

# PUBLIC SUBMISSION

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**Docket:** DOE-HQ-2025-0273

Importation or Exportation of Liquefied Natural Gas or Electric Energy; Applications, Authorizations, etc.: Golden Pass LNG Terminal LLC

**Comment On:** DOE-HQ-2025-0273-0001

Importation or Exportation of Liquefied Natural Gas or Electric Energy; Applications, Authorizations, etc.: Golden Pass LNG Terminal LLC

**Document:** DOE-HQ-2025-0273-DRAFT-0002

Comment on FR Doc # 2025-13599

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## Submitter Information

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## General Comment

Notice Title:

Golden Pass LNG Terminal LLC; Application for Blanket Authorization To Export Previously Imported Liquefied Natural Gas

Federal Register Citation: 90 FR 34260

Document Number: 2025-13599

Docket Number: 25-81-LNG

Agency: U.S. Department of Energy

Date Submitted: August 5, 2025

Comment Deadline: August 20, 2025

Comment:

To Whom It May Concern,

I am writing in response to the DOE's notice regarding the Golden Pass LNG Terminal LLC application for blanket authorization to export previously imported liquefied natural gas (LNG). I respectfully request that the Department of Energy fully consider the carbon dioxide (CO<sub>2</sub>) implications and related climate externalities of this proposed authorization, even though it applies to previously imported LNG.

Why CO<sub>2</sub> Must Be Considered:

Lifecycle Emissions of LNG Are Significant

Even for previously imported LNG, the processes of regasification, storage, and re-export involve substantial CO<sub>2</sub> emissions from compression, cooling, and transportation, particularly when measured over the full lifecycle and including fugitive methane emissions.

### Global Impact from U.S. Export Decisions

While the gas may have originated abroad, the act of re-exporting from U.S. terminals increases global LNG availability and prolongs dependence on carbon-intensive fuels, delaying the transition to low-carbon energy systems. The cumulative climate effects—particularly CO<sub>2</sub> emissions—are relevant for both domestic policy consistency and global leadership.

### DOE's Public Interest Determination Must Include Climate Considerations

The Natural Gas Act requires DOE to determine whether exports are in the “public interest.” It would be incomplete to define public interest without evaluating the CO<sub>2</sub> implications of expanding or facilitating fossil fuel infrastructure use. DOE must weigh economic benefits against climate costs in a transparent manner.

### Precedent and Program Integrity

Granting repeated blanket authorizations without CO<sub>2</sub> evaluation sets a precedent that externalizes the most important long-term consequence of LNG trade. This undermines climate objectives and the credibility of federal environmental stewardship.

### Recommendation:

I urge DOE to:

Require quantified CO<sub>2</sub> lifecycle assessments for LNG re-export applications;

Explicitly include climate impacts in its public interest determinations;

Ensure that all approvals reflect long-term national interests—including environmental and intergenerational equity.

Thank you for the opportunity to provide comment.

Sincerely,

A Concerned Citizen

Submitted Anonymously

Date: August 5, 2025