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 21<sup>st</sup> 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 Mike Tidwell Chesapeake Climate Action Network

Matia Vanderbilt Citizen Shale

Paul Ferrazzi Citizens Coalition for a Safe Community

Edie Kantrowitz Coalition Against the Rockaway Pipeline

Irene Etkin Goldman Coalition for Peace Action

Kathy Maher Coastal Monmouth Democratic Club

Suzy Winkler Concerned Burlington Neighbors

Dennis Higgins Concerned Citizens of Otego

Rhett Lawrence Conservation Director, Oregon Sierra Club

Caroline Martin Delaware Action Group

Dr. Bob Allen The National Union of Hospital and Health Care Employees, AFL-CIO

Laurel Errington District 4 Coalition for Change

Marie McRae Dryden Resource Awareness Coalition

Denise Katzman EnviroHancement<sup>™</sup>

Joanna Diamond Environment Maryland Doug O'Malley Environment New Jersey

Dave Rogers Environment North Carolina

Paul Sansone Forest Grove Oregon Citizens Against the Pipelines

Julia Walsh Frack Action

Shane Davis FRACTIVIST

Teresa Winchester Friends of Butternuts

Mary Beilby Gas Drilling Awareness for Cortland County

Yvonne Taylor Gas Free Seneca

Ellen Weininger Grassroots Environmental Education

Rich Fuller Green Party of Monmouth County

Ruth Alice White Howard County Climate Change

Dawn Dannenbring Illinois People's Action

Dan Mundy Jamaica Bay Ecowatchers

Rabbi Katy Allen Jewish Climate Action Network

Julie Ann Edgar Lehigh Valley Gas Truth 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

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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

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