

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

In the Matter of:)
)
JORDAN COVE ENERGY PROJECT L.P.) **FE Docket No. 12-32-LNG**

CITIZENS AGAINST LNG AND JODY MCCAFFREE REQUEST FOR AN EXTENSION OF TIME TO ANSWER SUPPLEMENTAL COMMENT AND PROTEST OF EVANS SCHAAF FAMILY L.L.C., RON SCHAAF AND DEBORAH EVANS.

Pursuant to 10 C.F.R. § 590.304(e), if the U.S. Dept of Energy (DOE) Assistant Secretary determines that good cause is shown to accept the supplemental comment and protest e-mailed on October 17, 2017 from attorney Thane W. Tienson on behalf of clients Evans Schaaf Family L.L.C., Ron Schaaf and Deborah Evans, then the Citizens Against LNG (CALNG) and Jody McCaffree request pursuant to 10 C.F.R. § 590.304(f), 590.105(b), and 501.7(a)(6), that additional time be allowed in order for us to be able to properly respond to the Evans Schaff Family filing. We would like an extension of no less than November 7, 2017.

Good cause exists to grant Citizens Against LNG and Jody McCaffree the requested extension of time due to the current response deadline conflicting with the Federal Energy Regulatory Commission proceeding that is currently underway on the same Jordan Cove LNG Export Project.

On October 5, 2017, the Federal Energy Regulatory Commission issued a Formal Notice of the September 21, 2017 Jordan Cove Energy Project, L.P. Application pursuant to section 3 of the Natural Gas Act (NGA) and Part 153 of the Commission's regulations, filed under **FERC Docket CP17-495-000**; and the September 21, 2017 Pacific Connector Gas Pipeline L.P. Application pursuant to section 7(c) of the NGA, and Parts 157 and 284 of the Commission's regulations, filed under **FERC Docket CP17-494-000**.

The Federal Energy Regulatory Commission set a deadline date of October 26, 2017 for the filing of Interventions; Comments and Protests on the Jordan Cove and Pacific Connector Application filings. **This overlap directly affects our ability to be able to fully and properly respond to the Evans Schaaf Family L.L.C. supplemental comment and protest if the Department of Energy Secretary determines that there is good cause to accept that filing.**

To further support our position. Our ability to fully participate in the FERC proceedings has already been delayed due to legal proceedings that occurred on October 12, 2017 before the Oregon Land Use Board of Appeals (LUBA case No. 2016-095) on the Jordan Cove Energy Project Coos County Conditional Use Permit for the Jordan Cove LNG export facility.

Prior to this on October 3, 2017, we also fully participated in the U.S. Army Corps of Engineers, Portland District (Corps) request for scoping comments in their preparation of an Environmental Impact Statement to analyze the potential environmental effects of approving the Oregon

International Port of Coos Bay's (OIPCB) proposed Coos Bay Channel Deepening and Widening project for facilitating export projects including (if not exclusively) for the benefit of the Jordan Cove LNG Export project.

This process also limited the time we have been able to donate to our review of Jordan Cove's extensive Federal Energy Regulatory Commission applications.

On March 24, 2014 the U.S. Dept of Energy Issued Order 3413¹ Conditionally Granting Long-term Multi-contract Authorization to Export LNG by Vessel from the Jordan Cove LNG Terminal in Coos Bay, Oregon to Non-free Trade Agreement Nations. On March 3, 2016, the U.S. Dept of Energy published in the Federal Register a notice concerning the Jordan Cove Energy Project, L.P. Amendment of their Application for Long-term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations under FE Docket 12-32-LNG.² The Jordan Cove Amendment Application sought to increase the volume of LNG for which Jordan Cove had previously requested export authorization from the equivalent of 292 Bcf/yr to the equivalent of 350 Bcf/yr of natural gas (0.96 Bcf/day). **The DOE/FE has not yet issued a final order on the pending Application or on Jordan Cove's Amended Application.**

Other DOE approvals for Jordan Cove include U.S. DOE/FE March 18, 2014 Order No. 3412³ for Jordan Cove long-term authority to import natural gas by pipeline from Canada (1.55 Bcf/d) under FE Docket No. 13-141-NG; and U.S. DOE/FE Dec 7, 2011 Order 3041⁴ for Jordan Cove to Export Liquefied Natural Gas by vessel from the Jordan Cove LNG terminal to Free Trade Agreement Nations (438 Bcf/yr) under FE Docket No. 11-127-LNG.

The Citizens Against LNG and Jody McCaffree have actively participated in the U.S. DOE processes for the Jordan Cove project since August of 2012. We take very seriously these processes and ask for ample time to be able to respond properly without the conflict of other Federal certification and permitting proceedings occurring simultaneously for the same Jordan Cove LNG export project.

We respectfully ask the U.S. Dept of Energy Assistant Secretary to consider carefully our participation and comments during the course of this proceeding. The issues raised in our comments continue to be relevant and need to be fully addressed before a final decision is made by the DOE under FE Docket 12-32-LNG:

1

https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2014/orders/ord3413.pdf

2

https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/applications/FR_Notice_12-32-LNG_AMD_PUB.03_03_16pdf.pdf

3

https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2014/orders/ord34121.pdf

4

https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2011/orders/ord3041.pdf

- CALNG / McCaffree August 6, 2012, Intervention. Protest and Comments:
http://www.fossil.energy.gov/programs/gasregulation/authorizations/Orders_Issued_2012/citizens_against_lng08_06_12.pdf
- CALNG / McCaffree September 12, 2012, Answer to Jordan Cove:
http://www.fossil.energy.gov/programs/gasregulation/authorizations/Orders_Issued_2012/Citizens_Against_LNG_Answer_to_JCEP_09_1.pdf
- CALNG / McCaffree 1-24-2013, Initial Comments on NERA study:
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/jody_mccaffree_lam01_24_13_Final.pdf
- CALNG / McCaffree 2-25-2013, Rebuttal Comments on NERA study:
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/reply_comments/Citizens_Against_LNG02_26_13.pdf
and
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/reply_comments/Citizens_Against_LNG02_25_13.pdf
- CALNG / McCaffree July 21, 2014, Comments on Proposed Procedures for Liquefied Natural Gas Export Decisions. *Environmental Review Documents concerning Exports of Natural Gas from the United States. LifeCycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States:*
<https://fossil.energy.gov/app/DocketIndex/docket/DownloadFile/202>
and Exhibits:
<https://fossil.energy.gov/app/DocketIndex/docket/DownloadFile/203>
- CALNG / McCaffree February 12, 2016, Comments on U.S. DOE LNG Export Economic Consulting Studies
CALNG-McCaffree_Comment_2-12-2016.pdf:
<https://fossil.energy.gov/App/DocketIndex/docket/DownloadFile/537>
DOE_CALNG-McCaffree_Index-for-Exhibits_2-12-2016....
<https://fossil.energy.gov/App/DocketIndex/docket/DownloadFile/538>
DOE_CALNG-McCaffree_Exhibits_1-to-10.pdf
<https://fossil.energy.gov/App/DocketIndex/docket/DownloadFile/539>
DOE_CALNG-McCaffree_Exhibits_11-to-20.pdf
<https://fossil.energy.gov/App/DocketIndex/docket/DownloadFile/540>
DOE_CALNG-McCaffree_Exhibits_21-to-26.pdf
<https://fossil.energy.gov/App/DocketIndex/docket/DownloadFile/541>
DOE_CALNG_McCaffree_Exhibits_27-to-31.pdf
<https://fossil.energy.gov/app/DocketIndex/docket/DownloadFile/556>

- McCaffree March 23, 2016 Notice of Intervention, Protest and Comment re Jordan Cove Amended Application ⁵
[https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/applications/March_23_2016_12-32-LNG/McCaffree - NOI correct03 23 16.pdf](https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/applications/March_23_2016_12-32-LNG/McCaffree_-_NOI_correct03_23_16.pdf)

In addition, we also respectfully ask the U.S. Dept of Energy Assistant Secretary to consider comments that have been filed in the course of this proceeding (1-27-13) from the DOW Chemical Company,⁶ the Industrial Energy Consumers of America,⁷ Alcoa,⁸ American Forest & Paper Association,⁹ American Iron and Steel Institute,¹⁰ American Public Gas Association,¹¹ CarbonX Energy Corporation Inc,¹² Nucor Corp,¹³ Rentech Inc,¹⁴ the Aluminum Association,¹⁵ the Fertilizer Institute¹⁶ along with the many other participants. The issues and concerns raised

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https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/applications/R_Notice_12-32-LNG_Signed_02_26_16.pdf

⁶
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/peter_molinaro_em01_24_13.pdf

⁷
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/satterfield_email.pdf

-and-
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/applications/March_23_2016_12-32-LNG/2Cicio_IECA_03_23_16.pdf

⁸
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/colonyvette_em01_24_13.pdf

⁹
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/Missimer_em01_24_13.pdf

¹⁰
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/Thomas_Gibson01_24_13.pdf

¹¹
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/Bertram_Kalisch01_24_13.pdf

-and-
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/orders/apga08_06_12.pdf

¹²
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/107_carmen_legato_em01_24_13.pdf

¹³
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/diggins_jennifer01_23_13a1.pdf

¹⁴
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/James_McVaney01_24_131.pdf

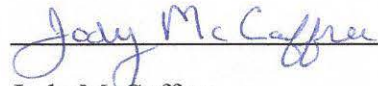
¹⁵
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/aluminum_ext_comments01_29_13_Redacted.pdf

¹⁶
https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/export_study/06.The_Fertilizer_Institute01_04_13.pdf

by these companies continue to be relevant and need to be fully considered under FE Docket 12-32-LNG.

Dated: October 27, 2017

Respectfully submitted by:

A handwritten signature in blue ink that reads "Jody McCaffree". The signature is written in a cursive style and is positioned above a solid horizontal line.

Jody McCaffree
Individual / Executive Director
Citizens Against LNG
PO Box 1113
North Bend, OR 97459

CERTIFICATE OF FILING

I hereby certify that in accordance with 10 C.F.R. § 590.107(c), I have this 27th day of October 2017 filed the foregoing REQUEST FOR AN EXTENSION OF TIME TO ANSWER SUPPLEMENTAL COMMENT AND PROTEST and NOTICE OF REPRESENTATIVE CHANGE by postal U.S. Certified mail and also by e-mail on:

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CERTIFICATE OF SERVICE

I hereby certify that in accordance with 10 C.F.R. § 590.107 (c), I have this 27th day of October 2017 caused a copy of the foregoing REQUEST FOR AN EXTENSION OF TIME TO ANSWER SUPPLEMENTAL COMMENT AND PROTEST and NOTICE OF REPRESENTATIVE CHANGE to be served by postal U.S. First Class mail and also by e-mail on the following individuals listed in the Service list for Docket FE-12-32:

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CERTIFICATE OF SERVICE

I also hereby certify that in accordance with 10 C.F.R. § 590.107 (a), I have this 27th day of October 2017 caused a copy of the foregoing REQUEST FOR AN EXTENSION OF TIME TO ANSWER SUPPLEMENTAL COMMENT AND PROTEST and NOTICE OF REPRESENTATIVE CHANGE to be served by e-mail on the following individuals pending intervenor status in the Docket FE-12-32:

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Dated this 27th day of October 2017



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