

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

IN THE MATTER OF)
)
Commonwealth LNG, LLC) **Docket No. 19-134-LNG**
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**Natural Resources Defense Council’s
Motion for Leave to Intervene Out of Time and Protest**

Natural Resources Defense Council (“NRDC”) moves for leave to intervene and protest pursuant to 10 C.F.R. §§ 590.303(b) and 590.304 in this docket concerning Commonwealth LNG, LLC’s (“Commonwealth”) application for the U.S. Department of Energy’s (“Department” or “DOE”) approval to export to non-free trade agreement countries. NRDC and its members have interests that would be affected by the Commonwealth Project and have good cause for moving to intervene now. As recognized by DOE, the facts regarding U.S. liquefied natural gas (“LNG”) exports have changed dramatically since the Department solicited interventions in this docket in November 2019. On December 17, 2024, DOE gave notice that it had completed an updated analysis of the potential effects of U.S. LNG exports and added that substantial new information to this docket. Additionally, the environmental review conducted by the Federal Energy Regulatory Commission (“FERC”) for Commonwealth, which DOE typically uses to assess a project’s exports, was overturned by the U.S. Court of Appeals for the D.C. Circuit. FERC has issued notice that it will be conducting additional analysis and publishing a supplemental environmental impact statement (“EIS”) in the coming months. As substantial new information is and will become available and the processes related to this terminal remain

ongoing, NRDC has good cause to intervene now, and that intervention would not unduly impact this proceeding.

If any party opposes this motion, NRDC respectfully requests leave to reply. *Cf.* 10 C.F.R. §§ 590.302, 590.310 (allowing for procedural motions and briefing).

I. INTERVENTION OUT OF TIME

DOE may permit motions to intervene out of time for good cause and after considering any impact that granting the late motion would have on the proceeding. 10 C.F.R. § 590.303(d). Although DOE's regulations specify that persons seeking to intervene or protest out of time must provide good cause to do so, the regulations do not specify what constitutes good cause, 10 C.F.R. §§ 590.303(d), 590.304(e), nor do DOE's other regulations define the term. *See* 10 C.F.R. § 590.102. However, DOE has already acknowledged in this proceeding that good cause to intervene out of time may exist, in DOE's discussion of NRDC's prior motion to intervene.¹ DOE also recently granted other groups leave to intervene out of time in the Alaska LNG proceeding, explaining that the availability of new information in a docket such as new environmental analysis can constitute good cause.² In addition, DOE can look to FERC's interpretation of its rules administering the Natural Gas Act pertaining to good cause for late intervention³ and federal courts' interpretation of their rules on good cause to file out of time.

¹ *Commonwealth LNG, LLC*, Notice Dismissing Request for Rehearing, Dkt. No. 19-134-LNG, at 20 n.108 (March 27, 2024), available at https://www.energy.gov/sites/default/files/2024-04/Commonwealth%20LNG%20LLC%20Opposition%20and%20Answer%20to%20Late%20Intervention%20and%20Comments_032724_print.pdf.

² *Alaska LNG Project LLC*, DOE/FECM Order No. 3643-C, Order Affirming and Amending DOE/FE Order No. 3643-A Following Partial Grant of Rehearing, Dkt. No. 14-96-LNG, at 16-21 (Apr. 13, 2023), available at <https://www.energy.gov/sites/default/files/2023-04/ord3643-C.pdf>.

³ *See* 18 C.F.R. § 385.214(d).

A. Good Cause

NRDC has good cause for late intervention. The Department has recognized that late intervention should be granted following the addition of new information. For example, in the Alaska LNG docket, DOE granted late intervention following the publication of a supplemental EIS that included “new environmental analyses and findings.”⁴ Here, substantial new information from the *2024 LNG Export Study*, which must inform DOE’s evaluation of Commonwealth’s application and is also informing NRDC’s protest, has recently been added to this docket. DOE also confirmed that additional substantial new information will become available next year with the publication of FERC’s supplemental EIS for the Commonwealth terminal. Good cause, therefore, exists for granting NRDC’s motion to intervene out of time.

DOE announced in early 2024 that it needed to update the data and analysis it relies on to evaluate export applications.⁵ The volume of exports from the United States has increased exponentially and created a fundamentally different global LNG market than previously existed. DOE therefore concluded that its prior analysis from 2018 and 2019 was out of date and needed to be updated to adapt to the rapid increase in U.S. LNG exports. On December 20, 2024, DOE gave notice that its update was complete and that the new analysis was available.⁶ The *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports* “updates DOE’s understanding of the potential effects of U.S. liquefied natural gas (LNG) exports on the domestic economy; U.S. households and consumers; communities that live near locations where

⁴ See *Alaska LNG Project LLC*, DOE/FECM Order No. 3643-C, Order Affirming and Amending DOE/FE Order No. 3643-A Following Partial Grant of Rehearing, Dkt. No. 14-96-LNG, at 18 (Apr. 13, 2023), available at <https://www.energy.gov/sites/default/files/2023-04/ord3643-C.pdf>.

⁵ DOE, “DOE to Update Public Interest Analysis to Enhance National Security, Achieve Clean Energy Goals and Continue Support for Global Allies” (Jan. 26, 2024), available at <https://www.energy.gov/articles/doe-update-public-interest-analysis-enhance-national-security-achieve-clean-energy-goals>; DOE, “Unpacking Misconceptions,” (Feb. 8, 2024) available at <https://www.energy.gov/articles/unpacking-misconceptions-surrounding-does-lng-update>.

⁶ DOE, *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports*, 89 Fed. Reg. 245 (Dec. 20, 2024), available at <https://www.govinfo.gov/content/pkg/FR-2024-12-20/pdf/2024-30370.pdf>.

natural gas is produced or exported; domestic and international energy security, including effects of U.S. trading partners; and the environment and climate.”⁷ In the Commonwealth docket, DOE gave notice of the availability of the *2024 LNG Export Study* and invited the submission of comments.⁸ DOE’s recognition that it needed to update its analysis to address critical developments since 2018 and 2019⁹ demonstrates the substantial changes that have occurred since the 2019 intervention window in this docket and supports permitting intervention out of time with the release of the substantially updated information.

Additionally, FERC’s EIS on the Commonwealth terminal—which DOE typically relies on for its overall consideration of the project’s export adverse effects—was invalidated by the D.C. Circuit in July 2024.¹⁰ FERC announced that it will be conducting a supplemental environmental review,¹¹ and on December 10, 2024, DOE acknowledged that the analysis contained therein will need to be incorporated into DOE’s review of the LNG export application.¹² Granting this motion to intervene would serve the National Environmental Policy Act’s (“NEPA”) purposes by protecting NRDC’s full participation in the NEPA process, including, if appropriate, the opportunity to request rehearing by the Department. Additionally,

⁷ DOE, “2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports” (Dec. 17, 2024), available at <https://fossil.energy.gov/app/docketindex/docket/index/30>.

⁸ *Commonwealth LNG, LLC*, 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports, Dkt. No. 19-134-LNG, Doc. No. 38 (Dec. 17, 2024), available at <https://www.energy.gov/fecm/articles/commonwealth-lng-llc-fe-dkt-no-19-134-lng> (“Comments are due no later than 4:30 p.m. Eastern time, February 18, 2025”).

⁹ See e.g. DOE, Office of Fossil Energy and Carbon Management, “Energy, Economic, and Environmental Assessment of U.S. LNG Exports,” Summary Report at S-v (Dec. 2024), available at https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_SummaryReport_Dec2024_230pm.pdf.

¹⁰ *Healthy Gulf v. FERC*, 107 F.4th 1033 (D.C. Cir. 2024).

¹¹ *Commonwealth LNG, LLC*, Notice of Schedule for the Preparation of a Supplemental Environmental Impact Statement for the Commonwealth LNG Project, FERC Dkts. CP19-502-000 and CP19-502-001, Accession No. 20241127-3067 (Nov. 27, 2024).

¹² DOE, “Following FERC Notices, U.S. Department of Energy Provides Clarity to Status of LNG Export Authorization Requests” (Dec. 10, 2024), available at <https://www.energy.gov/articles/following-ferc-notices-us-department-energy-provides-clarity-status-lng-export> (“Relying on DOE policy and consistent with precedent during the Obama, Trump, and Biden Administrations for the program that governs export of domestically-sourced natural gas as LNG to non-FTA countries, DOE cannot complete its review of these two applications—CP2 and Commonwealth—until after FERC’s completion of the environmental reviews and issuance of final merits orders.”).

FERC regulation 18 C.F.R. § 380.10(a)(1)(i) specifies that intervention is not late when prompted by an EIS. As in Alaska, we ask DOE to “apply the spirit of this regulation . . . consistent with NEPA’s emphasis on public involvement in EIS proceedings,”¹³ and find good cause for permitting late intervention.

B. No Undue Impact

Intervention at this stage will not negatively impact the proceeding. FERC almost uniformly concludes that there would be no prejudice resulting from late intervention and grants late motions to intervene so long as the motion is filed before FERC issues its order on the merits and movants address the factors for late intervention.¹⁴ As with FERC proceedings, here, there would be no prejudice in allowing NRDC to intervene and protest now, after the initial deadline, but prior to DOE’s issuance of a merits order. NRDC will adhere to DOE’s regulation, 10 C.F.R. § 590.303(h), which provides that, “[i]n the event that a motion for late intervention is granted, an intervenor shall accept the record of the proceeding as it was developed prior to the intervention.” DOE has yet to make a determination on the merits and nothing would have changed in the proceedings to date had NRDC filed its motion to intervene within the earlier window. Moreover, DOE has announced that it will not make a determination on the merits for at least five months because it must wait for FERC to finish its supplemental EIS.¹⁵ Therefore, NRDC’s late intervention will not delay the proceeding.

¹³ *Alaska LNG Project LLC*, DOE/FECM Order No. 3643-C, Order Affirming and Amending DOE/FE Order No. 3643-A Following Partial Grant of Rehearing, Dkt. No. 14-96-LNG, at 19 (Apr. 13, 2023), available at <https://www.energy.gov/sites/default/files/2023-04/ord3643-C.pdf>.

¹⁴ *Mountain Valley Pipeline, LLC & Equitrans, L.P.*, 161 FERC ¶ 61,043, P 22 (Oct. 13, 2017) (summarizing this practice and granting motion filed two years after intervention deadline); *Tenn. Gas Pipeline Co.*, 162 FERC ¶ 61,167 at 46-51 (denying late intervention because movant “cit[ed] no reason for the lateness of its intervention,” and explaining policy of granting late intervention when movant shows good cause).

¹⁵ DOE, “Following FERC Notices, U.S. Department of Energy Provides Clarity to Status of LNG Export Authorization Requests” (Dec. 10, 2024), available at <https://www.energy.gov/articles/following-ferc-notices-us-department-energy-provides-clarity-status-lng-export>.

Commonwealth’s application is also already contested: Industrial Energy Consumers of America submitted a protest¹⁶ and Sierra Club,¹⁷ Fisherman Involved in Sustaining our Heritage, For a Better Bayou, Healthy Gulf, and The Vessel Project of Louisiana¹⁸ have filed motions to intervene out of time and protests. Wherever possible, NRDC will endeavor to coordinate joint filings with other parties to further reduce any impact on the proceeding.¹⁹ Thus, there will be no disruption caused by NRDC’s late intervention and there will not be prejudice to existing parties.

II. NRDC’S INTEREST AND POSITION IN THE PROCEEDING

Beyond timeliness, DOE’s rules do not articulate any particular standard for intervention. DOE merely requires would-be-intervenors to set out the “facts upon which [their] claim of interest is based” and “the position taken by the movant.” 10 C.F.R. § 590.303(b)-(c). NRDC’s interests are based on the impact the proposed additional exports will have on its members and mission. NRDC’s position is that the application should be denied or, in the alternative, heavily conditioned.

A. NRDC’S Interests

NRDC and its members have direct interests in avoiding the environmental, health, and economic harms that the Commonwealth LNG Project will cause.²⁰ NRDC is a national non-

¹⁶ *Commonwealth LNG, LLC*, Notice of Intervention, Protest, and Comment, Dkt. No. 19-134-LNG (Dec. 20, 2019), available at https://www.energy.gov/sites/prod/files/2019/12/f70/12.20.19_Commonwealth%20LNG_FINAL.pdf.

¹⁷ *Commonwealth LNG, LLC*, Motion to Intervene and Protest Out of Time of Sierra Club, Dkt. No. 19-134-LNG (Nov. 22, 2024), available at <https://www.energy.gov/sites/default/files/2024-11/Commonwealth%20LNG%2019-134-LNG%20Sierra%20MTI%20and%20Protest.pdf>.

¹⁸ *Commonwealth LNG, LLC*, Motion for Leave to Intervene Out of Time and Protest, Dkt. No. 19-134-LNG (Dec. 9, 2024), available at <https://www.energy.gov/sites/default/files/2024-12/2024.12.03%20FISH%20et%20al%20Motion%20to%20Intervene%20Out%20of%20Time.pdf>.

¹⁹ See *Alaska LNG Project LLC*, DOE/FECM Order No. 3643-C, Order Affirming and Amending DOE/FE Order No. 3643-A Following Partial Grant of Rehearing, Dkt. No. 14-96-LNG, at 19 (Apr. 13, 2023), available at <https://www.energy.gov/sites/default/files/2023-04/ord3643-C.pdf> (commitment to joint filings one factor considered in granting late intervention).

²⁰ Note that DOE’s regulations do not preclude intervention due to common interests among intervenors. See 10 C.F.R. § 590.303.

profit membership organization with more than 3 million members and engaged community participants worldwide, including in domestic areas with significant gas infrastructure development. NRDC has approximately 900 members in Louisiana and hundreds more in areas that will be impacted by increased gas production. NRDC is committed to the preservation and protection of the environment, public health, and natural resources. To this end, NRDC conceives and develops policies that reduce greenhouse gas emissions and other forms of pollution and that accelerate the deployment of energy efficiency and renewable energy without raising costs for the public. NRDC has a longstanding and active interest in ensuring need-driven and efficient energy resource development; protecting consumers from pipeline overbuild, stranded assets, and unjust rates; promoting environmental justice; curbing harmful fossil fuel expansion; expanding clean energy resources; and protecting the public from environmental threats, including the protection of waterbodies and wetlands.

Pursuant to 10 C.F.R. § 590.303(d), NRDC identifies the following persons for the official service list:

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B. NRDC's Position and Protest

NRDC urges DOE to deny Commonwealth's application because the record demonstrates that the proposed exports are inconsistent with the public interest. NRDC agrees with Sierra Club and other parties that while DOE has sufficient evidence to deny the application now, the current

record is not sufficiently complete for DOE to approve the application.²¹ The Department cannot decide to approve the application without (1) analyzing the application in light of the new findings from the *2024 LNG Export Study* and (2) waiting for FERC to complete its supplemental EIS.

The Department cannot make a decision on an export application until “DOE has completed the pertinent NEPA review process and . . . DOE has sufficient information on which to base a public interest determination.”²² And, as DOE previously explained “when reviewing an application for export authorization,” DOE evaluates “economic impacts, international impacts, security of natural gas supply, *and environmental impacts*, among others.”²³ In conducting this review, DOE must consider the most up-to-date analysis. DOE has recognized that the facts it considers in its authorizations, like the authorizations themselves, “may become stale,” and that “DOE decisions regarding non-FTA exports . . . should be made on the basis of the latest market information and analytical approaches at the time of DOE’s decision.”²⁴

On December 17, 2024, the Department published “a comprehensive update to [its] understanding of how varying levels of U.S. LNG exports impact” “the various facets of the

²¹ *Commonwealth LNG, LLC*, Motion to Intervene and Protest Out of Time of Sierra Club, Dkt. No. 19-134-LNG, at 13-14 (Nov. 22, 2024), available at <https://www.energy.gov/sites/default/files/2024-11/Commonwealth%20LNG%2019-134-LNG%20Sierra%20MTI%20and%20Protest.pdf>; *Commonwealth LNG, LLC*, Motion for Leave to Intervene Out of Time and Protest, Dkt. No. 19-134-LNG, at 8-13 (Dec. 9, 2024), available at <https://www.energy.gov/sites/default/files/2024-12/2024.12.03%20FISH%20et%20al%20Motion%20to%20Intervene%20Out%20of%20Time.pdf>.

²² *Commonwealth LNG, LLC*, Notice Dismissing Request for Rehearing, Dkt. No. 19-134-LNG, at 15 (March 27, 2024), available at https://www.energy.gov/sites/default/files/2024-04/Commonwealth%20LNG%20LLC%20Opposition%20and%20Answer%20to%20Late%20Intervention%20and%20Comments_032724_print.pdf (quoting Dep’t of Energy, *Procedures for Liquefied Natural Gas Export Decisions; Final Revised Procedures*, 79 Fed. Reg. 48,132, 48,135 (Aug. 15, 2024)).

²³ DOE/FE Order No. 3357-B (Freeport LNG), at 9 (Nov. 14, 2014), available at <https://www.energy.gov/sites/prod/files/2014/11/f19/ord%203357-B.pdf> (emphasis added).

²⁴ DOE, *Policy Statement on Export Commencement Deadlines in Authorizations To Export Natural Gas to Non-Free Trade Agreement Countries*, 88 Fed. Reg. 25,272, 25,277 (Apr. 26, 2023).

public interest.”²⁵ The Secretary of Energy stated that this latest “publication reinforces that a business-as-usual approach is neither sustainable nor advisable.”²⁶ Based on the updated studies, the Secretary laid out multiple reasons why approval of additional export of LNG is likely not in the public interest:

- There will not be additional international demand for LNG exports because “the amounts that have *already* been approved will be more than sufficient to meet global demand for U.S. LNG for decades to come.”²⁷
- Domestic energy consumers would face higher energy prices from increased LNG exports, with “unfettered exports” increasing wholesale domestic natural gas prices by over 30%. The cost increase is a “triple-cost” increase due to the 1) increasing domestic price, 2) increasing electricity prices, and 3) increasing costs for consumers from the pass-through of higher costs to U.S. manufacturers.
- LNG facilities endanger frontline communities with “pollutants such as methane, volatile organic compounds, particulate matter, nitrogen oxides, and others [which] lead to higher mortality rates in communities where oil and gas are extracted and processed.”²⁸ Moreover, LNG facilities are disproportionately located in primarily low-income and environmental justice communities that are already overburdened by fossil fuel infrastructure. The cumulative impacts on these communities “will only get worse, if volumes of LNG exports continue to dramatically increase.”²⁹

²⁵ DOE, Office of Fossil Energy and Carbon Management, “Energy, Economic, and Environmental Assessment of U.S. LNG Exports,” Summary Report at S-1 (Dec. 2024), *available at* https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_SummaryReport_Dec2024_230pm.pdf.

²⁶ DOE, “Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses” (Dec. 17, 2024), *available at* <https://www.energy.gov/articles/statement-us-secretary-energy-jennifer-m-granholm-updated-final-analyses>.

²⁷ *Id.* (emphasis in original).

²⁸ *Id.*

²⁹ *Id.*

- In every scenario tested, global net emissions would increase if the United States continued to export more LNG, therefore “the climate impact of ever greater exports of LNG merits a close and rigorous focus.”³⁰

The Department cannot decide to approve the Commonwealth application without analyzing the application in light of these new findings that demonstrate that the additional export of LNG from Commonwealth is likely not in the public interest.

Additionally, the U.S. Court of Appeals for the D.C. Circuit held that FERC’s EIS analyzing the environmental impacts of the Commonwealth Project was flawed.³¹ FERC “inadequately explained its failure to determine the environmental significance of the project’s greenhouse gas emissions, and it failed to adequately assess the cumulative effects of the project’s nitrogen dioxide emissions.”³² DOE cannot rely on an EIS that the courts have declared inadequate and must wait to act on the Commonwealth application until the environmental review required by NEPA is complete.³³ This is especially true for the Commonwealth terminal in light of the findings in the *2024 LNG Export Study*: the D.C. Circuit invalidated the Commonwealth EIS for its failure “to adequately assess the cumulative effects of the project’s nitrogen dioxide emissions”³⁴ and cumulative effects of pollutants including nitrogen dioxide is one of the areas of concern highlighted by the *2024 LNG Export Study*.³⁵ The Secretary emphasized the need for additional environmental review for Commonwealth specifically in her

³⁰ *Id.*

³¹ *Healthy Gulf v. FERC*, 107 F.4th 1033 (D.C. Cir. 2024).

³² *Id.* at 1038.

³³ See DOE, *Procedures for Liquefied Natural Gas Export Decisions; Final Revised Procedures*, 79 Fed. Reg. 48,132 (Aug. 15, 2014) (explaining that DOE will act on applications to export LNG “only after completing the review required by” NEPA).

³⁴ *Healthy Gulf*, 107 F.4th at 1038.

³⁵ See Appendix D: Addendum on Environmental and Community Effects of U.S. LNG Exports (Dec. 2024), available at https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_AppendixD_Dec2024.pdf.

key findings and considerations.³⁶ DOE must therefore wait for FERC to supplement its environmental analysis. Any decision approving the Commonwealth application before FERC finalizes its supplemental EIS would be arbitrary, capricious, and in violation of the Natural Gas Act and NEPA.

III. CONCLUSION

For the reasons explained above, NRDC respectfully requests that DOE grant its motion to intervene out of time.

Respectfully,

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³⁶ DOE, “Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses” (Dec. 17, 2024), available at <https://www.energy.gov/articles/statement-us-secretary-energy-jennifer-m-granholm-updated-final-analyses>.

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NRDC CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b), I hereby certify that I am a duly authorized representative of the NRDC, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy and Carbon Management, on behalf of NRDC, the foregoing documents and in the above captioned proceeding.

Dated: December 24, 2024

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NRDC VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b), I hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the foregoing document, and that the facts stated therein are true and correct to the best of my knowledge.

Dated: December 24, 2024

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CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 590.107, I, Caroline Reiser, hereby certify that I caused the above documents to be served on the persons included on the official service list for this docket, as provided by DOE/FE at <https://www.energy.gov/fecm/service-list-download>, on December 24, 2024. Electronic service was provided by cc'ing every person on the service list in the email submitting this filing to fergas@hq.doe.gov.

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