

**RECEIVED**

By Received DOE/FE at 4:10 pm, May 09, 2018

UNITED STATES OF AMERICA **Amendment**  
UNITED STATES DEPARTMENT OF ENERGY

	)	<b>FE Docket No. 12–32–LNG</b>
	)	
	)	<b>Jordan Cove Energy Project, L.P.;</b>
	)	<b>Application to Amend Long-Term,</b>
	)	<b>Conditional Authorization To</b>
<b>Jordan Cove Energy Project, L.P</b>	)	<b>Export Liquefied Natural Gas</b>
<b>Authorization to Amend Application</b>	)	<b>to Non-Free Trade Agreement</b>
	)	<b>Nations and to Amend Pending</b>
	)	<b>Application for Long-Term</b>
	)	<b>Authorization to Export</b>
	)	<b>Liquefied Natural Gas to Non-Free</b>
	)	<b>Trade Agreement Nations</b>
	)	
	)	

**CITIZENS FOR RENEWABLES, Inc.**  
**AMENDED NOTICE OF INTERVENTION, COMMENT and PROTEST**

On April 19<sup>th</sup>, 2018, the Office of Fossil Energy at the Department of Energy (DOE/FE) posted in the Federal Register a notice of receipt for a proposed amendment dated February 6, 2018 to the application filed on March 23, 2012, by Jordan Cove Energy Project, L.P. (Jordan Cove or JCEP), requesting long-term, multi-contract authorization to export liquefied natural gas (LNG), Jordan Cove again seeks to increase its volume of LNG exports—to the equivalent of 395 Bcf/yr (1.08 Bcf/d) of natural gas—as approved in its Conditional Non-FTA Authorization (DOE/FE Order No. 3413) and as requested in its Non-FTA Application. Previously on October 5, 2015, JCEP filed an amendment to its Application ([81 FR 11202](#)), asking DOE/FE to increase its requested non-FTA LNG export volume from the equivalent of 292 Bcf/yr to 350 Bcf/yr of natural gas (0.96 Bcf/d). At that time, Jordan Cove did not seek to amend its Conditional Non-FTA Authorization. DOE/FE has not yet issued a final order on Jordan Cove’s Non-FTA Application, and it’s requested 2015 amendment remains pending.

The undersigned, Kathleen P. Eymann, President and attorney for Citizens for Renewables, Inc. moves to intervene, protest and comment on the above-captioned matter pursuant to 10 C.F.R. § 590.303 and § 590.304 and other relevant authorities.

**CLAIM OF INTEREST**

The people that Citizens for Renewables, Inc. represents personally have a substantial interest in the outcome of this proceeding because they live, work, socialize and recreate near the proposed facility and in the Zones of Concern, identified by the United States Coast Guard, surrounding the proposed LNG facility and tanker traffic. The proposed LNG facility poses safety and security risk, airport hazards, fire hazards, air quality hazards, plus loss of:

recreational opportunities; cultural resources; wildlife observation; wildlife habitat; commercial oyster farming; fishing; clamming; crabbing; and timber production. Increasing the amount of exported gas would mean more shipments of LNG out of the Coos Bay, increased risks and hazards, including those coming from additional greenhouse gases. The project is not in the public interest and would increase energy costs for consumers in the United States.

No other party is able to adequately represent its interest in this proceeding and for this reason it wishes to intervene and be made a party, with all the rights attendant to such status, pursuant to 10 C.F.R. § 590.303(b).

Citizens for Renewables, Inc. has previously participated in earlier proceeding before the US DOE as Citizens Against LNG, Inc. and in multiple land use hearings and appeals of decisions that involve the Jordan Cove Energy Project. It is in full support motions to intervene, protest and comments filed previously in this proceeding by the Citizens Against LNG, Jody McCaffree, Sierra Club, Landowners United, Klamath-Siskiyou Wildlands Center, Industrial Energy Consumers of America, among others.

### **COMMENT AND PROTEST**

DOE/FE can only legally authorize the requested exports upon a finding and evidence that such exports would be in the public interest. 15 U.C.C. § 717b. FERC's recent denial of the applications for the Jordan Cove export terminal and Pacific Connector Pipeline establishes there is no factual basis to support these projects being in the public interest.

#### **1. Jordan Cove's Application to Export Canadian Gas through Coos Bay Oregon is Inconsistent with the Public Interest**

Pembina, the owner of Jordan Cove, controls large quantities of Canadian gas and has openly stated they will export that gas through Jordan Cove. Thus, the premise of the conditional order (50% US sourced gas which was not imposed as a legal restriction) and the modeling and forecasts previously relied upon are no longer valid. The economic analyses relied upon are invalid primarily because they do not consider the effects of exporting Canadian gas through U.S. ports benefiting Canada over U.S.-sourced gas interests.

Some of the obvious negative impacts from exporting Canadian gas through Coos Bay Oregon by Jordan Cove are:

- No benefit to the United States trade balance.
- Negative impact on the availability of jobs in the United States
- Increased competition for existing LNG plants located in the United States
- Likely negative effect on U.S. GDP
- Use of eminent domain by a Canadian company subverting American private property rights.

## **2. Request For Increase In Volume And Extension Of Certification For Another Seven Years Is Inconsistent With The Public Interest And Unsupported Factually**

For the reasons stated above, there is no sufficient economic interest to the United States to increase the volume of gas available to export to Non-Free Trade Nations from 292 Billion cubic feet per year (Bcf/yr.) to 395 Bcf/yr. There is no market for the additional amount and there is no requirement that the gas be sourced from the United States.

## **3. Jordan Cove's Assertion that PCGP will Provide Needed Infrastructure is Not Supported**

Jordan Cove maintains it will provide gas for the Grants Pass Lateral for local consumption. As understood, however, the gas intended for the Grants Pass lateral will merely replace the gas they will take out of the 12-inch Coos Bay gas pipeline. Despite representing that Jordan Cove will provide gas for a small community along the pipeline route, as understood, they will merely provide a tap, having no intention of developing the distribution system necessary to use the gas.

### **RELIEF REQUESTED**

Citizens for Renewables, Inc. respectfully requests DOE/FE deny the Amended Application because the export of LNG to non-FTA countries is inconsistent with the public interest. It further requests that DOE/FE deny the amendment to increase volume and an extension of time as inconsistent with the public interest. Alternatively, DOE/FE should suspend the application; declare a moratorium on approvals for gas exports until the appropriate modeling and forecasting of the effects of exporting Canadian gas can be completed.

Please send any correspondence to:

Kathleen Eymann  
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1256 Newport Ave. SW  
Bandon, OR 97411  
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Sincerely,

*Kathleen P. Eymann*  
**Attorney for Citizens for Renewables, Inc.**

## CERTIFICATE OF FILING

I hereby certify that in accordance with 10 C.F.R. § 590.107(c), I have this 9<sup>th</sup> day of May 2018 filed the foregoing AMENDED NOTICE OF INTERVENTION, COMMENT and PROTEST by e-mail on:

Ms. Larine A. Moore  
Docket Room Manager FE-34  
U.S. Department of Energy  
[fergas@hq.doe.gov](mailto:fergas@hq.doe.gov)

## CERTIFICATE OF SERVICE

I hereby certify that in accordance with 10 C.F.R. § 590.107 (c), I have this 9<sup>th</sup> day of May 2018 caused a copy of the foregoing AMENDED NOTICE OF INTERVENTION, COMMENT and PROTEST by e-mail on the following individuals listed in the Service list for Docket FE-12-32:

### SERVICE LIST FE Docket No: 12-32 LNG

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Lesley@rogueriverkeeper.org joseph@kswild.org	Via: francis@douglasfast.net
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Dated this 9<sup>th</sup> day of May 2018

*Kathleen P. Eymann*

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