

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

IN THE MATTER OF)
)
Gasfin Development USA, LLC) 13 – 161- LNG
)
)

**Sierra Club’s Filing of DOE’s LNG Environmental Review Materials and
Comments of Sierra Club, *et al.*, Thereon**

Attached please find copies of DOE’s “Addendum to Environmental Review Documents Concerning Exports of Natural Gas from The United States” and associated reports authored by the National Energy Technology Laboratory, together with comments submitted by Sierra Club, *et al.*, on these studies.

These materials pertain to the impacts of the LNG exports proposed in this docket. These materials, and the documents cited in the DOE and NETL reports, should *already* be considered part of the record here. Yet while DOE has recognized the importance of the analysis contained in these materials by including them in many other LNG export dockets, DOE has inexplicably failed to include them here on DOE’s own initiative. Nor has DOE granted Sierra Club’s request that DOE confirm that, despite DOE’s decision to file these materials in some but not all individual application dockets, these materials will nonetheless automatically be considered part of the record in all present and future LNG export applications.

To ease review of these materials, Sierra Club is submitting them in two separate filings, corresponding with the two separate comments Sierra Club filed regarding the DOE studies. The first filing contains:

- DOE’s Final (Aug. 2014) Addendum to Environmental Review Documents Concerning Exports of Natural Gas from The United States
- NETL’s Environmental Impacts of Unconventional Natural Gas Development and Production
- Sierra Club’s Comment on Gas Production and exhibits thereto.

The second contains:

- NETL’s Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States
- NETL’s Life Cycle Analysis of Natural Gas Extraction and Power Generation
- Sierra Club’s Comment on Climate Impacts of LNG Exports and exhibits thereto.

Sierra Club has sought to reduce burdens on DOE and the applicant by ensuring that the electronic copies of these files conform to DOE’s information technology requirements. Accordingly, with one exception discussed below, we have simply downloaded these files, as processed by DOE, from another recent DOE docket in which we also filed these materials, 13-153-LNG.¹ To be clear: Sierra Club intends these to be exactly the same as the files already on DOE’s website, and agrees to allow DOE to simply re-use the copies it has already approved should DOE encounter any problems with these re-submitted files. Sierra Club has requested that DOE merely incorporate the prior submission by reference, but absent DOE approval of that request, and in light of the unexplained DOE decision to include these materials in some but not all dockets, Sierra Club must, in an abundance of caution, re-file these materials. The one exception is that we seek to correct an error from the DOE 13-153-LNG docket. Our comment on the climate issues, DOE LNG Comment – Climate – FINAL, was not uploaded to the website—instead, DOE appears to have re-uploaded a second copy of a different exhibit under this name.² We submit the correct exhibit here.

These materials are in addition to, and are incorporated by reference in, the separate motion to intervene, comment, and protest Sierra Club will file regarding the above-captioned application.

Sincerely,



Nathan Matthews
Staff Attorney
Sierra Club
85 2nd St., Second Floor
San Francisco, CA 94105
nathan.matthews@sierraclub.org

¹ http://www.fossil.energy.gov/programs/gasregulation/authorizations/2013_applications/sc_11-153-LNG/sc_LNG_enviro_n_sec_1/Sierra_Club%27s_LNG_Environmental_Review_1.html

² We will file a separate notice of this error in the 13-153 docket—in this letter, we are not requesting DOE action in a different docket, but instead we merely seek to explain the reason for treating this one document differently.

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

IN THE MATTER OF)

Gasfin Development USA, LLC)

FE DOCKET NO. 13-161-LNG)

VERIFICATION

SAN FRANCISCO §

§

CALIFORNIA §

§

Pursuant to C.F.R. §590.103(b), Nathan Matthews, being duly sworn, affirms that he is authorized to execute this verification, that he has read the foregoing document, and that facts stated herein are true and correct to the best of his knowledge, information, and belief.

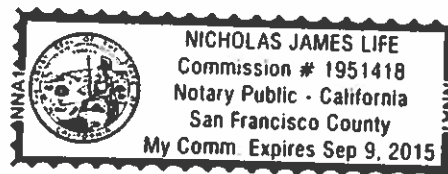


Nathan Matthews
Associate Attorney
Sierra Club Environmental Law Program
85 2nd St., Second Floor
San Francisco, CA 94105
Telephone: (415) 977-5695
Email: nathan.matthews@sierraclub.org

Subscribed and sworn to before me this 29th day of September, 2014.



Notary Public



My commission expires: 09/09/2015

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

IN THE MATTER OF)
)
Gasfin Development USA, LLC) FE DOCKET NO. 13-161-LNG
)

CERTIFICATE OF SERVICE

I hereby certify that I caused the above documents to be served on the applicant and all others parties in this docket, in accordance with 10 C.F.R. § 590.017, on September 29, 2014.

Dated at San Francisco, CA, this 29th day of September, 2014.



Nathan Matthews
Staff Attorney
Sierra Club Environmental Law Program
85 2nd St., Second Floor
San Francisco, CA 94105
Telephone: (415) 977-5695
Email: nathan.matthews@sierraclub.org