

RECEIVED

By Docket Room at

From: [REDACTED]
To: [FERGAS](#)
Subject: FE Docket No. 14-179-LNG Reject Pieridae's Pre-mature Application
Date: Monday, February 09, 2015 3:07:11 PM

Please reject the Pieridae LNG Export application FE Docket No. 14-179-LNG. It is pre-mature because the pipeline capacity to serve this project does not exist. New England presently has a seasonal shortfall of natural gas supply which requires IMPORTS of LNG. This LNG export proposal depends on reversing the flow of the Northeast and Maritimes pipeline that now brings natural gas into New England. To approve Pieridae's export application would not be in the public interest nor in the interest of national security.

Before approving any new LNG exports, DOE/FE needs to evaluate the impact of ALL the proposed exports on the U.S. economy (including GDP, consumers, and industry), and job creation. NH Senator Shaheen's office has found that "existing and approved export pipelines will make total LNG exports exceed the total amount of gas currently used in every American home and commercial business. According to a U.S. Department of Energy study, LNG exports at these levels could increase domestic natural gas prices by up to 54 percent."

A 54% increase in natural gas prices would have a depressive effect on the US economy, reducing consumer spending in other sectors of the economy, and reducing job creation by making many US industries less competitive on the global market. No further LNG exports should be approved until DOE/FE has evaluated these economic effects.

In addition, DOE/FE is required by NEPA to to give appropriate consideration to the environmental effects of its decisions. The cumulative greenhouse gas (GHG) impact from the life-cycle emissions of all LNG export proposals needs to be considered: in particular the impact of methane (CH₄), the chief ingredient of natural gas. The Intergovernmental Panel on Climate Change (IPCC) states that CH₄ has 86 times the global warming potential as CO₂ in a 20 year timeframe. Over the next 20 years increasing methane emissions could induce an enormous amount of climate change, accelerating sea level rise and weather extremes.

DOE's "Addendum to Environmental Review Documents Concerning Exports of Natural Gas From the United States" (79 FR 48,132 (Aug. 15, 2014) states on page 33 that "Based on 2012 data, the natural gas industry's emissions of CH₄ accounted for about 23 percent of all U.S. CH₄ emissions... Upstream activities account for most of the industry's CH₄ emissions (see e.g., Bradbury et al., 2013, p. 9). The Addendum recognizes that increasing LNG exports will drive increasing natural gas extraction, with all its environmental impacts.

It is incumbent upon DOE/FE to analyze the full environmental effects of ALL gas export proposals. Pieridae must be required to provide life-cycle greenhouse gas emissions data for its project, including upstream GHG sources such as gas extraction and pipelines. Please reject this application as it stands, for being pre-mature, against the public interest, and lacking appropriate environmental data.

Please institute a moratorium on further LNG export approvals, until the full life-cycle global warming potential of all existing approved LNG exports is analyzed. Thank you very much.

Liz Fletcher
[REDACTED]
Mason, NH 03048