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

In the matter of:

Pieridae Energy (USA) Ltd.

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FE Docket No. 14-179-LNG

**MOTION FOR LEAVE TO INTERVENE AND PROTEST OF
THE _____ PIPELINE AWARENESS NETWORK**

Pursuant to 10 C.F.R. 590.303, **350CT** files this motion to intervene in the above-captioned docket. In opposition, **350CT** states as follows:

I. COMMUNICATIONS

Any communications regarding this pleading should be addressed to:

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II. BACKGROUND

On October 24, 2014, Pieridae Energy (USA) Ltd. (“Pieridae”) filed an application with the Department of Energy’s Office of Fossil Energy (“DOE/FE”) seeking a long-term multi-contract authorization to export domestically produced liquefied natural gas (“LNG”) up to the equivalent of 0.8 billion cubic feet (“Bcf”) of natural gas per day to non-Free Trade Agreement (“nonFTA”) countries, via export into Canada via pipeline and re-exporting some or all of that gas as LNG from a proposed terminal in Goldboro, Nova Scotia.

III. PROTEST AND INTERVENTION

350CT is a volunteer organization working to protect the safety of our air, water and climate in CT and the earth.

For the last several months our group has been working to raise awareness of the Kinder Morgan Northeast Energy Direct (“NED”) pipeline project and that project's potential to harm the local environment, increase the long term use of polluting fossil fuels, and send natural gas overseas endangered the livable climate all people. It is clear upon reading the Pieridae application (page 20 & Appendix E) that its export plans would likely depend on the completion of the Kinder Morgan project and/or an alternative plan by Spectra Energy.

Currently New England depends on the Maritimes & Northeast pipeline, from Baileyville to Dracut, to supply up to 0.85 billion cubic feet of gas to Maine, New Hampshire, and

Massachusetts meter stations. Page one of the Kinder Morgan pre-file application (FERC Docket PF14-22, dated September 15, 2014) states that the NED project would entail “reversal of the primary direction of the joint facilities,” referring to the Maritimes & Northeast Pipeline from Dracut, MA to Westbrook ME which currently flows south with a peak capacity of 833mmcf per day. Although Pieridae states that it has not contracted with any pipeline company for capacity, it is clear that if approved, the intent of Pieridae is to contract for the new northbound capacity that would be made available as a result of the NED project.

Pieridae's application must acknowledge the potential source of natural gas, and in doing so it must also acknowledge the potential environmental impact of a new greenfield pipeline project like NED. Even in its reconfigured route, announced on December 8, 2014, the NED project would create new and expanded rights of way that would impinge upon the rights of thousands of homeowners and landowners to enjoy their properties. It would cross conservation lands and forests, the water supplies of several towns in this area and southern states, and it would endanger the safety of residents due to the crossing of many highly developed towns where a future pipeline incident could prove catastrophic.

Approval of the Pieridae export plan would not only drive the development of large pipelines, but it could prevent the development of renewable energy resources that could provide our energy needs with current technology. Stamford research Marc Jacobson has shown that every state in the us can transition to 100% renewable energy as defined at <http://thesolutionsproject.org> but this will not happen if we continue to develop fossil fuel infrastructure. Fossil fuel export projects such as the one defined here should be rejected in favor of local renewable energy projects that can provide our energy needs without danger of catastrophic accidents or the pollution causing health problems and environmental degradation.

Because 350CT represents CT citizens directly affected by climate change, individuals who are located in Connecticut towns along the proposed route of the Kinder Morgan Northeast Energy Direct pipeline and all citizens of Connecticut will be affected by the toxic emissions from fracked gas pipelines referenced in the Pieridae application (Appendix E-3, E-4) as a possible source for gas, 350CT thus has a direct and immediate interest in this docket which cannot be adequately protected by any other party. Accordingly, 350CT should be permitted to intervene in this docket with full rights as a party.

IV. CONCLUSION

For the reasons stated above, 350CT respectfully requests that DOE/FE grant this timely motion to intervene and that 350CT be accorded fully party status in any proceedings held by DOE/FE in this docket.

Respectfully submitted,

Ben Martin
Steering Committee
350CT.org