July 21, 2014

President Barack H. Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Secretary Ernest Moniz
Secretary of Energy
Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear President Obama and Secretary Moniz,

We, the undersigned organizations, are writing to express our deep concern regarding the Administration’s consideration of liquefied natural gas (LNG) exports and draft documents prepared by the Department of Energy (DOE) to facilitate the approval of projects. Although parties to this letter will submit more technical comments to DOE, we wish to address you directly, given the gravity of what is at stake—both with respect to climate change, and the impact upon communities that will be targeted with expanded drilling and fracking operations if export terminals are approved.

One of two draft reports released by DOE is an analysis of lifecycle greenhouse gas emissions resulting from the export of LNG overseas (Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States).

First, the lifecycle report is seriously flawed because it rests on a false set of choices: that countries in Europe and Asia will meet their energy needs either by relying on LNG exported from the United States, other sources of natural gas, or coal. This limited analysis neglects other energy options, including renewables—the 21st century choice that nations of the world, including the United States, ought to pursue instead of creating a greater dependency on fossil fuels.

Secondly, the lifecycle report significantly underestimates methane leakage associated with the production, processing, and transport of natural gas. A key finding in recent peer-reviewed articles is that methane leakage amounts to more than 3 percent of consumed natural gas, and potentially more than 7 percent. Without justification, the report uses a range of 1.1 to 1.6 percent. This low range leads DOE to significantly understate the greenhouse gas footprint of natural gas. LNG further exacerbates these impacts due to additional leakage and the tremendous amount of energy required for liquefaction, shipping, and regasification. Yet, despite grossly underestimating greenhouse gas emissions, the DOE’s life-cycle report is still unable to decisively conclude that replacing coal in Europe and Asia with LNG from the United States would be better from a greenhouse gas perspective.

The next few decades are crucial to avoiding a critical tipping point for the planet. The best science indicates that a swift and dramatic reduction in greenhouse gas emissions is absolutely necessary to limit global warming to no more than 2 degrees Celsius—a threshold beyond which the worst impacts of climate change cannot be avoided. This can only be achieved through the swift and dramatic transition
away from fossil fuels. If instead, the Administration promotes greater world dependency on natural gas through the approval of numerous multi-billion dollar export terminals, it will condemn future generations to climate catastrophe.

The second draft report recently released by DOE is an addendum document which purports to assess the various impacts of unconventional gas development, i.e. fracking. (*Addendum to Environmental Review Documents Concerning Exports of Natural Gas from the United States*).

Rather than performing a comprehensive assessment of impacts associated with gas production, the Addendum relies on an extremely limited set of information to make broad generalizations about impacts to water, air, climate change, seismic activity, and land use. The result is a document that is inaccurate, and only useful insofar as it highlights how much remains unknown. Moreover, the report fails to perform any meaningful assessment of policies and regulations in place at the federal or state level, or the efficacy of those measures. These concerns are elevated by the fact that the oil and gas industry enjoys exemptions from key provisions of landmark environmental law.

The Addendum describes various ways in which emissions, spills and leaks can cause air and water contamination, fracking and flowback injection can cause earthquakes, and rampant proliferation of well pads and infrastructure degrade or destroy the integrity of ecosystems. It also identifies various health problems including respiratory, neurological, and reproductive disorders that can be caused by exposure to gas industry activities. Yet instead of performing a comprehensive analysis of these risks or calling for additional research, the addendum dismissively asserts throughout the document that impacts are not well understood or cannot be predicted. This is of little comfort for those who today are living in areas were intense gas production occurs. Widespread accounts of pollution, accidents, and illness from drilling and fracking activities throughout the United States point to a system of lax regulatory oversight and broken regulatory enforcement.

To better understand the whole of these impacts, *Concerned Health Professionals of New York* recently prepared a compendium of over 300 professional reports, studies, and articles that confirm the significant risks and harms of drilling and fracking. A copy of the Compendium is enclosed. (website: www.concernedhealthny.org/compendium)

Finally, the DOE has proposed a change to its review process for LNG export applications that will end the agency’s current practice of issuing “conditional approvals” for terminals in advance of review by the Federal Energy Regulatory Commission (FERC). While we understand the basis for this decision, we also recognize that this may streamline the process for projects most likely to be built. This underscores the importance of robust review by FERC, which to date has been absent.

Exports of the scale sought by industry—an amount equivalent to over 60 percent of the U.S. natural gas produced in 2013—would dramatically accelerate the pace of drilling and fracking for natural gas, exposing Americans to greater danger. Given FERC’s reluctance to recognize the clear cause-and-effect relationship between LNG exports and more fracking, we are concerned that this could lead to a train of project approvals with a proliferation of negative impacts to match.

The DOE’s initial economic analysis determined that typical households “might not participate in benefits” of LNG exports. While the gas industry and its investors would undoubtedly profit from
exports, the many risks and harm of drilling and fracking mean that those benefits shared by few will come at the expense of many. We urge you to recognize that the widespread approval of LNG exports are not in the public interest.

Sincerely,

National Organizations:

Americans Against Fracking
Hillary Aidun
Center for Biological Diversity
Jennifer Krill
Earthworks
John Rumpler
Environment America
Drew Hudson
Environmental Action
Wenonah Hauter
Food & Water Watch
Kate DeAngelis
Friends of Earth
Josh Fox
Gasland
Joe Uehlein
Labor Network for Sustainability
Melinda Hughes-Wert
Nature Abounds
Stephen Kretzmann
Oil Change International
Alexis Baden-Mayer
Organic Consumers Association

Andrea Miller and Conor Boylan
 Progressive Democrats of America

Local and State Organizations:

Lyna Hinkel & Robert B. McLaughlin
350NYC
Murray Bell
Advocates for Morris
Heather Cantino
Athens County Fracking Action Network.
Karen Feridun
Berks Gas Truth
Ted Gleichman
Beyond Natural Gas, Oregon Sierra Club
Rebecca Roter
Breathe Easy Susquehanna County
Larry Bennett
Brewery Ommegang
Tracey Eno
Calvert Citizens for a Healthy Community
Francis Eatherington
Cascadia Wildlands
Jill Wiener
Catskill Citizens for Safe Energy
Wes Gillingham
Catskill Mountainkeeper
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<td>Chesapeake Climate Action Network</td>
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<td>Matia Vanderbilt</td>
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<td>Paul Ferrazzi</td>
<td>Citizens Coalition for a Safe Community</td>
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<td>Edie Kantrowitz</td>
<td>Coalition Against the Rockaway Pipeline</td>
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<td>Irene Etkin Goldman</td>
<td>Coalition for Peace Action</td>
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<td>Kathy Maher</td>
<td>Coastal Monmouth Democratic Club</td>
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<td>Suzy Winkler</td>
<td>Concerned Burlington Neighbors</td>
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<td>Dennis Higgins</td>
<td>Concerned Citizens of Otego</td>
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<td>Rhett Lawrence</td>
<td>Conservation Director, Oregon Sierra Club</td>
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<td>Caroline Martin</td>
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<td>Dr. Bob Allen</td>
<td>The National Union of Hospital and Health Care Employees, AFL-CIO</td>
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<td>Laurel Errington</td>
<td>District 4 Coalition for Change</td>
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<td>Marie McRae</td>
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<td>Denise Katzman</td>
<td>EnviroHancemnt™</td>
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<td>Joanna Diamond</td>
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<td>Paul Sansone</td>
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<td>Julia Walsh</td>
<td>Frack Action</td>
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<td>Shane Davis</td>
<td>FRACTIVIST</td>
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<td>Teresa Winchester</td>
<td>Friends of Butternuts</td>
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<tr>
<td>Mary Beilby</td>
<td>Gas Drilling Awareness for Cortland County</td>
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<td>Yvonne Taylor</td>
<td>Gas Free Seneca</td>
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<td>Ellen Weininger</td>
<td>Grassroots Environmental Education</td>
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<tr>
<td>Rich Fuller</td>
<td>Green Party of Monmouth County</td>
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<td>Ruth Alice White</td>
<td>Howard County Climate Change</td>
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<td>Dawn Dannenbring</td>
<td>Illinois People's Action</td>
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<td>Dan Mundy</td>
<td>Jamaica Bay Ecowatchers</td>
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<td>Rabbi Katy Allen</td>
<td>Jewish Climate Action Network</td>
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<td>Julie Ann Edgar</td>
<td>Lehigh Valley Gas Truth</td>
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Kaye Fissinger  
Our Health, Our Future, Our Longmont

Gloria Forouzan  
Marcellus Protest

Kelly Branigan  
Middlefield Neighbors

Otto Butz  
Milford Doers

Matt Shapiro  
New Jersey Tenants Organization

New Yorkers Against Fracking

Carol E. Gay  
NJ State Industrial Union Council

William Huston  
NY Friends of Clean Air and Water

Keith Schue  
Otsego 2000

Jenny Lisak  
Pennsylvania Alliance for Clean Water and Air

Kathy Shimberg  
Protect Laurens

Teresa Mendez-Quigley  
Physicians for Social Responsibility  
Philadelphia

Debra Slattery  
Protect Orange County

Gerri Wiley  
Residents Against Fracking Tioga

Allegra Schecter  
ROAR Against Fracking

Nedra Harvey  
Rochesterians Concerned About Unsafe Shale-Gas Extraction

Clare Donohue  
Sane Energy Project

Sara Hess  
Shaleshock Action Alliance

Mary Menapace  
Shaleshock CNY

Pramilla Malick  
Stop The Minisink Compressor Station

Sheila Cohen  
Center for Gender and Intercultural Studies,  
SUNY Cortland Environmental Justice Committee

Adrian Kuzminski  
Sustainable Otsego

Jay Sweeney  
The Green Party of Pennsylvania

John Ward  
The Rogue Flyfishers

Rabbi Arthur Waskow  
The Shalom Center

Kim Latham  
Transition Newton & Northwest NJ

Ling Tsou  
United for Action

Darree Siche  
United Sludge Free Alliance

Larraine McNulty  
Upper Unadilla Valley Association
Betsy Nicholas
Waterkeepers Chesapeake

Susan Jane M. Brown
Western Environmental Law Center