



July 10, 2017

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Dear Secretary Bose:

Western Energy Alliance appreciates the opportunity to comment on the Federal Energy Regulatory Commission's (FERC) Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Jordan Cove liquefied natural gas (LNG) terminal and Pacific Connector pipeline. Western Energy Alliance is a strong supporter of the Jordan Cove project, as well as LNG exports broadly. Based on strong economic evidence from studies by leading research universities, federal agencies, and industry, LNG exports will have positive overall economic impacts on the United States.¹ The Jordan Cove project is particularly important to the West as the only proposed export terminal that would be sourced by Rockies natural gas, in this case from Colorado, Utah and Wyoming. We encourage FERC to move forward with the EIS expeditiously.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. Alliance members are independents, the majority of which are small businesses with an average of fifteen employees.

The West contains major reserves of natural gas. In 2016, the U.S. Geological Survey released a new assessment of the Mancos Shale in the Piceance Basin of Colorado, finding a more than 40-fold increase in natural gas over its previous estimates.² Other discoveries are taking place across the West each year, transforming our understanding of U.S. natural gas reserves in the process. The United States has the resources to become an energy superpower but we currently lack the export infrastructure to enable our full geopolitical

¹ [The Macroeconomic Impacts of Increasing U.S. LNG Exports](#), Rice University et al., October 29, 2015.; [U.S. LNG Exports: State-Level Impacts on Energy Markets and the Economy](#), ICF International, November 13, 2013.;

[Macroeconomic Impacts of LNG Exports from the United States](#), NERA Economic Consulting, December 3, 2012.; [Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets](#), EIA, October 2014.

² [USGS Estimates 66 Trillion Cubic Feet of Natural Gas in Colorado's Mancos Shale Formation](#), U.S. Geological Survey, June 8, 2016.

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and economic potential. The Jordan Cove LNG terminal would be a critical piece in allowing the United States to realize its full potential as an energy exporter.

The Jordan Cove terminal has garnered significant interest from major LNG importers in Asia as a reliable, affordable energy source from a trusted ally. There is a clear appetite in the global marketplace for American LNG exports, and allowing construction to move ahead would bring the United States numerous geopolitical benefits. A Rice University study indicates that enhanced LNG exports would reduce natural gas prices for our allies in Europe and the Pacific Rim.³ Free trade in natural gas would reduce our allies' dependence on energy from Russia and the Middle East, and enhance the geopolitical position of the United States.

The terminal would bring significant investment to the Coos Bay Port and establish it as an important connection between North America and the Pacific Rim, delivering substantial economic benefits in Oregon and across the West. The LNG terminal and pipeline will create more than 3,500 construction jobs, and ultimately will support 250 permanent jobs at the LNG facility and along the pipeline. For western oil and natural gas producers, the increased demand of 7.8 million tonnes of liquefied natural gas per year will support new development in the West along with job creation, economic growth and increased revenue for local, state, and federal governments.

Oil and natural gas producers across the West have demonstrated the ability to quickly increase production in response to market demands. Domestic natural gas consumption is at an all-time high, yet prices remain affordable and stable. Moreover, trillions of cubic feet of untapped reserves stand ready to meet increased demand. However, without the added demand from LNG exports, many western natural gas reserves will remain untapped. According to economist John Dunham & Associates, pro-development oil and natural gas policies, including enhanced LNG exports, could create 19,363 new jobs.⁴ The Jordan Cove project would stimulate demand for Rockies natural gas, and foster additional American energy production.

Jordan Cove LNG has made numerous commitments to the local region to address environmental, safety, and infrastructure concerns. The company plans to build a state-of-the-art LNG firefighting school and assist with consolidation of emergency services in the Coos Bay region. Once completed, the project will provide billions of dollars in tax revenue for local schools, infrastructure, and other vital services and benefits for the region.

Increased LNG exports will also reduce greenhouse gases and traditional criteria pollutants globally. Clean-burning natural gas emits half the carbon dioxide of coal while producing negligible amounts of sulfur, mercury and particulate matter.⁵ LNG exports provide

³ Rice University, 2015

⁴ [Western Producers Could Help Pres. Trump Create 19,363 New Jobs](#), Western Energy Alliance, March 21, 2017

⁵ [Natural Gas 1998: Issues and Trends](#), EIA, 1998.

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American climate change leadership by promoting a meaningful solution to reduce global greenhouse emissions and improve public health. As the Energy Information Administration has demonstrated, increased natural gas electricity generation has displaced 62% of the greenhouse gas emissions reductions in the electricity sector, compared to just 38% for wind, solar and other non-carbon generation.⁶ By supporting increased natural gas use globally, the Jordan Cove terminal would deliver greenhouse gas emission reductions and environmental benefits around the world by supplying affordable and clean-burning natural gas. And by reducing ozone precursor emissions in Asian countries through increased natural gas use, the Jordan Cove project would help to reduce ozone transport from Asia to in the United States.⁷

We appreciate the opportunity to provide comment on the vitally important Jordan Cove and Pacific Connector project. We strongly support an expedited EIS and subsequent project approval, which will bring substantial environmental, economic, and security benefits.

Sincerely,



Kathleen M. Sgamma
President

⁶ [U.S. Energy-Related Carbon Dioxide Emissions, 2015 Figure 11](#), EIA, March 16, 2017.

⁷ [Ozone Transport in the West](#), Western States Air Resources Council, July 2004.