

December 11, 2023

The Honorable Jennifer Granholm
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Cc: President Biden

In the matter of: Venture Global CP2, LNG LLC, FE Docket No. 21-131-LNG

Dear Secretary Granholm:

As the climate crisis continues to accelerate, we write to urge the Department of Energy (DOE) to not approve the application for the CP2 LNG export facility proposed in southwest Louisiana. As DOE reviews and considers the application for CP2 LNG, it is critical to consider how LNG exports impact the climate, environmental justice, and domestic energy prices.

In 2022, the U.S. became the world's largest exporter of LNG. Additionally, exports have doubled over the past four years, and projects currently under development are set to almost double exports again – all at a time when projections indicate this surge in production will create a glut that will result in higher energy prices for people in the U.S. CP2 LNG is the largest export application ever evaluated by DOE and is a clear example of an infrastructure project that is not in the public interest. As DOE considers CP2 and other projects that would increase LNG exports, DOE should assess the aggregate impact that the explosive growth in US LNG exports is having on climate, communities, and our economy. In order to protect American consumers and communities, DOE must not authorize oil and gas companies to export more LNG.

As we experience the escalating impacts from climate change related disasters, it is critical that permitting decisions take lifecycle greenhouse gas emissions of LNG export facilities into account. At full volume, the lifecycle emissions of burning that much gas will add up to 190 million tonnes of carbon dioxide equivalent each year. CP2 LNG would be 20 times the annual emissions of the Willow drilling project in Alaska and equivalent to the emissions from more than 42 million gas-powered cars or 51 coal-fired power plants.¹ The annual emissions from the slate of operating, under-construction, and proposed U.S. LNG export terminals are equivalent to the annual emissions of 688 new coal-fired power plants.² LNG exports directly impede the global transition to clean energy as well as the U.S.'s ability to meet its own greenhouse gas and methane targets. Recent research on the climate pollution from LNG exports confirms that LNG is as bad as coal or much worse than coal, because of upstream methane leakage and boil-off during shipping. The U.S. Energy Information Administration has also found that LNG exports are the driving force behind forecasted gas production growth.³ At a time when Americans across the country are experiencing ever-harsher climate impacts, it is imperative that DOE rejects CP2 LNG.

¹ <https://www.sierraclub.org/articles/2023/09/president-biden-must-defuse-another-carbon-bomb>

² <https://www.sierraclub.org/dirty-fuels/us-lng-export-tracker>

³ https://www.eia.gov/outlooks/aeo/pdf/AEO2023_Release_Presentation.pdf

CP2 LNG is a prime example of the environmental injustice of gas export expansion. The terminal is proposed to be sited adjacent to Venture Global's already-existing export facility, Calcasieu Pass LNG. This facility was found to have over 2,000 air permit deviations and violated its permit on 84% of the days it was initially in operation. This localized pollution and concentration of export facilities forces the communities in the surrounding area to bear the brunt of harmful pollution and chemicals like benzene and nitrogen oxides (NOx) that cause cancer, heart disease, and asthma. This region relies on the coastal wetlands and marshes that CP2 would destroy – they are the spawning grounds and fisheries, oyster beds, and habitat that sustain the vibrant fishing industry and provide the first line of defense against storm surges. This is emblematic of the broader trend of the ways in which LNG export expansion disproportionately impacts low-income and communities of color along the Gulf Coast, many of whom rely on coastal livelihoods and who are already overburdened by industrial pollution from the fossil fuel industry.

American consumers, especially people of color and those in lower-income households, are already struggling with high energy costs that are exacerbated by LNG exports. Spikes and wide variability in home energy prices can be traced to increases in LNG exports – as can increases in prices of consumer goods.⁴ Because the harms of high energy and consumer good prices disproportionately fall on those who are already disadvantaged, now is not the time to be increasing gas exports with projects like CP2 LNG

It is long past time for DOE to chart a new course on how it determines that new licenses for LNG exports are in the public interest. With the agency's pending decision on the CP2 export application, DOE must consider climate, environmental justice, and domestic energy prices in making this determination. There is no standard under which exporting LNG should be deemed in the public interest, considering the significant climate, health, and environmental justice impacts.

The time is now and the stakes are high; DOE must reject CP2 LNG for the sake of our climate and communities.

Sincerely,

⁴ <https://ieefa.org/resources/lng-exports-may-spell-trouble-horizon-us-consumers>