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March 10, 2005

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: OEP/DPC/CB I
Freebird Gas Storage LLC
Docket Nos. CP05-29-000, *et al.*
§ 375.308(x)(3)

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2005 MAR 10 P 3:10
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Ms. Salas:

Enclosed for filing on behalf of Freebird Gas Storage, LLC please find an original and seven (7) copies of the Responses of Freebird Gas Storage, LLC to the February 28, 2005 Data Request. Also enclosed please find two copies to be time-stamped and returned to my messenger. Should you have any questions about this submission, please contact me at your convenience.

Very truly yours,



Melissa E. Maxwell
Attorney for FREEBIRD GAS STORAGE, LLC

Enclosure

cc: Elizabeth Anklam, Room 6M-07
David Hanobic, Room 6J-05

FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
Response to February 28, 2005 Data Request

Request No. 1

Please provide the latest isopach map of the East Detroit Storage Field, showing the storage reservoir boundary, as defined by fluid contacts or natural geological barriers; the protective buffer boundary; the surface and bottomhole locations of the existing and proposed wells.

Response:

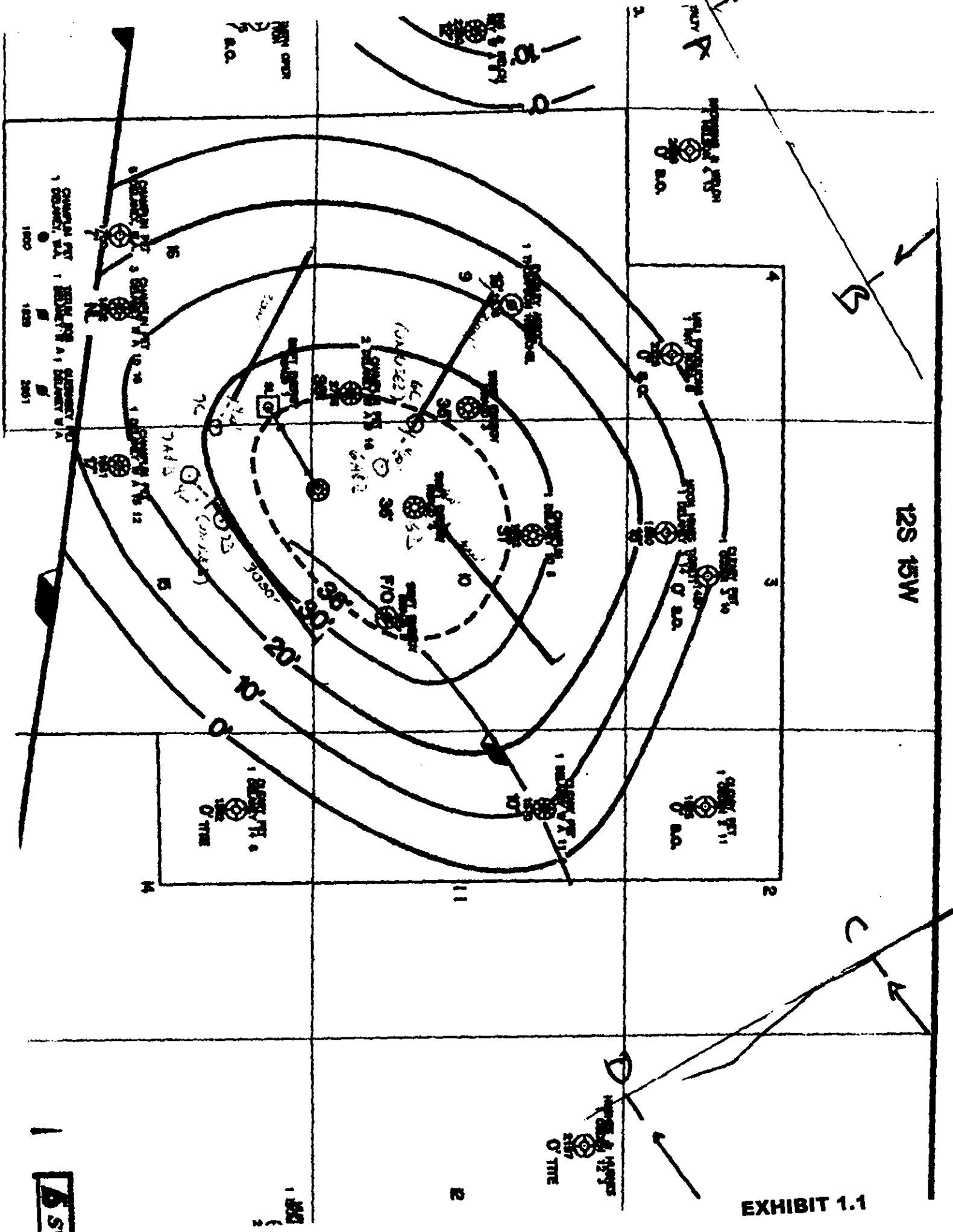
The latest isopach map of the East Detroit Storage Field is attached as Exhibit 1.1. The reservoir boundaries of the Carter Sand are defined to the North, East and West by drilled wells in which the Carter Sand is either not present (shaded out) or in which porosity is absent (zero net pay). There is a sealing fault to the South that separates the field from established oil production.

The horizontal lateral extensions and final bottomhole locations for the four new wells contemplated for the Freebird project are superimposed on Exhibit 1.1. These locations are approximate; the final wellpath for each well will be determined by the results of the actual drilling and may vary slightly from the proposed locations, although none of the wellpaths will extend beyond the existing boundaries of the reservoir. Freebird may modify the drilling program as approved, monitored, and inspected by the State Oil & Gas Board of Alabama.

Respondent:

Gil Muhl
Vice-President
Multifuels LP
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FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
Response to February 28, 2005 Data Request

Request No. 2

Please provide the latest field injection/withdrawal (deliverability) curves for present and proposed storage capacity including average back pressure curves and all other related data.

Response:

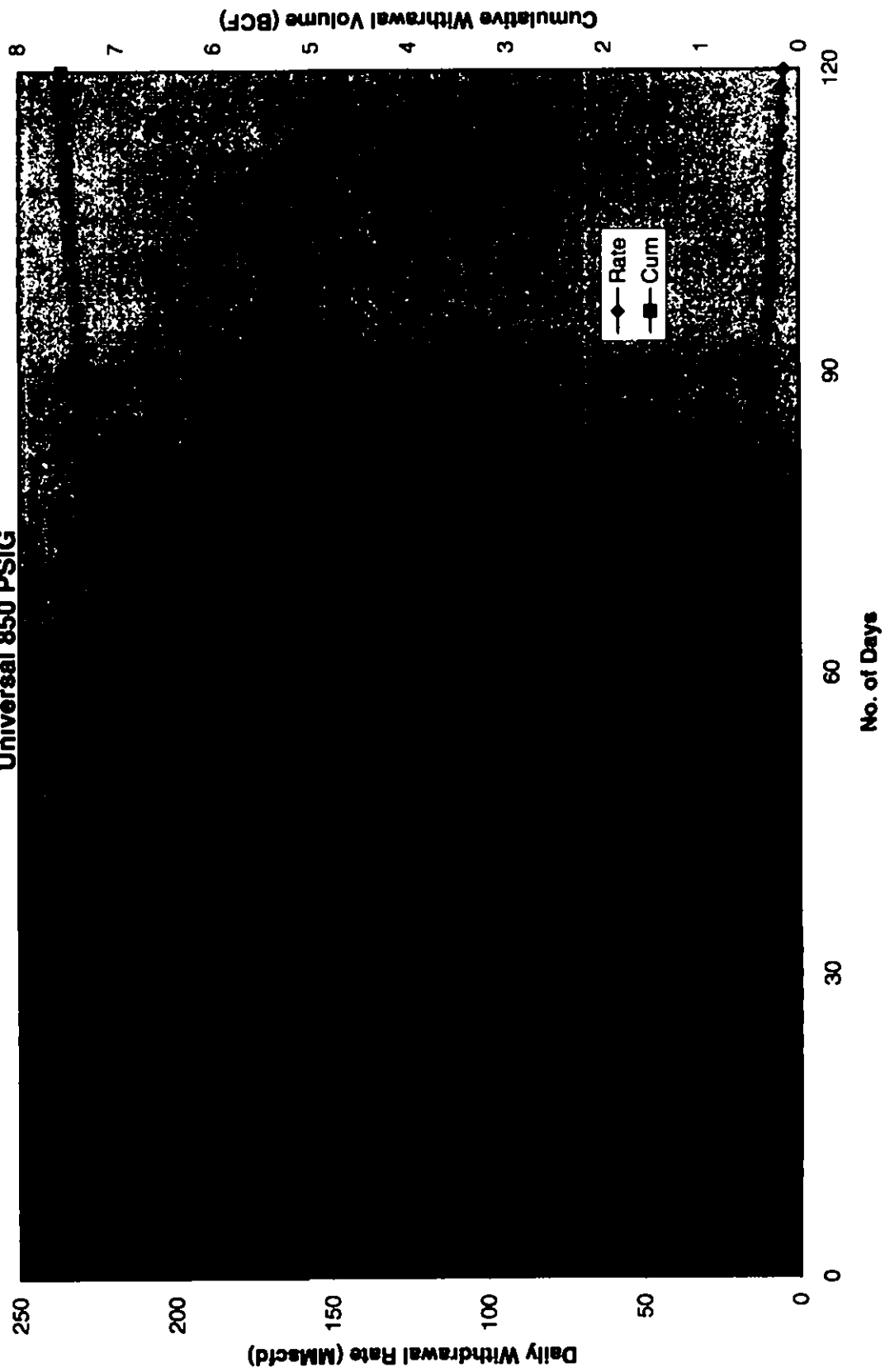
Exhibit 2.1 reflects the proposed withdrawal deliverability curve and cumulative rate for a 120-day delivery season. The peak rate is approximately 210 MMcf/d and the total recovery is approximately 7.6 bcf over a 120-day withdrawal cycle.

The injection cycle will follow essentially the same rate-time relationship, replacing the gas removed from inventory during withdrawal at comparable rates and times. Actual rates may vary day-to-day based on market demands. Backpressure on the wells will vary, depending on rate requirements. Backpressure may be as high as 600 psig or as low as 100 psig, and will be controlled by compressor suction pressure while withdrawing. During injection, backpressure on the wells will be regulated by control valves in the process piping. Exhibit 2.2 reflects the anticipated withdrawal backpressure curve for the first 60 days of the 120-day withdrawal cycle.

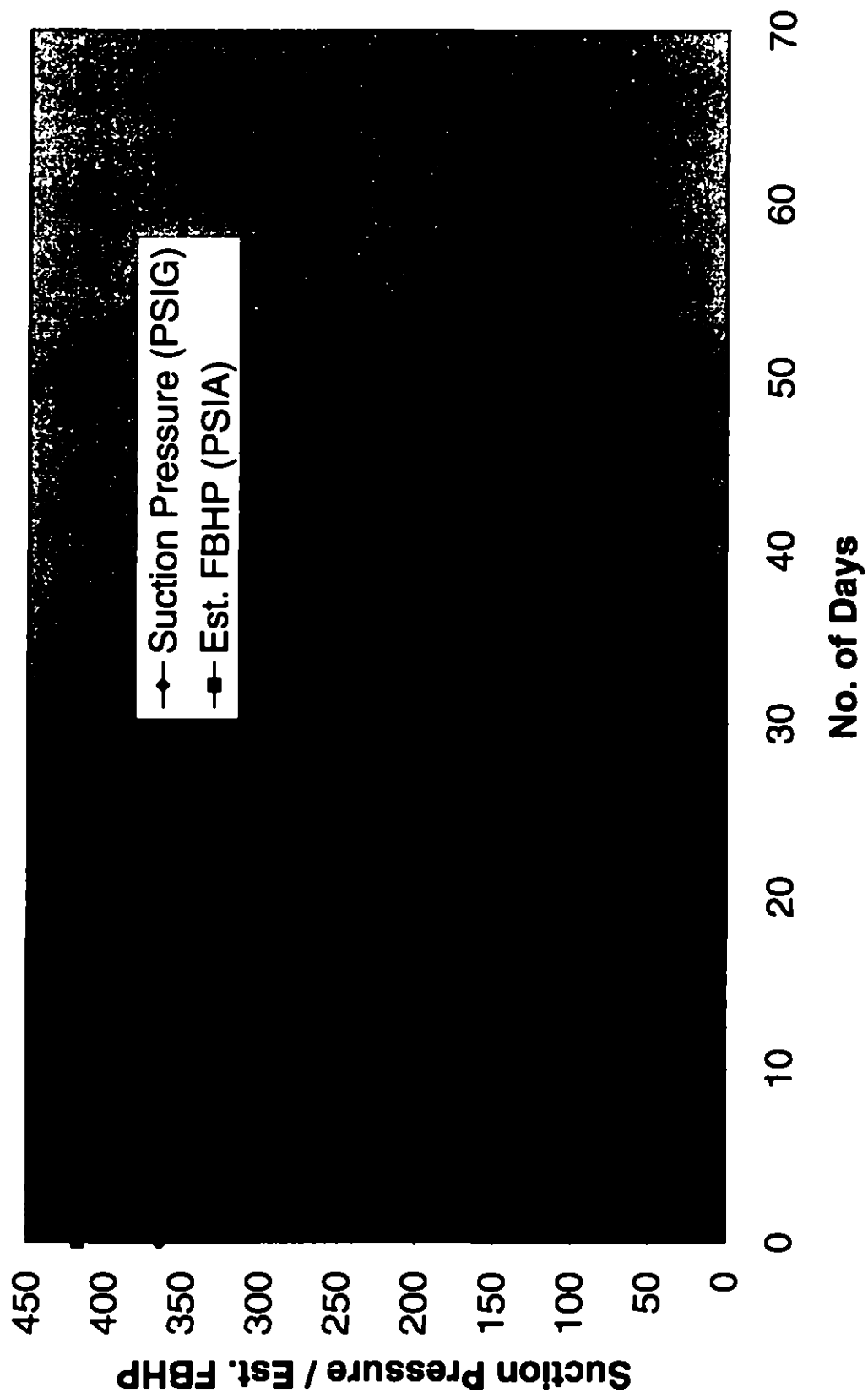
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**Freebird Gas Storage Project
Paul 02/17 Drill Plan - Run 2
Universal 850 PSIG**



Compressor Operating Conditions



FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
Response to February 28, 2005 Data Request

Request No. 3

Please provide the latest inventory verification study for the East Detroit Storage Field, including all methodology, data, and work papers.

Response:

The latest inventory performance curves are attached as Exhibits 3.1 and 3.2, which indicate that there are no losses from the reservoir (to the extent that they can be identified by P/z performance).

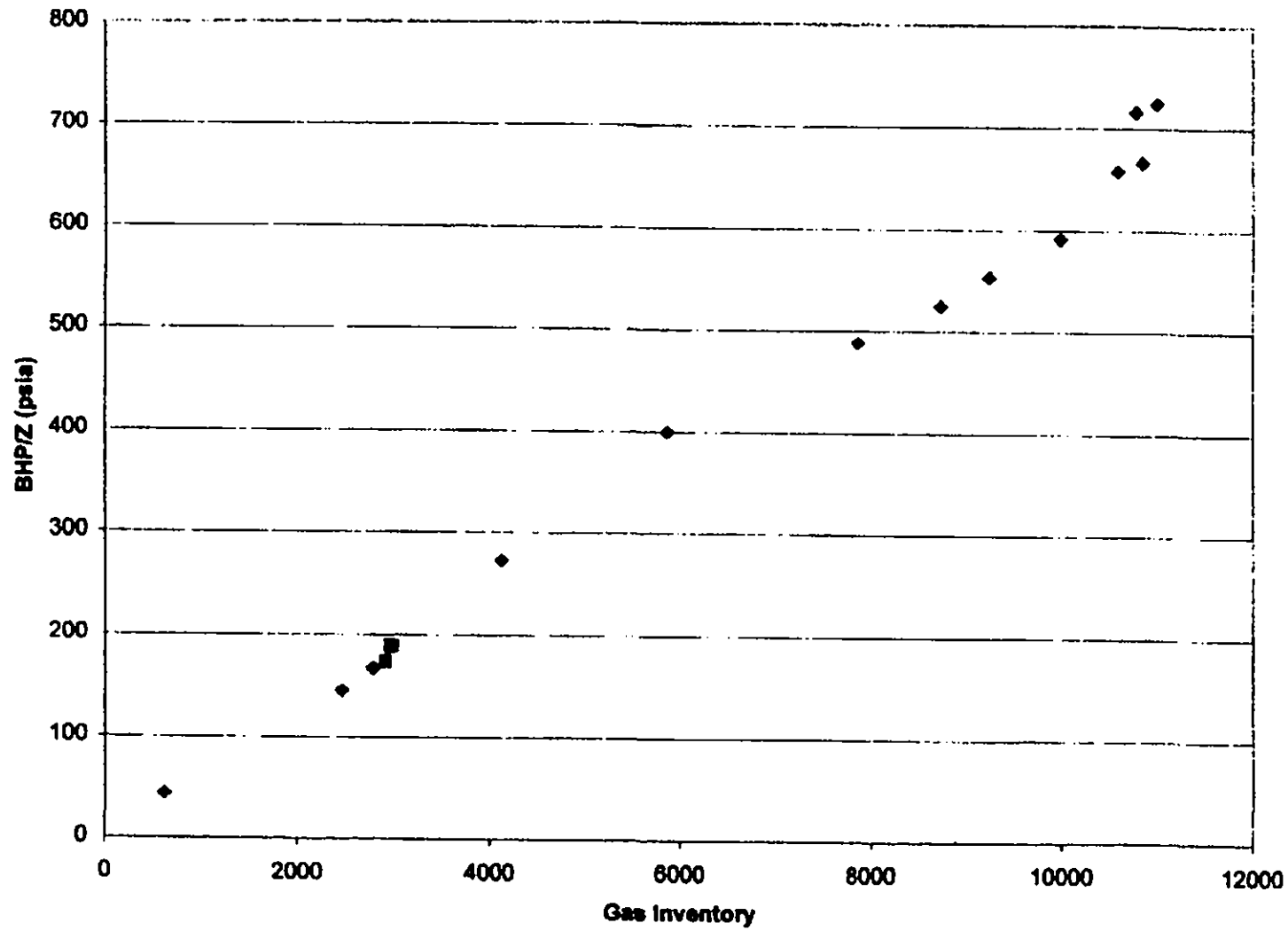
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EDGS INVENTORY PERFORMANCE

Storage Inventory (MMcf)	Production BHP/Z (psia)	Injection BHP/Z (psia)	Cum. Prod. (MMcf)	BHP (psia)
11000	725.2		0	652.6
10848	668		152	600
10782	717		218	645
10589	659.6		411	605.4
9986	592.4		1014	547.8
9251	554.8		1749	515.4
8745	525.8		2255	494.4
7870	489.2		3130	461.8
5872	400.6		5128	381.4
4126	274.2		6874	264.2
2794	168.2		8206	164.6
2467	146.4		8533	143.6
620	44		10380	43.7
2911		175		
2983		190		

EDGS Inventory Performance



FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
Response to February 28, 2005 Data Request

Request No. 4

Please provide a detailed discussion of all existing or past operational problems for the storage field, including but not limited to gas migration and gas loss.

Response:

There are no known existing or past operational problems with gas migration in the East Detroit Storage Field. Exhibit 3.2 represents a comparison of the original producing history of the East Detroit Gas Field and two repressuring cycles. Exhibit 3.2 suggests that there was no gas migration during repressuring and indicates performance typical of a closed reservoir, based on the P/z performance during primary depletion and subsequent repressuring.

Respondent:

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FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
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Request No. 5

Please provide a discussion of the current geological interpretation of the storage reservoir, including both the storage formation and the caprock.

Response:

Please see Exhibit 5.1, excerpts from Resource Report 6 (filed November 18, 2004) addressing the geological risks associated with the Freebird Gas Storage Facility. The geological interpretation of the Carter Sandstone is addressed at Section 6.1.3. An assessment of the potential adverse geological effects to the reservoir is addressed at Section 6.4.5.1. The Resource Report concludes that there is no adverse geological impact created by the project.

Respondent:

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Gordo Formation

The Gordo Formation is located under the entire Project area, except for the Sipsey Creek floodplain (Mancini, 1988; see Table 6.1-1). The Gordo Formation dates from the Upper Cretaceous Series of the Cretaceous System. This formation comprises the upper unit of the Tuscaloosa Group and it contains gravelly, poorly sorted sand with lenses of carbonaceous clay, mottled clay, and beds of strongly cross-bedded, fine to coarse sand. Gravelly sands, carbonaceous clays, and gray clays are common in the lower part of the formation, while mottled clays and beds are common in the upper part. *The Gordo Formation measures approximately 270 feet in thickness (Mancini, 1988).*

Quaternary Sediments

The Sipsey Creek floodplain contains alluvial, coastal, and low terrace deposits from the Holocene Series of the Quaternary System (Mancini, 1988). These deposits are associated with modern floodplains and streams. They are comprised of unconsolidated sand, silt, clay, and gravel. Older terraces are found at higher elevations, while younger terraces deposits occur at lower elevations only slightly higher than modern floodplains. The alluvial, coastal, and low terrace deposits measure up to 60 feet in thickness. Alluvium underlies the low terrace deposits and represents deposition from current streams.

6.1.3 Black Warrior Basin and Carter Sandstone

Further beneath the ground surface is the Black Warrior Basin. The Black Warrior Basin in northwestern Alabama and northeastern Mississippi is a foreland basin containing Paleozoic sedimentary rocks in the major structural re-entrant between the Appalachian and Ouachita Fold and Thrust Belts (Ryder, 1995). It covers an area of about 23,000 square miles – 230 miles long from west to east, and 188 miles long from north to south. Through 1991, 90 conventional non-associated gas fields, 15 coalbed gas fields, and 20 oil-associated gas fields have been discovered in the Black Warrior Basin in Alabama.

The existing gas storage reservoir is composed of the Upper Mississippian (Paleozoic) Carter sandstone, a member of the Lower Parkwood Formation. The Carter sandstone, which is the dominant reservoir of conventional gas and oil fields in the Black Warrior Basin, is generally a grayish brown, massive, well-sorted, subrounded to subsangular, fine-grained quartz sandstone (Panetta, 2003). In the Project area, the Carter sandstone is a deltaic lobe deposit (sandbar) that is semi-circular in shape with a south facing structural dip. The trapping mechanism is stratigraphic in nature as it occurs between the Millerella and Bangor limestone and the remaining sides are bound by shale and/or the absence of porous and permeable sands and; therefore, no structural closure is required.

Well logs from all the wells drilled in East Detroit Field (six gas wells, three oil wells and five dry holes) were correlated and used to map the Carter sandstone storage reservoir. Based on well control, mapping of the Carter Sandstone clearly defines the outer limits of the East Detroit storage reservoir. Appendix A of this resource report contains two affidavits from Swift Energy Company geologists prepared in 2002 as part of testimony presented to the Alabama State Oil and Gas Board verifying the presence, extent, and storage volume of the Carter Sandstone at the East Detroit field. Exhibit No. 1 of the affidavit from L. Jay Evans, Jr. is a Structure Map of the Carter Sand. Exhibit No. 2 of this affidavit is a Net Pay Isopach of the Carter Sand. As shown in these exhibits, the reservoir is located at an average depth of approximately 1,500 feet and has an average thickness of 34 feet.

The reservoir is uniform and continuous, except for a small fault within the minimal lateral extent seen in the NWAGD No.5 well (explained in the affidavit from Gary R. Lader –see Appendix A). The

fault only had 34 feet of displacement and minimal lateral extent. Since the displacement is nearly equal to the thickness of the Carter Sand in this area, the fault is believed to be non-sealing. Other than the monoclinical dip to the south and a non-closing fault to the east, the only major feature is a 200-foot high normal fault, which serves as the southern boundary of the field.

The existing gas storage reservoir has been converted from the depleted East Detroit gas field. The void space in the Carter sandstone created by the withdrawn gas was used for this gas storage. According to the Alabama State Oil and Gas Board records, the East Detroit field had produced 11.05 billion cubic feet (BCF) before its production wells were plugged and abandoned. Appendix C contains a copy of this record. The existing facility has the equipment to handle 2.6 BCF; hence, there is still 8.0 BCF of unused capacity. The proposed Project is designed to utilize the remaining 8.0 BCF of this unused storage capacity.

TABLE 6.1-1

GEOLOGICAL CONDITIONS OF THE FREEBIRD GAS STORAGE PROJECT LAMAR COUNTY, ALABAMA

Facility	Mileposts	Physiographic Province/District	Geological Formation/Stratigraphic Unit	Geologic Hazard Type
Compressor Station	4.28	East Gulf Atlantic Plain/ Fall Line Hills District - dissected uplands with a few broad, flat ridges separated by valleys.	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous) - gravelly, poorly sorted sand with lenses of carbonaceous clay, mottled clay, and beds of strongly cross-bedded fine to coarse sand.	None
Storage Facility	4.28	East Gulf Atlantic Plain/ Fall Line Hills District	Carter Sandstone of the Lower Parkwood Formation (Upper Mississippian) - grayish brown, massive, well-sorted, subrounded to subsangular, fine-grained quartz sandstone.	None
Pipeline	0.0 to 0.3	East Gulf Atlantic Plain/ Fall Line Hills District	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous)	None
	0.3 to 1.7	East Gulf Atlantic Plain/ Fall Line Hills District	Alluvial deposits (Holocene) - unconsolidated sand, silt, clay, and gravel	None
	1.7 - 4.28	East Gulf Atlantic Plain/ Fall Line Hills District	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous)	None
Meter Station	0.0	East Gulf Atlantic Plain/ Fall Line Hills District	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous)	None
Flow Lines	4.28	East Gulf Atlantic Plain/ Fall Line Hills District	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous)	None
Well Pads	4.28	East Gulf Atlantic Plain/ Fall Line Hills District	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous)	None
Access Roads	All roads (see Table 8.1.7-1)	East Gulf Atlantic Plain/ Fall Line Hills District	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous)	None
Pipe/Material Storage Yard	4.28	East Gulf Atlantic Plain/ Fall Line Hills District	Gordo Formation of the Tuscaloosa Group (Upper Cretaceous)	None

6.4.3 Landslides

Landsliding, a form of ground failure, involves the down-slope movement of earth materials under the force of gravity due to natural or artificial causes. Causes of landslides include weakness of rock and soil structure, heavy precipitation, changes in groundwater levels, seismic activity, construction activity, failure of agricultural terraces, cut-and-fill highway construction, mining, and changes in surface or irrigation runoff. Types of landslides include slides, earthflows, and creeps.

The Project area is at low risk from landslides (see Figure 6.4-2). The entire Project area is located within a zone of low susceptibility and low incidence of landslides (Radbruch-Hall et al, 1982). Also, the Project area is located in an area of relatively low seismic risk (Frankel et al., 2002).

6.4.4 Karst Topography and Subsidence

Karst topography is formed by the dissolution of carbonate (limestone and dolomite) rock units. Many areas of the state, particularly northern Alabama, are underlain by carbonate rocks that are susceptible to solution and the development of subsurface cavities in bedrock. Periods of drought, excessive rainfall, well pumpage, and construction activities increase the potential for sinkhole formation in these areas.

The GSA (2004d and 2004e) identified the Project area as occurring outside areas of active sinkholes, subsidence, and outcrops of carbonate rocks (see Figures 6.4-3 and 6.4-4). The Gordo formation and alluvial deposits underlying the Project area do not possess limestone or dolomite bedrock and; therefore, do not have rock units that are most susceptible to sinkhole development and subsidence. Also, the field surveys did not observe any areas of karst topography.

6.4.5 Avoidance and Minimization of Adverse Effects

6.4.5.1 Compressor Station/Gas Storage Facility

No specific hazards to the existing compressor station/gas storage facility are known. It is an existing state-approved underground gas storage facility, which has not experienced any geologic incidences that have compromised its use. Since the new facility uses the volume created by the withdrawn gas production, refilling the reservoir back to its original volume shall post no impact nor create any safety issues to the reservoir.

6.4.5.2 Pipeline

The Project area does not possess significant geologic hazards. No areas of active faulting, earthquake epicenters, landslides or subsidence were identified within or adjacent to the area of review. Thus, there will be no need to avoid these hazards nor will minimization efforts be necessary. According to the published literature, the pipeline is located within a relatively inactive area for geologic hazards.

6.4.5.3 Meter Station

The Meter Station is located in an area that does not possess significant geologic hazards. No areas of active faulting, earthquake epicenters, landslides or subsidence were identified within or adjacent to the area of review. Thus, there will be no need to avoid these hazards nor will minimization efforts

FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
Response to February 28, 2005 Data Request

Request No. 6

Please provide the current and proposed values of working gas volume, cushion gas volume, native gas volume, deliverability (at maximum and minimum pressure), and maximum and minimum storage pressures. Also provide the maximum operating capacity, including native gas and reservoir pressure. (Volumes and rates in MMcf and pressures in psia).

Response:

The East Detroit Storage Field reservoir storage capacity currently consists of approximately 1.44 bcf of working gas and 1.275 bcf of cushion gas. The proposed project will add approximately 6.5 bcf of working gas and approximately 1.25 bcf of cushion gas. Additionally, the reservoir contained 0.6 bcf of native gas at depletion that is not economically recoverable and will stay in the reservoir. These values total 11.05 bcf of gas, which corresponds to the original estimated gas in place in the reservoir. These capacities visualize operating the reservoir between a maximum pressure of 680 psia (equivalent to original reservoir pressure) and a minimum pressure of 118 psia. Deliverability at maximum and minimum pressures are 210 MMcf/d and 5 MMcf/d, respectively, as defined in Exhibit 2.1.

Respondent:

Gil Muhl
Vice-President
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FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
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Request No. 7

Please provide a matrix that shows the standard numbers that have been included in the tariff verbatim and identify their location in the tariff, e.g., section number, tariff sheet number, etc.

Response:

Table 7.1 lists the NAESB standards that have been included verbatim in the Freebird tariff and identifies the corresponding location by section number.

Respondent:

Gil Muhl
Vice-President
Multifuels LP
(832) 252-2251

Table 7.1

NAESB STANDARD	LOCATION IN GENERAL TERMS AND CONDITIONS
1.2.12	Section 2.9, Original Sheet No. 101
1.3.6	Section 8.2(d), Original Sheet No. 133
1.3.13	Section 8.2(b), Original Sheet No. 132
3.3.17	Section 13.3, Original Sheet No. 137
5.3.15	Section 4.6, Original Sheet No. 118

FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, et al.
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Request No. 8

If there are any standards which are not included in the tariff by reference or verbatim please identify the standard number, the location in the tariff and explain why Freebird did not choose to file that particular standard verbatim or by reference.

Response:

Table 8.1 lists those NAESB standards that were included in the Freebird tariff with only a few minor modifications to the language of the standard and identifies their corresponding location, by section and tariff sheet number, in the Freebird tariff. The minor modifications were made in the interest of ensuring consistency with the rest of the Freebird tariff and establishing coherence between the tariff and the standard. For example, verb tenses were changed, certain words in the standards were capitalized when they were defined terms in the Freebird tariff, and "Freebird" replaced the NAESB terms "transporter," "Transmission Service Provider," and "capacity release provider."

Table 8.2 identifies those NAESB standards that are included in the Freebird tariff but with some changes in order that the standards conform to the operation of a gas storage facility with only one receipt and delivery point. Table 8.2 lists the relevant NAESB standard, its corresponding location in the Freebird tariff, and an explanation for why the standard was not included verbatim.

Respondent:

Gil Muhl
Vice-President
Multifuels LP
(832) 252-2251

Table 8.1

NAESB STANDARD	LOCATION IN GENERAL TERMS AND CONDITIONS
1.2.4	Section 2.17, Original Sheet No. 102
1.2.6	Section 2.27, Original Sheet No. 103
1.2.14	Section 2.43, Original Sheet No. 104
1.2.15	Section 2.44, Original Sheet No. 104
1.2.16	Section 2.45, Original Sheet No. 104
1.3.1	Section 2.7, Original Sheet No. 101
1.3.2(i)	Section 8.2(a), Original Sheet No. 131
1.3.2(ii)-(iv)	Section 8.2(b), Original Sheet Nos. 132-133
1.3.5	Section 8.1, Original Sheet No. 131
1.3.9	Section 8.2(b), Original Sheet No. 132
1.3.19	Section 8.1, Original Sheet No. 131
1.3.21	Section 8.2(a), Original Sheet No. 132
1.3.26	Section 5.5(d), Original Sheet No. 127
3.2.1	Section 2.2, Original Sheet No. 101
5.2.1	Section 2.5, Original Sheet No. 101
5.3.1	Section 4.3, Original Sheet No. 115
5.3.3	Section 4.3, Original Sheet No. 115
5.3.4	Section 4.7, Original Sheet No. 119
5.3.13	Section 4.6, Original Sheet No. 118
5.3.14	Section 4.1, Original Sheet No. 114
5.3.16	Section 4.1, Original Sheet No. 114
5.3.24	Section 4.5, Original Sheet No. 118
5.3.25	Section 4.5, Original Sheet No. 118
5.3.44	Section 4.13(e), Original Sheet Nos. 121-123
5.3.45	Section 4.13(e), Original Sheet No. 123
5.3.48	Section 4.13(e), Original Sheet No. 122
5.3.51	Section 4.1(g), Original Sheet No. 114
5.3.53	Section 14.3(g), Original Sheet No. 124
5.3.54	Section 14.3(g), Original Sheet No. 124

Table 8.2

NAESB STANDARD	LOCATION IN GT&C	EXPLANATION
1.3.11	Section 8.2(b), Original Sheet No. 132	NAESB standard 1.3.11 indicates that intra-day nominations can be used, <i>inter alia</i> , to change receipt and delivery points. This part of the standard was omitted from Freebird's tariff because Freebird does not have multiple receipt and delivery points.
1.3.33	Section 8.2(b), Original Sheet No. 132	NAESB standard 1.3.33 provides that intra-day nominations may be used to nominate "new supply or market." To reflect Freebird's operation of a gas storage facility, the standard was incorporated into the Freebird tariff to read: "Intraday nominations may be used to nominate new injections or withdrawals."
2.3.9	Sections 2.1 and 2.6, Original Sheet No. 101	Freebird's tariff does not address gigacalories or discuss gas reported in cubic meters. Consequently, these portions of NAESB standard 2.3.9 were not included in the tariff. Freebird intends, however, to incorporate standard 2.3.9 by reference into Section 21 of the General Terms and Conditions of its tariff when it files to place its tariff into effect, in order to preserve the standard in its entirety.
3.3.9	Section 13.1, Original Sheet Nos. 136-37	Freebird did not incorporate the portion of NAESB standard 3.3.9 pertaining to the invoicing of quantities at points where OBAs exist because, as a gas storage facility with a single receipt and delivery point, Freebird intends to have an OBA at the delivery point with the interconnecting pipeline but does not intend to implement OBAs with its shippers.
3.3.10	Section 13.1, Original Sheet No. 136	NAESB standard 3.3.10 pertains to the timing of the provision of backup data corresponding to an invoice. Under Section 13.1 of the Freebird tariff, Freebird is to provide Shipper with an invoice and any required backup data not later than the tenth Business Day of each month. Freebird intends to incorporate NAESB standard 3.3.10 into Section 21 of the General Terms and Conditions in its conformed tariff in order to clarify that required invoice backup data should accompany or precede the invoice.
3.3.19	Sections 13.4 and 13.5, Original Sheet Nos. 137-38	Standard 3.3.19 is included in Sections 13.4 and 13.5 of the Freebird tariff. Like the standard,

		<p>these sections of the Freebird tariff require that the undisputed portion of amounts invoiced be paid and that documentation identifying the basis for the dispute be provided. The standard is not included verbatim in the Freebird tariff in order (a) to clarify that the Shipper has an obligation to pay <u>when due</u> the invoiced amount not in dispute and (b) to impose a timeframe in which supporting documentation identifying the basis for the dispute must be supplied.</p>
5.3.2	Section 4.3(a)-(d) Original Sheet Nos. 115-17	<ul style="list-style-type: none"> • Section 4.3(a)-(d) of the Freebird tariff has modified NAESB standard 5.3.2 in order to specify that the Releasing Shipper may request in its offer that the bid period be for the same day as the offer of the release or that the bid period extend beyond the same day. The release timelines in Section 4.3(a)-(b) reflect this change. • In addition, Section 4.3(a)-(b) simply elaborates on the NAESB standard's matching process for when the Prearranged Shipper's bid is not the "best bid." • NAESB standard 5.3.2 includes identical language under each posting deadline for releases not subject to bidding. Section 4.3(d) does not repeat the identical language from each posting deadline but includes this information once in Section 4.3(d) applying it to all the cycles listed in Section 4.3(d). <p>These modifications were all made in the interest of clarification. Section 4.3(a)-(d) otherwise tracks the substantive language of NAESB standard 5.3.2.</p>
5.3.55	Section 4.13(f), Original Sheet No. 123	<p>This standard provides that "the TSP's Tariff should specify" how the quantity in the recall notification should be expressed. Rather than including this instruction verbatim, Freebird drafted its tariff so that the tariff specifies, as directed by the standard, how the quantity should be expressed in the recall notification.</p> <p>Freebird intends to add the definition of "Elapsed Prorata Capacity" from NAESB standard 5.2.3 to its tariff when it files to place its tariff into effect. As a result, Freebird intends that Section 4.13(f) will read: "In the recall notification provided to Freebird by the Releasing Shipper, the quantity</p>

		to be recalled shall be expressed in terms of the adjusted total released capacity entitlements based upon the Elapsed Prorata Capacity."
5.3.56	Section 4.13(f), Original Sheet Nos. 123-24	<p>Freebird intends to incorporate the following provision into Section 4.13(f) of the General Terms and Conditions of its tariff: "In the event of an intraday capacity recall, Freebird shall determine the allocation of capacity between the Releasing Shipper and the Replacement Shipper(s) based upon the Elapsed Prorata Capacity (EPC). Variations to the use of EPC may be necessary to reflect the nature of Freebird's tariff, services, and/or operational characteristics."</p> <p>This provision will replace the following sentence from Section 4.13(f): "In the event of an intraday capacity recall, Freebird shall determine the allocation of capacity between the Releasing Shipper and the Replacement Shipper(s) based upon the Elapsed Prorated Scheduled Quantity."</p>
5.3.58	Section 4.13(f), Original Sheet No. 124	Freebird will include NAESB standard 5.3.58 in its entirety in Section 4.13(f) of its tariff when it files to place its tariff into effect.

FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, *et al.*
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Request No. 9

Freebird did not file some of the standards. For each standard that was not filed, specify the standard number and explain why the standard was not filed.

Response:

The standards listed in Table 9.1 were not filed in the Freebird tariff for the reasons set forth below. Included in Table 9.1, when applicable, is a statement of Freebird's intention to include the standard in its tariff when it files to place the tariff into effect.

Respondent:

Gil Muhl
Vice-President
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Table 9.1

NAESB STANDARD	EXPLANATION
1.2.3	Freebird intends to incorporate this standard by reference into Section 21.
1.3.8	NAESB standard 1.3.8 is generally covered in Section 8 of the General Terms and Conditions of the Freebird tariff. However, Freebird intends to incorporate this standard by reference in Section 21 of the General Terms and Conditions of its tariff.
2.2.2	Freebird intends to incorporate this standard by reference into Section 21.
2.2.3	(same)
2.3.30	(same)
2.3.40	(same)
2.3.41	(same)
2.3.42	(same)
2.3.43	(same)
2.3.44	(same)
2.3.45	(same)
2.3.46	(same)
2.3.47	(same)
2.3.48	(same)
2.3.49	(same)
2.3.50	(same)
2.4.7	(same)
2.4.8	(same)
2.4.9	(same)
2.4.10	(same)
2.4.11	(same)
2.4.12	(same)
2.4.13	(same)
2.4.14	(same)
2.4.15	(same)
2.4.16	(same)
4.2.11	(same)
4.2.12	(same)
4.2.18	(same)
4.2.19	(same)
4.3.2	(same)
4.3.8	(same)
4.3.9	(same)
4.3.10	(same)
4.3.11	(same)
4.3.12	(same)
4.3.13	(same)

4.3.14	(same)
4.3.15	(same)
4.3.55	(same)
4.3.80	(same)
4.3.81	(same)
4.3.82	(same)
4.3.83	(same)
4.3.84	(same)
4.3.88	(same)
5.2.3	Freebird intends to add NAESB standard 5.2.3 as a definition in Section 2 of the General Terms and Conditions of its tariff when it files to place its tariff into effect.
5.3.8	NAESB standard 5.3.8 is generally covered in Sections 4.1(g) and 4.13(g) of the General Terms and Conditions of the Freebird tariff. However, Freebird intends to incorporate this standard by reference in Section 21 of the General Terms and Conditions of its tariff when it files to place its tariff into effect.
5.3.26	Freebird intends to incorporate this standard by reference into Section 21.
5.3.27	(same)
5.3.28	(same)
5.3.30	(same)
5.3.41	(same)
5.3.42	(same)
5.3.49	Freebird intends to incorporate this standard into the last paragraph of Section 4.13(e) of the General Terms and Conditions of its tariff. Original Sheet No. 123 will read: "Such notices shall contain the information required to uniquely identify the capacity being recalled, and shall indicate whether penalties will apply for the Gas Day for which quantities are reduced due to a capacity recall."
5.3.50	NAESB standard 5.3.50 will be incorporated by reference in Section 21 of the General Terms and Conditions of Freebird's tariff when Freebird files to place its tariff into effect.
5.3.57	Freebird intends to add the following sentence at the end of Section 4.13(f) of the General Terms and Conditions of its tariff: "Freebird shall not be obligated to deliver in excess of the total daily contract quantity of the release as a result of NAESB WGQ Standard No. 5.3.55, as set forth in this Section 4.13(f)."

FREEBIRD GAS STORAGE, LLC
Docket Nos. CP05-29, et al.
Response to February 28, 2005 Data Request

Request No. 10

Please provide any information which you believe may assist staff in its analysis of the NAESB standards.

Response:

Freebird is in the process of contracting for full Internet/Electronic Delivery Mechanism (EDM)/Electronic Delivery Interchange (EDI) services from a third-party vendor that is a NAESB member. Consistent with Freebird's use of EDM and EDI, Freebird will, as indicated in the Response to Request No. 9, incorporate the following NAESB standards by reference into Section 21 of the General Terms and Conditions of its tariff when it files to place its tariff into effect: 2.4.7, 2.4.8, 2.4.9, 2.4.10, 2.4.11, 2.4.12, 2.4.13, 2.4.14, 2.4.15, 2.4.16, 4.2.11, 4.2.12, 4.2.18, 4.2.19, 4.3.2, 4.3.8, 4.3.9, 4.3.10, 4.3.11, 4.3.12, 4.3.13, 4.3.14, 4.3.15, 4.3.55, 4.3.80, 4.3.81, 4.3.82, 4.3.83, 4.3.84, 4.3.88, 5.3.30, 5.3.41 and 5.3.42.

As set forth in its Responses to Request Nos. 8 and 9, Freebird will also incorporate the following NAESB standards by reference into Section 21 of the General Terms and Conditions of the Freebird tariff when it files to place its tariff into effect: 1.2.3, 1.3.8, 2.2.2, 2.2.3, 2.3.9, 2.3.30, 2.3.40, 2.3.41, 2.3.42, 2.3.43, 2.3.44, 2.3.45, 2.3.46, 2.3.47, 2.3.48, 2.3.49, 2.3.50, 3.3.10, 5.3.8, 5.3.26, 5.3.27, 5.3.28 and 5.3.50. In addition, Freebird will include the following NAESB standards in the text of its tariff: 5.2.3, 5.3.49, 5.3.57 and 5.3.58.

Freebird intends to include NAESB standard 5.2.3 relating to "Elapsed Prorata Capacity" as a definition in its tariff. As a result, the incorporation of NAESB standards 5.3.55 and 5.3.56 will be changed, as discussed in the Response to Request No. 8, to take account of the inclusion of this definition. Finally, Freebird will use the defined term "Elapsed Prorata Capacity" in Section 14.3(f)(2) of its tariff in the discussion relating to the daily contractual entitlement that can be recalled by a Releasing Shipper for a partial day recall.

As discussed in the Response to Request No. 8, several standards were either modified or omitted from Freebird's tariff because they were not applicable to the operation of a gas storage facility with a single receipt/delivery point. According to the Commission, to the extent a NAESB standard does not apply to a pipeline because of the unique characteristics of its system or other aspect of its operations, the pipeline need not ask for specific waivers of such standards. *Trans-Union Interstate Pipeline, L.P.*, 104 FERC ¶ 61,315 at P 20 (September 23, 2003). If circumstances change, however, and a standard becomes applicable to the pipeline's operations, then the pipeline must file to modify its tariff to comply and otherwise act to comply with the standard. *Id.* Consistent with this policy, if any standard not incorporated by reference or otherwise included in Freebird's tariff becomes applicable to Freebird's operations, Freebird will file to modify its tariff accordingly.

Respondent:

Gil Muhl

Vice-President

Multifuels LP

(832) 252-2251

VERIFICATION

STATE OF TEXAS
COUNTY OF HARRIS

§
§

I, Gil Muhl, being duly sworn this 10th day of March 2005, do hereby state, on behalf of Freebird Gas Storage, LLC, that I have read and am familiar with the foregoing Responses to the Data Request issued by the Federal Energy Regulatory Commission staff on February 28, 2005, and that the statements in those Responses are true and accurate to the best of my knowledge, information and belief.



Gil Muhl

Subscribed and sworn to before me
this 10 day of March, 2005



Notary Public
for the State of Texas

My Commission expires:

