

methane, ethane and related commodity products. PIOGA appreciates the extension of time and welcomes the opportunity to comment on the above-referenced rulemaking proposing changes to regulations affecting the bulk transport by rail of liquefied natural gas (LNG). PIOGA supports this rulemaking and the proposed changes as they will increase access to end use markets....”

8. The current temporary popularity of LNG is no reason to continue promoting it. Fracking companies are already running out of credit, and the overseas market, for which much LNG is intended, has lower prices than its proponents expected.
9. A major reason for lower overseas LNG prices is the same as why LNG will fail in the near future in the United States: solar and wind power are being deployed exponentially. Even with the current glut of pipelines, LNG by truck, and LNG by rail, it is impossible for natural gas to grow exponentially because of the massive investments required in drilling, piping, liquefying, etc. Meanwhile, solar and wind power prices continue to fall through sheer economies of scale, pushing deployments up ever-faster.
10. The solution to risks of leaks, wrecks, and explosions of LNG truck tankers is not to add another source of risk in LNG rail cars, no matter what design.
11. We were told by pipeline companies that pipelines were needed or methane would be transported by truck. Now PHMSA tells us LNG by rail is less risky than trucks. Yet LNG is trucked down highways all the time. PIOGA in its January 10, 2020, comment spells out the industry attitude (emphasis theirs): **“Allowing LNG shipments by rail in DOT approved tank cars will provide energy producers with increased flexibility by allowing them to select the transportation method that is the most economic and desirable based on the pertinent circumstances while maintaining rail public health and safety protections, and providing increased health and safety protections compared to truck shipments.”** This proposed PHMSA rule would simply add yet another way for transport of hazardous methane, in the especially hazardous form of LNG, and the health and safety protections claimed by PIOGA are absent from the proposed rule. If PHMSA’s assumption of low initial volume and frequency of LNG by rail were true, LNG by rail would do little to lessen LNG by truck. If those assumptions are not true, LNG by rail is too risky.
12. As the additional comment by Delaware River Network of January 13, 2020, points out, there is no evidence in the rulemaking documents of PHMSA consulting with the other agencies involved in permitting natural gas or LNG, namely the Federal Energy Regulatory Commission (FERC), the U.S. Department of Energy Office of Fossil Energy (FE), and the Coast Guard, as well as the U. S. Department of Defense and U. S. Department of Homeland Security. LNG regulation is already dangerously fragmented among those agencies. Exacerbating this regulatory gap. the Federal Energy Regulatory Commission has disclaimed jurisdiction over inland LNG export facilities without a formal Rulemaking to delegate the Commission's jurisdictional authority under the Natural Gas Act to other federal or state agencies. In Jacksonville, Florida, alone, Eagle Maxville LNG was permitted by FE, Eagle LNG by FERC, and JAX LNG by neither, with nothing but a letter from the Coast Guard to show. Now PHMSA proposes to further enable shuffling LNG by rail from and among these questionably permitted LNG liquefaction facilities, in addition to the truck and rail LNG transport already in use. This rule would