

While we are not known as cheerleaders for FERC, it nonetheless seems clear that if FERC had retained oversight of Strom, LNG, most of the above would not have happened and most likely Strom LNG would have been gone years ago.

4. Eagle Maxville LNG

16236 Normandy Blvd, Jacksonville, FL 32234. 16236 Normandy Blvd, Jacksonville, FL 32234.

<https://www.eaglelng.com/facilities/maxville-facility> DOE/FE Order No. 4078, September 15, 2017, authorized Eagle Maxville to export 0.01 billion cubic feet per day (Bcf/d) of LNG, “to anywhere in the world not prohibited by U.S. law or policy. Eagle Maxville intends to export to markets in the Caribbean Basin and elsewhere in the region.”

https://www.energy.gov/sites/prod/files/2017/09/f36/ord4078_0.pdf

<https://www.energy.gov/articles/us-department-energy-authorizes-eagle-maxville-small-scale-liquefied-natural-gas-exports>

Operating since 2018. We do not locate a PHMSA Operator Identification Number. We do not know if this facility is in compliance with all of the Federal Safety Standards for LNG Facilities found in CFR Title 49, Subpart B, Part 193. In December 2020 Eagle Maxville LNG asked DoE/FE to extend its export permit term through 2050.

<https://www.federalregister.gov/documents/2020/12/07/2020-26780/eagle-lng-partners-jacksonville-ii-llc-application-to-amend-export-term-through-december-31-2050-for>

This company has a FERC-jurisdictional sister company: Eagle LNG Partners Jacksonville, LLC.

5. JAX LNG of Pivotal LNG

9225 Dames Point Rd, Jacksonville, FL 32226. <https://jaxlng.com/> JAX LNG was installed years later than the three Pivotal LNG liquefaction facilities in Georgia, and one each in Alabama and Tennessee. JAX LNG thus was not mentioned in the 2015 FERC Order regarding its Petition for Declaratory Order (*Pivotal*), because JAX LNG did not exist at that time. We can find no authorization for JAX LNG by FERC, FE, or MARAD; only a letter from the Coast Guard. Nonetheless, JAX LNG in May 2021 announced plans to triple its liquefaction capacity and double its LNG storage, both by 2022. <https://www.jaxdailyrecord.com/article/jax-lng-tripling-liquefaction-capacity-at-dames-point-facility>

D. Importance of methane as a greenhouse gas acknowledged by courts and FERC

Greenhouse gases, including methane from natural gas, have increasingly become recognized in legal precedents, starting with Sierra Club’s D.C. Circuit Court win against FERC and Sabal Trail in 2017, with co-plaintiffs Chattahoochee