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Attachments: [Pieridae application February 9 comment.doc](#)

Comments from Mina Hamilton, Citizen, [REDACTED] St, New York City, USA

It is inappropriate, unethical and quite possibly illegal for the US Department of Energy to approve the Pieridae Energy company application (FE DKT, No 14- 179-LNG) to export gas over a 20-year period via the Maritimes and Northeast Pipeline, and other pipelines, through the Goldboro, LNG terminal in Nova Scotia, Canada.

There are two important issues that require the rejection of this application:

1)The application includes a deliberate attempt to sever the link between the project and “upstream” consequences – consequences that would otherwise subject this application to the necessity for an Environmental Impact Statement.

2)The application involves a privately-held corporation with a total lack of public transparency.

1)The false assertion that there are no “upstream” consequences

The current application is faulty, misleading and incomplete in that Pieridae Energy makes the unsubstantiated, in fact, ludicrous claim that there will be no “upstream” impacts associated with the export of 292 bcf of natural gas per year. (“Upstream” being defined here as any impacts up the pipeline from the pipelines and LNG terminal in Nova Scotia – which in fact constitutes the geographic direction of South on a geographic map. Thus, “upstream” would include the Maritimes and Northeast pipeline, in addition to pipelines and attendant infrastructure in New England.)

Said claim is being made with the invalid and false assertion, “no planned new pipeline or planned pipeline expansion will be implemented as a consequence of, or will be dependent upon Pieridae’s decision to take capacity on that pipeline or pipeline expansion.” (see page 8 of the Pieridae Energy application.)

This is a clear and deliberate attempt to wave out of existence any “upstream” buildout of pipeline infrastructure and a deliberate and brazen attempt to have the project exempt from an EIS.

Indeed, in a bizarre self-contradiction, the applicant does clearly state that it will be sourcing gas from the Maritimes and Northeast pipeline, which runs from Dracut, MA through Maine to the Canadian border at Baileyville, Me.

It is patently false and absurd to claim that the amount of gas currently traveling via the Maritimes pipeline will be sufficient to reach the 292 cubic feet per year that Pieridae asserts it will be exporting. Absolutely without a doubt this sourced gas will be sourced from the build-out of additional pipeline infrastructure, such as the Kinder Morgan proposed Northeast Direct “greenfield” pipeline and multiple, toxic compressor stations, plus the proposed Spectra AIM and Atlantic Bridge pipeline expansions and multiple, toxic compressor stations.

2)The matter of a lack of corporate transparency and the potential of a corporate entity of questionable integrity.

Pieridae Energy company is a company totally without transparency – being a privately held corporation. Furthermore, it is a company without any experience in the building of complicated and potentially hazard complex infrastructure associated with a LNG terminal.

To have a project that will have major, deleterious economic and environmental impact on literally hundreds of towns, farms, water resources, schools, community parks, treasured state forests being permitted to a company that is basically a trading company is unconscionable.

Further, since in the past Pieridae Energy has “flipped” LNG facilities we view this application as questionable and potentially unethical, ie that Pieridae has no intention and never has had an intention of the building of Train 1 and 2 at the LNG terminal at Goldboro and attendant infrastructure associated with such building. That, instead, it is the intention of Pieridae Energy – after the permitting process - to sell out to a larger, more experienced, and more well-known corporate entity, such as Exxon, Shell, or ConocoPhillips.

This is indeed the case of what happened with the Kitimat LNG terminal in British Columbia, Canada. Kitimat was previously owned by a holding company, Galveston, LNG, owned by the current CEO of Pieridae Energy, Alfred Sorensen. Via Galveston, LNG, Sorensen obtained permits, and then sold out to Apache Energy (one of the largest shale gas companies), EOG and Chevron.

Whether said “flipping” is illegal or not, certainly it is of dubious integrity. In the case of Kitimat there is no evidence to our knowledge that there was

any collusion with said corporate entities – in order for the permitting process to have a lower political and media profile, but it cannot be ruled out as a possibility.

Nor can a similar “flip” with the current Pieridae Energy company application be ruled out as a possibility. Was this application deliberately conceived by Pieridae Energy in conjunction with other corporate entities as a way to fly under the radar of the media, legislators, community advocacy groups and a public already incensed by plans for a large build-out of toxic gas pipeline infrastructure in New England? We do not know the answer to this question, but certainly it is one that must be answered.

Certainly, there is no doubt that, **had** this application been made by an entity such as Exxon or Chevron or for that matter Kinder Morgan, it would have caught the attention of legislators, environmentalists, and the media long before now.

The Pieridae Energy application to the US Department of Energy must be denied.

Submitted by Mina Hamilton, Citizen