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**UNITED STATES OF AMERICA  
BEFORE THE  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY**

In the matter of:

Pieridae Energy (USA) Ltd.

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FE Docket No. 14-179-LNG

**MOTION TO INTERVENE AND PROTEST OF  
DRACUT PIPELINE AWARENESS GROUP**

Pursuant to 10 C.F.R. 590.303, Dracut Pipeline Awareness Group (DPAG) files this motion to intervene in the above-captioned docket. In opposition, DPAG states as follows:

**I. COMMUNICATIONS**

Any communications regarding this pleading should be addressed to:

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**II. BACKGROUND**

On October 24, 2014, Pieridae Energy (USA) Ltd. (“Pieridae”) filed an application with the Department of Energy’s Office of Fossil Energy (“DOE/FE”) seeking a long-term authorization to export domestically produced liquefied natural gas (“LNG”) up to the equivalent of 292 billion cubic feet (“Bcf”) of natural gas per year to non-Free Trade Agreement (“nonFTA”) countries, via export into Canada via pipeline and re-exporting some or all of that gas as LNG from a proposed terminal in Goldboro, Nova Scotia.

**III. PROTEST AND INTERVENTION**

The Dracut Pipeline Awareness Group is an organization created in the fall of 2014 to represent residents living in the portion of Dracut, MA close to the start of the Maritimes and Northeast (M&NE) interstate gas pipeline, where another company, Kinder Morgan Inc., has proposed a massive infrastructure expansion known as the Northeast Energy Direct (“NED”) project. This project entails the addition in Dracut of a 36” pipeline trunk, four laterals, and a 23,000 horsepower compression station designed to send natural gas northbound into the M&NE system.

For the last several months our group has been working to raise awareness of the purpose of the NED project. It is clear upon reading the DOE-FE application (page 20 & Appendix E) that Pieridae's export plans depend on the completion of the Kinder Morgan project.

Currently New England relies on the Maritimes & Northeast (“M&NE”) pipeline, from Goldboro, NS and ending in two points in Massachusetts, to supply natural gas to the region. Page one of the Kinder Morgan pre-file application (FERC Docket PF14-22, dated September 15, 2014) states that the NED project would enable “reversal of the primary direction of the joint facilities,” referring to the now-southbound flow of gas on M&NE with capacity of 833mmcf per day. Although Pieridae states that it has not contracted with any pipeline company for capacity, it is clear that if approved, the intent of Pieridae is to contract for the new northbound capacity that would be made available as a result of this reversal, and well as the possible reversal of flow on the Beverly portion of the M&NE system, a pipeline that would be fed by another branch of the NED project known as the Peabody lateral.

The availability of 833 mmcf per day of northbound flow and the displacement of existing southbound flow could provide enough gas to feed the proposed liquefaction by Pieridae of 292 billion feet of gas per year at Goldboro for export. A quantity of gas that large cannot be used by consumers in Maine and the Maritimes; EIA and Provincial Canada statistics show that Maine and the Maritimes combined never use more than 450 mmcf/day of gas during peak periods.

Pieridae's application must acknowledge the fact that spare pipeline capacity sufficient to transport the proposed volume of gas from the Marcellus shale region to Goldboro does not now exist. And it must acknowledge that the new, needed NED pipeline is not “existing infrastructure.” NED is a greenfield project with a proposed capacity of up to 2.2 billion cubic feet per day. The new route for NED revealed on December 8, 2014 creates a brand new right of way that would impinge upon the rights of thousands of homeowners and landowners to enjoy their properties. It would cross conservation lands and forests, the water supplies of several towns in this area, and it could endanger the safety of residents due to the proximity of the high-pressure pipeline to highly developed neighborhoods, other utility easements, active quarries, and sewer lines that often undergo maintenance and construction.

Approval of the Pieridae export plan would not only drive the development of large pipelines, but it could result in the depletion of natural gas winter storage and peak supply that are critical to all of New England. In 2014, natural gas “inventories fell 1,000 Bcf below the five-year average in mid-April,” according to EIA (<http://www.eia.gov/forecasts/steo/report/natgas.cfm>, accessed 2/8/15). That reduction in inventory was largely responsible for high spot prices for gas in January through October of 2014. Exporting 292 billion cubic feet of natural gas from this region would result in lower inventories of gas and thus, would contribute to higher New England gas prices than if these exports are not allowed.

Because Dracut Pipeline Awareness Group represents natural gas consumers now served by M&NE, and because we represent individuals who are located in the town(s) of Dracut along the proposed route of the NED pipeline, referenced in the Pieridae application (Appendix E-3, E-4) as a possible source for gas, DPAG has a direct and immediate interest in this docket which cannot be adequately protected by any other party. Accordingly, DPAG should be permitted to intervene in this docket with full rights as a party.

#### **IV. CONCLUSION**

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

Respectfully submitted,

*/s/ Carolyn Zuk*  
*President*  
*Dracut Pipeline Awareness Group*