

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
FEDERAL ENERGY REGULATORY COMMISSION

IN THE MATTER OF)
)
Freeport LNG Development, L.P.)
FLNG Liquefaction, LLC) Docket No. CP21-470
FLNG Liquefaction 2, LLC)
FLNG Liquefaction 3, LLC)

Motion to Intervene of Sierra Club

Pursuant to Rules 212 and 214 of the Federal Regulatory Commission Rules of Practice and Procedure¹, Sierra Club hereby moves to intervene in the above-captioned docket, as invited by FERC’s July 14, 2021 Notice of Application. Freeport LNG Development, L.P., and related entities seek, for a second time, to amend their existing authorizations under section 3(a) of the Natural Gas Act (“NGA”) to increase the authorized maximum production of LNG, from an initially approved volume of 1.8 bcf/d, or 657 bcf/y, to a currently-requested 870 bcf/y (a 32% aggregate increase).

A. Sierra Club’s Interest and Information

Sierra Club opposes the application and amendment as contrary to the public convenience and necessity. Notwithstanding the applicants’ assertion that increasing export volumes will not increase environmental impacts beyond levels previously *analyzed*, increasing volumes will increase the amount of impacts that *actually occur*, including air pollution emitted by operation of pretreatment and liquefaction equipment and impacts of the additional ship traffic needed to transport the additional LNG.

¹ 18 C.F.R. §§ 385.212, 358.214.

Accordingly, Sierra Club's position is that the application and amendment should be denied. Intervention is appropriate because the interests Sierra Club represents here are shared by the public at large, and Sierra Club is an environmental advocacy organization well suited to protect these interests, such that its intervention is in the public interest as provided by 18 C.F.R. § 385.214(b)(2)(iii). Alternatively, Sierra Club represents interests that may be directly affected by the outcome of the proceeding, as explained below, such that intervention is warranted under *id.* § 385.214(b)(2)(ii).

Pursuant to 18 C.F.R. § 385.203(b)(1)-(2), Sierra Club states that the exact name of the movant is the Sierra Club, and the movant's principal place of business is 2101 Webster Street, Suite 1300, Oakland, CA 94612.

Pursuant to 18 C.F.R. § 385.203(b)(3), Sierra Club identifies the following persons for service of correspondence and communications regarding this application:

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Sierra Club should be granted intervention because its members will be impacted by the LNG terminal, associated pipelines, and the associated infrastructure at local, regional, and national scales. 18 C.F.R. § 385.214(b)(2)(ii).

Sierra Club has 399,113 members throughout Texas, and 2,258 members in Brazoria County (as of this filing). These members will be affected by, among other things:

- Impacts of additional vessel traffic needed to transport the additional LNG
- Air pollution caused by operation of pretreatment and liquefaction equipment that would not occur if the facility is limited to previously-approved export volumes

Sierra Club's Texas members, and its additional members across the nation, will also be impacted by the gas production needed to supply the LNG project, and by greenhouse gas emissions resulting from use of the gas after delivery.

Sierra Club has demonstrated the vitality of these interests in many ways. Sierra Club runs national advocacy and organizing campaigns dedicated to reducing American dependence on fossil fuels, including natural gas, and to protecting public health. These campaigns, including its Beyond Coal and Dirty Fuels campaigns, are dedicated to promoting a swift transition away from fossil fuels and towards reducing global greenhouse gas emissions.

B. Conclusion

For the reasons stated above, Sierra Club moves to intervene in docket CP21-470.

Respectfully submitted August 4, 2021.

/s/ Nathan Matthews

Nathan Matthews

Sierra Club

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Attorney for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Oakland, CA this 4th Day of August, 2021.

/s/ Nathan Matthews

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