

March 10, 2020

Chairman Neil Chatterjee
Commissioner Richard Glick
Commissioner Bernard L. McNamee
Federal Energy Regulatory Commission
888 First St., N.E.
Washington, D.C. 20426

RE: San Juan Natural Gas Terminal

Dear Chairman Chatterjee and Commissioners,

The purpose of this letter is to request your urgent intervention and exercise of jurisdiction in relation to the on-going construction and proposed operation of a natural gas (LNG) terminal in the Bay of San Juan by New Fortress Energy LLC (NFE). This facility is being constructed without prior authorization, regulatory based risk assessment, and environmental based scrutiny by FERC.

Our group represents thousands concerned citizens living in or around the area of the proposed LNG Terminal. We are a community of Cristian churches from various denominations in the Municipalities of San Juan, Guaynabo and Cataño. These churches include: (1) Iglesia Cristiana (Discípulos de Cristo) in Amelia, Guaynabo (serving Barrio Pueblo Viejo de Guaynabo, Sabana, Amelia, Vietnam, La Puntilla and others sectors between Guaynabo & Cataño); (2) Iglesia Cristiana (Discípulos de Cristo) in San Patricio (serving Northeast/Northwest Puerto Nuevo and Barriada Borinquen); (3) Iglesia Luterana El Redentor (serving Puerto Nuevo); and (4) Iglesia Cristiana (Discípulos de Cristo) of Puerto Nuevo (serving Puerto Nuevo and the Hermanas Dominicanas de la Santa Cruz community in Cataño). Our group is also backed by the Puerto Rican Council of Churches with more than 500 congregations among its ranks. Combined, our group represents more than a dozen pastors seeking answers as to why a project such as this has not been audited by FERC.

We write to you as citizens, concerned with the development of an LNG Terminal less than half a mile from our communities. This is letter's objective is to convey our fear regarding this new industry being developed so close to our homes and schools, and to request that FERC take an immediate and active role in supervising the development of this LNG Terminal.

On March 5, 2019, the Puerto Rico Power Authority (PREPA) and NFE entered into an agreement to set up the infrastructure to import, store, and distribute LNG between the San Juan Electric Facility located in dock A and B, belonging to the Port Authority. An integral part of this Project is the storage of methane gas in a vessel which would dock permanently or semi-permanently in a vessel known as a Floating Storage Unit (FSU). From this facility, gas will be transported to the San Juan Electric Facility and to a separate distribution dock equipped to service individual gas deliveries. By necessity, the operation would involve the repeated transit of vessels with methane gas from the mouth of San Juan Bay to the site at the other end of San Juan Bay.

The sale and delivery of methane gas would take place under a contract between NFE and PREPA, which has a potential duration of up to 20 years. The process has been fraught with procedural deficiencies and an overall lack of clarity and transparency. One of the most notable oversights of this process is the absence of FERC throughout the entire process.

It is our understanding that FERC has jurisdiction over all LNG Terminals pursuant to Section 3 of the Natural Gas Act (15 USC § 717b (2012)). We understand that many of these projects have concurring jurisdiction with other agencies. However, despite meeting with the statutory description of what should be a FERC supervised LNG Terminal, no federal agency has assumed jurisdiction over the approval and construction of the new terminal. Furthermore, neither the Government of Puerto Rico nor NFE have the experience in managing this type of fuel, which increases the probability of a catastrophic accident.


We have gained access to several reports, including those from Sandia Laboratories, which provides us with a clear understanding of the potential perils of this new technology and the necessity of having proper oversight over the terminal's development. Our investigations also reveal a surprising fact: no agency within the Government of Puerto Rico has considered the potential risks to human security of both nearby residents or PREPA employees, those on Kennedy Avenue, or on cruise ships. Permits were granted to build NFE's facilities but in an isolated and fragmented way from the implications of transit and handling of methane gas. Even worse, a study commissioned by PREPA to the company Galway Energy Advisors, LLC in 2015 pointed out risks and safety problems regarding the option of a floating ship to store and deliver methane gas. Furthermore, all reviewed studies have always contemplated the presence of FERC as a regulatory watchdog.

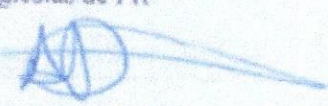
In addition to the available reports, the recent seismic events that have rocked the island over the first few weeks of 2020 have added a second layer of concern to the local citizens. It is imperative that Federal oversight be granted over the construction of these facilities, in order to assess their viability and quantify the risk it poses to the surrounding communities, and to ensure that the facility meets the most stringent of safety requirements set forth by the National Fire Protection Association (NFPA) Code 50A, among others. Furthermore, the exclusion zones set by the Coast Guard in the Bay of San Juan for the importation and ship-based LNG storage are no substitute for the broader safety and environmental protections which FERC's regulations entail.


In conclusion, we request from FERC to take urgent steps to protect public safety, address community concerns, carry out an immediate investigation, require NFE to obtain the proper permits from FERC, and to stop construction of the LNG Terminal. We urge you, as the statutorily designated Federal agency with jurisdiction over the natural gas industry. For further references or questions on this matter refer to: Rev. Carlos Negron, guifarra07@aol.com or 1-787-306-9563.


Respectfully,


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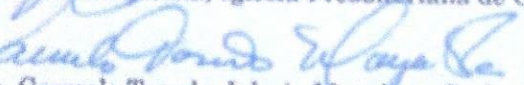

Obispo Emérito Rev. Felipe Lozada-Montañez, Presidente de la Junta de Directores del Concilio de Iglesias de PR



Rvdo. Abner Meléndez, Iglesia Cristiana (Discípulos de Cristo) Barrio Amelia, Guaynabo, PR

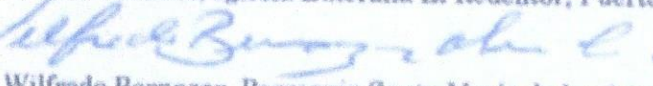

Rvdo. Luis A. González, Iglesia Cristiana (Discípulos de Cristo) San Patricio, Urb. Puerto Nuevo, San Juan, PR



Rvdo. Carlos Negrón, Iglesia Cristiana (Discípulos de Cristo) Puerto Nuevo, Urb. Puerto Nuevo, PR y Coordinador Hermandad Pastoral de Puerto Nuevo


Rvdo. Adolfo Santana, Iglesia Presbiteriana de Caparra Terrace, San Juan, PR

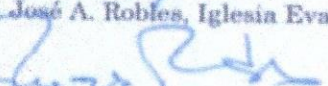

Rvdo. Carmelo Tosado, Iglesia Metodista Carlos Wesley, Reparto Metropolitano, San Juan, PR


Rvda. Diana Ceballos, Iglesia Luterana El Redentor, Puerto Nuevo, San Juan, PR


Hno. Wilfredo Bernazar, Parroquia Santa Maria de los Angeles, Ave. José de Diego, Urb. La Riviera, Puerto Nuevo, San Juan, PR


Hna. Lisette Aviles Rios, Comunidad de las Hermanas Dominicas de la Santa Cruz en Cataño, PR


Rvdo. José A. Robles, Iglesia Evangélica Unida Metropolitana, San Juan, PR


Rvdo. Eliezer Ronda, Iglesia Cristiana (Discípulos de Cristo) Metropolitana, San Juan, PR