

PUBLIC SUBMISSION

As of: 10/5/26, 9:15 AM
Received: October 02, 2026
Status: Pending_Post
Tracking No. mur-ufxf-apao
Comments Due: October 02, 2026
Submission Type: Web

Docket: DOE-HQ-2026-1189

Importation or Exportation of Liquified Natural Gas or Electric Energy; Applications, Authorizations, etc.: Venture Global CP2 LNG, LLC

Comment On: DOE-HQ-2026-1189-0001

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Document: DOE-HQ-2026-1189-DRAFT-0001

Comment on FR Doc # 2026-15642

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General Comment

Under Section 3(a) of the Natural Gas Act (15 U.S.C. § 717b(a)), non-FTA LNG exports carry a rebuttable presumption in favor of approval unless DOE finds they "will not be consistent with the public interest." Authorizing an additional 620.5 Bcf/yr (bringing cumulative Gulf Coast export demand to unprecedented peaks) creates severe upward price pressure on domestic consumer heating and industrial feedstocks, especially at this precarious time when everyone is struggling with high diesel prices.

DOE's use outdated, broad-macroeconomic studies that treat LNG exports as a net GDP positive while ignoring localized, regressive energy burden shifts onto domestic ratepayers and manufacturing sectors.

Under 42 U.S.C. § 4321 et seq., DOE must evaluate all reasonably foreseeable direct, indirect, and cumulative environmental impacts prior to authorization. CP2 Expansion adds a dedicated, natural gas-fired combined-cycle power plant to power six new liquefaction blocks. DOE cannot treat this massive new local combustion source in isolation; its operational emissions must be evaluated cumulatively with the existing CP2 terminal infrastructure.

DOE's refusal or failure to quantify full lifecycle greenhouse gas (GHG) emissions, from upstream Permian/Haynesville fracking leakages to downstream overseas end-use, violates NEPA standards under D.C. Circuit precedent (*Sierra Club v. FERC* / *Sierra Club v. DOE*).

Cameron Parish, LA already suffers from severe cumulative industrial concentrations. Failing to perform a granular Environmental Justice (EJ) evaluation of localized criteria pollutants (NOx, SOx, PM2.5) violates NEPA and executive environmental justice mandates.

If DOE measures project impacts against an artificially inflated baseline or ignores the cumulative draw of all concurrently pending export dockets, its economic and environmental conclusions are legally defective.