From: Doug Heiken
Sent: Tuesday, January 22, 2013 6:26 PM

To: LNGStudy

Subject: NERA Macroeconomic Study of LNG Exports - comments

FROM: Doug Heiken, Oregon Wild

TO: LNGStudy@hq.doe.gov

ATTN: Office of Natural Gas Regulatory Activities

DATE: 22 January 2013

**RE: NERA Macroeconomic Study of LNG Exports - comments** 

Please accept the following comments from Oregon Wild regarding NERA's Macroeconomic Study of LNG Exports. Oregon Wild represents approximately 10,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

The Macroeconomic Study of LNG Export was deeply flawed and cannot form the basis for any credible finding that LNG export furthers the general public interest. Significant flaws in the study include:

- The study admits that real wages will be reduced and profits will increase. Those who will benefit from LNG export are likely already well-off, while those who would be harmed are more likely to be struggling. The study does not adequately account for the adverse social costs of increased economic disparity caused by LNG export and the consequent transfer of wealth TO the wealthy shareholders of energy export companies FROM gas customers and the rest of the economy. Our nation's social fabric is damaged when the rich get richer, and the poor get poorer.
- The study does not adequately account for social and environmental "externalities" like irreversible pollution of groundwater by fracking; habitat damage from increased drilling, building LNG terminals, pipelines, and other infrastructure; and the adverse consequences of climate change from greenhouse gases emissions associated with the entire LNG supply chain (leaky wells, pipelines, fossil energy invested in liquefaction, combustion by end-users, slowing the US's transition away from coal; etc).
- The study does not adequately account for regional and local impacts.
- The study does not account for the most recent projections of future domestic natural gas use as presented in the Annual Energy Outlook (2013).
- The study does not account for emerging uses of natural gas such as transportation fuel.
- The study does not account for the adverse effects of gas exports on the United States' competitive position in world markets. A significant increase in natural gas prices could speed the loss of jobs and slow the repatriation of American jobs that many say is needed to rebuild the middle class.

Please conduct a much more careful review of all the evidence of adverse economic, social, and environmental impacts before approving LNG export.

Sincerely, /s/	
Doug Heiken, Oregon Wild	