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ATTENTION: fergas@ [hq.doe.gov](mailto:fergas@hq.doe.gov).

Motion to Intervene docket 14-179-LNG

NAME: Damascus Citizens for Sustainability, Inc.

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Pursuant to 10 C.F.R. 590.303, I herein file this motion to intervene in the above-captioned docket. In opposition, I state as follows :

- I am an impacted landowner and/or resident living near either a) extraction wells or b) near the northeast network of interstate transmission corridors that would feed into the pipeline used by Pieridae to export the gas. Some of these pipeline projects include but are not limited to the AIM, Constitution, NED, and Atlantic Bridge Pipelines, all of which are identified by Pieridae as potential sources of transportation capacity to serve this project.
- I am an impacted citizen and will be impacted by the regional environmental degradation, impact on gas/electric rates, and impact on grid reliability, that will result as a consequence of this project.
- I am an impacted resident and/or citizen, and I will be adversely affected by the climate change impacts of this project

For the reasons stated above, I respectfully requests that DOE/FE grant this timely motion to intervene and that I be accorded fully party status in any proceedings held by DOE/FE in this docket.

I further submit the attached comment in opposition to this project

ATTENTION: Larine Moore
U.S. Department of
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Global Security and Supply, Office of
Fossil Energy, P.O. Box 44375,
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VIA Electronic Filing by email: fergas@hq.doe.gov

**Motion to Intervene and/or Comment on FE Docket No. 14-179-LNG
Filed February 9 2015**

By : Damascus Citizens for Sustainability, Inc.

First, this project is not in the public interest. This permit application must be evaluated based on the full life cycle of the gas from extraction, processing, transportation, shipping, liquefaction, re-gasification, and consumption. The full life cycle of the gas creates adverse impacts upon hundreds of American communities and thousands of Americans living upstream of this project. Residents living near the extraction fields as well as residents living along interstate transmission pipeline infrastructure face adverse health impacts, water contamination, air pollution, depletion of property values, noise, heavy truck traffic, loss of forests, wetlands, and parklands, creation of radioactive waste, soil depletion, loss of wildlife, general environmental degradation, and adverse impacts on local business sectors sensitive to environmental quality such as agriculture and tourism.

Second the comment period must be extended to allow for these impacted residents and their representative community, environmental, business, and civic organizations opportunity to intervene and comment. Many of these individuals and organizations are currently interveners in several pipeline projects currently under federal review that span from PA to NY, CT, MA, such as the AIM, NED, Constitution, and Atlantic Bridge Expansion projects that may provide transportation capacity to Pieridae. These residents and entities have a direct stake in this project and must be given the opportunity to comment on this. It would be a violation of due process rights not to notify and take comment from impacted communities because approval of this permit could give supporting pipeline owners the legal basis to commence eminent domain proceedings against these landowners.

Furthermore, we have discovered that many of our elected state and federal officials (many of whom were sworn in just a few weeks ago) were not notified of the submission of this application and of the opportunity to comment. Allowing our representatives to weigh in is essential, given the fact that this project could adversely impact millions of New England residents by impacting Northeast energy markets.

Many conditions that would determine if this project would cause harm to the American public are still undetermined. Numerous interstate pipeline projects in the Northeast region have been proposed that claim to serve winter energy needs. None of these proposals (NED, AIM, Atlantic Bridge, Access Northeast) have been completed and all face legal challenges.

Moreover the energy markets are also in flux and competition from this proposed export facility for domestic energy supplies especially in the New England region during the winter heating season may create adverse impacts upon ratepayers, and extreme hardship for lower income communities, and risk grid reliability.

Third The National Environmental Policy Act requires agencies to examine the cumulative effects of all projects in the past, present, and foreseeable future. There are currently 28 export permits approved by the DOE and another 9 under review. Pursuant to NEPA the DOE must examine the cumulative effects of all of these projects combined on domestic gas supplies. The DOE must also look at the cumulative environmental and human impacts of all of these projects along with their related pipeline and extraction infrastructure requirements.

Fourth Pieridae's Application provides insufficient information for a determinative review. Pieridae fails to identify which pipelines specifically will supply the Port of Goldboro, Nova Scotia. This omission deprives impacted landowners of their right to participate in this process..

Pieridae does not fully acknowledge that its proposal creates a demand for additional pipeline construction, nor do they explain the seasonal nature of the LNG export business or reveal the times of the year when most exports from this northern export terminal would take place. For this reason as well, the DOE must extend the comment period and require Peridae to specify both the extraction source as well as the transportation route of the gas to be exported. It is known that M&N Pipeline would interconnect with the NED at Dracut, MA, as well as the AIM project at Beverly MA . Pieridae must also supply specific details about the LNG market demands and conditions.

Fifth, Estimates of domestic natural gas supplies are greatly overestimated. Research by the Post-Carbon Institute based in Berkeley, CA, shows that the decline rate in the Marcellus Shale is about 75% in the first three years of a well's operation. What this practically means is that new Marcellus Shale wells have to be drilled at a faster rate than the old wells are played out – and the gas needs to be shipped and sold quickly. (Hughes, David, "Drilling Deeper: A Reality Check on US Government Forecasts for a Lasting Tight Oil and Shale Gas Boom," Post-Carbon Insitute, Oct 27, 2014.) Pieridae seeks a permit for 20 years. The current depletion rates indicate that the U.S. does not have excess natural gas supplies to allow for export for 20 years.

Sixth, the Pieridae export permit application and the Spectra Pipeline Expansions are interconnected and inter-related and both violate the segmentation clause of the National Environmental Policy Act. Furthermore, recently the DC Circuit affirmed that segmenting inter-related projects in order to evade a full EIS is a violation of NEPA, in the case of *Delaware Riverkeeper v The Federal Energy Regulatory Commission*. Spectra is owner of both the AIM and Atlantic Bridge Projects, and owner of the M&N Pipeline (MNP). Moreover, the following industry analysis explains why reversing the flow on the MNP would not be possible without the Spectra pipeline expansions under review by FERC. <https://rbnenergy.com/moving-out-exporting-us-sourced-gas-from-the-maritimes-part-2>. It is clear that these pipeline expansions along with the Pieridae Application are one overall project illegally segmented.

Seventh Pieridae must conduct a full Environmental Impact Statement that includes all related pipeline projects.

Eighth The Obama Administration, by executive order, has mandated all federal agencies to evaluate the climate change impact of all federal projects prior to approval. This analysis must also included the full-lifecycle of the gas and include all upstream sources of emissions. Moreover this analysis must begin with a scientifically supported Green House Gas inventory that includes methane. According to the Inter-Governmental Panel on Climate Change methane has 86 times the Global Warming Potential as CO₂e over a 20year time frame This analysis must account for all upstream fugitive and combustion emission sources. Finally a complete analysis is not possible without knowing all the precise destinations of the gas to be exported. Again Pieridae should be required to supply this information and the public should be given the time to comment on it.

In summary DOE should reject Pieridae's application and require a resubmission with additional details and provide the public the opportunity to appropriately weigh in on the environmental impact of this proposal based on complete information so that the DOE may fulfill its responsibilities under NEPA ("National Environmental Policy Act"). Based on the current information provide, the DOE cannot make a determination that this project is in the public interest.

Respectfully submitted,

/s/ John J. Zimmerman

Counsel for Damascus Citizens
For Sustainability, Inc.

