

GASGATE

President Biden, following in Trump's footsteps, gave fossil fuel lobbyists everything on their wishlist to profit from the Ukraine war

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- > Within 24 hours of Russia’s attack on Ukraine, the secretive fossil fuel lobby group LNG Allies called on President Biden to take five specific actions to boost the liquefied natural gas (LNG) industry it represents, claiming they would support Europe’s response to the war.
 - > All five of LNG Allies’ demands became Biden administration policy within a matter of weeks, and now form a core part of U.S. efforts to counter Russia’s aggression.
 - > The measures include withdrawing U.S. environmental rules, greenlighting new LNG infrastructure and setting up a pro-LNG transatlantic task force, with LNG Allies boasting that the task force is a “*direct result*” of its lobbying.
 - > Expanding U.S. LNG infrastructure and exports will push the world closer to climate disaster and harm environmental justice communities, yet increasing supplies of LNG are not needed to support Europe’s response to the war in Ukraine.
 - > Instead of letting fossil fuel interests dictate U.S. energy policy as President Trump did, President Biden should deliver on his own campaign promises on climate and environmental justice, and listen to the climate youth and environmental justice movements that helped to elect him.
 - > At home and abroad, the U.S. government should promote genuinely sustainable measures to ensure environmental justice, protect the climate and truly strengthen energy security. These include accelerating the deployment of renewables and energy savings, alongside a rapid phaseout of fossil fuels.

Introduction

The day after Russia invaded Ukraine in February 2022, a little-known fossil fuel lobby group called LNG Allies wrote to President Biden urging him to “*take several specific actions to help bolster U.S. and European energy security right now, at this dangerous juncture, and in the months ahead.*”¹

The letter, dated February 25, listed five actions for President Biden to take in response to the invasion, all of which would boost the liquefied natural gas (LNG) industry that LNG Allies represents.

After LNG Allies sent its letter, some of the same demands were made in public lobbying by other industry groups, including the American Petroleum Institute and the Interstate Natural Gas Association of America.²

Over the following weeks and months, all five of LNG Allies’ demands became Biden administration policy, in some cases almost verbatim.

This investigation reveals how a central part of the U.S. government’s response to Russia’s attack on Ukraine was apparently dictated by an opaque fossil fuel lobby group.

It shows that LNG Allies' demands are little more than a cynical repackaging of policies that it and other fossil fuel lobbyists were advocating before the war, whose implementation will do little to benefit Europe and is damaging global efforts to tackle the climate emergency.

More LNG would damage the climate & local communities, and isn't needed

LNG Allies is using Russia's invasion of Ukraine to secure a long-term expansion of LNG, claiming higher U.S. exports to Europe would boost the continent's energy security and help it to stop importing gas from Russia.³

However, analyses show that the EU's security of supply, and its goal of ending dependence on Russian gas, do not require the construction of new gas infrastructure or additional imports of LNG.⁴

Accelerating the rollout of renewables and energy efficiency while – over the short term – keeping LNG imports at their 2019 level or lower would allow the EU to maintain energy security and exit Russian gas by 2025.⁵

Indeed, the EU is rapidly increasing efforts to cut demand for fossil gas, and it is not clear if there will be a market in Europe for U.S. LNG by the end of this decade.

Even if Europe needed more LNG to replace declining imports from Russia, the U.S. could increase shipments without building any new LNG export terminals.⁶

Who are LNG Allies?

LNG Allies is a corporate lobby group that claims to be the LNG industry's leading voice in the U.S. Its mission is to work *“with its members to open new [LNG] markets, expand existing markets, and establish strategic relationships.”*⁷

LNG Allies' website does not disclose who its members are or how the organization is funded. The only personnel shown are four individuals on

its leadership team, including the CEO Fred H. Hutchison.⁸

Global Witness asked LNG Allies to provide a list of its donors and members, but the group did not directly respond to this request, referring Global Witness to its tax filings.⁹ However, the only such publicly available filing, for year 2019, does not include information on the group's donors or members.¹⁰

According to the same 2019 filing, Hutchison is not paid by LNG Allies but through a company he owns called Franklin-Hamilton, which at one point was paying him \$20,000 per month through a management contract – an unusual arrangement for an association representing a multi-billion dollar industry.¹¹

Little financial information is publicly available about LNG Allies. According to its website, LNG Allies is the global brand name for the US LNG Association. Both the US LNG Association and Franklin-Hamilton companies are registered in Delaware, a notorious corporate secrecy jurisdiction.¹²

U.S. tax authorities revoked LNG Allies' tax-exempt status in 2019 for failure to file the required tax filing for three consecutive years – a breach of federal charity law that further obscures the group's financial information.¹³

According to LNG Allies' response to Global Witness, the US LNG Association was granted federal tax-exempt status in June 2022, retroactive to September 2019.

LNG Allies has financial ties to the American Petroleum Institute (API), a powerful oil industry lobby group. API tax filings show that it gave \$80,000 to LNG Allies and \$235,000 to Franklin-Hamilton over 2015 and 2016.¹⁴

As well as being unnecessary, new LNG investments would bring the world closer to climate disaster. Recently, the Intergovernmental Panel on Climate Change warned that emissions

from existing and planned fossil fuel infrastructure would push the world past the Paris Agreement goal of limiting global heating to 1.5°C.¹⁵

With operating lifespans of 30 to 80 years,¹⁶ new infrastructure such as LNG terminals and associated pipelines would lock-in the use of fossil gas for decades and is fundamentally at odds with climate science.¹⁷

A new buildout of U.S. gas infrastructure would also leave marginalized communities exposed to even more toxic pollution and health impacts caused by the industry.

Fossil gas infrastructure is located disproportionately near communities of color, and its export relies on projects that pose major health, safety and environmental risks for people living near gas extraction, transmission and processing sites.¹⁸

LNG Allies' demands & President Biden's actions

Here are LNG Allies' five demands, as set out in its February letter to President Biden, with a summary of the U.S. government's subsequent actions.

The letter was co-signed by three other fossil fuel groups including the American Exploration and Production Council.

Demand 1: Resume fossil fuel leasing & pave the way for more gas pipelines

In a section asking President Biden to signal his support for domestic oil and gas production, LNG Allies' letter states that:

*"Policies such as pausing leasing on federal lands, preventing new pipeline infrastructure, and discouraging investments across the hydrocarbon value chain hamper U.S. [fossil gas] production, thereby driving up prices and making the world more reliant on energy from nations such as Russia."*¹⁹

As a presidential candidate, Joe Biden vowed to ban new oil and gas drilling on federal lands, famously telling voters in February 2020, *"And by the way, no more drilling on federal lands, period. Period, period, period."*²⁰

Soon after taking office, Biden took a step towards this goal by pausing oil and gas leasing on federal lands and waters while the new administration undertook a review of the policy.²¹

LNG Allies' demands & U.S. government's actions

LNG Allies' demands	Government actions
Resume fossil fuel leasing and pave the way for more gas pipelines	Fully met
Create a U.S.-EU energy task force to boost LNG exports and infrastructure	Fully met
Expedite six specific LNG export licenses	Partially met
Get regulators to approve new infrastructure	Partially met
Approve \$300 million public funding to build infrastructure in Europe, including for fossil gas	Fully met

Source: Global Witness research

Due to a series of court challenges, the leasing pause ended in August 2021, but was reinstated in February 2022, before Russia invaded Ukraine and LNG Allies sent its letter.²²

On April 15 – just seven weeks after LNG Allies sent its letter – the Department of the Interior announced plans to resume selling leases for new oil and gas drilling on federal lands.²³

Not only would a resumption of oil and gas leasing threaten efforts to tackle the climate emergency, it would also do little or nothing to bring down domestic energy prices, or help Europe quit Russian gas.

Most existing fossil gas production in the U.S. takes place on private or state-owned land – 91% in 2019.²⁴ As such, even if energy firms secured new federal leases and used them to ramp up production, the increase in total U.S. supply would likely be marginal.

As Raúl M Grijalva (D-Ariz.), chair of the House natural resources committee put it, industry demands to resume federal leasing “*have nothing to do with countering Putin’s invasion or stabilizing gas prices, and everything to do with making oil and gas development as easy and profitable as possible.*”²⁵

Nixing environmental justice & climate protections

As noted above, LNG Allies’ letter to President Biden also criticized measures that supposedly discourage investment in fossil gas infrastructure.

Four weeks after the letter was sent, U.S. authorities withdrew newly created policies that aimed to ensure the impacts of new gas infrastructure on local communities and on the climate are scrutinized more closely.²⁶

The policies were developed by the Federal Energy Regulatory Commission (FERC), and came into effect in February 2022.²⁷ They applied to both existing and future applications to build

fossil gas infrastructure, including pipelines and LNG export terminals.

Industry lobbyists and some members of Congress had opposed a strengthening of FERC’s gas infrastructure policies before Russia’s invasion of Ukraine, claiming that they would impede investment and raise costs.²⁸

After the invasion, they used the conflict as further justification for skewering the policies.²⁹

On March 24, in response to corporate and political pressure, FERC withdrew the gas policies and announced a public consultation on the issue. FERC also stated that when the policies are eventually re-introduced, existing applications to build fossil gas infrastructure will be exempt.³⁰

Demand 2: Create a U.S.-EU energy task force to boost LNG exports and infrastructure

LNG Allies’ letter asked President Biden to work with “*U.S. and European business interests*” and with “*the EU leadership to stand-up a joint EU-U.S. Emergency Energy Infrastructure Council*” as a response to Russia’s attack on Ukraine.³¹

The letter specified that this new body’s role should be to facilitate:

- 1) Additional U.S. LNG exports.
- 2) Additional LNG import terminals in Europe.
- 3) Associated pipelines on both sides of the Atlantic.

One month later, President Biden granted LNG Allies’ wish when he announced the formation of a U.S.-EU Task Force for Energy Security.³²

A joint U.S-EU statement on the new body shows that LNG Allies was given what it asked for almost verbatim, with key roles for the Task Force being to:

- 1) Work with other gas exporters globally to ensure that at least 15 billion cubic meters (bcm) of additional LNG is available to the EU in 2022, and for the EU to ensure demand for

an additional 50 bcm of U.S. LNG per year until at least 2030.

- 2) Speed up regulatory procedures to determine approvals for LNG import infrastructure in the EU.
- 3) Maintain a supportive regulatory environment in the U.S. to help achieve these objectives.³³

In March, LNG Allies boasted that that the Task Force “*is a direct response to the proposal put forward by LNG Allies, The U.S. LNG Association, in our letter to President Biden on Feb. 25 and our conversation with EU Energy Commissioner Simson earlier in the month.*”³⁴

Following LNG Allies’ meeting with the EU’s energy commissioner Kadri Simson, Global Witness requested information from the European Commission about its interactions with LNG Allies. At the time of writing the Commission had not provided any information, and Global Witness is appealing its failure to meet the deadline for responding.

A conflict of interest on the Task Force?

LNG Allies received a further boost to its campaign when Amos Hochstein, a senior State Department energy adviser who’s close to President Biden, was appointed co-chair of the joint Task Force.³⁵

Until September 2020, Hochstein was executive vice-president for marketing at the U.S. LNG producer Tellurian.³⁶ Tellurian is building a new \$25 billion LNG export facility in Louisiana, which is facing a legal challenge for its harmful impacts on the surrounding wetlands and on the global climate.³⁷

A disclosure published by the Revolving Door Project shows Hochstein was handsomely paid by Tellurian, receiving \$623,155 in salary, \$86,230 in severance and between \$100,001 and \$1 million in restricted stock options from the company.³⁸

According to an LNG Allies tax return, the group is closely linked to Tellurian through Majida Mourad, the senior vice-president of government affairs at Tellurian, who was on LNG Allies’ board of directors in 2019.³⁹

Mourad joined Tellurian in May 2017, making her a colleague of Hochstein’s when he was the company’s marketing chief.⁴⁰

As well as replacing Russian gas imports with U.S. LNG, the Task Force is supposed to promote measures that will reduce the EU’s demand for fossil gas, such as energy efficiency and switching to renewables.⁴¹

But appointing a former U.S. LNG executive as the U.S. government’s lead representative on the Task Force raises concerns about potential conflicts of interest and bias towards fossil gas.

A joint U.S.-EU statement that announced the Task Force specifies that the EU will aim to ensure demand for 50 bcm of additional U.S. LNG per year until at least 2030.⁴² Meeting this target would bring substantial benefits to the U.S. LNG industry, which is already on track to achieving it years ahead of schedule.⁴³

The statement goes on to say that the U.S. and EU will work to speed up the deployment of energy efficiency and renewable power projects via the Task Force, as well as cooperate on clean energy technologies.⁴⁴ However, the benefits for industries involved in decarbonizing the energy system appear less tangible as the document does not set targets in any of these areas.

According to the March 25 statement, the U.S and EU will “*formulate immediate recommendations*” to accelerate the rollout of clean energy technologies and measures.⁴⁵

But as shown below, transparency is sorely lacking from the Task Force, and Global Witness is not aware of any public source that confirms whether these recommendations have been developed and if so, what they contain.

Cheney task force redux?

Climate justice groups, including Global Witness, have criticized the Task Force's lack of transparency, which appears to be breaking U.S. law. The body has convened at least three times since its inception and included unnamed "industry participants" in these meetings.⁴⁶

By keeping the identities and interests of attendees under wraps, the White House appears to be in breach of the Federal Advisory Committee Act (FACA).⁴⁷ The law allows civil society, journalists and the public to scrutinize who is engaging with the government on key issues that affect them.

The secrecy surrounding the present day Task Force invites comparisons with a notorious energy task force set up by Dick Cheney, a former oil industry executive, when he was U.S. Vice President in 2001. The group has been subject to numerous legal attempts by civil society to force its records into the public domain and was investigated by Congress for its secrecy and bias towards the fossil fuel industry.⁴⁸

Recently, reports emerged that the major U.S. LNG exporters Cheniere⁴⁹ and Freeport⁵⁰ have actively participated in the current U.S.-EU Task Force.

Meanwhile the director for government affairs at Sempra, another large-scale U.S. LNG exporter, revealed that in June 2022 the company visited Brussels "as part of a coalition of LNG firms ... to propel the goals of the U.S.-EU Task Force."⁵¹

In stark contrast to the access given to LNG industry interests, environmental justice issues and consultation with affected communities are absent from the U.S.-EU statement.

This is despite the fact that almost every proposed LNG facility and fossil gas pipeline in the U.S. is facing opposition from local communities, many of which are environmental justice communities.⁵²

Global Witness asked LNG Allies if it had taken part in any of the Task Force's meetings. The group said it had not, although it had discussed the Task Force in separate meetings with U.S. government officials.⁵³



An indigenous protester from Louisiana speaks out against the effects of fossil fuel pipelines during a demonstration outside the White House, June 2021. Allison Bailey/Alamy

Demand 3: Expedite six specific LNG export licenses

In its February letter, LNG Allies asked President Biden to "instruct the Department of Energy to immediately approve the U.S. LNG export applications pending before it to export gas from the United States".⁵⁴

The letter named six specific export applications that LNG Allies wanted expediting. Twenty-three days later, the Department of Energy (DOE) announced it had approved two them.⁵⁵

In a news release marking the announcement, LNG Allies linked DOE's approval of the export licenses to its letter to President Biden.

It also included a quote from LNG Allies' CEO Fred H. Hutchinson, asserting that "olive-branch statements" made by members of the Biden administration at an energy industry event the week before were followed up by "real pen-on-paper actions... Two [licenses] down and four to go!"⁵⁶

On April 27, just over two months after LNG Allies sent its letter to President Biden, DOE authorized two more of the six export licenses on LNG Allies' list.⁵⁷ The lobby group published another news release following DOE's decision, this time exclaiming "*Four down and two to go!*"⁵⁸

Too late to help Europe

One of the April 27 licenses was granted to Golden Pass – an LNG firm jointly owned by affiliates of ExxonMobil and Qatar's state-controlled oil company QatarEnergy – allowing it to increase exports from an existing LNG facility in Texas. The other went to a company called Glenfarne, to expand capacity at its planned LNG export terminal in Louisiana.⁵⁹

In both cases, the increased export volumes are not due to materialize until 2025 or later, which is too late to aid Europe's short-term response to the war in Ukraine.⁶⁰ Moreover, the EU is rapidly increasing efforts to cut gas demand, and it is not clear if there will be a market in Europe for these higher export volumes in the latter 2020s.

The exports are, however, set to have a hugely damaging impact on the climate as both licenses are authorized up to 2050,⁶¹ whereas the International Energy Agency has noted that LNG trade must fall by 60% by 2050 in order to meet global net zero goals.⁶²

At the time of writing, the remaining two export licenses on LNG Allies' list had not been authorized by DOE. These are to facilitate the

export of fossil gas via pipeline from the U.S. to two separate projects in northwest Mexico, which would then re-export the fuel as LNG.⁶³

Cutting corners?

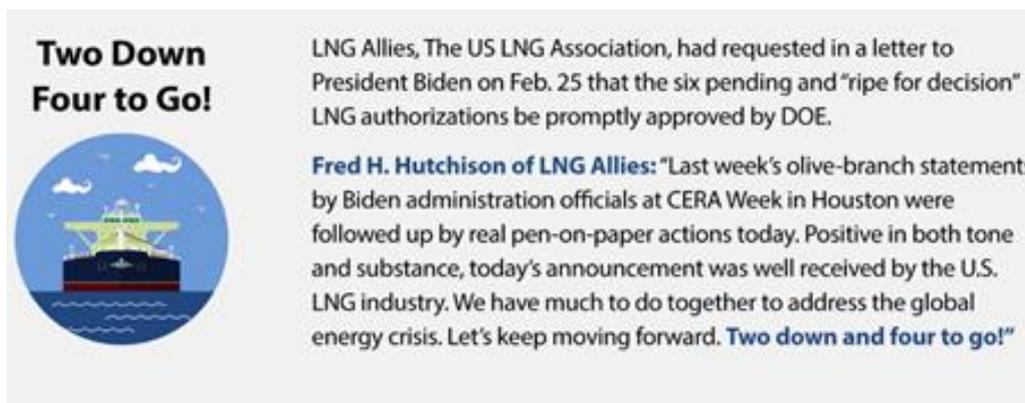
The rapidity of DOE's actions following LNG Allies' letter raises a concern that the agency may have rubberstamped these export licenses without duly taking into account their implications for climate and communities.

DOE is required by law to assess whether proposed exports of LNG would be in the public interest, and to consider their environmental impact.⁶⁴

However, in December 2020, the Trump administration finalized a rule that allows DOE to exclude environmental and climate considerations from its export permit decisions. This makes it easier for DOE to deem LNG exports as being in the public interest and rubberstamp license applications.⁶⁵

Disappointingly, since Biden became president, DOE has applied the Trump-era rule on at least two occasions, both in 2021, to approve LNG exports without conducting any environmental impact analysis.⁶⁶

DOE has signalled that it intends to "reconsider" the Trump-era rule and publish a proposal in September 2022.⁶⁷ The agency refrained from applying the rule directly in the more recent batches of export approvals in 2022.



**Two Down
Four to Go!**

LNG Allies, The US LNG Association, had requested in a letter to President Biden on Feb. 25 that the six pending and "ripe for decision" LNG authorizations be promptly approved by DOE.

Fred H. Hutchison of LNG Allies: "Last week's olive-branch statements by Biden administration officials at CERA Week in Houston were followed up by real pen-on-paper actions today. Positive in both tone and substance, today's announcement was well received by the U.S. LNG industry. We have much to do together to address the global energy crisis. Let's keep moving forward. **Two down and four to go!**"

Excerpt from LNG Allies news release linking its February 25 letter to the authorization of LNG export licenses.

However, DOE still relied on the flawed underlying analysis that justified Trump’s rule to mistakenly conclude that these LNG exports would not have significant climate impacts.⁶⁸

Demand 4: Get regulators to approve new infrastructure

LNG Allies’ letter states: “*although FERC is an independent agency, we urge you to join us in asking the commissioners to act within the next six months on all pending U.S. LNG export facility and gas pipeline applications in order to help move more natural gas to domestic customers and LNG export facilities.*”⁶⁹

One month after the letter was delivered to the White House, FERC approved three new pipeline projects intended to transport fossil gas to LNG export facilities, consistent with LNG Allies’ fourth demand.⁷⁰

One of the new pipelines connects to an LNG facility in Louisiana that is under construction and aims to start exporting by the end of 2024.⁷¹ So even if it met this deadline – and assuming that Europe needed the additional LNG supply – the project wouldn’t be able to support Europe’s near-term response to the Ukraine war.

Another one of the newly approved pipelines connects to a planned LNG export facility on the northwest coast of Mexico, which is likely to serve mainly Asian and Pacific Basin markets.⁷²

Demand 5: Approve \$300 million of public funding to build infrastructure in Europe, including for fossil gas

The fifth and final demand in LNG Allies’ letter was for President Biden, working with the U.S. International Development Finance Corporation (DFC) to “*immediately release the \$300 million in funding that the United States promised in 2020 to the Three Seas Initiative Investment Fund to build critical natural gas and other energy infrastructure along the North-South corridor in Central and Eastern Europe.*”⁷³

The Three Seas Initiative (3SI) is an inter-governmental forum that aims to boost the economic development of 12 EU member states in central and eastern Europe. The initiative has been criticized for strongly favouring fossil gas over renewable energy, and for threatening to lock-in new and unnecessary gas infrastructure beyond 2050.⁷⁴

3SI includes a dedicated fund that raises public financing to leverage private investments of up to €100 billion. As of July 2021, the initiative featured 18 fossil gas infrastructure projects including LNG terminals on its ‘priority projects’ list, making it a prime target for LNG Allies’ lobbying.⁷⁵

On June 20, DFC’s board agreed to approve up to \$300 million to 3SI’s investment fund, a decision that ensured all five of LNG Allies’ demands had become Biden administration policy.⁷⁶



Solar panels on an apartment building in Helsinki, Finland. Scaling up renewables and energy efficiency would allow the EU to exit Russian gas by 2025. Lev Karavanov/Alamy

Recommendations

Expanding U.S. LNG infrastructure and exports is not necessary to support Europe’s response to Russia’s invasion of Ukraine. This makes it a pointless exercise that serves only to line the pockets of gas industry executives, harm affected communities and lock in climate-destroying fossil fuel infrastructure.

Instead of acquiescing to the self-serving demands of those who stand to benefit from

more LNG – the industry and its lobbyists – **the U.S. government should:**

- Stop writing energy policy based on fossil fuel interests' demands
- Ensure environmental justice for Black, Indigenous and other marginalized communities
- Phase out fossil gas exports in line with the Paris Agreement's 1.5°C goal, delivering a just transition for workers and communities
- Stop using its geopolitical influence to foist gas on the rest of the world
- Declare a climate emergency and use all available presidential powers, including to reinstate a crude oil export ban and to declare LNG exports to be contrary to the public interest.

The EU should:

- Ensure its energy policy-making is free from influence by fossil fuel lobbyists, including U.S. groups such as LNG Allies
- Accomplish true energy security and independence from climate-wrecking fossil gas, wherever it comes from, by rapidly phasing out fossil gas and scaling up energy savings and renewables.

ENDNOTES

- ¹ LNG Allies, American Exploration and Production Council, Energy Policy Research Foundation, & Energy Equipment and Infrastructure Alliance, joint letter to President Biden, March 25, 2022: <https://lngallies.com/energysecurity/>
- ² American Petroleum Institute, letter to Energy Secretary Jennifer Granholm, February 28, 2022: <https://www.api.org/~media/Files/News/2022/03/01/The%20Honorable%20Jennifer%20Granholm.pdf>; Interstate Natural Gas Association of America, Natural Gas Supply Association, American Gas Association, & Independent Petroleum Association of America, joint letter to President Biden: March 23, 2022: <https://www.aga.org/news/news-releases/energy-trades-write-to-pres.-biden-seeking-meeting-on-natural-gas-supply-solutions/>
- ³ LNG Allies, American Exploration and Production Council, Energy Policy Research Foundation, & Energy Equipment and Infrastructure Alliance, joint letter to President Biden, March 25, 2022: <https://lngallies.com/energysecurity/>
- ⁴ Artelys & European Climate Foundation, ‘Does phasing-out Russian gas require new gas infrastructure?’, May 2022, page 6: <https://www.artelys.com/wp-content/uploads/2022/05/Artelys-Russian-gas-phase-out-Briefing-note.pdf>; Bellona Europa, E3G, Ember & Regulatory Assistance Project, ‘EU can stop Russian gas imports by 2025’, March 2022, page 3: https://9tj4025o153byww26jdkao0x-wpengine.netdna-ssl.com/wp-content/uploads/Briefing_EU-can-stop-Russian-gas-imports-by-2025.pdf
- ⁵ Artelys & European Climate Foundation, ‘Does phasing-out Russian gas require new gas infrastructure?’, May 2022, page 3: <https://www.artelys.com/wp-content/uploads/2022/05/Artelys-Russian-gas-phase-out-Briefing-note.pdf>; Bellona Europa, E3G, Ember & Regulatory Assistance Project, ‘EU can stop Russian gas imports by 2025’, March 2022, page 3: https://9tj4025o153byww26jdkao0x-wpengine.netdna-ssl.com/wp-content/uploads/Briefing_EU-can-stop-Russian-gas-imports-by-2025.pdf
- ⁶ Institute for Energy Economic & Financial Analysis, ‘Analysis finds U.S. can increase LNG shipments to Europe without building new facilities,’ April 6, 2022: <https://ieefa.org/articles/analysis-finds-us-can-increase-lng-shipments-europe-without-building-new-facilities>
- ⁷ <https://lngallies.com/about-us/>
- ⁸ <https://lngallies.com/leadership/>
- ⁹ Letter from LNG Allies to Global Witness, August 22, 2022.
- ¹⁰ US LNG Association, Form 990-EZ, 2019: https://apps.irs.gov/pub/epostcard/cor/842940648_201912_990EO_2021042017968159.pdf
- ¹¹ Ibid., page 5; Franklin-Hamilton, Foreign Agents Registration Act filing, December 30, 2014, page 3: <https://efile.fara.gov/docs/6268-Exhibit-AB-20141230-1.pdf>. Fred H. Hutchison is identified as the owner of Franklin-Hamilton in a separate Foreign Agents Registration Act filing, page 2: <https://efile.fara.gov/docs/6268-Registration-Statement-20141230-1.pdf>
- ¹² State of Delaware, Department of State, Division of Corporations entity search (accessed August 15, 2022): <https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx>; Franklin-Hamilton, Foreign Agents Registration Act filing, December 30, 2014, page 2: <https://efile.fara.gov/docs/6268-Registration-Statement-20141230-1.pdf>
- ¹³ Internal Revenue Service, revocation list, December 2, 2019: <https://apps.irs.gov/app/eos/detailsPage?ein=465721112&name=LNG%20ALLIES%20INC%20&city=LEWES&state=DE&countryAbbr=US&dba=&type=REVOCAATION&orgTags=REVOCAATION>
- ¹⁴ American Petroleum Institute, 2015 Form 990 report, Schedule I: <https://projects.propublica.org/nonprofits/organizations/130433430/201633209349302298/full>; American Petroleum Institute, 2016 Form 990 report, Schedule I: <https://projects.propublica.org/nonprofits/organizations/130433430/201743199349303904/full>
- ¹⁵ Intergovernmental Panel on Climate Change, Sixth Assessment Report, Working Group III: Climate Mitigation, ‘Headline statements from the summary for policymakers’, Page 2: https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_HeadlineStatements.pdf
- ¹⁶ E3G, ‘Infrastructure for a changing energy system: the next generation of projects for the European Union’, December 2017, page 7: https://9tj4025o153byww26jdkao0x-wpengine.netdna-ssl.com/wp-content/uploads/E3G_The_next_generation_of_EU_infrastructure_policies_Dec_2017.pdf
- ¹⁷ Intergovernmental Panel on Climate Change, Sixth Assessment Report, Working Group III: Climate Mitigation, ‘Headline statements from the summary for policymakers’, page 2: https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_HeadlineStatements.pdf. According to Carbon Tracker Initiative & UN Principles for Responsible Investment study, as of 2017 oil and gas projects worth at least \$2.3 trillion were not aligned with the Paris Agreement: <https://carbontracker.org/reports/2-degrees-of-separation-transition-risk-for-oil-and-gas-in-a-low-carbon-world-2/>
- ¹⁸ Global Witness, ‘President Biden is set to choke the world’s climate in fossil gas’, October 2021, pages 3-5: <https://www.globalwitness.org/en/campaigns/fossil-gas/president-biden-is-set-to-choke-the-worlds-climate-in-fossil-gas/>
- ¹⁹ LNG Allies, American Exploration and Production Council, Energy Policy Research Foundation, & Energy Equipment and Infrastructure Alliance, joint letter to President Biden, March 25, 2022: <https://lngallies.com/energysecurity/>
- ²⁰ Washington Post, ‘Biden opens door to more offshore drilling, despite earlier climate vow’, July 1, 2022: <https://www.washingtonpost.com/climate-environment/2022/07/01/biden-offshore-drilling-climate/>.
- ²¹ The White House, ‘Executive order on tackling the climate crisis at home and abroad’, January 27, 2021: <https://www.whitehouse.gov/briefing-room/presidential->

[actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/](#)

²² Reuters, 'Biden administration to resume drilling auctions in setback to climate agenda', September 1, 2022: <https://www.reuters.com/business/energy/biden-administration-takes-steps-resume-oil-gas-drilling-auctions-2021-08-31/>; CNN, 'Biden administration freezes new oil and gas drilling leases after court rules against key climate tool', February 21, 2022: <https://www.cnn.com/2022/02/21/us/biden-climate-social-cost-of-carbon-court/index.html>

²³ Department of the Interior, 'Interior Department announces significantly reformed onshore oil and gas lease sales', April 15, 2022: <https://www.doi.gov/pressreleases/interior-department-announces-significantly-reformed-onshore-oil-and-gas-lease-sales>

²⁴ Congressional Research Service, 'Revenues and disbursements from oil and natural gas production on federal lands', September 22, 2020, page 3: <https://sgp.fas.org/crs/misc/R46537.pdf>

²⁵ Guardian, 'Oil and gas lobbyists are using Ukraine to push for a drilling free-for-all in the US', March 4, 2022: <https://www.theguardian.com/commentisfree/2022/mar/04/oil-gas-lobbyists-us-ukraine-drilling>

²⁶ Bloomberg Law, 'Energy regulators revamp much-criticized gas review policy', March 24, 2022: <https://news.bloomberglaw.com/environment-and-energy/energy-regulators-walk-back-much-criticized-gas-review-policy>

²⁷ Federal Energy Regulatory Commission, 'FERC updates policies to guide natural gas project certifications', February 17, 2022: <https://www.ferc.gov/news-events/news/ferc-updates-policies-guide-natural-gas-project-certifications>

²⁸ Houston Chronicle, 'FERC tells gas pipelines, LNG to start calculating climate impacts', February 17, 2022: <https://www.houstonchronicle.com/business/energy/article/FERC-tells-gas-pipelines-LNG-to-start-16927264.php>

²⁹ Bloomberg Law, 'Ukraine "energy war" demands fast gas permits, Manchin says', March 3, 2022: <https://news.bloomberglaw.com/environment-and-energy/ferc-natural-gas-policies-come-under-bipartisan-senatorial-fire>

³⁰ Federal Energy Regulatory Commission, Order on draft policy statements, March 24, 2022: <https://ferc.gov/media/c-1-032422>

³¹ LNG Allies, American Exploration and Production Council, Energy Policy Research Foundation, & Energy Equipment and Infrastructure Alliance, joint letter to President Biden, March 25, 2022: <https://lngallies.com/energysecurity/>

³² The White House, United States and European Commission announce task force to reduce Europe's dependence on Russian fossil fuels, March 25, 2022: <https://www.whitehouse.gov/briefing-room/statements-releases/2022/03/25/fact-sheet-united-states-and-european-commission-announce-task-force-to-reduce-europes-dependence-on-russian-fossil-fuels/>

³³ The White House, Joint Statement between the United States and the European Commission on European energy security, March 25, 2022: <https://www.whitehouse.gov/briefing-room/statements-releases/2022/03/25/joint-statement-between-the->

[united-states-and-the-european-commission-on-european-energy-security/](#)

³⁴ LNG Allies, 'EU-US LNG Agreement', March 25, 2022: <https://lngallies.com/2022-03-25/>

³⁵ Washington Post, 'Biden's "energy whisperer" balances climate agenda, rising gas prices', June 19, 2022: <https://www.washingtonpost.com/climate-environment/2022/06/17/amos-hochstein-biden-energy-gas/>

³⁶ <https://www.linkedin.com/in/amos-hochstein-8806091aa/>

³⁷ The Advocate, 'Federal permit for \$25 billion Louisiana LNG plant challenged by environmental groups', July 21, 2022: https://www.theadvocate.com/acadiana/news/business/article_58ce76ce-0937-11ed-9c62-7ba153e78f60.html

³⁸ Office of Government Ethics, New entrant report, page 3: <https://therevolvingdoorproject.org/wp-content/uploads/2021/08/Hochstein-Amos-New-Entrant-Report-2021-1.pdf>

³⁹ US LNG Association, Form 990 EZ, 2019, page 2: https://apps.irs.gov/pub/epostcard/cor/842940648_2019_12_990EO_2021042017968159.pdf

⁴⁰ <https://www.linkedin.com/in/majida-mourad-56a6b56>

⁴¹ The White House, Joint Statement between the United States and the European Commission on European energy security, March 25, 2022: <https://www.whitehouse.gov/briefing-room/statements-releases/2022/03/25/joint-statement-between-the-united-states-and-the-european-commission-on-european-energy-security/>

⁴² Ibid.

⁴³ Euractiv, 'US LNG exports to Europe on track to surpass Biden promise', July 26, 2022: <https://www.euractiv.com/section/energy/news/us-lng-exports-to-europe-on-track-to-surpass-biden-promise>

⁴⁴ The White House, Joint Statement between the United States and the European Commission on European energy security, March 25, 2022: <https://www.whitehouse.gov/briefing-room/statements-releases/2022/03/25/joint-statement-between-the-united-states-and-the-european-commission-on-european-energy-security/>

⁴⁵ Ibid.

⁴⁶ European Commission, Joint Statement between the United States and the European Commission on European energy security, April 29, 2022: https://ec.europa.eu/commission/presscorner/api/files/document/print/en/statement_22_2750/STATEMENT_22_2750_EN.pdf

⁴⁷ Global Witness, 'Secretive Biden energy task force appears illegal – "reminiscent of Trump"', May 23, 2022: <https://www.globalwitness.org/en/press-releases/secretive-biden-energy-task-force-appears-illegal-reminiscent-of-trump/>

⁴⁸ Natural Resources Defense Council, 'Supreme Court takes pass on task force secrecy', June 24, 2004: <https://www.nrdc.org/media/2004/040624>; New York Times, 'Cheney refuses to release energy task force records', August 4, 2022: <https://www.nytimes.com/2001/08/04/us/cheney->

[refuses-to-release-energy-task-force-records.html](#); ABC News, 'Cheney energy task force under investigation', June 18, 2001: <https://abcnews.go.com/Politics/story?id=121549&page=1>

⁴⁹ Seeking Alpha, Cheniere Energy's (LNG) CEO Jack on Q1 2022 results – earnings call transcript, May 4, 2022: <https://seekingalpha.com/article/4506931-cheniere-energys-lng-ceo-jack-fusco-on-q1-2022-results-earnings-call-transcript>

⁵⁰ Reuters, 'Freeport LNG seeks extension to build 4th liquefaction train at Texas plant', May 17, 2022: <https://www.reuters.com/article/usa-freeport-lng-texas/freeport-lng-seeks-extension-to-build-4th-liquefaction-train-at-texas-plant-idINL2N2X91IV>

⁵¹ YouTube, Eurogas: let's talk LNG with Sempra, June 29, 2022, 0.32-1.05: <https://www.youtube.com/watch?v=f2jY4qKRBI&t=1s>

⁵² Oil Change International, 'Groups call out U.S.-EU "Joint Task Force for Energy Security" for lack of transparency and climate criteria', April 14, 2022: <https://priceofoil.org/2022/04/14/groups-us-eu-joint-task-force-energy-security-transparency/>

⁵³ Letter from LNG Allies to Global Witness, August 22, 2022.

⁵⁴ LNG Allies, American Exploration and Production Council, Energy Policy Research Foundation, & Energy Equipment and Infrastructure Alliance, joint letter to President Biden, March 25, 2022: <https://lngallies.com/energysecurity/>

⁵⁵ Department of Energy, 'DOE issues two LNG export authorizations',

March 16, 2022: <https://www.energy.gov/articles/doe-issues-two-lng-export-authorizations>

⁵⁶ LNG Allies, 'DOE raises USLNG export ceilings', March 17, 2022: <https://lngallies.com/news/doe-2022-03-16/>

⁵⁷ Department of Energy, 'U.S. Department of Energy issues export authorizations to two LNG projects', April 27, 2022: <https://www.energy.gov/fecm/articles/us-department-energy-issues-export-authorizations-two-lng-projects>

⁵⁸ LNG Allies, 'Magnolia and Golden Pass increases', April 27, 2022: <https://lngallies.com/news/2022-04-27/>

⁵⁹ Reuters, 'U.S. authorizes more LNG from two plants in development', April 28, 2022: <https://www.reuters.com/legal/transactional/us-permits-two-liquefied-natural-gas-facilities-energy-sec-granholm-2022-04-27/>

⁶⁰ Ibid.

⁶¹ Department of Energy, Golden Pass LNG Terminal LLC, Order amending long-term authorization to export liquefied natural gas to non-free trade agreement nations, April 27, 2022, page 3: <https://www.energy.gov/sites/default/files/2022-04/fonsi-2179-golden-pass-inc-2022-04.pdf>; Department of Energy, Magnolia LNG terminal LLC, Order amending long-term authorization to export liquefied natural gas to non-free trade agreement nations, April 27, 2022, page 3: <https://www.energy.gov/sites/default/files/2022-04/ord3909c.pdf>

⁶² International Energy Agency, 'Net zero by 2050: a roadmap for the global energy sector', October 2021,

pages 102-103:

https://iea.blob.core.windows.net/assets/deebef5d-0c34-4539-9d0c-10b13d840027/NetZeroBy2050-ARoadmapfortheGlobalEnergySector_CORR.pdf

⁶³ Department of Energy, 'Vista Pacifico LNG S.A.P.I de C.V. – FE Dkt. No - 20-153-LNG, July 12, 2022:

<https://www.energy.gov/fecm/articles/vista-pacifico-lng-sapi-de-cv-fe-dkt-no-20-153-lng>; Department of Energy, 'Energía Costa Azul, S. de R.L. de C.V. – Dkt. No. 18-145-LNG', July 12, 2022:

<https://www.energy.gov/fecm/articles/energia-costa-azul-s-de-rl-de-cv-dkt-no-18-145-lng-eca-large-scale-project>

⁶⁴ 15 U.S.C. §717b(a):

<https://www.law.cornell.edu/uscode/text/15/717b>

⁶⁵ Global Witness, 'President Biden is set to choke the world's climate in fossil gas', October 2021, page 8:

<https://www.globalwitness.org/en/campaigns/fossil-gas/president-biden-is-set-to-choke-the-worlds-climate-in-fossil-gas/>; Department of Energy, National Environmental Policy Act Implementing Procedures, final rule, December 4, 2020:

<https://www.federalregister.gov/documents/2020/12/04/2020-26459/national-environmental-policy-act-implementing-procedures>

⁶⁶ Global Witness, 'President Biden is set to choke the world's climate in fossil gas', October 2021, page 8:

<https://www.globalwitness.org/en/campaigns/fossil-gas/president-biden-is-set-to-choke-the-worlds-climate-in-fossil-gas/>; Department of Energy, Nopetro LNG, DOE/FE Order 4671, March 23, 2021:

<https://www.energy.gov/sites/default/files/2021-03/ord4671.pdf>; Department of Energy, Southern LNG Company LNG, DOE/FE Order 4687, March 30, 2021: <https://www.energy.gov/sites/default/files/2021-04/ord4687.pdf>

⁶⁷ Department of Energy, Proposed Rule, Categorical Exclusion B5.7: Export of Natural Gas and Associated Transportation by Marine Vessel: <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202204&RIN=1990-AA51>

⁶⁸ The Department of Energy cited the 2020 rule (Technical Support Document) as one of the bases to support a "finding of no significant impact" for three of the LNG license applications listed in LNG Allies' letter that were subsequently authorized: Cheniere Marketing LLC & Corpus Christie Liquefaction LLC, DOE/FECM Order no. 4799, March 16, 2022, page 80:

<https://www.energy.gov/sites/default/files/2022-03/ord4799.pdf>; Sabine Pass Liquefaction LLC, DOE/FECM Order no. 4800, March 16, 2022, page 81:

<https://www.energy.gov/sites/default/files/2022-03/ord4800.pdf>; Golden Pass LNG Terminal LLC, DOE/FECM Order no. 3978-E, April 27, 2022, page 61: <https://www.energy.gov/sites/default/files/2022-04/ord3978e.pdf>. The 2020 rule was also a key factor in the fourth export license listed in LNG Allies' letter that was authorized, which was found by FERC to have potentially damaging environmental impacts and made subject to certain environmental conditions: Magnolia LNG LLC, DOE/FECM Order no. 3909-C, April 27, 2022, page 55:

<https://www.energy.gov/sites/default/files/2022-04/ord3909c.pdf>

⁶⁹ LNG Allies, American Exploration and Production Council, Energy Policy Research Foundation, & Energy Equipment and Infrastructure Alliance, joint letter to

President Biden, March 25, 2022:
<https://lngallies.com/energysecurity/>

⁷⁰ Energy Information Agency, 'FERC approves new natural gas pipeline projects to increase U.S. exports', May 24, 2022:
<https://www.eia.gov/todayinenergy/detail.php?id=52478>

⁷¹ Reuters, 'Latest Venture Global LNG deals advance second Louisiana facility', May 12, 2022:
<https://www.reuters.com/business/energy/latest-venture-global-lng-deals-advance-second-louisiana-facility-2022-05-12/>

⁷² Energía Costa Azul LNG terminal, project website:
<https://ecalng.com/>

⁷³ LNG Allies, American Exploration and Production Council, Energy Policy Research Foundation, & Energy Equipment and Infrastructure Alliance, joint letter to

President Biden, March 25, 2022:
<https://lngallies.com/energysecurity/>

⁷⁴ Global Energy Monitor, 'The Three Seas Initiative's failing case for gas', September 2021, page 1:
<https://globalenergymonitor.org/report/the-three-seas-initiatives-failing-case-for-gas/>

⁷⁵ Ibid, page 2.

⁷⁶ Three Seas Initiative, '\$300 million for the Three Seas Fund by DFC', undated:
<https://3seas.eu/media/news/usd300-million-for-the-three-seas-fund-by-dfc?lang=en>; International Development Finance Corporation, 'DFC and the Three Seas Initiative Investment Fund agree to term sheet for up to \$300 million in financing', June 20, 2022:
<https://www.dfc.gov/media/press-releases/dfc-and-three-seas-initiative-investment-fund-agree-term-sheet-300-million>