US Department of Energy  
Attn: Proposed Procedures  
Office of Oil and Gas Global Security and Supply,  
Office of Fossil Energy  
Forrestal Building, Room 3E-042,  
1000 Independence Avenue SW  
Washington, D.C. 20585  

Re: Proposed Procedures for LNG Export Decisions  

Dear Sir or Madam,  

I am writing concerning the U.S. Department of Energy’s proposal to amend its process for review of applications to export liquefied natural gas ("LNG") to non-free trade countries. According to its Federal Register notice dated June 4, 2014, DOE would cease issuing conditional licenses to export LNG to non-free trade countries, and instead would prioritize review of projects near completion of environmental permitting under the National Environmental Policy Act ("NEPA"). DOE proposes to act on LNG applications 30 days after the publication of a Final Environmental Impact Statement.  

I would like to express qualified support for the procedural changes as described in the Federal Register notice. These changes would create several benefits over the status quo “first come, first served” method DOE has used to date for review of LNG export applications. By prioritizing LNG projects that have substantially completed their NEPA review, DOE would provide a clear path forward for projects that are commercially mature to receive evaluation of their export applications. The proposed procedure would ensure that applicants otherwise ready to proceed with construction are not held back by their position in the current DOE queue. This change would increase the transparency and certainty of the
regulatory process for LNG projects, thereby facilitating competition and the development of markets for U.S. natural gas. The proposed procedural revisions also would assure that DOE’s input is timely and relevant as a participatory agency in the NEPA review process.

The United States is home to abundant low-cost natural gas resources, and our domestic industry is a global leader in developing and deploying advanced technologies in the field. As the Department’s own studies demonstrate, LNG exports will create wealth and jobs at home while bolstering the security of America’s allies overseas. Exports clearly benefit the public interest, and LNG applicants have waited far too long for review by DOE as one part of a long and complex regulatory process. Nevertheless, DOE’s proposed procedural changes represent a step in the right direction to provide greater clarity for participants in this review. I urge the DOE to quickly implement these changes and to act in a consistent and expeditious manner in its review of future LNG permits.

Sincerely,

Lynn Spencer
Chief Executive Officer
San Patricio County EDC