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Comment on FR Doc # 2016-04733

This is a Comment on the **Department of Energy (DOE)** Notice: **Authorizations to Export Liquefied Natural Gas: Jordan Cove Energy Project, LP; Amendment of Application**

For related information, [Open Docket Folder](#)

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Comment

Please accept these comments to the U.S. Department of Energy concerning Jordan Cove Energy Project, L.P. (JC) Amendment of Application for Long-Term, Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations/

Here is a brief history of JCs pending U.S. Dept. of Energy Application:

On March 23, 2012 JC filed an original Application seeking authority to export LNG to non-free trade countries in a volume equivalent to 292 Bcf/yr (0.8 Bcf/day) from a proposed terminal to be located on Coos Bay.

On March 24, 2014, the Department of Energy issued DOE/FE Order No. 3413, conditionally granting JCs Application. DOE/FE has not yet issued a Final Order on the original pending Application.

On October 5, 2015, JC filed an amendment (Amendment) request. The current Amendment seeks to increase the volume of LNG for which Jordan Cove requests export authorization from the equivalent of 292 Bcf/yr to the equivalent of 350 Bcf/yr of natural gas (0.96 Bcf/day). The current proposal would amount to a 20% increase from what the U.S. DOE had conditionally authorized on March 24, 2014 for export from Jordan Cove (JC) to non-free trade agreement nations.

Reasons to deny the Amendment:

1. FERC, being the lead federal agency for this project

is responsible for the required NEPA process. On March 10, 2016 FERC issued an Order rejecting the JC project. Consequently, the US DOE must also deny the pending Amendment.

2. FERC only analyzed the environmental impact of 90 shipments per year which equates to a volume of just less than .8 Bcf/day. See box A below for calculation.

3. Oregon agencies, such as the Department of Environmental Quality, only analyzed the impact of .9 Bcf/day. The environmental impact of the proposed Amendment has not been analyzed.

4. The increase of exports to Non-free trade countries will harm the US economy because we are allowing the export of energy that will not be available to fuel the US economy and instead will provide fuel for our global competitors.

Box A

FERC based the EIS on 90 shipments a year which would now be incorrect

148,000 cubic meters LNG = 5,226,570.675 cubic feet LNG

5,226,570.675 X 600 = 3,135,942,405 cubic feet of natural gas

.8 Bcf/d X 365 = 292 Bcf/y
292,000,000,000 cubic ft a year for export / 3,135,942,405 cubic ft gas per shipment = 93 shipments or 186 harbor disruptions at high slack tide.

148,000 cubic meters LNG = 5,226,570.675 cubic feet LNG

5,226,570.675 X 600 = 3,135,942,405 cubic feet of natural gas

.96 Bcf/d X 365 = 350 Bcf/y
350,000,000,000 cubic ft a year for export / 3,135,942,405 cubic ft gas per shipment = 112 shipments or 224 harbor disruptions at high slack tide.

Respectfully submitted

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