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From: [Francis Eatherington](#)
To: [FERGAS](#)
Subject: FE Docket No. 12-32-LNG. Jordan Cove Amendment of Application
Date: Wednesday, March 23, 2016 3:20:07 PM

To:
U.S. Department of Energy FE-34
Office of Regulation and International Engagement
Office of Fossil Energy
P.O. Box 44375
Washington DC 20026

RE: FE Docket No. 12-32-LNG.
Jordan Cove Amendment of Application to Export LNG to Non-Free Trade Agreement
Nations
and
Motion to Intervene from Oregon Women's Land Trust

On October 5, 2015, Jordan Cove Energy Project, L.P. (Jordan Cove) filed an amendment requesting it's March 2012 application to export 292 Bcf/yr (0.8 Bcf/day) of LNG from Coos Bay be increased to 350 Bcf/yr (0.96 Bcf/day).

Please consider these comments from Oregon Women's Trust, an organization that holds land on the Pacific Connector Gas Pipeline (PCGP) proposed route near MP 86. Any increased gas would be routed through this pipeline to the LNG export terminal. Almost 8 acres of our property would be taken for this pipeline, clearcutting a 100' wide swath through our oldest and most sacred forest. In exchange we have been offered a one-time payment of only \$2,292.48.

We are opposed to, and protest, the amendment to allow an increase amount gas.

Our property is in a "Class 1" because there are 10 or fewer buildings on a one-mile length of pipeline in our rural area. Pipelines in Class 1 areas have the lowest safety standards applied. Compared to those in urban areas, we would have fewer welds, thinner pipes, and a host of other reduced safety measures. It's bad enough that the original volume of gas would come through our property, much less a 20% increase in gas.

This increase in gas through our property, and associated decrease in our safety, was never considered by FERC in the FEIS. We object to this increase in gas, without at least giving us, and other rural landowners full Class 4 safety protections.

Much of the Pacific Connector Gas Pipeline is through fire-adapted forests, meaning forest fires are common. In fact, last summer several miles of the proposed PCGP route burned in the "Stouts Creek Fire". It came very close to where an above-ground block valve would have been. Fire impacts to the block valve would have been dangerous enough with the current amount of gas proposed through that valve. The danger would only increase with a greater amount of gas in the event of a forest fire. The increased impacts of forest fires on block valves, where gas is routed above ground, must be considered.

The U.S. Core of Engineers even felt the buried pipe could be compromised during a forest fire. In a letter dated 4-6-15, they wrote to FERC:

“The Corps wishes to inquire if the FERC, PCGP or DOT have reviewed the impacts of large trees, stumps or slash catching on fire during a forest fire event and landing over the buried pipeline and how that could affect the ground temperature and buried pipeline integrity/safety? If an object such as a large tree burns long enough over the buried pipeline it could warm the ground to a degree that it could compromise the integrity of the pipeline.”

If this is their concern with the current amount of gas proposed, it would be even worse with increased gas. (FERC never responded to their concerns).

Our safety is being compromised with the current amount of gas proposed by being in a Class 1 location, in a fire-adapted forest, near land-slide prone slopes where earthquakes are expected. The DOE should not allow even more gas, and gas pressure, through our land.

On March 11, 2016 FERC denied this project because Jordan Cove couldn't sell the lower amount of gas they applied for. It makes no sense to allow even greater quantities of gas, at least not without greater compensation to landowners who have to host this pipeline on our properties. FERC found the pipeline was not in the public interest. DOE can not authorize increased gas in a pipeline that is not in the public interest.

Oregon Women's Land Trust requests to be a intervener in this project. We have a direct interest, including economic interest, as described above.

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