

that lack of oversight by FERC does not lead to more risk to human life, the environment, and climate. WWALS thus has a substantial interest in the instant request for rulemaking and any processes arising therefrom.

WWALS contributed to the lawsuit Sierra Club won against FERC and Sabal Trail, which has been cited by New York State in denying a permit that caused the demise of the Constitution Pipeline, by the U.S. Sixth District Court in vacating oil and gas leases in the Gulf of Mexico, and by FERC itself in its new Greenhouse Gas Guidelines. Recent research has revealed far more methane leaks than had previously been known. See **III.D. Importance of methane as a greenhouse gas acknowledged by courts and FERC.** In the light of this renewed attention to greenhouse gases, it is time for FERC to take back up its oversight of small inland LNG operations.

B. LEAD Agency, Inc. (“LEAD”)

Oklahoma is a large source for this natural gas and we are tired of the earthquakes that have ruined and damaged our homes as a result of fracking for the gas and oil in our state. It has not only ruined hundreds of homes, including destroying Earl Hatley’s (Grand Riverkeeper) and damaging Rebecca Jim’s (Tar Creekkeeper), it has and will continue to cause ground and surface water contamination in the state. Thus LEAD Agency, Inc., the parent organization of Grand Riverkeeper and Tar Creekkeeper, support this petition to hold FERC accountable for these facilities and ultimately our climate.

LEAD members, collectively and individually, have a substantial interest in ensuring that lack of oversight by FERC does not lead to more risk to human life, the environment, and climate. LEAD thus has a substantial interest in the instant request for rulemaking and any processes arising therefrom.

C. Kissimmee Waterkeeper (“Kissimmee”)

In the flatlands of Florida, the state most already and soon even more affected by climate change, Kissimmee Waterkeeper and its members have a direct interest in preventing the greenhouse gases released by LNG operations with no FERC oversight, as well as in the more immediate risks from LNG trucks and trains passing nearby. Individually, have a substantial interest in ensuring that lack of oversight by FERC does not lead to more risk to human life, the environment, and climate. Kissimmee thus has a substantial interest in the instant request for rulemaking and any processes arising therefrom.