018 requesting a plan for investigating the potential mixing of topsoil and subsoil on certain properties (“Mixing Plan”). Sabal Trail requests approval of its Mixing Plan by the Director of OEP by March 16, 2018 so it can complete the associated field work by April 15, 2018, ahead of anticipated cultivation activities and associated crop growth on the properties.

If you have any questions, please contact David A. Alonzo, Specialist I, Rates and Certificates at (713) 627-4957 or the undersigned at (713) 627-4102.

Sincerely,

/s/ Lisa A. Connolly

Lisa A. Connolly
Director, Rates and Certificates
Sabal Trail Management, LLC
Operator of Sabal Trail Transmission, LLC

Attachment

cc: John Peconom (FERC)
Danny Lafoon (FERC)

Plan for Testing Soil Compaction and Mixing
March 9, 2018

This testing plan has been developed in consultation with Charles C. Mitchell, Jr., Ph.D., Professor Emeritus of Auburn University's Department of Agronomy and Soils, and Kirk V. Iversen, a Certified Professional Soil Scientist, affiliated with Auburn University's Department of Crops, Soil & Environmental Science, both of whom will coordinate the sampling and testing activities. The testing plan outlines the steps that will be taken to quantitatively measure any soil compaction and mixing on and adjacent to Sabal Trail's pipeline easements.

1.0 Soil Compaction

Measurements of resistance will be recorded using a soil penetrometer. Soil moisture can greatly affect the penetrometer measurement so most measurements are taken when soil moisture is at its optimum e.g. field capacity. Resistance measurements are relative.

Proposal: Take soil penetrometer measurements every 25 feet along 200-foot transects that cover either side of and across Sabal Trail's easement.¹ Test approximately 3 transects across each field. This will result in a replicate of measurements and allow reasonable statistics to separate means.

2.0 Soil Mixing

Because horizon depth and soil texture naturally vary across a landscape, soil mixing is not an easy measurement to interpret. One way to accomplish this is by comparing soil texture across the landscape. This assumes that the original soil was rather uniform and the mixing of topsoil and subsoil only occurred in a specific part of the field. This method is most reliable if the original soil had dramatic textural differences in shallow (<16 inches) soil horizons. Typically, in Southeastern Coastal Plain soils, there may be shallow topsoil consisting of a fine sandy loam, sandy loam, or loamy sand. If the soil has been plowed or cultivated, this may be the plow layer.

¹ In the case of the property designated GA-BR-004.005 on which the pipeline easement is adjacent to Tallokas Road the transects will extend from the northern edge of the pipeline easement. Moreover, because of the width of the temporary workspace easements on some properties it may be necessary at certain locations to extend the transects to 250 feet to collect off right-of-way samples.

As we go deeper into the soil, the texture may change to a loam, sandy loam, sandy clay loam, or sandy clay. Clay percentage usually peaks in the Bt horizon(s).

If a site is suspected of having soil mixing, then one would expect the surface horizon of the disturbed site to have a higher clay content (or lower sand content) than undisturbed sites in the same landscape and within the same soil series. This can be determined by measuring the sand, silt and clay in a series of samples collected from across the suspected site. This would indicate that subsoil (Bt horizon) has been mixed with the original topsoil. This fact, however, would not predict the effect, if any, this mixing would have on land use or soil fertility. If surface mixing has occurred, there is no need for deep profile sampling assuming that similar mixing has occurred to the depth the soil was disturbed.

Assessing the extent of mixing can be an even greater challenge. One can measure the deviation of (for example) sand or clay content from the sand or clay content of a disturbed site to that of a nearby undisturbed, adjacent site.

Proposal: Measure particle size (sand, organic matters, silt, and clay) with depth to 16 inches in samples along the 200-foot transects identified in “Soil Compaction” discussion above and attached mapping in Exhibits A - F. Core samples will be taken along each transect at 0, 25, 50, 75, 100, 125, 175 and 200 feet. The 100-foot sample will be obtained near the center of the pipeline easement. In addition to documenting the core samples with photo logs, graphs will be developed following a laboratory analysis of particle size, reflecting percent sand, organic matter, clay, and silt and clay across each transect and in each of the two samples per core (i.e. 0 – 8” and 8 – 16”.

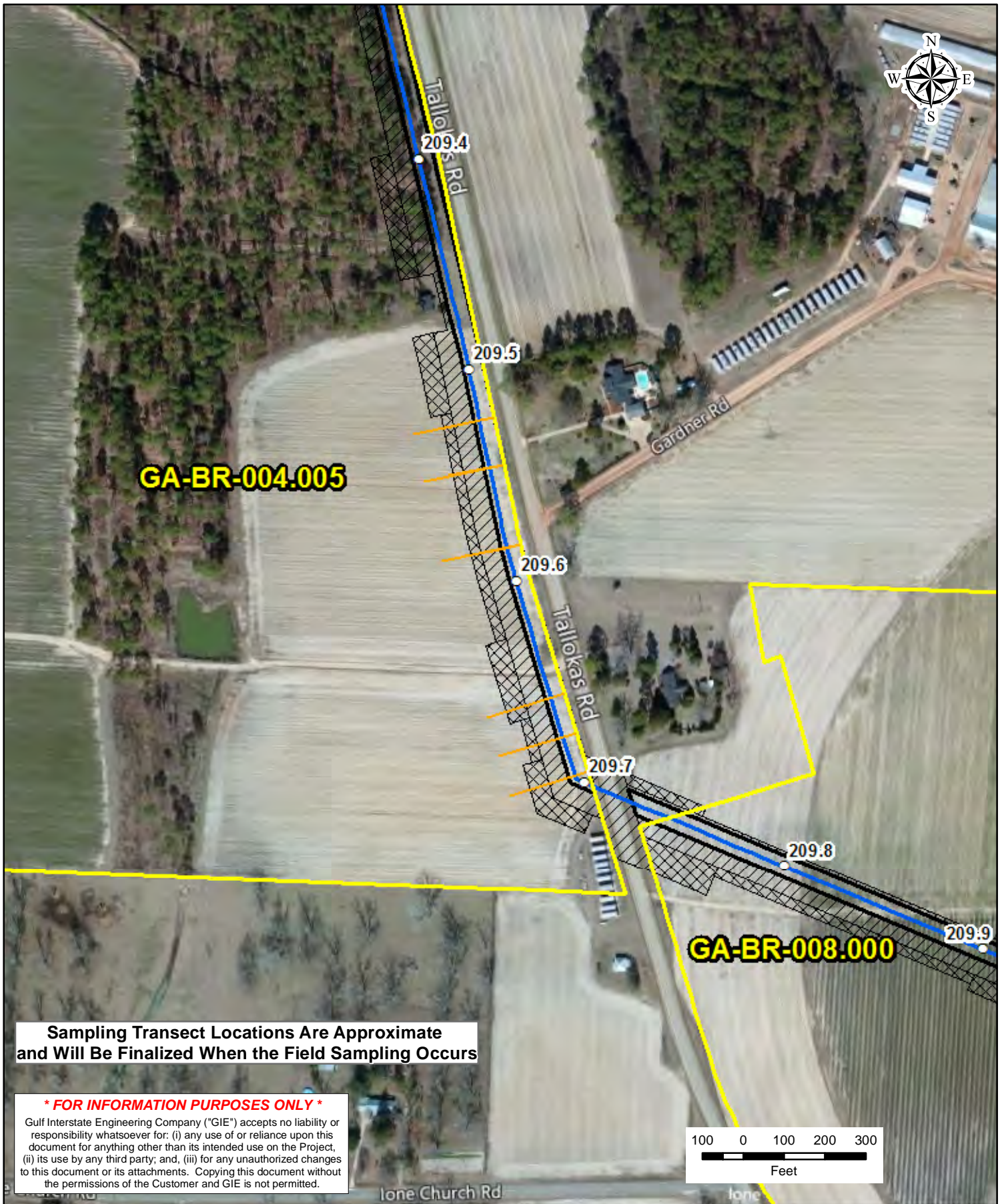
3.0 Testing Locations and Schedule

The approximate locations of the transects to be sampled are depicted on the mapping attached as Exhibits A – F. The locations may be adjusted in the judgment of Sabal Trail’s consulting agronomists based on conditions that exist on the properties at the time of sampling. Sampling must be completed no later than April 15, 2018 because of anticipated cultivation activities and associated crop growth on the properties. To accommodate this sampling schedule Sabal Trail requests FERC’s review and approval of this plan no later than March 16, 2018. Collected soil

samples will be analyzed by a laboratory certified by the North American Proficiency Testing Program.

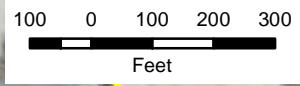
4.0 Post Testing Results

It is anticipated that laboratory reports, as well as an analysis of the sampling and testing results, will be submitted to FERC Staff for review by June 2018.



Sampling Transect Locations Are Approximate and Will Be Finalized When the Field Sampling Occurs

*** FOR INFORMATION PURPOSES ONLY ***
 Gulf Interstate Engineering Company ("GIE") accepts no liability or responsibility whatsoever for: (i) any use of or reliance upon this document for anything other than its intended use on the Project, (ii) its use by any third party; and, (iii) for any unauthorized changes to this document or its attachments. Copying this document without the permissions of the Customer and GIE is not permitted.

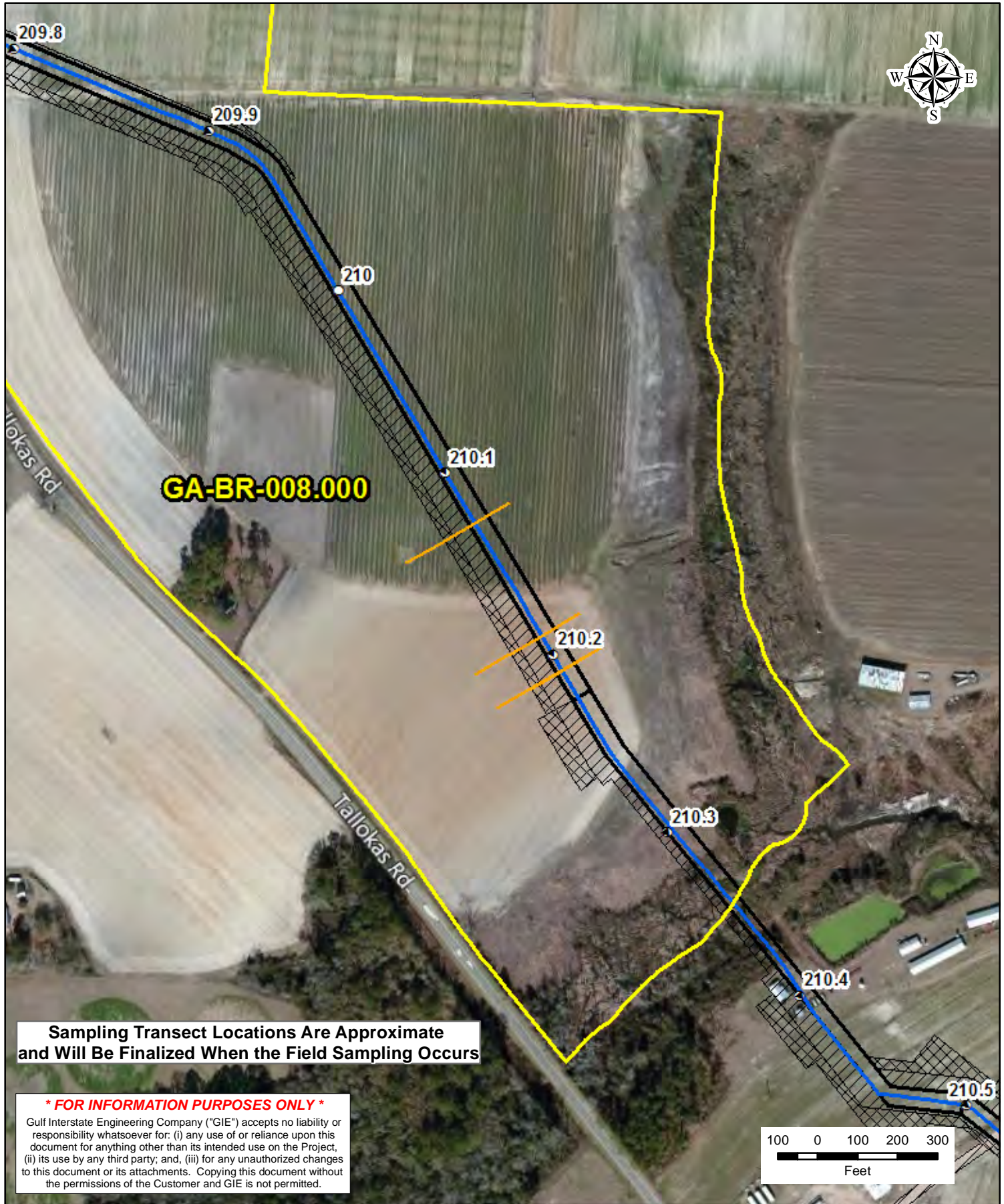


○ MILEPOSTS	CONSTRUCTION WORKSPACE
— TRANSECTS	▨ ADDITIONAL TWS
▭ PARCELS	▨ TEMPORARY WORKSPACE
— AS-BUILT PIPELINE	
▭ AS-BUILT PERMANENT EASEMENT	

NO.	REVISION - DESCRIPTION	BY	DATE	CHK'D	APP'D	DWN. BY:	DATE:
A	PRELIMINARY	GIE	3/8/2018	FR	GA	FSR	3/8/2018
						GA	
						GA	
						GA	

TRACT NO: GA-BR-004.005 Sabal Trail Project	
DWG NO: TBD	SHT: 1 of 6 REV: A

*** FOR INFORMATION PURPOSES ONLY ***



Sampling Transect Locations Are Approximate and Will Be Finalized When the Field Sampling Occurs

*** FOR INFORMATION PURPOSES ONLY ***
 Gulf Interstate Engineering Company ("GIE") accepts no liability or responsibility whatsoever for: (i) any use of or reliance upon this document for anything other than its intended use on the Project, (ii) its use by any third party; and, (iii) for any unauthorized changes to this document or its attachments. Copying this document without the permissions of the Customer and GIE is not permitted.

- MILEPOSTS
- TRANSECTS
- ▭ PARCELS
- AS-BUILT PIPELINE
- ▭ AS-BUILT PERMANENT EASEMENT
- ▭ CONSTRUCTION WORKSPACE
- ▭ ADDITIONAL TWS
- ▭ TEMPORARY WORKSPACE

NO.	REVISION - DESCRIPTION	BY	DATE	CHKD	APPD	DWN. BY:	DATE:
A	PRELIMINARY	GIE	3/8/2018	FR	GA	FSR	3/8/2018
						GA	
						GA	
						GA	


TRACT NO:
GA-BR-008.000
Sabal Trail Project

DWG NO: TBD SHT 2 of 6 REV: A



Sampling Transect Locations Are Approximate and Will Be Finalized When the Field Sampling Occurs

*** FOR INFORMATION PURPOSES ONLY ***
 Gulf Interstate Engineering Company ("GIE") accepts no liability or responsibility whatsoever for: (i) any use of or reliance upon this document for anything other than its intended use on the Project, (ii) its use by any third party; and, (iii) for any unauthorized changes to this document or its attachments. Copying this document without the permissions of the Customer and GIE is not permitted.

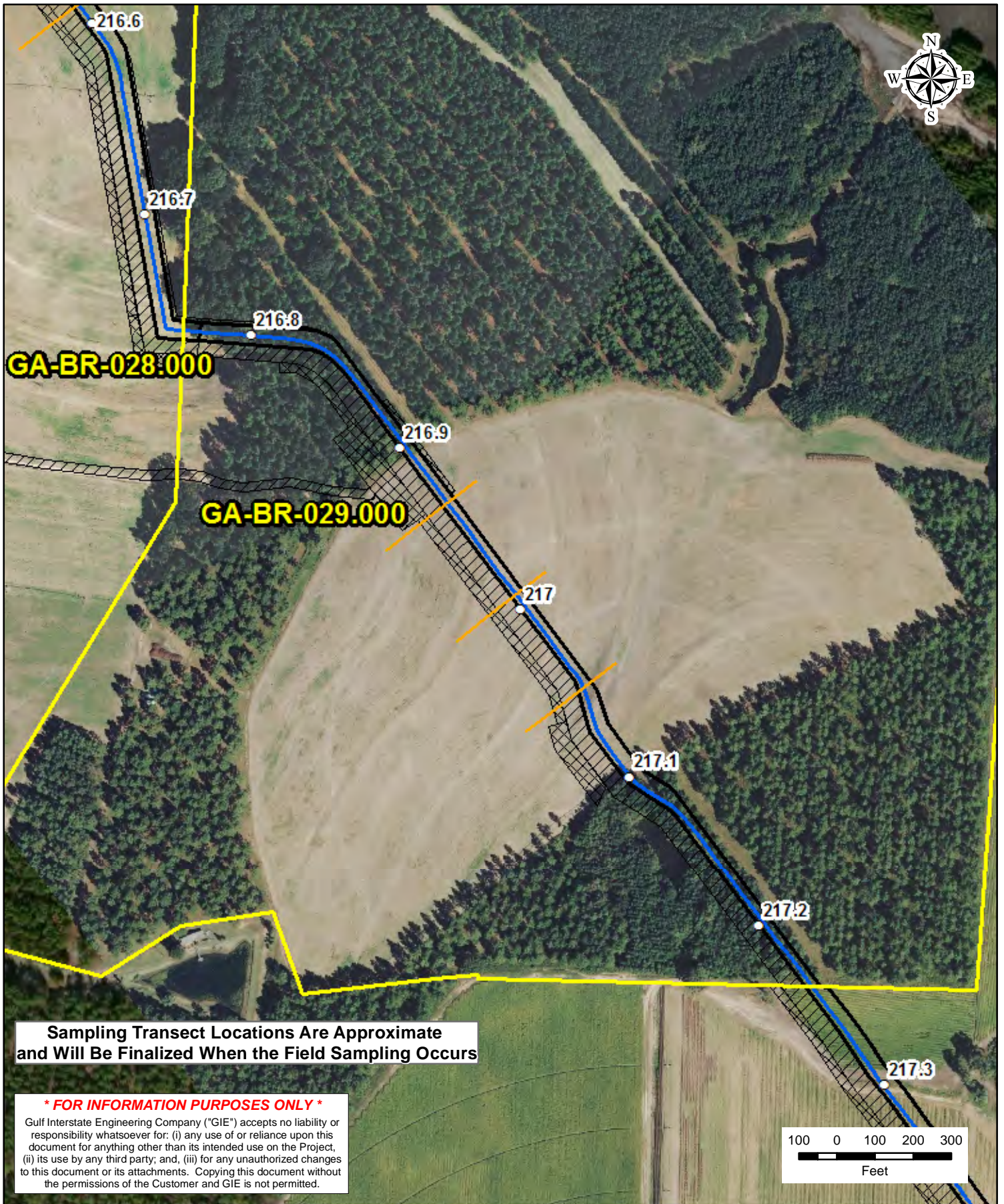
○	MILEPOSTS	CONSTRUCTION WORKSPACE
—	TRANSECTS	▨ ADDITIONAL TWS
▭	PARCELS	▨ TEMPORARY WORKSPACE
—	AS-BUILT PIPELINE	
▭	AS-BUILT PERMANENT EASEMENT	

NO.	REVISION - DESCRIPTION	BY	DATE	CHKD	APPD	DWN. BY:	DATE:
A	PRELIMINARY	GIE	3/8/2018	FR	GA	FSR	3/8/2018
						CHK. BY: GA	
						PROJ. ENGR: GA	
						PROJ. MGR: GA	
						CLIENT APP:	



TRACT NO:
GA-BR-028.000
Sabal Trail Project

DWG NO: TBD	SHT 3 of 6	REV: A
-------------	------------	--------



Sampling Transect Locations Are Approximate and Will Be Finalized When the Field Sampling Occurs

*** FOR INFORMATION PURPOSES ONLY ***
 Gulf Interstate Engineering Company ("GIE") accepts no liability or responsibility whatsoever for: (i) any use of or reliance upon this document for anything other than its intended use on the Project, (ii) its use by any third party; and, (iii) for any unauthorized changes to this document or its attachments. Copying this document without the permissions of the Customer and GIE is not permitted.

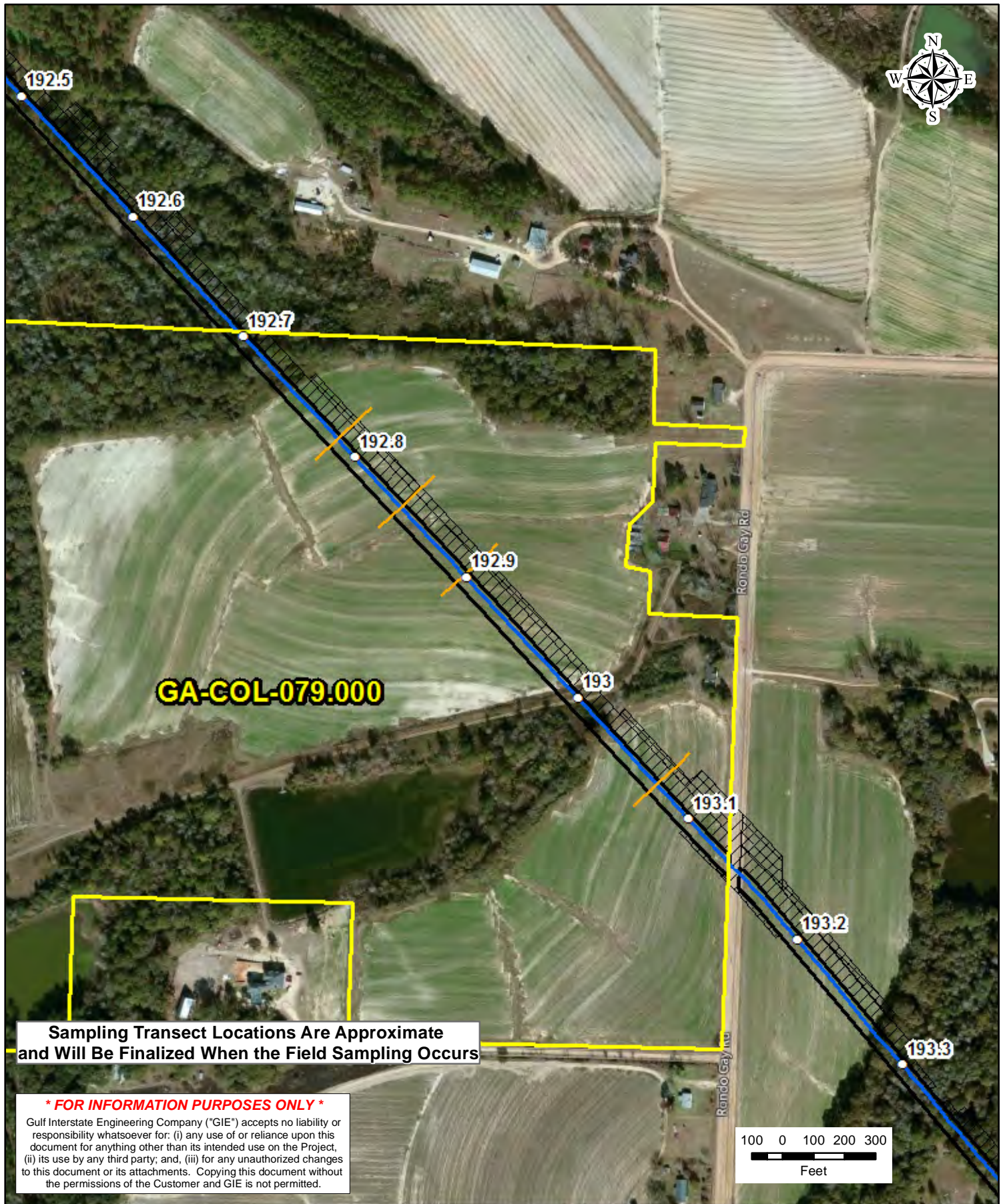
- MILEPOSTS
- TRANSECTS
- ▭ PARCELS
- AS-BUILT PIPELINE
- ▭ AS-BUILT PERMANENT EASEMENT
- ▭ CONSTRUCTION WORKSPACE
- ▭ ADDITIONAL TWS
- ▭ TEMPORARY WORKSPACE

NO.	REVISION - DESCRIPTION	BY	DATE	CHKD	APPD	DWN. BY:	DATE:
A	PRELIMINARY	GIE	3/8/2018	FR	GA	FSR	3/8/2018
						GA	
						GA	
						GA	

Sabal Trail
TRANSMISSION

**TRACT NO:
GA-BR-029.000
Sabal Trail Project**

DWG NO: TBD SH: 4 of 6 REV: A



Sampling Transect Locations Are Approximate and Will Be Finalized When the Field Sampling Occurs

*** FOR INFORMATION PURPOSES ONLY ***
 Gulf Interstate Engineering Company ("GIE") accepts no liability or responsibility whatsoever for: (i) any use of or reliance upon this document for anything other than its intended use on the Project, (ii) its use by any third party; and, (iii) for any unauthorized changes to this document or its attachments. Copying this document without the permissions of the Customer and GIE is not permitted.

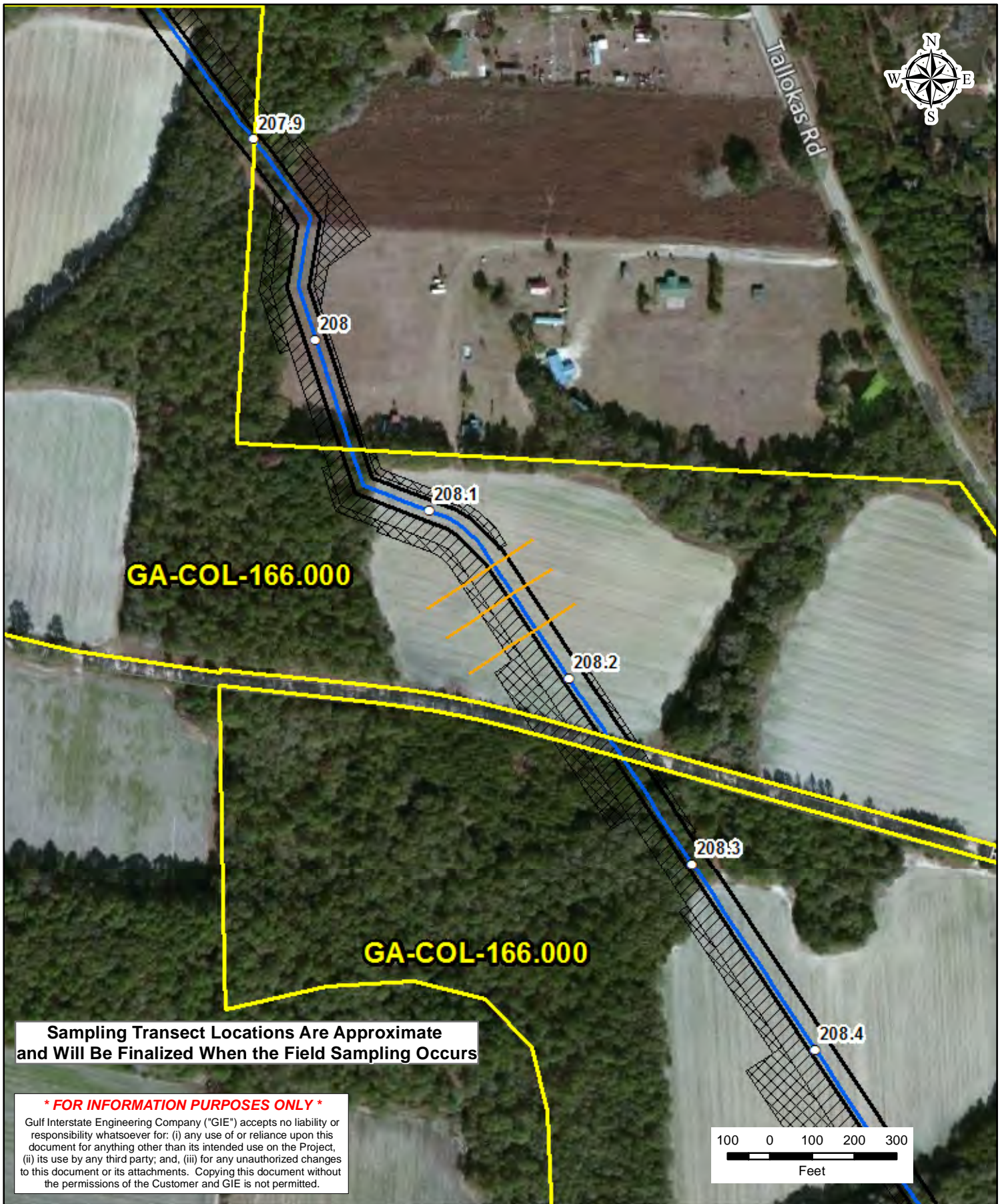
- MILEPOSTS
- TRANSECTS
- ▭ PARCELS
- AS-BUILT PIPELINE
- ▭ AS-BUILT PERMANENT EASEMENT
- ▭ CONSTRUCTION WORKSPACE
- ▨ ADDITIONAL TWS
- ▨ TEMPORARY WORKSPACE

NO.	REVISION - DESCRIPTION	BY	DATE	CHK'D	APP'D	DWN. BY:	DATE:
A	PRELIMINARY	GIE	3/8/2018	FR	GA	FSR	3/8/2018
						GA	



TRACT NO:
GA-COL-079.000
Sabal Trail Project

DWG NO:	TBD	SHT	5 of 6	REV:	A
---------	-----	-----	--------	------	---



Sampling Transect Locations Are Approximate and Will Be Finalized When the Field Sampling Occurs

*** FOR INFORMATION PURPOSES ONLY ***
 Gulf Interstate Engineering Company ("GIE") accepts no liability or responsibility whatsoever for: (i) any use of or reliance upon this document for anything other than its intended use on the Project, (ii) its use by any third party; and, (iii) for any unauthorized changes to this document or its attachments. Copying this document without the permissions of the Customer and GIE is not permitted.

○	MILEPOSTS	CONSTRUCTION WORKSPACE
—	TRANSECTS	▨ ADDITIONAL TWS
—	PARCELS	▨ TEMPORARY WORKSPACE
—	AS-BUILT PIPELINE	
—	AS-BUILT PERMANENT EASEMENT	

NO.	REVISION - DESCRIPTION	BY	DATE	CHK'D	APP'D	DWN. BY:	DATE:
A	PRELIMINARY	GIE	3/8/2018	FR	GA	FSR	3/8/2018
						CHK. BY: GA	
						PROJ. ENGR: GA	
						PROJ. MGR: GA	
						CLIENT APP:	


TRACT NO:
GA-COL-166.000
Sabal Trail Project

DWG NO: TBD SHT 6 of 6 REV: A

Document Content(s)

Sabal - Top and Subsoil Mixing Plan Response - FILED.PDF.....1-10