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October 23, 2023

U.S. Department of Energy (FE-34)
Office of Regulation, Analysis, and Engagement
Office of Fossil Energy and Carbon Management
Forrestal Building, Room 3E-056
1000 Independence Avenue SW
Washington, DC 20585
sent via email

**Re: NFE Altamira FLNG, S. de R.L. de C.V.
Docket No. 22-110-LNG
Clarifications and Comments regarding Draft Environmental Assessment**

To whom it may concern:

On September 15, 2023, the United States Department of Energy's Office of Fossil Energy and Carbon Management ("DOE/FECM") issued a Draft Environmental Assessment ("Draft EA") regarding NFE Altamira FLNG, S. de R.L. de C.V.'s ("NFE Altamira") request for long-term, multi-contract authorization to export domestically-produced natural gas from the United States to Mexico and, after liquefaction in Mexico, to re-export the U.S.-sourced natural gas in the form of liquefied natural gas ("LNG") from the NFE Altamira FLNG facility ("Facility") to other countries.¹ The Texas Commission on Environmental Quality filed comments on October 13, 2023 in response to a consultation request by DOE/FECM ("TCEQ Comments"). NFE Altamira hereby provides comments and clarifications regarding certain topics in the Draft EA and the TCEQ Comments.

¹ NFE Altamira FLNG, S. de R.L. de C.V., Draft Environmental Assessment (DOE/EA-2226), Docket No. 22-110-LNG (Sept. 15, 2023); *see also* U.S. Dep't of Energy, Notice of Availability of the Draft Environmental Assessment for the New Fortress Energy Altamira FLNG Project, 88 Fed. Reg. 65,160 (Sept. 21, 2023).



Mexican Permitting Process

Statement in EA: Page 9, Table 1.

“Technical Justification Study demonstrating that the ecosystem’s biodiversity will not be jeopardized where natural vegetation will be removed.”

Clarification/Comment: The Technical Justification Study is only applicable to onshore projects where forestry land would be removed. Accordingly, this reference should be removed from the EA.

Statement in EA: Page 10.

“In addition to review of the MIA and ERA, ASEA reviews and issues authorizations for projects, such as pipelines and liquefaction facilities, that will impact existing land use.”

Clarification/Comment: The assessment on potential impacts on land use, through the Technical Justification Study, applies only to onshore projects. Accordingly, this reference should be removed from the EA.

Facility Configuration

Statements in EA: Page 22- Discussion on Jack-Up Rigs.

Clarification/ Comment: NFE Altamira is committed to the safe operation of the Facility. NFE Altamira has engaged a world class team of offshore experts who have performed numerous site specific meteorological, environmental, geotechnical, engineering and safety studies to inform design, fabrication, installation, and operation. To ensure the safe design and operation of the Facility, NFE Altamira selected Lloyd's Register (“LR”) as the designated Maritime Classification Society for the Facility. LR is a recognized global industry leader and trusted advisor for setting rules and safety standards across maritime assets.

Based on LR’s rigorous engineering and safety evaluations, as well as its inspections and surveys, LR has issued Classification Certificates for the Facility. In this regard, LR has independently determined that the Facility is safe, meets the stringent requirements of the classification rules and is ready for commissioning and operation. LR will continue to support NFE Altamira during Facility commissioning and start of operations and will conduct periodic surveys of the Facility for compliance with the classification certificate requirements.

Maritime classification is the development, publication and global implementation of rules that define standards of quality, safety, and reliability for marine facilities. Internationally recognized classification ensures that marine facilities are constructed to the highest standards, can operate effectively and safely comply with strict maritime and environmental regulations. When a classification society awards a classification certificate to a particular vessel or offshore unit, it indicates that it has been designed, constructed, and tested in accordance with the applicable rules and regulations as published by the classification society. LR’s Rules and



Regulations for the Classification of Offshore Units, July 2020 (LR ROU) is the governing Rules Set applicable to the Facility.

LR has evaluated the Facility design, including the proximity of the self-elevating platforms to each other and the potential for structural failures. LR has also conducted numerous surveys, inspections and testing of the Facility.

As part of its evaluation, LR has assessed the Facility for:

1. Global structural strength;
2. Foundation stability;
3. Fatigue life in the elevated condition; and
4. Elevation analysis (with site specific weather conditions including hurricanes);
 - a. Spud Can Penetration Curves
 - b. Leg Layout
 - c. Airgap Assessment
 - d. Dynamic Wave Analysis & Elevated Analysis Summary
 - e. Safety Factor Calculation
 - f. Overturning Moment Stability Calculation
 - g. Stabilizing Lever Arm against Overturning Moment
 - h. Preloading Procedures and Holding Times.

LR also performed the following safety studies:

1. Collision Risk Assessment;
2. Cryogenic Spill Risk Study;
3. Emergency Systems Survivability Analysis;
4. Fire and Explosion Risk Analysis;
5. Fire and Gas Detector Mapping Study;
6. Human Factors Control Room Study;
7. Input to Design Accidental Loads Specification;
8. Integrity Inspection and Maintenance Philosophy;
9. Noise Study;
10. Quantitative Risk Assessment;
11. Simultaneous Operations Risk Study; and
12. Smoke and Gas Ingress Analysis.

In light of the various studies listed above, LR determined the Facility to be safe and ready for commissioning/operation.



Comments Filed by TCEQ

Statement in Comment Letter:

“We recommend the environmental assessment address actions that will be taken to prevent surface and groundwater contamination.

The management of industrial and hazardous waste at the site including waste treatment, processing, storage and/or disposal is subject to state and federal regulations. Construction and Demolition waste must be sent for recycling or disposal at a facility authorized by the TCEQ. Special waste authorization may be required for the disposal of asbestos containing material.”

Clarification/Comment:

NFE Altamira proposes to export natural gas from the United States via the Valley Crossing Pipeline, LLC existing border crossing facility, and any future cross-border pipelines interconnecting with the Sur de Texas - Tuxpan Pipeline offshore natural gas pipeline system. In this regard, no construction or modification of facilities in Cameron County is proposed in connection with NFE Altamira’s request for export authorization.

If you have any questions regarding this filing, please contact the undersigned at (212) 506-3710.

Respectfully submitted,

/s/ Lisa M. Tonery

Lisa M. Tonery

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Attorneys for

NFE Altamira FLNG, S. de R.L. de C.V.

CERTIFICATE OF SERVICE

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

Dated at New York, N.Y., this 23rd day of October, 2023.

/s/ Dionne McCallum-George
Dionne McCallum-George
Executive Assistant on behalf of
NFE Altamira FLNG, S. de R.L. de C.V.

VERIFICATION

I, Komi Hassan, declare that I serve as Managing Director, Permitting for New Fortress Energy Inc. and I am duly authorized to make this Verification on behalf of NFE Altamira FLNG, S. de R.L. de C.V.; that I have read the foregoing instrument and the facts therein stated are true and correct to the best of my knowledge, information, and belief.

Signed on this 23rd day of October, 2023, at Houston, TX.

/s/ Komi Hassan

Komi Hassan

Managing Director, Permitting on behalf of
NFE Altamira FLNG, S. de R.L. de C.V.