Testimony about HBCU-13-02
From Janet Stoffel
Concerned Coos Bay Citizen

I am a concerned tax paying property owner/resident of Coos County. I have not worked in the gas industry, and I know very little about liquefied natural gas and the pipelines it flows through. I have, however, done some research and wish to express my concerns.

If Andrew Stamp, as he stated in the hearing on September 20, 2013 knows very little about natural gas and the pipeline, then before he completes his finding on HBCU-13-02, an unbiased authority needs to be consulted about changing the flow of gas from import to export and whether it makes a difference regarding the safety of the pipeline or its effects upon this community. Mr. Stamp repeatedly claimed to be unbiased, yet he took testimony at the hearing from a Williams Pipeline project manager and appeared to take it as the gospel truth. Of course the pipeline project manager, in unsworin testimony, will say whatever serves the best interest of the company from whom he earns his income. When Mr. Stamp issues his report I demand that it show what gas expert (not Jordan Cove connected nor recommended by Jordan Cove) he consulted for unbiased information about the liquefaction and the flow of gas, and what informational facts that yielded. However, this step would be completely unnecessary if Mr. Stamp rules for the County to not make this decision until after the FERC Record of Decision on the JCEP and Pacific Connector Gas Pipeline project is completed.

I have done enough internet research to know that when LNG is imported, as the original permit required, what JCEP proposed was to accept imported LNG on the North Spit of Coos Bay and use the proposed pipeline to transport the gas inland. “LNG is principally used for transporting natural gas to markets, where it is re-gasified and distributed as pipeline natural gas.” Thus I presume what would have happened at the JCEP terminal in Coos County was for the gas to be warmed back up from a liquid to a gas (re-gasified) and be transported through the pipeline toward Malin.

If the permit is going to be changed so that JCEP is going to export the gas, then the gas coming from Malin would require the liquefaction process before it could be put in transport tankers. “The liquefaction process involves removal of certain components, such as dust, acid gases, helium, water, and heavy hydrocarbons, which could cause difficulty downstream. The natural gas fed into the LNG plant will be treated to remove water, hydrogen sulfide, carbon dioxide and other components that will freeze (e.g., benzene) under the low temperatures needed for storage or be destructive to the liquefaction facility. LNG typically contains more than 90 percent methane. It also contains small amounts of ethane, propane, butane, some heavier alkanes, and Nitrogen. The purification process can be designed to give almost 100 percent methane.”

Exportation thus requires that the proposed plant will have refineries (called trains) to remove these components from the gas flowing from Malin before it can be liquefied. Where will these polluting gases go in refinement? Will some of them go into the air that we breathe in this community, as Dr. Morgan, our local allergy doctor, previously publically testified? Will some of it go into our bay,
or our groundwater? This would be very detrimental to the citizens of the Coos Bay area, who at this point do not know this may happen and who fully expect the county to protect them. Why would our County Board of Commissioners wish to spew pollutants over the most populated area of the county?

The export process would also lead to increased noise, traffic, extreme security measures to protect the facility from terrorist attack, and gas burn-off at the liquefaction plant. This would lower our quality of life and cause sickening changes in this beautiful ocean community where I chose to retire, own property, and pay taxes. Thus, when Mr. Stamp is not interested in what this means for our community or what the NEPA rules are and all that matters to him are land use codes, I come to wonder how we got to this point. The original Jordan Cove plan, as approved by the county years ago, placed the condition 25 of “import only” on the applicants. No one at the hearing, including Mr. Stamp and Mr. Whittow seemed to know why this condition was imposed. The county states it was not about an ORS or a County land use code and was thus labeled “miscellaneous,” but that does not mean it was not an important condition that should just be thrown out because the applicant now wants to change the whole scope, sequence, and function of the project. I know that condition was there because the community was concerned that the applicant was going to attempt this change and it was to block such a change. It was not an added condition and written this way so that those of us testifying at the hearing could have a mockery made of us by being told by the applicant’s lawyer, Mr. Whitlow, that our testimony was “ridiculous”.

The applicant is robbing the community of their due process and forcing this community to accept something few people (except those receiving financial incentives from the applicant) want. It would seem that the proposed change in direction of flow definitely affects the use of the land, and one would think that change of use would be the subject of a “land use” hearing. If the whole use of the land has now changed, it seems the applicant should now seek all land use permits again under these dramatically different uses that were so specifically preempted by condition 25.

One of the reasons NEPA rules continued to be brought up by those testifying at the hearing is because many issues being discussed, including this conditional change, are very premature. The entire Jordan Cove Project and Pacific Connector Pipeline should have started over with a new FERC application and a new EIS, but amazingly the applicants were allowed to retain all the permits they had received under the false pretense of an import only facility. The import facility was claimed to be for the good of our nation. A significant part of the NEPA process is about establishing that there is a public benefit to the project. This applicant intends to use eminent domain to steal the property of those landholders who cannot be convinced that they want to sell their property rights along the pipeline route to this primarily Canadian corporation. However, the FERC process and eminent domain laws require that the land will be used to benefit the public rather than line the pockets of a foreign corporation. For Coos County to be issuing permits now, including changing from import (which was supposedly for the public benefit of the people of the United States) to export (where the benefit is to a foreign corporation) is a bait and switch for all of the landowners and at the expense of the environmental and economic quality of the United States and specifically the County of Coos and the state of Oregon.
If this change is allowed, then the pipeline land should not be taken by public domain; thus this "no brainer" (hearings officer's choice of words) change of condition is very impactful to the total project. The scope of this new export project with the additional power plant and "trains" is magnified greatly from the original project, yet the same permits apply. How can the same permits apply? It makes no rational sense; in fact it appears the applicant is involved in something criminal or at the least very ridiculous, to use Mr. Whitlow's term.

I concur with the Revised Narrative in Support of an Amendment to the Pacific Gas Connector Pipeline Land Use Appeal where on page 4 in the last sentence of the first quoted paragraph (referring to the Board of Directors) it states: "Nonetheless, if 'reams of testimony' were submitted to FERC, then it seems proper that the FERC decide the issue. There is no County zoning code provision that requires the County to make that decision." This statement makes it very clear that Coos County should not be making this decision at this time. This is a decision that needs to be made by the FERC, not a hearings officer proposing it to the Board of Commissioners. It should be put on hold by the county until the FERC issues its Record of Decision on the proposed Jordan Cove Energy Project and Pacific Connector Gas Pipeline, which should also include the South Dunes Power Plant and Liquefaction Facility. An end-run sneak by the applicant is not what is called for at this time. The county is trying to make a decision about which they don't have enough information or expertise; meanwhile it is the FERC that has the information and is the legal body that is charged with making this decision. Coos County needs to cease and desist NOW.

Sincerely,

Janet Stoffel
Concerned Citizen