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November 22, 2022

Via E-File & US Mail:  
Office of the Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, D.C. 20426

**Re: COMPLAINT REQUESTING FAST TRACK PROCESSING  
Driftwood LNG LLC  
Docket No. CP17-117-000**

### **Introduction**

Healthy Gulf and Sierra Club (collectively “Healthy Gulf” or “Complainants”) submit this complaint pursuant to 18 C.F.R. § 385.206 to address Driftwood LNG’s unauthorized construction in violation of FERC’s Section 3 and 7 Authorization Order (hereinafter “FERC Authorization Order”).<sup>1</sup> Conditions 10 and 20 of FERC’s Authorization Order prohibit any construction without prior, written authorization. FERC does not appear to have authorized any pile driving activity beyond placement of thirty-four test piles.<sup>2</sup> However, on November 15,

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<sup>1</sup> 167 FERC ¶ 61,054 (Apr. 18, 2019), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20190418-3085&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190418-3085&optimized=false) [hereinafter “FERC Authorization Order”].

<sup>2</sup> Driftwood LNG, LLC, Implementation Plan - B Supplement under CP17-117 et al (May 22, 2019), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20190522-](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190522-)

2022, the Chief Executive of Tellurian, Driftwood’s parent company, posted a YouTube video stating that Driftwood had installed over 4,000 piles.<sup>3</sup> Similarly, FERC does not appear to have authorized any foundation construction or cement pouring, but this video documents “foundation pours” in “plant 1 compressor areas.” Driftwood’s pile-driving and foundation activities are brazen violations of the express terms of the FERC Authorization Order for the project and unreasonably accelerate the pace of construction without necessary safeguards. FERC must take immediate action to stop Driftwood’s illegal onsite activities.

This complaint is being filed against:

Driftwood LNG, LLC.  
1201 Louisiana Street, Suite 3100  
Houston, TX 77002

Driftwood is a wholly owned subsidiary of Tellurian, Inc.

### **Background**

On April 18, 2019, FERC issued its authorization under the Natural Gas Act for the construction and operation of the Driftwood LNG facility, which is located on the west bank of the Calcasieu River in Calcasieu Parish, Louisiana.<sup>4</sup> In authorizing LNG export terminals under the Natural Gas Act, FERC has the authority to issue such authorizations “upon such terms and conditions as the Commission find[s] necessary or appropriate.” 15 U.S.C. § 717b(e)(3)(A). FERC’s Authorization Order approving the Driftwood LNG export terminal expressly

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5160&optimized=false; *see also* Driftwood LNG, LLC, Implementation Plan - B (Test Piles) under CP17-117.et al. (May 22, 2019), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20190522-5121&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190522-5121&optimized=false).

<sup>3</sup> Tellurian, Inc., *Two minutes with Charif Souki and Samik Mukherjee on the Driftwood LNG Project*, YOUTUBE (Nov. 15, 2022), <https://www.youtube.com/watch?v=oGMoM9xn8lQ> [hereinafter “Driftwood Construction Video”].

<sup>4</sup> FERC Authorization Order, *supra* note 1.

prohibits Driftwood from commencing any construction without first obtaining written authorization to do so from the Director of the Office of Energy Projects.<sup>5</sup>

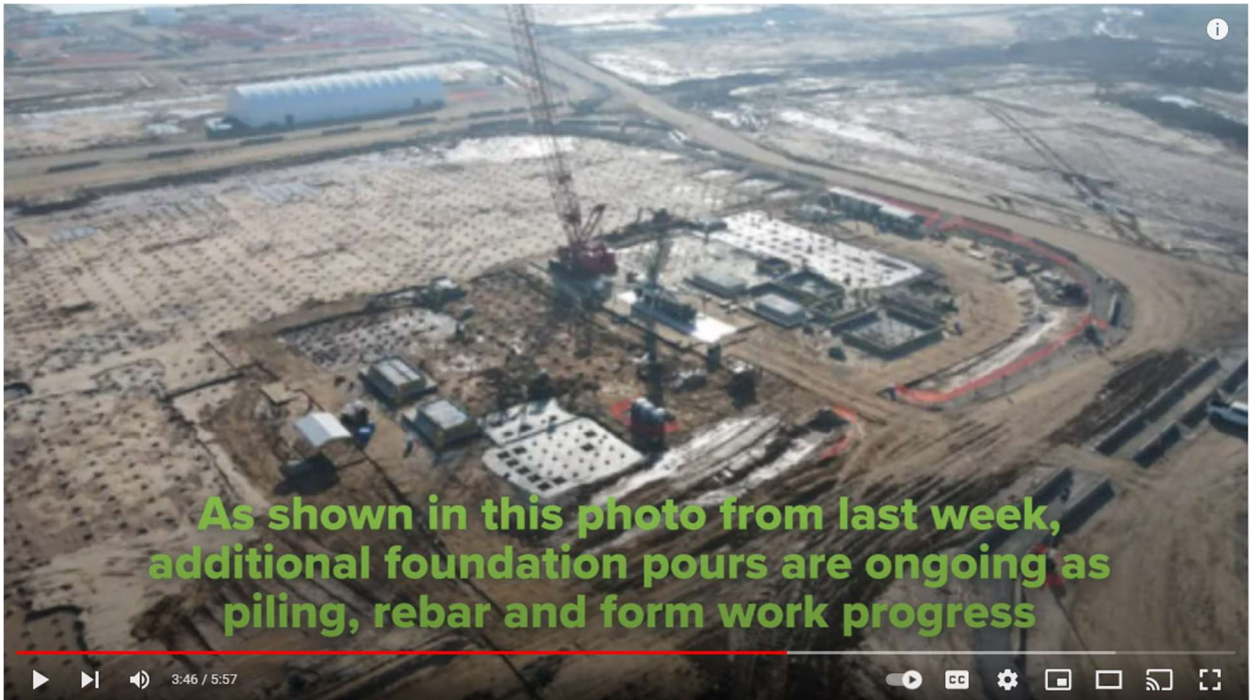
On November 15, 2022, the Chief Executive of Tellurian, Driftwood's parent company, posted a YouTube video meant to inform the company's investors about the status of construction at the Driftwood site.<sup>6</sup> The video included drone footage of construction, identified that over 4,000 piles have been installed, highlighted the construction of the foundation at one of the compressor stations, and indicated that Driftwood intends to continue with foundation installation for several months. Screenshots of the video are included for reference below:



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<sup>5</sup> *Id.* at P 51, Condition 10 & P 53, Condition 20(c).

<sup>6</sup> Driftwood Construction Video, *supra* note 3.



## Rule 206(b) Statement

1. *Clearly identify the action or inaction which is alleged to violate applicable statutory standards or regulatory requirements; and*
2. *Explain how the action or inaction violates applicable statutory standards or regulatory requirements.*

FERC has exclusive authority under the Natural Gas Act to regulate “the siting, construction, expansion, or operation” of the Driftwood LNG project under Section 3 of the Natural Gas Act. 15 U.S.C. § 717b(e)(1). And FERC may place conditions on any such approval. 15 U.S.C. § 717b(e)(3)(A). Here, FERC’s Authorization Order prohibits Driftwood from commencing any construction of the facility without first obtaining written authorization.<sup>7</sup> Thus, any construction for which Driftwood has not received express, written authorization violates FERC’s Authorization Order and 15 U.S.C. §§ 717b(e)(1), (e)(3)(A).

As noted in the Introduction and Background section above, Driftwood has stated that it is conducting extensive pile driving and foundation construction activities at the project site. Driftwood has claimed those activities are part of its limited notice to proceed and early works program. However, FERC has only issued four letters with limited notices to proceed, none of which authorize these pile-driving or foundation activities:

1. On June 6, 2019, FERC authorized the preliminary phase of a test pile program.<sup>8</sup> Driftwood had explained that the program would consist of an Early Pile Test (consisting of two test piles) as well as Phase I and Phase II (collectively consisting of “a total of thirty-four indicator test piles with PDA/CAPWAP analysis and nine static load tests”).<sup>9</sup> In its October 2022

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<sup>7</sup> See FERC Authorization Order, *supra* note 1, at P 51, Condition 10 & P 53, Condition 20(c).

<sup>8</sup> Letter order granting Driftwood LNG LLC's et al. 5/22/19 filing to commence the installation of test piles at the Driftwood LNG Project under CP17-117 et. al (Jun. 6, 2019), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20190606-3050&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190606-3050&optimized=false).

<sup>9</sup> Driftwood LNG, LLC, Implementation Plan - B Supplement under CP17-117 et al (May 22, 2019, [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20190522-](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190522-)

Status Report, Driftwood asserted that FERC approved Phases I and II of the Test Pile program on May 19, 2022.<sup>10</sup> We could not locate such a May 19, 2022 order in the docket. Regardless, at most, the Test Pile program would authorize a maximum of 36 test piles and nine static load tests.

2. On December 11, 2019, FERC authorized Driftwood to “commence site preparation activities identified as vegetation clearing and grading, demolition and removal of existing site buildings and infrastructure, commencement of the dry excavation, preparation of the pioneer docks and marine offloading facility, and dredging of the marine berths at the Driftwood LNG Facility.”<sup>11</sup> This authorization did not list any pile driving or foundation construction.
3. On June 21, 2022, FERC approved (1) Driftwood’s pile driving noise management plan, and (2) Driftwood’s request for an additional “temporary workspace that will facilitate delivery and storage of construction material.”<sup>12</sup> In approving the noise management plan, FERC did not authorize Driftwood to start construction under the plan, but rather approved Driftwood’s plan to manage the noise from future, yet-to-be-authorized pile

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5160&optimized=false; *see also* Driftwood LNG, LLC, Implementation Plan - B (Test Piles) under CP17-117 et al. (May 22, 2019), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20190522-5121&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190522-5121&optimized=false).

<sup>10</sup> Driftwood LNG, LLC, Monthly Construction Report for October 2022 (Nov. 18, 2022), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20221118-5055&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20221118-5055&optimized=false).

<sup>11</sup> Letter order granting Driftwood LNG LLC's 11/12/2019 request to commence site preparation activities identified as vegetation clearing and grading, etc. for the Driftwood LNG Project under CP17-117 et al (Dec. 11, 2019), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20191211-3019&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20191211-3019&optimized=false).

<sup>12</sup> Letter order granting Driftwood LNG LLC's May 9, 2022, as supplemented on June 16, 2022 variance request No. 1 and Pile Driving Noise Management Plan for the Driftwood LNG Project under CP17-117 (Jun. 21, 2022), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20220621-3024&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220621-3024&optimized=false).

driving. This is merely consistent with Condition 24's requirement for Driftwood to submit such a plan for approval.

4. On November 7, 2022, FERC authorized Driftwood to “construct select underground piping and grounding cable installations in the Mixed Refrigerant Compressor Area.”<sup>13</sup> This authorization approved Driftwood's September 29, 2022, request, wherein Driftwood described the activities as “underground piping and grounding cable installation activities for the DWLNG Facility in the Mixed Refrigerant (MR) Compressor Area.”<sup>14</sup> The piping relates to “fire water, eye-wash/safety-shower, and drain connections.”<sup>15</sup> There is no indication in the publicly available documents that this letter order granted Driftwood authority to drive any piles or pour any concrete.

Separately, Driftwood has requested authorization to commence “piling,” “wall,” and “foundation slab” activities for LNG Tanks 1T-2401 and 1T-2402 under Implementation Plan E.<sup>16</sup> However, there is no record in the docket of FERC granting such authorization.

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<sup>13</sup> Letter order granting Driftwood LNG LLC's 09/29/2022 request to construct select underground piping and grounding cable installations in the Mixed Refrigerant Compressor Area under CP17-117 (Nov. 15, 2022), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20221115-3020&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20221115-3020&optimized=false).

<sup>14</sup> Driftwood LNG, LLC, Implementation Plan – F, Underground Piping and Grounding Cables for the Driftwood Project under CP17-117 (Sep. 29, 2022), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20220929-5076&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220929-5076&optimized=false).

<sup>15</sup> *Id.* at PDF 4.

<sup>16</sup> Driftwood LNG, LLC, Implementation Plan – E, LNG Tanks Foundation Design Drawings for the Driftwood LNG Facility under CP17-117 (Aug. 10, 2022), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20220810-5115&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220810-5115&optimized=false); Driftwood LNG, LLC, Supplement No. 1 to Implementation Plan - E re LNG Tanks Design Drawings and Calculations for Driftwood Project under CP17-117 (Aug. 10, 2022), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20220810-5161&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220810-5161&optimized=false); Driftwood LNG, LLC, Supplement No. 2 to

Similarly, Driftwood has not received approval to begin construction under Implementation Plan D, relating to pile driving activities. Although Driftwood submitted that plan and various supplements to FERC,<sup>17</sup> Driftwood neither requested FERC's approval of that plan nor FERC's authorization to conduct activities under that plan. As a result, there is no record in the docket of FERC providing authorization to conduct pile driving activities pursuant to Implementation Plan D.

The video shows foundation activities at "Plant 1 compressor areas" and the driving of approximately 4,000 piles. There is no indication that FERC has approved foundation laying activities for these areas or 4,000 piles. Similarly, there is no indication that Driftwood has even *requested* authorization to undertake such activities in these areas. The video also indicates that Driftwood plans to continue with these flagrant, unauthorized activities absent intervention.<sup>18</sup>

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Implementation Plan - E re LNG Tanks Design Drawings and Calculations for Driftwood Project under CP17-117 (Aug. 25, 2022),  
[https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20220825-5135&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220825-5135&optimized=false).

<sup>17</sup> Driftwood LNG, LLC, Implementation Plan - D under Docket Nos. CP17-117 and CP17-118 (Feb. 5, 2020),  
[https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20200205-5050&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20200205-5050&optimized=false); Driftwood LNG, LLC, Supplement to Implementation Plan - D for the Driftwood LNG Facility and Driftwood Pipeline Project under CP17-117 (Jun. 3, 2022),  
[https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20220603-5173&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220603-5173&optimized=false); Driftwood LNG, LLC, Supplement to Implementation Plan - D in Compliance with Condition 30b for the Driftwood LNG Facility under CP17-117 (Sep. 12, 2022),  
[https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20220912-5184&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20220912-5184&optimized=false).

<sup>18</sup> Additional photos of pile driving and concrete pouring at the site are attached to Driftwood's October, 2022 Monthly Construction Report available at Driftwood LNG, LLC, Monthly Construction Report for October 2022 (Nov. 18, 2022),  
[https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20221118-5055&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20221118-5055&optimized=false).



3. *Set forth the business, commercial, economic or other issues presented by the action or inaction as such relate to or affect the complainant;*
4. *Make a good faith effort to quantify the financial impact or burden (if any) created for the complainant as a result of the action or inaction; and*
5. *Indicate the practical, operational, or other nonfinancial impacts imposed as a result of the action or inaction, including, where applicable, the environmental, safety or reliability impacts of the action or inaction.*

Driftwood is causing a quantifiable impact inasmuch as it is has driven approximately 4,000 piles with more expected and a discernible amount of foundation is being poured and acreage displaced to make more construction imminent. This is reflected in the video screen-shots included above. This is causing significant harm to the Complainants in four primary ways.

First, the Complainants are non-profit membership environmental organizations whose members use the Calcasieu Pass area near the site for boating, fishing, birding, wildlife study, and recreation. The unauthorized construction fails to provide the procedural safeguards needed to ensure that construction proceeds in a safe and responsible manner. As a result, Driftwood is causing environmental harms without FERC's oversight or approval. This includes noise and vibration from pile-driving which impacts surrounding communities and birds and wildlife.<sup>19</sup> These impacts can be heard at Calcasieu Point and therefore interferes with Complainants' members' use and enjoyment of that area.<sup>20</sup> The increased traffic from these unauthorized construction activities also interferes with Complainants' members' commutes and times to get children to school.

Second, the unauthorized construction also places a financial burden on Complainants because the purpose of both organizations is to protect against unlawful environmental harm and protect nearby communities. By not complying with the FERC Authorization and going forward without adequate procedure, Driftwood is requiring both organizations to expend significant resources and staffing to monitor Driftwood's actions to prevent these harms from occurring.

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<sup>19</sup> See Final Environmental Impact Statement, 4-173 – 4-174, 4-183 – 4-184, 4-83 (Jan. 2019), [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20190118-3018](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20190118-3018).

<sup>20</sup> See *id.* at 4-184 (showing noise impacts at NSA M6).

Third, Healthy Gulf has pending litigation challenging the U.S. Army Corps of Engineers' ("Corps") Clean Water Act Section 404 permit for the facility.<sup>21</sup> That challenge relates to whether Driftwood should be allowed to use this site, at all, or whether the Corps was required to instead require Driftwood to construct on a nearby site that would destroy at least 50 fewer acres of wetlands. By failing to seek and obtain the requisite approvals for its pile-driving and foundation activities, Driftwood is expediting the pace of construction, without the required environmental safeguards, potentially frustrating Healthy Gulf's ability to obtain effective relief from the court before the wetlands at the project site are irreparably destroyed. Because FERC is responsible for overseeing Driftwood's construction, and has a duty to enforce its certificate and act in the public interest, it is appropriate for FERC to enforce the terms of its Authorization Order, including prohibiting any construction activities that are not expressly authorized by FERC.

Fourth, rushed construction activities now may cause unnecessary harm to the environment because Driftwood faces substantial financial obstacles to completing the LNG project. Driftwood has not made a "final investment decision," and it recently withdrew a \$1 billion high-yield bond sale<sup>22</sup> and lost two of its major sales contracts.<sup>23</sup> Entami Corp., a Driftwood shareholder that "specializes in event-driven and distressed-debt investing," also recently demanded that Tellurian put itself up for sale, claiming that the company lacks the expertise, financial resources, and "institutional credibility" to complete the LNG facility.<sup>24</sup> Thus, the Driftwood project faces substantial headwinds to continuing with construction and ultimately becoming operational. Yet, the company is diving headlong into

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<sup>21</sup> *Healthy Gulf v. U.S. Army Corps of Eng'rs*, No. 22-60397 (5th Cir. petition for review filed July 19, 2022).

<sup>22</sup> Jill R. Shah, *Tellurian Plunges After Axing \$1 Billion Bond for LNG Plant*, BLOOMBERG (Sept. 19, 2022), <https://www.bloomberg.com/news/articles/2022-09-19/tellurian-pulls-1-billion-bond-deal-leaving-lng-site-in-limbo> (attached).

<sup>23</sup> *Tellurian Says Driftwood LNG Deals with Shell, Vitol Scrapped*, REUTERS (Sept. 23, 2022), <https://www.reuters.com/business/energy/tellurian-says-driftwood-lngdeals-with-shell-vitol-scrapped-2022-09-23/> (attached).

<sup>24</sup> Jill R. Shah, *Tellurian Investor Demands Sale of LNG Developer, Cites Nepotism*, BLOOMBERG LAW (Sept. 16, 2022), <https://news.bloomberglaw.com/esg/tellurian-investor-demands-sale-oflng-developer-cites-nepotism> (attached).

invasive construction operations that will cause irreparable environmental harm, without authorization.

6. *State whether the issues presented are pending in an existing Commission proceeding or a proceeding in any other forum in which the complainant is a party, and if so, provide an explanation why timely resolution cannot be achieved in that forum.*

Complainants have not intervened in and are not parties to Commission Docket No. CP17-117-000. Complainants are not able to present this issue in that forum. The unauthorized construction activities are not at issue in that docket because neither the Commission nor any of the parties have raised this issue. Nor are any of the parties likely to raise it because the only intervenors are other LNG and pipeline companies.<sup>25</sup> No public interest or environmental groups are intervenors in CP17-117-000.

These unauthorized construction activities are also not at issue in the Complainants' litigation against the Corps as noted above. That involves claims for the Corps' violations of the Clean Water Act Section 404 and Corps' regulations, not Driftwood's non-compliance with the FERC Authorization. Therefore, timely resolution cannot be achieved in those forums.

7. *State the specific relief or remedy requested, including any request for stay or extension of time, and the basis for that relief.*

Healthy Gulf requests FERC to issue an order requiring Driftwood LNG to immediately cease all unauthorized construction at the site pending the resolution of this complaint and to conduct an onsite investigation to quantify the unauthorized environmental harms Driftwood is currently causing. Specifically, Healthy Gulf requests that FERC prohibit Driftwood from continuing with any pile driving in excess of its test pile program, any further pile driving (e.g., driving of up to 21,000 piles), constructing the foundations for the compressors or any other facility components, or conducting any construction upon such foundations.

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<sup>25</sup> Intervenors include: Magnolia LNG, LLC; Lake Charles Pilots Association LLC; Cameron LNG, LLC; Port Arthur Pipeline, LLC; Cameron Interstate Pipeline, LLC; Cheniere LNG Terminals; and Kinder Morgan Louisiana Pipeline LLC. FERC Authorization Order, *supra* note 1, at P 8.

Healthy Gulf further requests that FERC take any additional action that it deems appropriate.

8. *Include all documents that support the facts in the complaint in possession of, or otherwise attainable by, the complainant, including, but not limited to, contracts and affidavits;*

See the FERC letter orders and Driftwood's FERC filings set out in the footnotes above, which are in FERC's possession. The footnotes also contain links to additional documents relied on, including the YouTube video from Tellurian, Inc. documenting the status of construction at the Driftwood LNG site as well as three articles discussing recent developments relevant Driftwood's ability to complete the project. The three articles are attached to this complaint.

9. *State (i) Whether the Enforcement Hotline, Dispute Resolution Service, tariff-based dispute resolution mechanisms, or other informal dispute resolution procedures were used, or why these procedures were not used; (ii) Whether the complainant believes that alternative dispute resolution (ADR) under the Commission's supervision could successfully resolve the complaint; (iii) What types of ADR procedures could be used; and (iv) Any process that has been agreed on for resolving the complaint.*

Counsel for Complainants called the Enforcement Hotline on November 21, 2022 to inform FERC of this situation. However, it is not required that Complainants use the Enforcement Hotline because this complaint regards a matter that is before the Commission in Docket No. CP17-117-000. 18 C.F.R. § 1b.21 ("The Hotline Staff may not resolve matters that are before the Commission in docketed proceedings.").

Complainants do not believe that alternative dispute resolution ("ADR") under the Commission's supervision could successfully resolve the Complaint as the unauthorized construction is on-going, and there is no time for ADR. Driftwood LNG's senior leadership has publicly stated an express intention to continue with the construction activities at issue. In addition, no process has been agreed upon to resolve this Complaint. FERC must take immediate action to prevent further harm.

*10. Include a form of notice of the complaint suitable for publication in the Federal Register in accordance with the specifications in § 385.203(d) of this part. The form of notice shall be on electronic media as specified by the Secretary.*

See attached. Healthy Gulf also provided a digital copy of the notice to FERC. Additional copies in additional formats can be provided upon request.

*11. Explain with respect to requests for Fast Track processing pursuant to section 385.206(h), why the standard processes will not be adequate for expeditiously resolving the complaint.*

This complaint requires expeditious resolution because Driftwood is currently constructing the facility, and carrying out the unauthorized activities and will continue to do so while this complaint is being resolved. In the meantime, Driftwood is causing significant environmental harm and harming neighbors and wildlife through increased noise and extensive construction operations. The drone footage and video posted by Tellurian demonstrates the scale of this harm and Driftwood's intent to continue perpetuating that harm until FERC intervenes.

## Conclusion

For the reasons set forth above, Healthy Gulf requests that FERC commence an immediate investigation of Driftwood's unauthorized construction and issue a Cease and Desist Order on the unauthorized construction unless and until Driftwood applies for and receives proper authorization for its activities as described herein. Healthy Gulf further requests that FERC take any additional action that it deems appropriate.

Respectfully submitted this 22nd day of November, 2022.

/s/ Thomas Gosselin

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*Attorneys for Healthy Gulf and Sierra Club*

**VERIFICATION PURSUANT TO 28 U.S.C. § 1746**

I verify under penalty of perjury that the foregoing is true and correct.  
Executed on November 22, 2022.

**/s/ Thomas Gosselin**

Thomas Gosselin

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### Certificate of Service

I hereby certify under penalty of perjury that on this day I caused the foregoing document and included attachments to be served upon the persons listed below, including each person designated on the official service list for FERC Docket No. CP17-117.

<b>Party</b>	<b>Persons to be Served</b>	
Driftwood LNG LLC	Lisa Tonery Attorney ORRICK, HERRINGTON & SUTCLIFFE, LLP 51 West 52nd St New York, NEW YORK 10019 UNITED STATES ltonery@orrick.com	Mariah T Johnston 51 West 52nd St 22 <sup>nd</sup> Floor New York, NEW YORK 10019 mjohnston@orrick.com
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Cameron LNG, LLC	Richard A. Siegel Director, Regulatory Compliance Cameron LNG, LLC 2925 Briarpark Dr, Suite 1000 Houston, TEXAS 77042 rsiegel@cameronlng.com	



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Cheniere LNG Terminals, LLC	Sean P Jamieson General Counsel Spire Marketing Inc. PO Box NA Houston, 77046 sean.jamieson@spireenergy.com	Mona Tandon Partner Van Ness Feldman LLP 1050 Thomas Jefferson Street, NW Washington, DISTRICT OF COLUMBIA 20007 mxt@vnf.com
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Kinder Morgan Louisiana Pipeline LLC	Bruce H. Newsome Vice President Kinder Morgan Louisiana Pipeline LLC 3250 Lacey Road, Suite 700 Downers, Grove, ILLINOIS 60515-7918 (630) 725-3070 bruce_newsome@kindermorgan.com  Karen Z. Ferazzi Attorney for Kinder Morgan Louisiana Pipeline LLC 1001 Louisiana Street Houston, TEXAS 77002 (713) 369-9354 karen_ferazzi@kindermorgan.com	J. Curtis Moffatt Deputy General Counsel 1001 Louisiana Street Houston, TEXAS 77002 (713) 420-4998 curt_moffatt@kindermorgan.com

RESTORE	RESTORE RESTORE RESTORE RESTORE PO Box 233 Longville, LOUISIANA 70652-0233 UNITED STATES michaeltritico@yahoo.com	
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Dated at San Antonio, TX November 22, 2022.

***/s/ Thomas Gosselin*** \_\_\_\_\_

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