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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL FUELS

IN THE MATTER OF DELFIN LNG LLC	FE Docket No. 13-129-LNG 13-147-LNG

Motion to Intervene and Protest of the Center for Biological Diversity and Sierra Club

On June 1, 2017, the Department of Energy ("DOE") authorized Delfin LNG, LLC ("Delfin") to export liquefied natural gas ("LNG") to non-free trade agreement ("non-FTA") countries.[1] Consistent with DOE's standard practice, Delfin's authorization required the commencement of exports within seven years, i.e., June 1, 2024.[2] In March 2024, Delfin asked for a five-year extension of their commencement date, from June 1, 2024 to June 1, 2029.[3] Now, once again, Delfin requests an additional two-year extension to June 1, 2031.

The Center for Biological Diversity and Sierra Club (collectively "Environmental Advocates") moved to intervene and protest the March 2024 previous extension request in this

[1] Delfin LNG LLC, DOE/FE Order No. 4028, Docket No. 13–147–LNG (June 1, 2017), *reh'g denied*, Order No. 4028–A (Apr. 3, 2018), *amended by* Order No. 4028–B (Dec. 10, 2020) (extending export term), *further amended by* Order No. 4028– C (May 18, 2021) (correcting and amending location of floating LNG vessels). In addition, Delfin's export authorization was amended by DOE/FE Order No. 4641 (Dec. 18, 2020) to include short-term export authority on a non-additive basis.
[2] *Id.*
[3] Delfin LNG LLC, DOE/FE Filing No. 46, Docket No. 13-147-LNG (March 1, 2024).

docket.[4] Again, Environmental Advocates move to intervene and protest Delfin LNG's extension request in the above docket pursuant to 10 C.F.R. §§590.303(b) and § 590.304. For the reasons stated in this intervention and protest, DOE should deny the requested license extension because an extension would be contrary to the public interest. 15 U.S.C. § 717b(a).

I. Intervention

Sierra Club intervened in the original proceeding of this docket. Environmental Advocates intervened in the March 2024 extension request docket.[5] Again, Environmental Advocates move to intervene in this docket. DOE's rules do not articulate any particular standard for timely intervention, and as such, intervention should be granted liberally. DOE merely requires would-be-intervenors to set out the "facts upon which [their] claim of interest is based" and "the position taken by the movant." 10 C.F.R. § 590.303(b)-(c). As explained in the following section, the Environmental Advocates' position is that the application should be denied or, in the alternative, cannot be approved without additional analysis. The organizations' interests are based on the impact the proposed extension of operation commencement will have on their members and missions.

A. Center for Biological Diversity

The Center for Biological Diversity ("The Center") is a national, nonprofit conservation organization committed to advancing environmental justice and safeguarding ecosystems that support the full biodiversity of life on Earth. The Center uses environmental advocacy to protect

[4] Delfin LNG LLC, DOE/FE Filing No. 70, Docket No. 13-147-LNG (April 29, 2024).
[5] *Id*.

wildlife and wildlands from habitat destruction, pollution, climate change, population growth and other human activities.

The Center has long been concerned about the impacts of Delfin LNG. In June 2015, the Center intervened against the Delfin LNG facility in FERC proceedings[6] and filed comments on the Final Environmental Impact Statement in 2016.[7]

The requested extension will facilitate gas exports that would otherwise not occur, threatening the interests of the Center and its members in numerous ways. Every greenlighted fossil fuel project unleashes devastating, wide-ranging harms to the climate, communities, wildlife and the air and water we all depend on while slowing the needed transition to equitable, affordable, clean, and renewable energy alternatives.

The Center's members on the Gulf Coast and across the country are already impacted by climate change, from rising temperatures and sea level rise to stronger storms and other harms. Expansion of LNG exports without adequate consideration of greenhouse gas emissions harms the Center's members both in the vicinity of these projects and across the nation. The Center has 342 members and more than 9,000 registered supporters in Louisiana, including in areas that will likely be impacted by increased gas production.

Construction and operation of LNG facilities for export can adversely impact protected species of concern to the Center's members through noise pollution, discharge of toxic

[6] Center For Biological Diversity, Motion to Intervene, Docket No. CP15-490-000, FERC, Jun. 11, 2015.
[7] Comments of the Center for Biological Diversity (Aug. 29, 2016), in Final Environmental Impact Statement for the Port Delfin LNG Project Deepwater Port Application, Appx C, at C-23, https://www.energy.gov/sites/default/files/2018/11/f57/final-eis-0531-port-delfin-lng-app-c-2016-11.pdf.

chemicals, and physical habitat disturbance/alteration.[8] Waste from ships and other port activities can result in loss or degradation of habitat areas and harm to marine life.

A likely increase in ship traffic can also injure and kill a variety of marine animals. For example, the Rice's whale, which is one of the most endangered marine mammals on Earth, faces a substantial risk of harm from ship strikes that could lead to death due to the significant amount of time it spends near the surface of the water.[9] The Center's members enjoy viewing, studying, etc. the Rice's whale, giant manta ray, and other species that may be harmed by expansion of LNG exports.

DOE must ensure that approval of LNG exports serves the public interest and considers appropriate environmental, and environmental justice, and macroeconomic factors. Approval of Delfin's extension request without appropriate review of these concerns would harm the Center and its members. Exports from the Delfin LNG project could also impact the Center's members by increasing consumer energy prices. Ample research from the DOE, Energy Information Administration, and others demonstrates that increases in U.S. exports have cost American consumers millions of dollars in higher energy costs.[10]

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[8] U.S. EPA, Ports Primer: 7.1 Environmental Impacts, https://www.epa.gov/community-port-collaboration/ports-primer-71-environmental-impacts (Jan. 13, 2022); United Nations Econ. And Soc. Comm'n for Asia and the Pacific, Assessment of the Environmental Impact of Port Development (1992), https://www.unescap.org/sites/default/files/pub 1234 fulltext.pdf.

[9] Melissa Soldevilla et al., Spatial distribution and dive behavior of Gulf of Mexico Bryde's whales: potential risk of vessel strikes and fisheries interactions, 32 Endang. Species Rsch. 533 (2017) (Prior to 2021, the Rice's whale was thought to be a distinct subspecies of Bryde's whales, known as the Gulf of Mexico Bryde's whale), https://repository.library.noaa.gov/view/noaa/16050.

[10] *See, e.g.*, IEEFA, Gas Exports Cost U.S. Consumers More than $100 Billion Over 16-Month Period (Jan. 29, 2024), https://ieefa.org/resources/gas-exports-cost-us-consumers-more-100-billion-over-16-month-period (attached).

For these reasons, and as described in the following protest, the Center contends that DOE should deny the Delfin LNG's requested extension.

Pursuant to 10 C.F.R. § 590.303(d), the Center identifies the following persons for the official service list:

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B. Sierra Club

Granting Delfin LNG's requested extension will facilitate gas exports that would not otherwise occur, resulting in harm to Sierra Club's members. The project's gas exports will cause an increase in energy prices for gas and electricity that will financially impact Sierra Club members. As DOE and the Energy Information Administration have previously explained, each marginal increase in export volumes is also expected to further increase domestic energy prices. Absent the extension, Delfin LNG's export authorization would lapse, which would prohibit the project from proceeding with construction, thereby protecting Sierra Club members from economic harm.

The requested operational deadline extension will further harm Sierra Club members by increasing gas production and associated air pollution, including (but not limited to) the emission of greenhouse gases and ozone precursors. As DOE has recognized, increasing LNG exports will increase gas production,[11] which causes increased ozone pollution. This added pollution threatens regional air quality and public health in areas already classified as non-attainment for federal ozone standards.[12] Ozone pollution causes significant health harms, including asthma and other respiratory illnesses. Sierra Club has over 2,700 members in Louisiana, including many in the Barnett Shale region and other areas that are adversely impacted by ozone pollution from fossil fuel industry pollution. These members will likely experience adverse impacts from the increased gas production induced by Delfin. Denying the project's extension request, thereby preventing construction and operation, would likely avoid such harmful effects.

The additional exports resulting from an extension of Delfin LNG's license will cause the emission of significant greenhouse gases throughout the LNG life cycle—from production, transportation, liquefaction, and end use. While climate change already adversely impacts Sierra Club members in numerous ways, these emissions will cause additional harm to Sierra Club members. Coastal property owners risk losing property to sea level rise. Extreme weather events, including flooding and heat waves, impact members' health, recreation, and livelihoods.

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[11] *See, e.g.*, U.S. EIA, Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets (Oct. 2014) at 12, *available at* https://www.eia.gov/analysis/requests/fe/pdf/lng.pdf (explaining that "[n]atural gas markets in the United States balance in response to increased LNG exports mainly through increased natural gas production," and "[a]cross the different export scenarios and baselines, higher natural gas production satisfies about 61% to 84% of the increase in natural gas demand from LNG exports," with "about three-quarters of this increased production [coming] from shale sources.").

[12] U.S. DOE, Final Addendum to Environmental Review Documents Concerning Exports of Natural Gas from the United States (Aug. 2014) at 27-32, *available at* https://www.energy.gov/sites/prod/files/2014/08/f18/Addendum.pdf.

Increased frequency and severity of wildfires emits smoke that impacts members' health, harms ecosystems members depend upon, and threatens members' homes. Proposals, such as this one, that encourage long-term use of carbon-intensive fossil fuels will increase and prolong greenhouse gas emissions, increasing the severity of climate change and the resulting harms.

The proposed exports will require new onshore and offshore infrastructure with significant direct environmental impacts, including air pollution emissions. These emissions will adversely impact Sierra Club members and others who live, work, and/or recreate in the vicinity of the proposed project infrastructure.

Delfin LNG would require significant additional shipping traffic that would not occur if DOE denies the extension, thus preventing the project from moving forward. The associated vessel or tanker traffic will emit air pollutants such as carbon monoxide and ozone-forming nitrogen oxides. Increased ship traffic will also harm wildlife that the organization's members enjoy viewing, including the threatened giant manta ray,[13] threatened oceanic whitetip shark,[14] and the critically endangered Rice's whale.[15]

In summary, the requested extension by Delfin LNG will harm Sierra Club members in numerous ways. Sierra Club accordingly contends that the application should be denied or conditioned, as further described in the following protest.

Pursuant to 10 C.F.R. § 590.303(d), Sierra Club identifies the following person for the official service list:

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[13] Final Rule to List the Giant Manta Ray as Threatened Under the Endangered Species Act, 83 Fed. Reg. 2,916 (Jan. 22, 2018).
[14] Listing the Oceanic Whitetip Shark as Threatened Under the Endangered Species Act, 83 Fed. Reg. 4,153 (Jan. 30, 2018).
[15] Technical Corrections for the Bryde's Whale (Gulf of Mexico Subspecies), 86 Fed. Reg. 47,022 (Aug. 23, 2021) (determined a genetically distinct species from the Bryde's whale, it was renamed the Rice's whale in 2021).

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II. DOE must revisit the findings underlying its initial public interest determination

DOE evaluates "economic impacts, international impacts, security of natural gas supply, and environmental impacts, among others."[16] This standard should apply to changes in the licensing, like the requested extension, or where there are changes to the underlying project that alter the underlying public interest analysis.

As a result of the elapsed time and changed circumstances in the project and underlying public interest analysis described below, each of the public interest factors weigh against granting Delfin LNG's extension request.

A. DOE has the authority and obligation to revisit prior determinations in deciding whether to grant the proposed extension request

Project proponents, like Delfin LNG, are not entitled to a license extension. If they were, the license expiration date would serve no purpose. Conditions can change significantly over time, particularly when eight years have passed since the original licensing decision and

[16] DOE/FE Order No. 4010, FE Docket No. 16-109-LNG at 14-15 (June 29, 2017), available at https://www.energy.gov/sites/prod/files/2017/06/f35/ord4010.pdf

construction has not yet begun. In deciding whether to grant an extension request, DOE has the authority to reassess the findings made in the original export authorization—including by considering whether circumstances have changed or if previous determinations have gone stale. Pursuant to 10 C.F.R. § 590.404, DOE may "attach such conditions thereto as may be required by the public interest." Thus, DOE may extend the in-operation deadline, but DOE is not required to do so. Accordingly, in deciding whether to grant an extension request, DOE should and must consider whether such a request is in the public interest.

If changed circumstances undermine DOE's previous conclusions, there is no justification for granting Delfin LNG additional time to complete a project that is not in the public interest. Furthermore, reconsideration of the prior determinations does not affect the initial authorization. Delfin maintains the opportunity to utilize the existing authorization so long as they meet the current operational deadline of June 1, 2029. But, where a developer asks that the initial authorization be reopened for purposes of changing the operational deadline, it is appropriate to reopen it for other purposes as well. In this case, significant changes have occurred in ownership, design, financing and operations, providing further bases for revisiting the agency's initial authorization. According to the Maritime Administration, the agency tasked with the review and approval of the construction and operation of the Delfin LNG deepwater port terminal, "widespread changes were made to the project ownership, design, financing, and operations" resulting in "a revised proposal." [17] This revised proposal has not been reviewed by DOE and determined whether to be in the public interest.

[17] US DOT MARAD, Letter to Delfin in Response to License Request (April 17, 2024) hereinafter "MARAD letter".

Importantly, DOE has broad authority to "amend … orders … as it may find necessary or appropriate." 15 U.S.C. § 717o. Here, subsequent events, such as newly proposed and permitted LNG export terminals, more recent climate studies, and additional information on threatened and endangered species, make it unreasonable for DOE to rely on its initial authorizations without further analysis of this critical information.

B. New studies and evidence demonstrating LNG exports' impacts on domestic energy prices and supply demonstrate that the extension is not in the public interest.

DOE has historically given particular emphasis to "the domestic need for the natural gas proposed to be exported" and "whether the proposed exports pose a threat to the security of domestic natural gas supplies."[18] Recent data undermines any conclusion that LNG exports have little impact on domestic natural gas prices and that Henry Hub gas prices are forecasted to remain low. In fact, DOE's 2024 study concluded that LNG exports harm American consumers, particularly those located in the Gulf Coast of Texas and Louisiana where LNG export facilities, like Delfin LNG are located.[19] If LNG exports increase based on global demand, the price of natural gas in the U.S. will go up. For example, by 2050, Henry Hub natural gas prices could rise by 31% compared to current levels, depending on the export level.[20] DOE's prior studies and Delfin's previous public interest determinations fail to address this data, which demonstrate that an extension is not in the public interest.

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[18] *See, e.g.,* DOE/FE Order No. 3357-B, available at https://www.energy.gov/sites/prod/files/2014/11/f19/ord%203357-B.pdf, at 10; 85 Fed. Reg. 53,243 (Aug. 25, 2020) ("In evaluating the public interest, DOE takes seriously the potential economic impacts of higher natural gas prices.").

[19] DOE, 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports, Summary Report, available at https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_SummaryReport_Dec2024_230pm.pdf at S-4.

[20] *Id*.

From an economic perspective, LNG exports are simply making most Americans worse off: all Americans must pay energy bills, but few own shares (even indirectly, through pension plans and the like) in the gas companies that are benefiting from high gas prices and LNG sales.[21] DOE is charged with protecting the "public" interest, 15 U.S.C. § 717b(a); that is, the interest "of … all or most of the people" in the United States.[22] Higher LNG exports in 2050 could increase U.S. residential natural gas prices by 4% on average. In regions with less gas supply, prices might rise even more (up to 7%). The increase in natural gas prices could cost U.S. households up to $122 more annually for gas and electricity combined, or $47 for gas alone.[23]

DOE has previously recognized that "the distributional consequences of an authorizing decision" may be so negative as to demonstrate inconsistency with the public interest despite "net positive benefits to the U.S. economy as a whole."[24] Accordingly, unless DOE addresses distributional concerns, DOE will have failed to consider an important part of the problem. But to date, DOE has never grappled with the distributional impacts of LNG exports: DOE has acknowledged that LNG exports have some positive and some negative economic impacts,[25] but DOE has not addressed the fact that those who suffer the harms are not the same as those who

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[21] Synapse Energy Economics, Inc., *Will LNG Exports Benefit the United States Economy?* (Jan. 23, 2013) at 9, *available at* https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/Exhibits_1-20.pdf (previously submitted as Attachment 15 to Comments of Sierra Club *et al.* on Delfin's March DOE Extension request)

[22] *Public*, Merriam-Webster Unabridged Dictionary, available at http://www.merriam-webster.com/dictionary/public (last visited July 1, 2025).

[23] 2024 LNG Export Study, *supra* note 18.

[24] DOE/FE Order 3638-A (Corpus Christi) at 45 (May 26, 2016), *available at* https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/applications/12-97-LNG_CMI_Corpus_Rehearing__May_26.pdf.

[25] *See*, *e.g.*, NERA Economic Consulting, Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports (June 7, 2018) at 19, 21, 64, 67, available at https://cms.doe.gov/sites/prod/files/2018/12/f58/2018%20Study.pdf.

enjoy the benefits, or that the former are more numerous and generally more disadvantaged than the latter. In particular, research shows that low-income, Black, Hispanic, and Native American households all face dramatically higher energy burdens—spending a greater portion of their income on energy bills—than the average household.[26] Increased gas prices will exacerbate the existing energy burden disparities, placing these households at even further risk. These concerns among others must be considered when determining whether Delfin LNG's extension is in the public interest.

C. New information regarding the environmental impacts of Delfin LNG demonstrate that an extension is not in the public interest.

DOE must also address mounting scientific evidence highlighting the substantial risk of extreme weather events facing infrastructure like Delfin LNG along the Gulf Coast, and the urgent need to curb greenhouse gas emissions. Specifically, DOE must address the 2022 National Oceanic and Atmospheric Administration ("NOAA") Report on sea level rise and three recent documents from the IPCC's 6th Assessment Report ("AR6") that paint a staggering picture of a climate-destabilized future absent urgent and aggressive carbon emission reductions**.**

The National Climate Assessments decisively recognize the dominant role of fossil fuels in driving climate change. As stated by the Third National Climate Assessment: "observations unequivocally show that climate is changing and that the warming of the past 50 years is primarily due to human-induced emissions of heat-trapping gases. These emissions come mainly

[26] American Council for an Energy-Efficient Economy, *How High are Household Energy Burdens?* (Sept. 2020), *available at* https://www.aceee.org/sites/default/files/pdfs/u2006.pdf (previously submitted as Attachment 10 to Comments of Sierra Club *et al.* on the Delfin's March DOE Extension request); Eva Lyubich, *The Race Gap in Residential Energy Expenditures* (June 2020), *available at* https://haas.berkeley.edu/wp-content/uploads/WP306.pdf (attached)

from burning coal, oil, and gas."[27] In its 2022 report, NOAA concluded sea level will rise by one foot by 2050 as a result of climate change.[28] The 2022 NOAA sea level rise data represents significant new information. Louisiana has the highest relative rise in sea level of anywhere in the U.S.;[29] storms and hurricanes are common in Louisiana and could happen at any time, as aptly demonstrated by the 2020 and 2021 hurricane seasons; and the onshore components of Delfin LNG are at risk of serious flooding.[30] The 2022 NOAA report also predicts an "increase in the frequency of coastal flooding, even in the absence of storms or heavy rainfall."[31] This, combined with a subsidence rate of over 22 mm per year—the highest rates along the western Gulf states—makes sea level rise a climate and safety problem.[32] DOE must consider the 2022 NOAA report in its public interest analysis.

Similarly, the IPCC's August 2021 *The Physical Science Basis* report confirms that "[h]uman- induced climate change is already affecting many weather and climate extremes in

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[27] Jerry M. Melillo et al. (eds.), U.S. Global Change Research Program Climate Change Impacts in the United States: The Third National Climate Assessment (2014) at 2, available at https://www.globalchange.gov/browse/reports/climate-change-impacts-united-states-third-national-climate-assessment-0. *See also* Report Finding 1 at 15: "The global warming of the past 50 years is primarily due to human activities, predominantly the burning of fossil fuels."

[28] *See* National Oceanic and Atmospheric Administration, *U.S. coastline to see up to a foot of sea level rise by 2050,* available at http://www.noaa.gov/news-release/us-coastline-to-see-up-to-foot-of-sea-level-rise-by-2050 (Feb. 15, 2022) (attached) (hereinafter "U.S. Sea Level Rise").

[29] "[A] federal study from NOAA . . . points out that the Gulf of Mexico from Texas to Louisiana is likely to see the highest sea-level rise in the contiguous United States. And flooding will likely become more intense and more frequent." *See* Mike Lee, *U.S. LNG surge may have a flood problem*, E&E News (June 8, 2022) (attached).

[30] "Hurricane Laura pushed a 17-foot-high wall of water onto the Louisiana coastline . . . The storm tide surged nearly 30 miles up the Calcasieu River and flooded large swaths of Lake Charles." *Id*.

[31] U.S. Sea Level Rise, *supra* note 27.

[32] Dokka, R., Shinkle K., *Rates of vertical displacement at benchmarks in the lower Mississippi Valley and the North Gulf Coast*, NOAA (July 2004), http://geodesy.noaa.gov/heightmod/NOAANOSNGSTR50.pdf (attached).

every region across the globe."[33] Evidence demonstrating the link between human greenhouse gas emissions and "changes in extremes such as heatwaves, heavy precipitation, droughts, and tropical cyclones . . . has strengthened since" the prior IPCC report.[34] In addition to exacerbating extreme weather, "[h]eating of the climate system has caused global mean sea level rise through ice loss on land and thermal expansion from ocean warming."[35] The IPCC forecasts with *high confidence* that flooding will become more likely in coastal cities due to "the combination of more frequent extreme sea level events (due to sea level rise and storm surge)."[36] Even under deep emission reductions scenarios that keep global warming to within 1.5°C, the report finds that "heavy precipitation and associated flooding are projected to intensify and be more frequent in most regions," including North America (*medium to high confidence*).[37]

LNG exports and its contributions to climate change pose significant national security concerns. In U.S. coastal regions, rising sea levels, higher storm surge, and increased erosion could damage or destroy critical infrastructure. Sea level rise and higher storm surge in coastal regions increases the risk of major coastal impacts on transportation infrastructure, including flooding of airports, ports and harbors, roads, rail lines, tunnels, and bridges.[38] Furthermore, climate change caused primarily by oil and gas activities also affects "key economic sectors"

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[33] *See Climate Change 2021: The Physical Science Basis, Summary for Policymakers*, IPCC, available at https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf (Oct. 2021) (attached) (hereinafter "IPCC Physical Science Summary").
[34] *Id*. at 8, A.3.
[35] *Id*. at 11, A.4.3.
[36] *Id*. at 25, C2.6.
[37] *Id.* at C.2.2. With 2°C or more of global warming, changes in droughts and heavy and mean precipitation will be even more dramatic. *Id.* at C.2.3.
[38] Obama Report Archives, Findings from Select Federal Reports: The National Security Implications of Climate Change (2015) at 3, https://obamawhitehouse.archives.gov/sites/default/files/docs/National_Security_Implications_of_Changing_Climat e_Final_051915.pdf (attached)

such as agriculture and water which has profound effects on food security and threatens overall economic stability.[39] The Department of Defense ("DOD") has elevated climate change as a national security priority.[40] Climate change is an urgent and growing threat to our national security contributing to increased natural disasters, refugee flows, and conflicts over basic resources like food and water. The present-day effects of climate change are being felt from the Arctic to the Midwest. In turn, the global economy suffers, compounding the growing costs of preparing and restoring infrastructure.[41] The pressures caused by climate change are felt globally and will influence resource competition and aggravate stressors abroad such as poverty, environmental degradation, political instability, and social tensions which are conditions that can enable terrorist activity and violence.[42] As Assistant Secretary of the United States Army Rachel Jacobson stated, "climate change is a threat to global peace and security" and urgent action is needed.[43] In addition to considering the national security implications of accelerating climate change with expanded LNG exports, DOE must also take a hard look at our country's current export capacity and the demand of our allies for LNG imports into the future. The Institute for Energy Economics and Financial Analysis ("IEEFA") predicts that Europe's demand for LNG

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[39] *Id*.
[40] U.S. Dep't of Defense, Tackling the Climate Crisis (visited May 10, 2024), available at https://www.defense.gov/spotlights/tackling-the-climate-crisis/.
[41] White House, National Security Strategy, February 2015 Domestic Energy Prices in Obama Report Archives, Findings from Select Federal Reports: The National Security Implications of Climate Change (2015), at 3, available at https://obamawhitehouse.archives.gov/sites/default/files/docs/National_Security_Implications_of_Changing_Climate_Final_051915.pdf. (attached)
[42] *Id*. at 8.
[43] U.S. Dep't of Defense, DOD Officials Highlight Climate and Energy Security Issues at International Conference, Defense Department News (Dec. 11, 2023), https://www.defense.gov/News/NewsStories/Article/Article/3614103/dod-officials-highlight-climate-and-energy-security-issues-at-international-con/ (attached)

will peak in 2025,[44] years before currently approved export authorizations will expire. Additionally, Europe's demand has fallen over the past year.[45] IEFFA found European gas demand is expected to fall further by 2030, noting that LNG export capacity in 2030 will be 76 percent higher than Europe's forecasted demand.[46]

Looking to the future, *The Physical Science Basis* concludes that cutting greenhouse gas emissions now is critical because "there is a near-linear relationship" between human-caused greenhouse gas emissions and related global warming, meaning that each additional increment of global warming exacerbates changes in extreme weather events and increases these national security concerns. For example, the IPCC forecasts that each additional 1°C of global warming will cause about a 7 percent increase in the intensity of extreme daily precipitation events (*high confidence*).[47] Based on this demonstrated relationship, the IPCC concludes that "reaching net zero anthropogenic CO2 emissions is a requirement to stabilize human-induced global temperature increase at any level."[48]

Additionally, the IPCC's February 2022 report—on *Impacts, Adaptation, and Vulnerability*— highlights the increasing climate-related risks to coastal and nearshore

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[44] Sam Reynolds & Ana Maria Jaller-Makerewicz, IEEFA, The U.S. Pause on LNG Export Permits Does Not Threaten Energy Security in Europe and Asia (Feb. 08, 2024), available at https://ieefa.org/resources/us-pause-lng-exportpermits-does-not-threaten-energy-security-europe-and-asia (attached)
[45] IEEFA, European LNG Tracker, https://ieefa.org/european-lng-tracker.
[46] IEFFA, As the U.S. Builds New LNG Terminals, Europe Reduces Gas Demand and Diversifies Energy Sources (Jan. 2024), https://ieefa.org/resources/us-builds-new-lng-terminals-europe-reduces-gas-demand-and-diversifiesenergy-sources (attached)
[47] *Supra* note 32 at 16, B.2.4. The IPCC reports that "every additional 0.5°C of global warming causes clearly discernible increases in the intensity and frequency of hot extremes, including heatwaves (*very likely*), and heavy precipitation (*high confidence*), as well as agricultural and ecological droughts in some regions (*high confidence*)." *Id*. at 15, B.2.2.
[48] *Id*. at 28, D.1.1.

infrastructure like Delfin LNG. Because "[c]limate change impacts and risks are becoming increasingly complex and more difficult to manage," it is increasingly likely that "[m]ultiple climate hazards will occur simultaneously, . . . compounding overall risk[.]"[49] Moreover, "[u]navoidable sea level rise will bring cascading and compounding impacts resulting in losses of coastal ecosystems and ecosystem services, groundwater salinization, flooding and damages to coastal infrastructure that cascade into risks to livelihoods, settlements, health, well-being, food and water security, and cultural values in the near to long-term (high confidence)." [50]

The IPCC again concludes, with *very high confidence*, that "[t]he magnitude and rate of climate change and associated risks depend strongly on near-term mitigation and adaptation actions, and projected adverse impacts and related losses and damages escalate with every increment of global warming."[51] If overall global warming reaches 1.5°C in the near-term, there would be "unavoidable increases in multiple climate hazards" that would "present multiple risks to ecosystems and humans (very high confidence)." Although "[n]ear-term actions that limit global warming to close to 1.5°C would substantially reduce projected losses and damages related to climate change in human systems and ecosystems," the IPCC confirmed (with very high confidence) that, at this point, those actions cannot eliminate all of the harms.[52]

Because climate change impacts cannot be eliminated entirely, the IPCC also highlights critical adaptation strategies, including restoring wetlands to "further reduce flood risk (medium

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[49] *See* IPCC, *Climate Change 2022 Impacts, Adaptation and Vulnerability, Summary for Policy Makers* at 18, B.5, available at https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf (Feb. 2022) (attached) (hereinafter "IPCC Impacts Summary").
[50] *Id*. at Figure SPM.B.5.2.
[51] *Id*. at SPM.B.4.
[52] *Id*. at SPM.B.3.

confidence)."[53] Noting that "siting of infrastructure" and other factors have "contributed to the exposure of more assets to extreme climate hazards increasing the magnitude of the losses (high confidence),"[54] the IPCC also concludes that "[a]ctions that focus on sectors and risks in isolation and on short-term gains often lead to maladaptation if long-term impacts of the adaptation option and long-term adaptation commitment are not taken into account (high confidence)."[55]

Lastly**,** the IPCC's April 2022 *Mitigation of Climate Change* report[56] further demonstrates that LNG exports will need to be significantly curtailed well before 2050. For example, the IPCC concludes that, to remain consistent with current internal climate pledges, global greenhouse gas emissions reductions must undergo "an unprecedented acceleration" between 2030 and 2050 (medium confidence).[57] Without additional abatement, projected greenhouse gas "emissions over the lifetime of existing and currently planned fossil fuel infrastructure" will result in global warming over 1.5°C.[58] Moreover, to reduce greenhouse gas emissions, the energy sector will "require[] major transitions, including a substantial reduction in overall fossil fuel use, the deployment of low-emission energy sources, switching to alternative energy carriers, and energy efficiency and conservation."[59] On the other hand, "[t]he continued installation of unabated fossil fuel infrastructure will 'lock-in' [greenhouse gas] emissions" (high confidence).[60] The required

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[53] *Id*. at SPM.C.2.1.
[54] *Id*. at SPM.B.1.6.
[55] *Id*. at SPM.C.4.1.
[56] *See* IPCC, *Climate Change 2022: Mitigation of Climate Change, Summary for Policy Makers*, available at https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf (Apr. 2022) (attached).
[57] *Id*. at B.6.3.
[58] *Id*. at B.7.
[59] *Id*. at C.4.
[60] *Id*.

transition in the energy sector "is projected to reduce international trade in fossil fuels."[61] Because limiting warming to 2°C "could strand considerable fossil fuel infrastructure," the IPCC estimates that gas assets "are projected to be more at risk of being stranded towards mid-century" (high confidence),[62] reiterating the risk that new LNG facilities like Delfin must not come online or cease operations well before 2050.

In short, the IPCC's AR6 reports add to the mounting evidence demonstrating the dual climate risks associated with the licensing and operation of Delfin LNG facility: (1) that the facility's staggering greenhouse emissions will fuel climate change, and (2) that the climate-driven hazards at the project sites will increase the risk of significant contamination being released into the surrounding communities and ecosystems. DOE must consider this significant new information in its public interest analysis and in supplemental NEPA review.

D. Delfin LNG risks harm threatened and endangered species like the Rice's whale.

The Endangered Species Act ("ESA") requires all federal agencies to "ensure that any action authorized, funded, or carried out" is "not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification" of a species critical habitat.[63] The ESA requires that federal agencies consult with expert wildlife agencies and affirmatively promote the conservation of listed species.[64] Similarly,

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[61] *Id*. at C.4.4.
[62] *Id*.
[63] 16 U.S.C. § 1536(a)(2).
[64] 16 U.S.C. § 1536(a)(1); Sarah Krakoff, S, & Shawn Finley, U.S. Department of Interior, Office of the Solicitor, Letter to Director Martha Williams, U.S. Fish and Wildlife Service, on federal agency obligations under section 7(a)(1) of the Endangered Species Act (February 6, 2024), available at https://www.fws.gov/sites/default/files/documents/federal-agency-obligations-under-section-7-a-1-memo-2024-02-06.pdf (attached).

the Marine Mammal Protection Act ("MMPA") prohibits the "taking" of marine mammals, defined as harassment, hunting, capturing or killing.[65] Harassment is any act of pursuit, torment or annoyance that has the potential to injure or disturb a marine mammal in the wild including the disruption of behavioral patterns like breeding or migration.[66] Even with such protections, however, the construction and operation of liquefied natural gas ("LNG") export facilities, like Delfin LNG, is likely to cause significant and irreversible harm to protected wildlife.

Although scientists have called for a rapid transformation of our energy system away from fossil fuels to avoid a mass extinction event,[67] the past several years has seen a rampant surge in LNG exports, which adversely affect species survival and accelerate global heating. The rapid expansion of LNG export infrastructure and shipping of LNG comes with severe consequences for vital ecosystems and wildlife species already on the brink of extinction.

LNG exports negatively impact endangered species and their critical habitat across terrestrial and marine ecosystems. Construction and operation of LNG export facilities adversely impact both ESA and MMPA protected species (collectively "protected species") through discharge of toxic chemicals, noise pollution, physical habitat disturbance and alteration, direct mortality (e.g., ship strikes, oil spills), and worsening climate change. Numerous mobile and stationary emission sources associated with LNG export facilities discharge a wide array of pollutants onshore and offshore, including pollution from onshore terminals, pipelines, trucks, marine vessels, locomotives, cargo handling equipment, refineries, and storage facilities. Supporting infrastructure, such as pipelines, requires dredging and disposal events during

[65] 16 U.S.C. §§ 1361-1423.
[66] 16 U.S.C. § 1362(18)(A)(i-ii), (18)(C-D).
[67] Anthony Barnoksy, *MRS Energy & Sustainability*, Transforming the global energy system is required to avoid the sixth mass extinction (July 2015) at 2, (attached).

construction, and poses the risk of leaks during operation. This results in the release of contaminants into critical ecosystems, which threaten wildlife and human communities alike.

For coastal and marine species, waste from ships and other port activities can result in destruction or degradation of habitat areas and harm to marine life. Delfin LNG would result in additional vessel traffic during construction and operation of the export facility including 40 LNG carriers, 4 floating vessels, and an estimated 200 transits of vessels during the construction phase.[68] Ships and other vessels run over, injure, and kill whales, sea turtles, and other marine animals. Underwater noise pollution from LNG export-related construction and operations threatens marine species with impacts ranging from permanent hearing loss (Permanent Threshold Shift, PTS), temporary hearing loss (Temporary Threshold Shift, TTS), to behavioral harassment.[69] Additionally, non-native marine species transported and released from ship ballast water can become invasive in their new habitat and introduce new diseases.[70]

The Gulf of Mexico is home to some of the most productive and biodiverse tropical and temperate habitats in the United States, including coral reefs, wetlands, seagrass beds, mangroves, and Sargassum, as well as hard- and softbottom marine communities. These ecosystems support thousands of species of fish, whales, dolphins, sea turtles, corals, and other animals. There are twenty ESA-listed marine species in the Gulf of Mexico[71] and up to twenty

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[68] Delfin LNG, Final Environmental Impact Statement for the for the Port Delfin LNG Project Deepwater Port Application (November 2016), Docket No. USCG-2015-0472, available at https://www.energy.gov/sites/default/files/2018/11/f57/final-eis-0531-port-delfin-lng-main-volume-2016-11.pdf

[69] National Oceanic and Atmospheric Administration, TetraTech Request for incidental harassment authorization for marine mammals for the New Fortress Energy Louisiana FLNG project (February 2023), available at https://www.fisheries.noaa.gov/s3/2023-03/NFELNG_2023IHA_App_OPR1.pdf.

[70] Ports Primer: 7.1*, supra* note 8.

[71] National Oceanic Atmospheric Administration, *Threatened and Endangered Species List Gulf of Mexico*, March 18, 2024), available at https://

species of resident marine mammals protected under the MMPA.[72]

Additionally, the Gulf has been identified as "Biologically Important Areas" (BIAs) for two species of marine mammals, highly endangered Rice's whales (previously considered a population of Bryde's whale) and bottlenose dolphins.[73] While the BIA for the Rice's whale only includes the eastern Gulf studies, there is evidence that the species persistently occurs in the central and western Gulf in the region that Delfin would operate.[74] The Rice's whale, endemic to the Gulf of Mexico, is considered one of the planet's most endangered marine mammals, with fewer than 100 individuals and a current best estimate of 50 whales that exclusively inhabit Gulf of Mexico waters.[75] Recent science demonstrates that the loss of even a single Rice's whale could result in the extinction of this species.[76] This Administration recently proposed critical

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www.fisheries.noaa.gov/southeast/consultations/threatened-and-endangered-species-list-gulf-mexico.

[72] Baumgartner, M., K. Mullin, L. Nelson May, T. D. Leming, Cetacean habitats in northern Gulf of Mexico (2001), *Fishery Bulletin* 99(2), 219.

[73] LaBrecque, E., Curtice, C., Harrison, J., Van Parijs, S. M., & Halpin, P., *Aquatic Mammals* (Special Issue) *41*(1), Biologically important areas for cetaceans within U.S. waters Gulf of Mexico region (2015), available at http://dx.doi.org/10.1578/AM.41.1.2015.1

[74] NOAA Fisheries, Rice's Whale Spotted in the Western Gulf of Mexico (April 30, 2024), available at https://www.fisheries.noaa.gov/feature-story/rices-whales-spotted-western-gulf-mexico.

[75] P.E. Rosel, L.A Wilcox., T.K. Yamada, & K.D. Mullin, A new species of baleen whale (Balaenoptera) from the Gulf of Mexico, with a review of its geographic distribution (2021), *Marine Mammal Science, 37*(2), 577- 610, available at https://doi.org/10.1111/mms.12776; NOAA Fisheries, Rice's whale (Balaenoptera ricei): Northern Gulf of Mexico stock (May 2023), available at https://www.fisheries.noaa.gov/s3/2023-08/Rices-Whale-Northern-Gulf-of-Mexico-2022.pdf

[76] *See, e.g.,* Endangered and Threatened Wildlife and Plants; Endangered Status of Gulf of Mexico Bryde's Whale, 84 Fed. Reg. 15,446, 15446-488 (Apr. 15, 2019) (listing decision, determining that the whale is at a "high risk of extinction" under three statutory factors); see e.g., National Oceanic and Atmospheric Administration, *Rice's whale*., available at https://www.fisheries.noaa.gov/species/rices-whale; P.E. Rosel, P.J. Corkeron, L. Engleby, D. Epperson, K. Mullin, M.S. Soldevilla, and B.L. Taylor, Status review of Bryde's whales (Balaenoptera edeni) in the Gulf of Mexico under the Endangered Species Act, NOAA Tech. Memo (2016), NMFS-SEFSC-692, available at http://doi.org/10.7289/V5/TM-SEFSC-692, at iv, 130-32; *see also* Natural Resources Defense Council, Comment re: proposed critical habitat

habitat for the species that directly overlaps with the Delfin LNG project area including vessels that would be serving the project throughout construction. Continued expansion of these operations in this critical habitat for Rice's whales thus threatens the very existence of the species.

Sperm whales are also a resident endangered species along the continental shelf edge across the Gulf of Mexico. Some portions of the population occur in the Gulf year-round. Female and juveniles spend most of their life cycle within the Gulf of Mexico, and bull males will migrate in from the broader Atlantic to reproduce.[77] While sperm whales are primarily found in deeper waters in the Gulf of Mexico, they have also been observed in waters as shallow as 30-40m on the shelf and near the Delfin LNG project site.[78] The response of sperm whales to environmental changes and anthropogenic stressors, such as operations from oil and gas export projects, has been extensively studied.[79] Construction, operation, and vessel traffic noise can directly interfere with intraspecies communication,[80] which in turn can decrease social cohesion and the ability for the animals to reproduce. For species like the sperm whale, which use

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designation for Rice's whale (Oct. 6, 2023), NOAA-2023-0028, available at https://www.regulations.gov/comment/NOAANMFS-2023-0028-25145 (Providing a summary of the recent science on the Rice's whale and threats to the species, including evidence of the species' persistent occurrence in central and western Gulf waters and direct threats of vessel strikes, noise and spills from oil and gas development).

[77] National Oceanic and Atmospheric Administration, *Sperm whale*., available at https://www.fisheries.noaa.gov/species/spermwhale.

[78] Rice, A., Sierra Club Environmental Law Program, Possible risks to marine protected species from the construction and operation of the Delfin LNG offshore terminal (Feb. 2, 2022), at 9. (attached).

[79] Ackleh, A. S., R. A. Chiquet, B. Ma, T. Tang, H. Caswell, A. Veprauskas, N. Sidorovskaia, *Ecotoxicology* 26 (2017), Analysis of lethal and sublethal impacts of environmental disasters on sperm whales using stochastic modeling, available at https://doi.org/10.1007/s10646-017-1813-4 at 820-830.

[80] Erbe, C., Reichmuth, C., Cunningham, K., Lucke K., Dooling, R. (2016). Communication masking in marine mammals: A review and research strategy. *Marine Pollution Bulletin,* 103, 15-38, available at https://doi.org/10.1016/j.marpolbul.2015.12.007.

echolocation for feeding, vessel noise can also disrupt foraging patterns[81] and increase physiological stress.[82]

All five sea turtle species that inhabit the Gulf of Mexico—green, hawksbill, Kemp's ridley, leatherback, and loggerhead—are protected under the ESA.[83] Of the five sea turtle species in the Gulf of Mexico, Kemp's ridley sea turtles are the most vulnerable to threats, especially threats that cause population-level impacts like the Deepwater Horizon oil spill, due to their already low numbers and location of nesting habitat. Kemp's ridley sea turtle observations demonstrate a broadly distributed population with highly concentrated sightings that overlap significantly with oil and gas export operations. Noise from offshore supply vessels induce behavioral reactions from sea turtles even at distance, and sea turtles face a higher likelihood of being struck and killed by vessels traveling through the Gulf given increased traffic from expanded export operations. The National Marine Fisheries Service found in its 2020 Gulf of Mexico oil and gas drilling biological opinion that status quo drilling activities will kill 11,500 sea turtles every year by vessel strikes (including 2,100 of Kemp's ridley sea turtles).[84] In addition to these offshore harms, endangered sea turtles are adversely impacted by onshore

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[81] National Oceanic and Atmospheric Administration, Pygmy *Sperm whale*, available at https://www.fisheries.noaa.gov/species/pygmy-sperm-whale; Rice, A., Sierra Club Environmental Law Program, Possible risks to marine protected species from the construction and operation of the Delfin LNG offshore terminal (Feb 2, 2022).

[82] R. M. Rolland, , S. E. Parks, K. E. Hunt, M. Castellote, P. J. Corkeron, D. P. Nowacek, S. K. Wasser, S. D. Kraus, Evidence that ship noise increases stress in right whales (2012), *Proceedings of the Royal Society B: Biological Sciences* 279, 2363-2368, available at https://doi.org/10.1098/rspb.2011.2429.

[83] J.Reneker, M. Cook, B. Stacy, R. W. Nero, D G. Stewart, NOAA Technical Memo, NMFS-SEFSC-732, Summary of sea turtle strandings, incidental captures and related survey effort in Mississippi during 2017(October 2018).

[84] National Marine Fisheries Service, Biological opinion on the federally regulated oil and gas program activities in the Gulf of Mexico (March 13, 2020), available at https://doi.org/10.25923/hyeh-mb74.

infrastructure, including the construction and operation of new LNG pipelines, which destroy critical nesting habitat.

III. Conclusion

For the reasons stated above, the Environmental Advocates' motion to intervene in this docket should be granted. Further, Delfin LNG's proposed export extension is not in the public interest and should be denied.

Respectfully submitted July 3, 2025

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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL FUELS

IN THE MATTER OF DELFIN LNG LLC	FE Docket No. 13-129-LNG 13-147-LNG

CENTER FOR BIOLOGICAL DIVERSITY STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b), I, Lauren A. Parker, hereby certify that I am duly authorized representative of the Sierra Club, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy and Carbon Management, on behalf of the Sierra Club, the foregoing documents and I the above captioned proceeding.

Dated at Washington, DC this 3rd day of July, 2025

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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL FUELS

IN THE MATTER OF DELFIN LNG LLC	FE Docket No. 13-129-LNG 13-147-LNG

SIERRA CLUB STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b), I, Rebecca McCreary, hereby certify that I am duly authorized representative of the Sierra Club, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy and Carbon Management, on behalf of the Sierra Club, the foregoing documents and I the above captioned proceeding.

Dated at Boulder, CO this 3rd day of July, 2025

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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL FUELS

IN THE MATTER OF DELFIN LNG LLC	FE Docket No. 13-129-LNG 13-147-LNG

CENTER FOR BIOLOGICAL DIVERSITY VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b), I, Lauren A. Parker, hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the foregoing document, and that the facts stated therein are true and correct to the best of my knowledge.

Dated at Washington, DC this 3rd day of July, 2025

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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL FUELS

IN THE MATTER OF DELFIN LNG LLC	FE Docket No. 13-129-LNG 13-147-LNG

SIERRA CLUB VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b), I, Rebecca McCreary, hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the foregoing document, and that the facts therein are true and correct to the best of my knowledge

Dated at Boulder, CO this 3rd day of July, 2025

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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL FUELS

IN THE MATTER OF DELFIN LNG LLC	FE Docket No. 13-129-LNG 13-147-LNG

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 590.107, I, Lauren A. Parker, hereby certify that I caused the above documents to be served on the persons included on the official service list for this docket, as provided by DOE/FE on July 3, 2025.

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