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FERC Online eFiling
Comment to Docket PF15-3
Mountain Valley Pipeline (MVP)

To Whom It May Concern:

This comment is in opposition to the MVP Project. The proposed pipeline is not in the public interest because its full capacity can -- and will likely -- be fully absorbed by natural gas export volume in its first year of operation and beyond. Furthermore, it is not in the best interests of current and future generations of American citizens to encourage the export of domestically produced natural gas because of negative environmental and economic consequences, as well as serious infringement on the rights of individuals directly impacted by construction and operation of gas transmission infrastructure.

The full capacity of MVP (2 bcf/day[1]) satisfies just 20% of the projected export volume of natural gas (10.7 bcf/day[2]) in 2019, diminishing to less than 10% by 2040. MVP's termination point at the Transco Zone 5 compressor station will provide direct access to the Cove Point Liquid Natural Gas (LNG) export facility authorized for construction in Calvert County, MD.[3] Therefore, the MVP has the capacity, means, and likelihood of transporting gas to primarily serve the LNG export market.

Negative consequences resulting from natural gas exports include:[4]

- "Increased LNG exports lead to increased natural gas prices.
- "Increased LNG exports result in higher total primary energy use and energy-related CO_2 emissions in the United States.
- "Consumer expenditures for natural gas and electricity increase modestly with added LNG exports.
- "Added U.S. LNG exports result in higher levels of domestic consumption expenditures for goods and services in most cases."

[1] *Mountain Valley Pipeline Project Overview*, October 2014. http://mountainvalleypipeline.info/wp-content/uploads/2014/09/MVP-Initial-Project-Overview-Oct-2014-Rev-4.pdf
[2] *Annual Energy Outlook 2014*, U.S. Energy Information Administration. Natural Gas Imports and Exports Table, Reference Cases (3.90 and 8.02 annual trillion cubic feet, 2019 and 2040, respectively).
[3] FERC Docket CP13-113
[4] *Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets*, U.S. Energy Information Administration, October 29, 2014. http://www.eia.gov/analysis/requests/fe/

Not only does the MVP cause significant, direct harm to the individual landowners on and near the pipeline route, the negligible impact to overall economic output is negated by these adverse economic and environmental impacts to the general public.

Qualitative benefits frequently touted for this project are in direct conflict with the position of the U.S. Energy Information Administration (EIA). MVP's purpose is ostensibly to export LNG for sole benefit of natural gas producers, pipeline operators, and transporters. Individuals and localities in MVP's path will receive virtually no lasting benefit from a large-scale (36" to 42" diameter) interstate transmission pipeline. Despite proponents' suggestion that MVP will spur natural-gas-related economic activity along its route, there is zero evidence that any of the gas will be intentionally removed from the pipeline between its start and termination points.

For reasons outlined above, this proposed project is neither necessary nor does it constitute a public convenience. Therefore, it is incumbent upon FERC to deny the application for a Certificate of Public Convenience and Necessity by Mountain Valley Pipeline, LLC.

Sincerely,

Paul E. Washburn

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