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WWALS is an IRS 501(c)(3) nonprofit  
charity est. June 2012

*WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.*

*Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.*



July 19, 2022

To: Honorable Kimberly D. Bose, Secretary  
kimberly.bose@ferc.gov  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Chairman Richard Glick  
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**Re: Rule 207(a)(4) Petition for Rulemaking for Small-Scale Inland LNG Export Facilities in FERC Docket No RM22-\_\_-000**

Dear Secretary Bose:

Enclosed is the Petition of WWALS Watershed Coalition, Inc., LEAD Agency, Inc., Kissimmee Waterkeeper, Our Santa Fe River, Center for a Sustainable Coast, Three Rivers Waterkeeper, and Lumber Riverkeeper, for Rulemaking on FERC oversight of LNG Export facilities. As detailed therein, the Petitioners respectfully request that the Commission issue a Notice of Proposed Rulemaking (“NOPR”) to ensure that the Commission is carrying out its statutory responsibilities under the letter of the law, specifically the Commission’s jurisdiction under section 3 of the Natural Gas Act (“NGA”), by revisiting and reconsidering Commission decisions that a Liquid Natural Gas (“LNG”) facility must be connected to a pipeline to qualify as an LNG terminal, or that such a facility must be located where ocean-going ships directly load LNG for export to be considered an LNG export facility.

If there are any questions, please do not hesitate to contact us.

Respectfully submitted,

John S. Quarterman, Suwannee RIVERKEEPER®

/s

WWALS Watershed Coalition, Inc.

Earl L. Hatley, President

/s

LEAD Agency, Inc. (Grand Riverkeeper®, Tar Creekkeeper®)

John C. Capece, Ph.D., Executive Director and Waterkeeper

/s

Kissimmee Waterkeeper®

Terry Phelan, Interim President

/s

Our Santa Fe River, Inc.

David Kyler, Director

/s

Center for a Sustainable Coast

Heather Hulton VanTassel, Executive Director

/s

Three Rivers WATERKEEPER®

Jefferson Currie II, Lumber Riverkeeper®

/s

Winyah Rivers Alliance