UNITED STATES OF AMERICA
DEPARTMENTOF ENERGY

IN THE MATTER OF	)	
	)	
Jordan Cove Energy Project, L.P.	)	**FE Docket No. 12–32–LNG**
Amendment Application	)	
	)	
	)	
	)	

Evans Schaaf Family LLC, Deborah Evans and Ron Schaaf's
Motion to Intervene, Comment and Protest

The Evans Schaaf Family LLC, Deborah Evans and Ron Schaaf (collectively "Intervenors") move 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. In support of this motion, comments and protest Intervenors submit the comments included at Exhibits A, B, C and D.

Basis for intervention

Intervenors move to intervene pursuant to 10 C.F.R. § 590.303(b) based on their strong interests in both the Jordan Cover Energy Project and the related Pacific Connector Pipeline.

On May 21, 2013, Jordan Cove Energy Project, L.P. filed in FERC Docket No. CP13-483-000 an application under section 3 of the Natural Gas Act (NGA) and Parts 153 and 380 of the Commission's regulations, seeking authorization to site, construct and operate a natural gas liquefaction and liquefied natural gas (LNG) export facility in Coos Bay, Oregon. The LNG Terminal is intended to receive natural gas through the Pacific Connector Gas Pipeline, which filed an application under CP13-492-000 with FERC to construct and operate the a new 231-mile, 36-inch diameter interstate natural gas pipeline transmission system and related facilities.

The Pacific Connector Pipeline ("Pipeline") would cross 0.45 miles of the Evans Schaaf Family LLC's 157-acre forested property. The Evans Schaaf Family LLC is owned by Proposed Intervenors Deborah Evans and Ron Schaaf and would be subject to eminent domain should FERC grant the requested certificate. DOE's consideration of Jordan Cove's request to export 350 Bcf/yr (0.8 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 proposed Intervenors' interests.

The Pipeline would result in approximately a 100-foot swath of forest being clear-cut

from proposed Intervenors' property. 50 feet of that area would be permanently removed from timber production on what was purchased as timberland and for recreation.

A hydrostatic testing site would also impact Intervenors' property. The pipeline would result in substantial long-term management impacts due restrictions on tree planting within the pipeline right of way, limitations on heavy equipment movement over the right of way, and disturbance from right of way management activities such as herbicide spraying and vegetation clearing. The presence of the pipeline will also result in a long-term management burden given the need to inform and coordinate with contractors involved with work on the property regarding necessary operational and safety considerations and limitations related to the pipeline.

Importantly, because of safety concerns related to the Class I pipeline, if the pipeline is built the owners will not proceed with planned improvements to the property, including a residential structure, which was an important reason for their purchase of the property.

Jordan Cove's request is contrary to the public interest and should be denied

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. This is further detailed in Intervenors' attached comments to FERC which highlight both the lack of proven demand and the gross failure of the project's backers to take reasonable actions that would mitigate the impacts of eminent domain on the Intervenors and hundreds of other landowners along the proposed Pacific Connector route.

The project applicants' failure to demonstrate demand for its project in the face of radical LNG market changes is not cured by Veresen's March 22, 2016 announcement it had reached a non-binding "preliminary agreement" with JERA Inc. While Veresen no doubt has a strong incentive to trump up any evidence of demand for its project, a "preliminary agreement" for a minor portion of the LNG output from the project is no substitute for the type of evidence for demand that would show the project would be in the public interest despite the significant impacts on landowners along the Pacific Connector route. As an LNG buyer JERA is only benefitted by taking superficial steps, such as the preliminary agreement, that may even for a short period of time keep alive the potential for an over-supply of LNG in the Pacific market. Such preliminary agreements, however, cannot replace credible evidence of demand.

Communications concerning this proceeding should be served upon as follows:

Evans Schaaf Family LLC
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Thank for considering this motion, protest and comments.

Respectfully submitted,

/s/

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Dated: March 23, 2016

CERTIFICATE OF SERVICE

I certify that on this 23rd day of March, 2016, I served copies of the document above filed electronically with the DOE/FE on the designated representatives of all of the parties to this proceeding, in accordance with 10 C.F.R. § 590.107.

Dated: March 23, 2016

/s/ Deb Evans

SERVICE LIST - FE DOCKET NO: 12-32-LNG

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Intervenor(s):

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