Zimmerman & Associates

Environmental Litigation, Mediation, Enforcement & Compliance, Counseling

July 21, 2014

U.S. Department of Energy
Office of Oil & Gas Global
Security and Supply
P.O. Box 44375
Washington, DC 20026

Attn: LCA GHG Report Comments

Dear Sirs:

On behalf of Damascus Citizens for Sustainability, Inc. and NYH2O, Inc.,I am submitting the following comments on the draft report entitled "Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States."

The draft document reports the results from comparing the GHG potential impacts of various modeling scenarios for producing energy in Europe and Asia from liquefied natural gas transported from the United States and from coal or gas from other areas. The report uses a methane leakage rate for natural gas from the Marcellus Shale of 1.2% to 1.6% and concludes that at the 1.6% leakage rate, there is no significant GHG advantage for LNG versus coal.

Our purpose in submitting this comment letter is to bring to your attention a scientific paper published in the Proceedings of the National Academy of Sciences on June 30, 2014, after the LCA GHG Report was published. This new paper, "Assessment and Risk Analysis of Casing and Cement Impairment in Oil & Gas Wells in Pennsylvania, 2000 – 2012," looks at records of the Pennsylvania Department of Environmental Protection for over 41,000 oil & gas wells drilled between the beginning of 2000 and the end of 2012. For unconventional (i.e. horizontally drilled and hydraulically fractured) gas wells drilled since 2009, the paper reports a methane leakage rate of nearly 10% for wells drilled in northeastern Pennsylvania, the most intensely drilled area of the Marcellus Shale. This paper is available from the National Academy of Sciences at http://www.pnas.org/content/early/2014/06/25/1323422111.abstract. We urge the authors of the LCA GHG Report to modify the models for LNG export to use this new figure of nearly 10% (actually reported as 9.84%) in the final report.

Sincerely,

J. J. Zimmerman

Jeff Zimmerman

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