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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
COMPRESSOR-FREE FRANKLIN**

Pursuant to 10 C.F.R. 590.303, Compressor-Free Franklin (CFF) files this motion to intervene in the above-captioned docket. In opposition, CFF 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

Compressor-Free Franklin is an association of citizens of Franklin, NY and surrounding communities. For the last several months our group has been working to raise awareness of both Cabot/Williams’ Constitution Pipeline and the Kinder Morgan Northeast Energy Direct (“NED”) pipeline project—which includes a massive compressor station within the Town of Franklin—and those projects’ potential to harm the local environment, increase the long term use of polluting fossil fuels, and send natural gas overseas instead of using it for domestic purposes. 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 as well as Cabot/Williams' Constitution pipeline. These two pipelines are proposed for mostly identical routes through the Town of Franklin.

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 projects like NED and Constitution. 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 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 result in the depletion of natural gas winter storage and peak supply that are critical to all of New England. In 2004, natural gas "inventories fell 1,000 Bcf below the five-year average in mid-April," according to EIA (<http://www.eia.gov/forecasts/steo/report/natgas.cfm>, accessed 2/8/15). That reduction in inventory was largely responsible for high spot prices for gas in January through October of 2014. Exporting 292 billion cubic feet of natural gas from this region would result in lower inventories of gas and thus, would contribute to higher New England gas prices than if these exports were not allowed.

Because Compressor-Free Franklin comprises and represents individuals who are located in the towns of Franklin, Sidney, and Davenport along the proposed routes of both the NED and Constitution pipelines, referenced in the Pieridae application (Appendix E-3, E-4) as a possible source for gas, Compressor-Free Franklin thus has a direct and immediate interest in this docket which cannot be adequately protected by any other party. Accordingly, Compressor-Free Franklin should be permitted to intervene in this docket with full rights as a party.

IV. CONCLUSION

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

Respectfully submitted,

Eugene Marner
Compressor-Free Franklin