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July 21, 2014

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

RE: Addendum to Environmental Review Documents Concerning Exports of Natural Gas from the U.S.

To Whom It Concerns:

Please accept the following comments from Cascadia Wildlands regarding the draft report: Addendum to Environmental Review Documents Concerning Exports of Natural Gas from the U.S. (the "Addendum").

Cascadia Wildlands is a non-profit conservation organization in Oregon representing approximately 10,000 members and supporters throughout the country. Cascadia Wildlands works to protect and restore the wildlands and species in the Cascadia bioregion. We have been monitoring the development of the Jordan Cove LNG export terminal proposed at Coos Bay Oregon, and it's associated 230-mile new pipeline across southern Oregon.

The Addendum should be revised so that it can be used as an accurate source of information for decisions relating to the exporting of natural gas. As it currently reads, the Addendum is biased in favor of the increased economic profits of exporting gas, while underplaying the environmental, human and global impacts.

We have already submitted comments on the increased global warming issues associated with exporting fossil fuels, on the problem of fugitive methane, and on the environmental impacts of fracking.

These comments cover the following issues:
1. Exporting LNG will cause increased fracking;
2. Impacts of Canadian gas exports, authorized by DOE from the United States, were not considered; and
3. Pipeline issues were not adequately considered in the Addendum.

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1. Exporting LNG will cause increased fracking.

The Addendum states, page 2, that:

> The current rapid development of unconventional natural gas resources will likely continue, with or without the export of natural gas. …. Exporting natural gas may accelerate the timing of the development unconventional resources and the associated potential impacts. However, it is not reasonable to assume that unconventional natural gas production and the associated potential impacts will not occur if natural gas exports to non-FTA countries are prohibited.

We disagree. It is reasonable to assume that "unconventional natural gas production" (fracking) will increase over the long-term if exports to non-free trade countries are allowed.

For instance, Veresen, the Canadian company proposing the Jordan Cove LNG export terminal[1], submitted their Resource Report 1 to the Federal Energy Regulatory Commission (FERC). It included the *purpose and need* for the Jordan Cove project. Veresen states that the purpose for Jordan Cove is a "response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada".[2] They point to "hydraulic fracturing technology" providing so much natural gas, they must export in order to continue fracking. They state that:

> "LNG exports, including those from the proposed Project, should be seen as instrumental in providing the increased demand to spur exploration and development of gas shale assets in North America…"[3]

The Navigant study attached to Resource Report 1 states that if exports are allowed, and demand is increased, "additional shale wells can be drilled and fractured to meet that demand and mitigate the initial production or IP decline rates from earlier wells."[4] In other words, Veresen must be able to export (and their request is to export to non-FTA countries) in order to continue fracking additional shale wells.

Based on the companies own description of the "Purpose and Need" to export LNG, the DOE Addendum must conclude that fracking will increase over the long-term with increased exports. The same Navigant study makes this even more clear when they state that:

> "It is becoming increasingly evident that the slow development of new markets for natural gas is the only thing currently restricting even more gas resource development."[5]

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[1] Export to Non Free Trade Agreement Countries. FERC docket numbers CP13-483 and CP13-492.
[2] Draft Resource Report 1. JCEP LNG Terminal Project. Jordan Cove Energy Project, L.P. January 2013. Page 1-2.
[3] Draft Resource Report 1. January 2013. Page 1-4.
[4] Draft Resource Report 1. January 2013. Appendix B.1. Navigant Study. Page 15.
[5] Draft Resource Report 1. January 2013. Appendix B.1. Navigant Study. Page 20.

When the DOE approves of increased exports, gas resource development (fracking) will also increase.

The Addendum states, "DOE cannot meaningfully estimate where, when, or by what method any additional natural gas would be produced"[6] Again, we disagree. When the corporations that ask for DOE export permits clearly state they will increase fracking if given the license to export, the DOE can meaningfully estimate that fracking will be increased. The Navigant study referred to above clearly states where, when, and by what method Veresen plans to get the additional natural gas to be exported.

2. The Addendum failed to consider Canadian impacts from DOE authorizations.

The DOE only considered the "U.S. energy picture" in the Addendum, while significant DOE export approvals will be for Canadian corporations and Canadian gas, such as the Jordan Cove LNG export terminal proposed for Coos Bay Oregon.

The Addendum states that "Natural gas production in the United States from unconventional sources… is expected to increase".[7] However, the DOE does not include Canadian production in Figure 1 and the rest of the report, only shale gas from "the United States". If Canadian gas production were also considered, the impacts would significantly increase.

Veresen, the Canadian would-be owner of the proposed Jordan Cove export facility, states that about 70% of the methane they would export from the United States, under the approval of FERC and the DOE, would be fracked in Canada[8]. Methane contributes to global warming no matter what side of the Canadian/U.S. boarder it comes from. The DOE must revise its studies to include Canadian shale gas, especially the Canadian gas authorized by DOE to be exported to non-free trade agreement countries.

Throughout the Addendum, DOE ignores Canadian shale gas impacts that the DOE will be authorizing for export. For instance, on "Greenhouse Gas Emissions", the Addendum consistently refers to impacts just "in the United State", such as "emissions of CH4 accounted for one-third of all U.S. CH4 emissions…" and "Percent of U.S. GHG emissions from all sources".[9] If the DOE is granting LNG export permits to Canadian companies, to export Canadian gas from the United States to non-FTA countries, the DOE must consider the Canadian impacts, added to the U.S. impacts.

3. Pipeline and Other Issues

Other issues associated with the LNG export proposal we are familiar with, Jordan Cove, were not addressed in the Addendum. For instance, the impact of the 230-mile pipeline

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[6] Addendum page 2.
[7] Addendum page 5
[8] Draft Resource Report 1. January 2013. Appendix B.1. Navigant Study. Page 29. "Initially, the gas feedstock for Jordan Cove will be provided mainly from Canadian resources… gas initially exported at Jordan Cove will be 70 percent Canadian gas and 30 percent Rockies gas…"
[9] Addendum page 32-33.

across southern Oregon (called the Pacific Connector Pipeline) was not reflected in the Addendums' assessment of "Pipelines" starting on page 56. Our pipeline will threaten eminent domain of over 300 Oregon families. The initial offers from the Company for easement purchases were ridiculously low. They were accompanied by information on "Eminent Domain", appearing to threaten Oregonians with swift legal action if the low offers were not accepted. If FERC grants eminent domain to enhance the profits of a Canadian natural gas company, the ability to engage in fair negotiations is taken away from U.S. Citizens. The Addendum failed to consider these impacts.

The Land Use Mitigation Measures described on page 63 of the Addendum also did not reflect the problems with the Jordan Cove Mitigation Measures, such as the lack of adequate mitigation measures offered for the pipeline. Other problems include the demands that the federal agencies cut short their review of the impacts on 28 species protected under the Endangered Species Act that could be impacted by the Jordan Cove Project.

These, and other areas of The Addendum, such as impacts on global warming, should be re-written to consider the full impact of exporting natural gas to non-FTA countries.

Thank you for considering these comments by revising the Addendum to more fully reflect the realities of increased fracking, Canadian gas exports, and eminent domain impacts to United States citizens from Canadian exports authorized by DOE.

Sincerely

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