



Thus, the Commission's issuance of a certificate would allow Pacific Connector to proceed with eminent domain proceedings in what we find to be the absence of a demonstrated need for the pipeline.

We find the generalized allegations of need proffered by Pacific Connector do not outweigh the potential for adverse impact on landowners and communities.

Jordan Cove and PCGP have filed new applications with FERC (Docket No. CP-17-495-000 and Docket No. CP17-494-000, respectively) and the PCGP proposed in the Section 7 application continues to cross .75 miles of my property.

My property will be subject to eminent domain should FERC grant the requested certificate. DOE/FE's consideration of Jordan Cove's request to export 395 Bcf/yr (1.08 Bcf/day) from its proposed terminal to nations with which the United States does not have a Free Trade Agreement (FTA) is directly related to and affects the viability and operation of both the Jordan Cove LNG terminal and the related Pipeline and therefore my interests.

While perhaps similar to other landowners, my interests are unique to me and no other party is able to adequately represent my interest in this proceeding. I request intervener status in this proceeding.

## **COMMENT AND PROTEST**

DOE/FE cannot legally authorize the requested exports absent a finding and evidence that such exports would be in the public interest. 15 U.C.C. § 717b. As is supported by FERC's recent denial of the applications for the Jordan Cove export terminal and Pacific Connector Pipeline, there is not a factual basis to support these projects are in the public interest.

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

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US sourced gas which was not imposed as a legal restriction) and the modeling and forecasts previously relied upon are no longer valid.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. They do not consider the effects of international trading on domestic gas prices. Market dynamics have change dramatically since the 2015 DOE studies were completed.

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

- No benefit to the US trade balance.
- Negative impact to American Jobs.
- Competition for American LNG plants keeping prices lower.
- Likely negative effect on U.S. GDP
- A Canadian Company using eminent domain to subvert 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.

Jordan Cove first proposed an LNG terminal and the PCGP in 2004. There is no sufficient basis to prolong the harm and uncertainty to myself and other landowners for the benefit of foreign interests. The extension will constitute a taking under the Fifth Amendment.

## **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 which they have held exclusive rights to by paying Coos County \$25,000 per month since 2007. Despite representing that Jordan Cove will provide gas for 2 small communities 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**

As an affected landowner on the Pacific Connector Gas Pipeline (PCGP), I respectfully request DOE/FE deny the Amended Application and rescind conditional order #3413 because the export of LNG to non-FTA countries is inconsistent with the public interest. I further request that DOE/FE deny the amendment to increase volume and an extension of time as inconsistent with the public interest and to avoid further takings of and damage to landowners' interests in the properties. 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:

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Sincerely,

*/s/ James E. Dahlman*  
James E. Dahlman