

Posting of Off-the-Record Communication

The attached document was sent to the Department of Energy in reference to this proceeding, Venture Global CP2 LNG, LLC, Docket No. 21-131-LNG. This document is considered an “off-the-record communication” under 10 CFR 590.102 and 590.108 because (1) the person/entity who either made the communication or knowingly caused the communication to be made is an “interested person;” (2) the communication was directed to a “decisional employee;” and (3) the communication “is relevant to the merits of the proceeding.”

The comment period for this proceeding has closed. This communication is posted here in compliance with regulations. As provided in 10 CFR 590.108(a)(5), a request by a party wishing to rebut this communication, on the record, may be submitted in writing. As specified in this regulation, such requests will be granted “only for good cause.”

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By Docket Room at 12/12/2023 12:37 p.m.

December 11, 2023

The Honorable Jennifer Granholm
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Cc: President Joseph R. Biden

In the matter of: Venture Global CP2, LNG LLC, FE Docket No. 21-131-LNG

Dear Secretary Granholm:

As the climate crisis continues to accelerate, we write to urge the Department of Energy (DOE) not to approve the application for the CP2 LNG export facility proposed in southwest Louisiana. As DOE reviews and considers the application for CP2 LNG, it is critical to consider how LNG exports impact the climate, environmental justice, and domestic energy prices.

In 2022, the U.S. became the world's largest exporter of LNG. Additionally, exports have doubled over the past four years, and projects currently under development are set to almost double exports again – all at a time when projections indicate this surge in production will create a glut that will result in higher energy prices for people in the U.S. CP2 LNG is the largest export application ever evaluated by DOE and is a clear example of an infrastructure project that is not in the public interest. As DOE considers CP2 and other projects that would increase LNG exports, DOE should assess the aggregate impact that the explosive growth in US LNG exports is having on climate, communities, and our economy. In order to protect American consumers and communities, DOE must not authorize oil and gas companies to export more LNG.

As we experience the escalating impacts from climate change related disasters, it is critical that permitting decisions take lifecycle greenhouse gas emissions of LNG export facilities into account. At full volume, the lifecycle emissions of burning that much gas will add up to 190 million tonnes of carbon dioxide equivalent each year. CP2 LNG would be 20 times the annual emissions of the Willow drilling project in Alaska and equivalent to the emissions from more than 42 million gas-powered cars or 51 coal-fired power plants.¹ The annual emissions from the slate of operating, under-construction, and proposed U.S. LNG export terminals are equivalent to the annual emissions of 688 new coal-fired power plants.² LNG exports directly impede the global transition to clean energy as well as the U.S.'s ability to meet its own greenhouse gas and methane targets. Recent research on the climate pollution from LNG exports confirms that LNG is as bad as coal or much worse than coal, because of upstream methane leakage and boil-off during shipping. The U.S. Energy Information Administration has also found that LNG exports are the driving force behind forecasted gas production growth.³ At a time when Americans across

¹ <https://www.sierraclub.org/articles/2023/09/president-biden-must-defuse-another-carbon-bomb>

² <https://www.sierraclub.org/dirty-fuels/us-lng-export-tracker>

³ https://www.eia.gov/outlooks/aeo/pdf/AEO2023_Release_Presentation.pdf

the country are experiencing ever-harsher climate impacts, it is imperative that DOE rejects CP2 LNG.

CP2 LNG is a prime example of the environmental injustice of gas export expansion. The terminal is proposed to be sited adjacent to Venture Global's already-existing export facility, Calcasieu Pass LNG. This facility was found to have over 2,000 air permit deviations and violated its permit on 84% of the days it was initially in operation. This localized pollution and concentration of export facilities forces the communities in the surrounding area to bear the brunt of harmful pollution and chemicals like benzene and nitrogen oxides (NOx) that cause cancer, heart disease, and asthma. This region relies on the coastal wetlands and marshes that CP2 would destroy – they are the spawning grounds and fisheries, oyster beds, and habitat that sustain the vibrant fishing industry and provide the first line of defense against storm surges. This is emblematic of the broader trend of the ways in which LNG export expansion disproportionately impacts low-income and communities of color along the Gulf Coast, many of whom rely on coastal livelihoods and who are already overburdened by industrial pollution from the fossil fuel industry.

American consumers, especially people of color and those in lower-income households, are already struggling with high energy costs that are exacerbated by LNG exports. Spikes and wide variability in home energy prices can be traced to increases in LNG exports – as can increases in prices of consumer goods.⁴ Because the harms of high energy and consumer good prices disproportionately fall on those who are already disadvantaged, now is not the time to be increasing gas exports with projects like CP2 LNG

It is long past time for DOE to chart a new course on how it determines that new licenses for LNG exports are in the public interest. With the agency's pending decision on the CP2 export application, DOE must consider climate, environmental justice, and domestic energy prices in making this determination. There is no standard under which exporting LNG should be deemed in the public interest, considering the significant climate, health, and environmental justice impacts.

The time is now and the stakes are high; DOE must reject CP2 LNG for the sake of our climate and communities.

Sincerely,

198 methods
350.org
350 Bay Area Action
350 Central Mass
350 Eugene
350 New Orleans
350 Pensacola
350 Roaring Fork
350 Sacramento

⁴ <https://ieefa.org/resources/lng-exports-may-spell-trouble-horizon-us-consumers>

350 San Diego
350 SoCal Climate Action
350 Triangle
350 Wenatchee
350 Deschutes
350 Hawaii
350 NYC
350 PDX
A Community Voice
Accelerate Neighborhood Climate Action
Action for the Climate Emergency (ACE)
Alabama Interfaith Power & Light
Alliance for the Wild Rockies
Alsen St Irma Lee Community Village
Animals Are Sentient Beings, Inc.
Another Gulf Is Possible Collaborative
Arizona Interfaith Power & Light
Bayou City Waterkeeper
Beyond Extreme Energy (BXE)
Big Reuse
Blue Future
Bold Alliance
Boston Catholic Climate Movement
Bronx Climate Justice North
Businesses for a Livable Climate
Buy Local, Grow Local
Cahaba Riverkeeper
Call to Action Colorado
Catholic Network US
Center for Biological Diversity
Center for Environmental Research and Agriculture Innovations (CERAI)
Center for Oil and Gas Organizing
Chesapeake Climate Action Network Action Fund
Chispa Texas
Church Women United in New York State
Clean Energy Action
Clean Energy Now Texas
Climate Code Blue
Climate Crisis & Militarism Project, Veterans For Peace
Climate Critical
Climate Defenders
Climate Disobedience Center
Climate Hawks Vote
Climate Reality Project Greater New Orleans Chapter
Climate Reality Project Southern CT Chapter
Colorado Democratic Party - Energy and Environment Initiative

Coalition Against Death Alley
Colorado Businesses for a Livable Climate
Columbia Riverkeeper
Columbus Community Bill of Rights
Community for Sustainable Energy
Concerned Citizens of St. John
Dayenu: A Jewish Call to Climate Action
Democratic Socialists of America - Knoxville, TN
Don't Gas the Meadowlands Coalition
Earth Action, Inc.
Earth Ministry/Washington Interfaith Power and Light
Earthjustice
Earthworks
Elders Climate Action
Empower Our Future
Endangered Species Coalition
Environmental Action Community of Western NC
Extinction Rebellion San Francisco Bay Area
Extinction Rebellion Western Massachusetts
First Unitarian Universalist Society of New Haven Social & Environmental Justice Committee
FISH (Fisherman Involved in Sustaining our Heritage)
Food & Water Watch
For a Better Bayou
For Love of Water (FLOW)
For the Many
Fox Valley Citizens for Peace & Justice
Frack Action
Franciscan Action Network
FreshWater Accountability Project
Fridays for Future USA
Fridays for Future Volusia
Friend of the Earth
Gen-Z for Change
Georgia Interfaith Power and Light
Greater Highland Area Concerned Citizens
Greater New Orleans Housing Alliance
Greater New Orleans Interfaith Climate Coalition
Green House Connection Center
GREEN TEAM of Shoreline Unitarian Universalist Society of Madison, Connecticut
GreenARMY
GreenFaith
Greenpeace USA
Group Against Smog & Pollution
Habitat Recovery Project
Harford County Climate Action
Healthcare Is A Human Right Prince George's County

HealthyPlanet
Hip Hop Caucus
Inclusive Louisiana
Indivisible Ambassadors
Ingleside on the Bay Coastal Watch Association
Institute for Agriculture and Trade Policy
Institute for Policy Studies Climate Policy Program
Interfaith Power & Light
International Marine Mammal Project of Earth Island Institute
Interstate 70 Citizens Advisory Group
Jewish Climate Action Network
Kauai Climate Action Coalition
Larimer Alliance for Health, Safety, & Environment
Latino Outdoors
League of Conservation Voters
Lexington Climate Action Network
Littleton Business Alliance
Long Beach Alliance for Clean Energy
Long Island Progressive Coalition
Louisiana Bucket Brigade
Louisiana Just Recovery Network
Louisiana League of Conscious Voters
Mayfair Park Neighborhood Association
Mental Health & Inclusion Ministries
Micah Six Eight Mission
Michigan Interfaith Power & Light
Mind's Eye Productions
Missouri River Bird Observatory
Montbello Neighborhood Improvement Association
Morningside Gardens Green Committee for Environmental Sustainability
Natural Resources Defense Council
New Mexico & El Paso Interfaith Power and Light
New Mexico Climate Justice
New York Progressive Action Network
New York Society for Ethical Culture
New Yorkers for Clean Power
North American Climate, Conservation and Environment(NACCE)
North Bronx Racial Justice
North Carolina Council of Churches
North Carolina Interfaith Power & Light
North Country Earth Action
North Jersey Sierra Group
North Range Concerned Citizens
Northern NJ NOW
Nuclear Energy Information Service (NEIS)
Nuclear Information and Resource Service

Ocean Defense Initiative
Ohio Sustainable Business Council
Oil and Gas Action Network
Oil Change International
Olympic Climate Action
Only One
Our Climate
Our Revolution Michigan
Our Sacred Earth
PASUP
Patagonia
Peacemakers of Schoharie County
Pennsylvania Interfaith Power & Light
People's Health Movement
Peoples Climate Movement - NY
Pesticide Action Network
Physicians for Social Responsibility
Physicians for Social Responsibility Iowa
Physicians for Social Responsibility Pennsylvania
Planting Justice
Presente.org
Private Equity Stakeholder Project
Progressive Democrats of America
Property Rights and Pipeline Center
Putnam Progressives
Putting Down Roots
RadioactiveWasteAlert.org
Rainforest Action Network
RapidShift Network
Razom We Stand
Remineralize the Earth
Resist the Pipeline
Resource Renewal Institute
Rise to Thrive
Rise Up WV
Rogue Climate
San Francisco Bay Physicians for Social Responsibility
Santa Cruz Climate Action Network
Save Ohio Parks
Save Our Illinois Land
Save the Environmental Protection Agency
Scientist Rebellion, Turtle Island
Shoreline Unitarian Universalist Society
Sierra Club
Sisters of Mercy of the Americas Justice Team
Small Business Alliance

SOMA Action
South Coast Neighbors United
South Texas Environmental Justice Network
Southwest Organization for Sustainability
Spirit of the Sun
SPROUT
Stand.earth
Stop the Algonquin Pipeline Expansion
Sunflower Alliance
Sunrise Movement
Sunrise New Orleans
Sustainable Energy Systems, Inc.
Sustainable Upton
System Change Not Climate Change
Taproot Earth
Terra Advocati
Texas Campaign for the Environment
The Natural History Museum
The People's Justice Council
The Revolving Door Project
Third Act
Third Act Ohio
Tinker Tree Play/Care
Transition Sebastopol
Turtle Island Restoration Network
Union of Concerned Scientists
Unitarian Universalists for a Just Economic Community
Unitarian Universalists for Social Justice
Unite North Metro Denver
United For Action
United Native Americans
UU Congregation of Binghamton, Green Sanctuary
UUCB Green Sanctuary
Vessel Project of Louisiana
Wall of Women
Waterkeeper Alliance
WESPAC Foundation, Inc.
Western Slope Businesses for a Livable Climate
Wild Idaho Rising Tide
Womxn from the Mountain
Working Families Will County PAC
Working for Racial Equity
Youth United for Climate Crisis Action
Zero Hour
Zero Waste Kauai