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From:
To: FERGAS

Subject: Request for delay FE Docket No. 14-179-LNG

Date: Monday, February 09, 2015 11:53:58 AM

TO: fergas@hq.doe.gov

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I request that you extend the comment period for the Pieridae LNG Export Permit application docket no. FE-14-179-LNG and require Pieridae to submit more details on its proposal in order to facilitate comments.

In its application, Pieridae has failed to clearly state which Northeast pipeline projects would be necessary to achieve the needed gas supply for exports via New England through the port of Goldboro, Nova Scotia. Pieridae does not fully acknowledge that its proposal creates a demand for additional pipeline construction, nor do they explain the seasonal nature of the LNG export business or reveal the times of the year when most exports from this northern export terminal would take place.

Furthermore, we have discovered that most/all of our elected state and federal officials (many of whom were sworn in just a few weeks ago) were not notified of the submission of this application and of the opportunity to comment. Allowing our representatives to weigh in is essential, given the fact that this project could adversely impact millions of New England residents by impacting Northeast energy markets.

Numerous interstate pipeline projects in the Northeast region have been proposed that claim to serve winter energy needs. None of these proposals (NED, AIM, CT Expansion, Atlantic Bridge, Access Northeast) have been completed and all face legal and environmental challenges. Construction of an export terminal to send much or all of this new supply to Europe or Asia could further disrupt winter supply and grid reliability in the territory served by ISO New England.

Moreover the DOE has requested comments on whether this proposal would impact global warming compared to other LNG proposals and compared to having the customers of the gas uses supplies for pipelines. More detail is needed on the intended export market for this gas so that informed estimates of the full life-cycle emissions that would result from transportation, processing, liquefaction, re-gasification, and consumption of natural gas can be determined. (Natural gas is 95 percent Methane, a greenhouse gas that according to the IPCC has 86 times the global warming potential as CO2e in a 20 year timeframe.)

DOE should reject Pieridae's application and require a resubmission with additional details so that the public may appropriately weigh in on the environmental impact of this proposal, and so that the DOE may fulfill its responsibilities under NEPA ("the National Environmental Policy Act").

Sent from my iPad