

facilities where federal jurisdiction is unknown and where there are unanswered questions concerning compliance with the Federal Safety Standards for LNG Facilities and NEPA. A brief list is included in FERC [Accession Number 20210817-4000](#), “Comments of WWALS Watershed Coalition re NFE Miami LNG under CP20-466.” Should you require further details or more specific examples, we are happy to provide them.

Solutions

Ideally, the Commission should, as Chairman Glick suggested, “reconsider” and “revisit” *Shell*, as well as *Emera* and *Pivotal*, and revoke all three.

Meanwhile, we petition for the Commission to issue a formal *Rulemaking* mandating developers of proposed small-scale inland Liquid Natural Gas (LNG) export facilities file *Petitions for Declaratory Order* with the Commission in order for FERC to determine federal jurisdiction before a developer proceeds with a project.

Any consideration afforded this request is sincerely appreciated.

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/s
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