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February 8, 2015

Mr. John Anderson
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U.S. Department of Energy
Docket Room 3F-056, FE-50
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FE Docket No. 14-179-LNG

The request from Pieridae Energy (USA) Ltd.; Application for Long-Term Authorization To Export Domestically Produced Natural Gas Through Canada to Non-Free Trade Agreement Countries After Liquefaction to Liquefied Natural Gas for a 20-Year Period is not in the public interest. The source of this natural gas will be the Marcellus Shale deposits in Pennsylvania extracted by hydraulic fracturing, fracking. The method by which this natural gas will be transported to the Canadian LNG facilities will be via the proposed Kinder Morgan NED gas pipeline, currently in pre-file with the FERC under docket PF14-22 from Pennsylvania to Dracut, MA. From there natural gas will flow to Canada through the existing Maritimes and Northeast gas pipeline. Under the Natural Gas Act of 1938, as amended, the DOE has jurisdiction over this natural gas export approval

- We join other owners and protectors of conservation lands and natural habitats in our alarm at the local damage and potential damage caused by the installation and maintenance of these pipelines. While some limited projects in general could be justified by critical need for energy in some locations, there is no such justification for exporting energy
- natural gas export from the approval of this application will result in the rising cost of domestic natural gas, accelerate the decline of manufacturing and productivity throughout the United States, have a negative effect on the United States balance of trade and will result in a strategic loss of critical United States resources

Kinder Morgan has proposed the NED natural gas pipeline with a capacity of 2.2 billion cubic feet of natural gas per day. The Massachusetts Low Gas Analysis Report shows a much lower capacity, .6 billion cubic feet of natural gas, on a small number of the coldest days during winter. Excess capacity will be available for export, incurring the consequences listed above. Other studies indicate that this shortfall can be satisfied by efforts to expand solar, wind and hydro power generation combined with limited LNG import through existing facilities, conservation, efficiency and demand response. These efforts will be suppressed by approval of the NED natural gas pipeline by the FERC. Approval of this export application will be used by Kinder Morgan to inflate the needed gas pipeline capacity as the necessity criteria for the FERC approval of the proposed NED pipeline.

We urge the U.S. Department of Energy to deny this natural gas export application.

Thank you,

Alan Ferry
(for the Bolton Conservation Trust)