



March 20, 2025

Submitted via Online Form: <https://fossil.energy.gov/app/docketindex/docket/index/30>.

U.S. Department of Energy
Office of Regulation, Analysis, and Engagement
Office of Fossil Energy and Carbon Management
Forrestal Building
Room 3E-056
1000 Independence Avenue SW
Washington, DC 20585

Re: "2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports," 89 Fed. Reg. 104,132 (Dec. 20, 2024)

GPA Midstream Association ("GPA Midstream" or "GPA") hereby submits the following comments in response to the Department of Energy's (DOE's) "2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports." GPA respectfully requests that DOE consider this input as the Department completes public interest determinations in future export proceedings and improves on LNG export policy.

GPA Midstream has served the U.S. energy industry since 1921 and represents over 50 domestic corporate members that directly employ 57,000 employees that are engaged in the gathering, transportation, processing, treating, storage, and marketing of natural gas, natural gas liquids, crude oil and refined products, commonly referred to as "midstream activities." The work of our members indirectly creates or impacts an additional 400,000 jobs across the U.S. economy. In 2023, GPA Midstream members operated over 250,000 miles of gas gathering pipelines, gathered over 91 billion cubic feet per day of natural gas, and operated over 365 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.¹ GPA Midstream members are critical to the natural gas supply chain that provides the energy exported through our country's liquified natural gas ("LNG") terminals. GPA works with operators upstream and downstream to ensure LNG is transported safely to these facilities and then to our allies overseas.

GPA Midstream understands the need to study the economic impacts of LNG exports but believes the analysis issued in 2024 fails to fully recognize or account for the benefits of LNG exports.²

¹ For more information, reference www.gpamidstream.org.

² U.S. Department of Energy. 2024. "LNG Update Summary Report, December 2024." Accessed March 6, 2025. https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_SummaryReport_Dec2024_230pm.pdf.

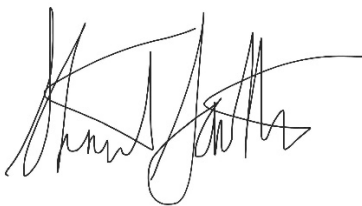
Additional LNG exports are in the public interest and consistent with the Natural Gas Act (“NGA”) because additional LNG exports support both the U.S. and global economy and promote energy security. The 2024 Study’s macroeconomic analysis is flawed because it relies on unrealistic assumptions concerning both supply and demand of natural gas. In contrast, an analysis with realistic assumptions demonstrates even greater benefits of LNG exports. Lastly, the Study fails to recognize, or downplays, the vast economic and other benefits to local communities driven by LNG export activities.

While there may be useful information discovered in the course of an environmental assessment of LNG exports, GPA Midstream believes the analysis in the 2024 Study is unreliable. For example, there is no credible evidence that LNG export authorizations cause negative public health outcomes. Second, although Appendix D outlines the relevant federal and state regulatory programs, the Study fails to recognize all the federal, state, and local laws and regulations that govern environmental protection.³ Finally, DOE should not consider environmental factors that are: (1) unrelated to the purposes of the NGA and its public interest standard, which is promotion of natural gas production and whether the U.S. needs such gas for domestic purposes; and (2) already addressed by various state and federal environmental statutes and regulations.

GPA Midstream also recommends the DOE give due consideration of the concerns identified in the joint comments submitted by the American Petroleum Institute (API), The Center for Liquefied Natural Gas (CLNG), and The U.S. Chamber of Commerce.

Thank you for your consideration of GPA’s comments. We ask that our concerns be addressed in your further work on LNG export policy and project approvals.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stuart Saulters', with a stylized, sweeping flourish extending to the right.

Stuart Saulters
VP, Federal Affairs
GPA Midstream Association

³ U.S. Department of Energy. 2024. “LNG Update Appendix D, December 2024.” Accessed March 6, 2025.
https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_AppendixD_Dec2024.pdf.