

July 21, 2014

U.S. Department of Energy (FE-34)
Attn: LCA GHG Report Comments
Office of Oil & Gas Global Security and Supply
Office of Fossil Energy
P.O. Box 44375
Washington, DC 20026-4375

RE: Life Cycle Greenhouse Gas Perspective on Exporting LNG from the U.S.

Dear Sir or Madam:

Please accept the following comments submitted by the undersigned organizations on the Department of Energy (DOE) draft report: *Life Cycle Greenhouse Gas Perspective on Exporting LNG from the U.S.*

As written, the life cycle report is seriously flawed and not suitable as a source of information for making decisions relating to the export of natural gas.

The following is a summary of our concerns:

Failure to Consider Alternatives

The report seeks to compare the greenhouse gas impacts of Europe and Asia relying on LNG from the U.S. to other alternatives, taking into account cradle-to-grave emissions produced during the entire lifecycle process of production, processing, transport, and consumption. However, energy alternatives considered in the report are a small subset of choices available. Only four discrete sources of energy are actually considered for Europe and Asia: LNG from the United States, LNG from regional sources (Algeria or Australia), natural gas by pipeline from Russia, or coal from within Europe and Asia respectively. Obvious sources of energy that the report fails to consider include renewable energy such as wind and solar, nuclear power, natural gas produced within Europe and Asia, and LNG from Russia. Notably, renewable energy is already making a significant contribution to the energy portfolio of several European countries. The expansion of renewables is also underway in China and India, where wind power is cost-competitive with new coal-fired plants, and solar is expected to be soon. It is troubling that the DOE would not include renewables in a comparative analysis of energy choices--presumably one with the intent of minimizing greenhouse gas impacts.

Displacement of Renewable Energy

The report fails to consider how promoting natural gas, including the unbridled export of LNG, would impact recent growth in renewable energy. The International Energy Agency has warned that efforts to increase global access to natural gas could displace renewable such as wind and solar. Furthermore if significant capital investments are made in the near future to develop infrastructure for natural gas--such as power plants, pipelines, and import/export terminals--the United States and other nations could become locked into fossil fuels for decades to come. Contrary to industry's characterization of natural gas as "bridge fuel", the targeted promotion of natural gas and exports could impede an otherwise promising future for renewable energy.

Impact on the U.S. Energy Market

The report fails to consider the interaction between the export of natural gas to Europe and Asia, and energy use within the United States. For example, it is widely recognized that natural gas exports will result in higher domestic prices for natural gas. This in turn could result in the renewed burning of coal in the United States. Likewise, the rapid depletion of U.S. natural gas reserves--due in part to unbridled exports-- is likely to drive prices higher still.

Methane Emissions

The report grossly underestimates methane emissions associated with the production, processing, and transport of natural gas. A growing body of research (Howarth, Miller, Brandt) demonstrates that actual emissions from natural gas systems could be over 5 percent of total production, far exceeding EPA estimates of 1.1 to 1.6 percent cited in the lifecycle report. This discrepancy, particularly over the 20-year timeframe, undercuts any supposed benefit to LNG. Unlike leakage estimates by the EPA which are based on a "bottom up" calculation of predicted emissions from various sources, "top down" studies such as those performed by Miller and Brandt reflect real-world measurements of air quality. In addition, the report understates the global warming potential (GWP) of methane by placing greater emphasis on the 100-year timeframe. Climate scientists agree that immediate action is needed within the next couple of decades to prevent a global temperature rise of 2 degrees Celsius, beyond which the worst impacts of climate change cannot be avoided. In light of this, the climate driving potential of methane over 20 years is most important.

Other Greenhouse Gas Emissions

The report improperly dismisses emission losses that occur beyond the destination import terminal by assuming that power plants are always located at the port. Similarly, the report ignores all other industrial, commercial, and residential users of natural gas past the LNG import terminals. These end-users would be connected through distribution networks, which are also prone to leakage. Finally, the report contains only a few references. It is not apparent where the DOE has obtained its data on greenhouse gas emissions attributable to LNG production, shipping, and regasification, or the pipeline from Russia.

Significantly, despite flawed estimates, analyses, and assumptions that favor LNG, the DOE lifecycle 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. Correcting for these flaws, it becomes very apparent that the approval of exports will actually exacerbate climate change. Neither coal nor gas is the answer. Fracking, piping natural gas to power-hungry terminals for liquefaction, and shipping it around the world is not responsible climate policy. Rather than perpetuate a global addiction to fossil fuels, the United States should be a leader in the advancement of renewable energy.

We urge the DOE to withdraw this flawed report, perform a comprehensive evaluation of impacts associated with LNG exports, and determine that widespread approval of exports is not in the public interest.

Sincerely,

Americans Against Fracking

Karen Feridun

Berks Gas Truth

Larry Bennett

Brewery Ommegang

Francis Eatherington

Cascadia Wildlands

Jill Wiener

Catskill Citizens for Safe Energy

Wes Gillingham

Catskill Mountainkeeper

Paul Ferazzi

Citizens Coalition for a Safe Community

Suzy Winkler

Concerned Burlington Neighbors

Dennis Higgins

Concerned Citizens of Otsego

Caroline Martin

Delaware Action Group

Marie McRae

Dryden Resource Awareness Coalition

Wenonah Hauter

Food & Water Watch

Julia Walsh

Frack Action

Mary Beilby

Gas Drilling Awareness for Cortland County

Yvonne Taylor

Gas Free Seneca

Jay Sweeney

The Green Party of Pennsylvania

Josh Fox

Gasland

Rabbi Katy Allen

Jewish Climate Action Network

Joe Uehlein

Labor Network for Sustainability

Julie Ann Edgar

Lehigh Valley Gas Truth

Kelly Branigan, RN

Middlefield Neighbors

Matt Shapiro

New Jersey Tenants Organization

New Yorkers Against Fracking

Nicole Dillingham

Otsego 2000

Kaye Fissinger

Our Longmont

Kathy Shimberg

Protect Laurens

Gerri Wiley, RN

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, RN

ShaleshockCNY

Sheila Cohen

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

Adrian Kuzminski

Sustainable Otsego

Rabbi Arthur Waskow

The Shalom Center