Wim de Vriend

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October 9, 2018

MUR # 7512

Office of General Counsel
Federal Election Commission
1050 First Street NE
Washington DC, 20463

Complaint – Possible violations of election law – Contributions by foreign nationals

Dear General Counsel:

I need to confess that I am writing this Complaint while harboring some uncertainty regarding the FEC's authority to deal with it. The Commission's website states that it

> "... administers and enforces the laws that govern the financing of elections for federal office – the U.S. House, Senate and President. Other election-related laws are not within the FEC's jurisdiction."

To a non-legal eagle like me that seems to imply that state and local elections are not the FEC's concern, but that impression is contradicted in the section "Who can and can't contribute", under "Foreign nationals", which happens to be the topic of my complaint:

> "Federal law prohibits contributions, donations, expenditures and disbursements solicited, directed, received or made directly or indirectly by or from foreign nationals in connection with any election – federal, state or local."

In the language following this quote, "foreign nationals" are further defined, in ways that seem to qualify my complaint for consideration.[1] It is also supported by Section 319 of the Federal Election Campaign Act of 1071 (2 U.S.C.441e), as amended by Public Law 107-155-Mar.27, 2002, covering "CONTRIBUTIONS AND DONATIONS BY FOREIGN NATIONALS". I will therefore assume that the second quote, instead of contradicting the first one, supplements it, and the FEC does enforce violations of election law by foreign nationals in state and local elections, albeit that the Commission only applies federal election laws to such cases, not local laws (assuming they exist). If I'm wrong, I may have wasted considerable time, but what I'm writing about does seem to be a story of substantial, repeated interference in local elections by foreign nationals.

[1] Another difference noted concerns the mailing address of the Office of General Counsel. In the "How to file a complaint" section it is listed as 1050 First Street, N.E., while in the "Guidebook for Complainants" it reads 999 E Street, N.W. I do hope this will not lead to the loss of my complaint.

The most recent part of my Complaint concerns the run-up to a local election this November 2018, here in Coos County, Oregon, but the same foreign actors seem to have committed a far more substantial violation during a County election in May 2017. I will also supply evidence of extreme pro-contributor bias on the part of the Coos County Commissioners, especially the main subject of my complaint, John Sweet, along with indications of a County transaction that looks like a legal lease with the foreign contributor, but looks more like an additional inducement for favoritism.

Appendix 1 to this letter shows 2 screen shots of campaign contributions listed on Orestar, a website of the Oregon Secretary of State's office, which oversees elections in the state. The table in the top half shows that this year John Sweet, who is running as an incumbent for Coos County Commissioner for the November 2018 election, received a total of $20,000 (2 x 10,000) in cash contributions from Jordan Cove LNG. Other Oregon politicians or their committees received contributions from Jordan Cove LNG as well. Since November 11, 2017, Jordan Cove LNG has contributed a total of $66,605 to various Oregon candidates and political action groups.

This total is, however, dwarfed by Jordan Cove's contributions to the Coos County election of May 2017. The strikingly high numbers in the lower screen shot in **Appendix 1** suggest that the company was desperate to defeat a local ballot measure that looked as if it could endanger its plans to build an LNG export terminal here. Although I believe that particular measure contained too much ideological baggage to pass, Orestar shows that Jordan Cove gave $596,155 to a campaign to defeat it, an astonishing amount to spend in a remote rural County of 63,000 residents.

> "In general, corruption tends to exist whenever governments have favors to extend, or something to sell."
>
> Alan Greenspan, *chief of the Federal Reserve (1987-2006)*

According to **Appendix 2**: Campaign Expenditures, Jordan Cove's campaign against the May 2017 measure spent $584,572.52, which must have left $11,582,48 of Jordan Cove's money in the coffers of the local campaign committee, called "Save Coos Jobs". I have no idea what might have happened to the balance; maybe the committee members got to keep it for their efforts, which were not at all onerous because all the campaign work was done by out-of-town professionals, and the members themselves contributed no money at all, which I believe is unusual for campaign committees. They did, however, spend $433 of Jordan Cove's money for a victory dinner at Save Coos Jobs Chairman Joe Benetti's restaurant. Given the fact that Jordan Cove's generosity exceeded the total cost of the most expensive campaign this County has ever seen, the few non-Jordan Cove contributions to that campaign, a total of $18,000 from 4 Portland-based construction unions, turned out to be unnecessary. Besides the Orestar screen shots in Appendices 1 and 2, further details are found in our local paper's article in **Appendix 3:** "Measure opponents exceed $1 million in combined donations and spending."

Jordan Cove LNG is the company that for 14 years has been scheming to build an LNG terminal in Coos Bay. First it wanted an LNG import terminal, which was approved by

FERC, the Federal Energy Regulatory Commission, but due to changing market conditions never built. Next it was to be an LNG export terminal, which was turned down by FERC in 2016, due to a lack of demand, but re-applied for the following year. Since all LNG facility approvals require large investments of time (and money), and this has now been going on for over 14 years, many of us here in Coos County feel that we are doing time in regulatory purgatory – with no end in sight. And among the worst-off victims of this purgatory are the hundreds of landowners who have had Jordan Cove's pipeline hanging over their heads, ruining their plans for improving the rural refuge of their golden years, and ruining their peace of mind.

To clarify these issues I should explain that LNG is an abbreviation for Liquefied Natural Gas, which is natural gas, or methane, cooled to an extremely low temperature to turn it into a liquid taking up only 1/600th the volume of the gas, so it can be economically stored and shipped overseas, to a terminal that will turn it back into gas for local distribution. Natural gas itself has become a very popular fuel because it burns very cleanly, but that also means that if a large amount is released, deliberately or by accident, and it ignites, a very hot fire can result. This is because unlike an oil fire, none if a natural gas fire's heat is absorbed by smoke. And if LNG is for some reason spilled from an LNG terminal or tanker, especially onto water, the warmed gas cloud will be 600 times the volume of the LNG spilled. This has caused some people to describe an LNG tanker as carrying the incendiary equivalent of several dozen Hiroshima bombs.

It cannot be news to you that complaints about election law violations are usually lodged by opponents of the politician or the political cause, not by their supporters. And this rule applies to me and many other locals too, so I ask your indulgence for my digression into what is at stake here, which is meant to add perspective. First of all, a lot of people have talked as if the Jordan Cove LNG project is of national economic importance, but it is no such thing. More important yet, its plans for siting the terminal have been drawn up with complete disregard for the LNG industry's own, most essential safety recommendations.[2]

Let me start with the claim that exporting American gas as LNG through Coos Bay is in the national interest, because it will improve our trade balance. The real story is that Canadian gas will travel through Canadian-owned pipelines to Coos Bay, where it will be turned into LNG by a Canadian company. That this will be all or mostly Canadian gas is proved by **Attachment 4,** showing 3 pages of

> "I have formed a very clear conception of patriotism. I have generally found it thrust into the foreground by some fellow who has something to hide in the background. I have seen a great deal of patriotism; and I have generally found it the last refuge of the scoundrel."
>
> G. K. Chesterton, *The Judgement of Dr. Johnson*, Act III

[2] These safety recommendations are formulated by an organization called SIGTTO – Society of International Gas Tanker and Terminal Operators, headquartered in London. Among other things, its Information Paper No. 14, *"Site Selection and Design for LNG Ports and Jetties"* advises the avoidance of long, inshore waterways, of moorage in an outside curve of a channel, and recommends siting LNG facilities far enough from other industries and local populations so no "civilians" can get hurt in case of an accident, which in practice means more than 2.2 miles away. Most or all these recommendations are being implemented in LNG projects elsewhere, such as those being constructed in Louisiana and Texas, in Australia and elsewhere. But they have been completely ignored in the Jordan Cove proposal.

Canada's "licence" for Jordan Cove to export more than enough Canadian gas to fill all of its Coos Bay terminal's needs. This gas will enter the US near the pipeline hub at Kingsgate, B.C., and travel to another hub near Malin, in southern Oregon, through a pipeline owned by Trans-Canada Corporation. From Malin it will go through the planned new pipeline to Coos Bay, which will also be Canadian-owned. It's not that hatred of Canadians has gripped Coos Bay, but the least you can say is that all this casts an odd light on the "national interest" argument. Instead, we're experiencing a new form of colonialism – by a foreign power.

Regardless, as part of Jordan Cove's endless campaign to gin up loud but ignorant political support, County Commissioner John Sweet recently joined a company official on a trip to Colorado, to pitch Jordan Cove's plan to fracked gas drillers in that state that are desperate to sell their product, which would travel through the Ruby pipeline from Opal to Malin. Oddly enough, what Jordan Cove promised the drillers was that Colorado gas might make up about 8% of its total gas supply, which hardly makes this a matter of national importance – for the U.S.A. But even this small bone tossed to the Colorado frackers made them salivate so copiously that they were unable to smell the coffee. See **Attachment 5**, from the Grand Junction (Colorado) newspaper: "Geopolitical case for Jordan Cove", particularly page 4.

I will offer more data proving that Jordan Cove is a purely Canadian enterprise, and a dangerous, irresponsible one – but then, that may be typical of colonial ventures. But first I should mention that this one also makes a travesty of the American concept of eminent domain, already muddled by the regrettable *Kelo* decision of 2005. This is because approval of this terminal would allow a foreign corporation to force the construction of a 36-inch, 230-mile gas pipeline across the lands of hundreds of unwilling American landowners, all in order to turn its Canadian gas into LNG at the Coos Bay terminal, and ship it out through a waterway that (like the terminal itself) will violate the LNG industry's own safety standards. Besides the industry standards cited on the next page, the industry recommends against LNG tankers sailing through long, inshore channels, and urges that they have a quick escape route to the ocean incase of emergencies like earthquakes. Like the other recommendations, these are being ignored.

Society of International Gas Tanker and Terminal Operators (SIGTTO)

Site Selection and Design for LNG Ports and Jetties

➡ *KEEP LNG AWAY FROM SHIPS, OTHER INDUSTRIES AND PEOPLE:*

" ... an accident, albeit rare, is possible as a result of human error or catastrophic event such as an earthquake." (p. 2)

There is an "on-going need to keep other industry or populations remote from the plant." (p. 4)

LNG terminals should be sited " ... In remote areas where other ships do not pose a (collision) risk and where any gas escape cannot affect local populations." (p. 6)

In fact, Jordan Cove's own FEIS, compiled for the application FERC denied in 2016 (though not for that reason), stated that if built it will put almost 17,000 local people at risk of instant death and various degrees of burn injuries, not to mention property destruction. The unmentioned, unmentionable reason was its blatant neglect of public safety. See **Attachment 6,** which shows only one page from the Jordan Cove FEIS.

I should not dwell on this further because I have strayed far enough from this complaint's main topic. You are not in the safety business or in the LNG business, but condoning illegal political meddling can give an edge to reckless actors. Should you want to know more about those topics, a good, succinct source of information would be a local website: https://katyforcoos.com/lng-frequently-asked-questions/

It is now time for me to provide information proving that Jordan Cove LNG is a foreign corporation, run by foreign individuals, who have foreign interests at heart. Although it is registered as a limited liability corporation in Delaware, Jordan Cove LNG has long been known to be wholly owned by Canadian companies in the gas and pipeline business, first a company called Veresen, and then a company called Pembina Pipeline, which absorbed Veresen in a "friendly takeover" about a year ago. Veresen was, and Pembina is, headquartered in Calgary, Alberta.

(See **Attachment 7**: "Canadian firm applies to build $10-billion Jordan Cove LNG project in Oregon", in the Canadian publication *Financial Post* of September 22, 2017.)

Prior to Pembina's takeover of Veresen, Jordan Cove was officially described as

> " ... owned by Jordan Cove Energy Project L.P. ("JCEP"), a subsidiary of Jordan Cove LNG L.P. (the "Applicant"), both owned by Veresen Inc. ("Veresen").

That description was in Appendix A of a "Project Description" by Canada's National Energy Board, related to Jordan Cove's application for a license to export Canadian gas to Coos Bay. It's revealing to quote paragraphs 3 and 6 of this document, **Attachment 8**:

> The proposed location of Jordan Cove has benefits for Canada, Western Canada's natural gas producers, and Alberta's petrochemical industry. By utilizing existing natural gas transmission systems in Alberta and British Columbia, natural gas supplies for Jordan Cove can be entirely sourced from the Western Canadian Sedimentary Basin ("WCSB"), keeping

> pipelines and related facilities used and useful, resulting in lower tolls.
>
> ... it is possible that long-term gas supplies for LNG export through Jordan Cove could be sourced from the U.S. Rocky Mountain region ... However, to create flexibility in the sourcing of natural gas for Jordan Cove, the Applicant is requesting authorization from the National Energy Board to export the full amount of gas required to support Jordan Cove at full build-out from Canada.

An article titled "Pembina says Jordan Cove LNG terminal budget to be reviewed in 2018" in *S & P Global*, is **Attachment 9**. In this article Pembina is described as Jordan Cove's "new operator", and the decision to build Jordan Cove will be entirely Pembina's.

Following Veresen of Calgary's absorption by Pembina of Calgary, company letters of October 4, 2017, confirmed that Jordan Cove as well as the pipeline project were now "a wholly owned subsidiary of Pembina." These documents are in **Attachment 10**, which also shows a chart of the corporate structure, with Pembina owning 100% of everything.

Moreover, on Jordan Cove's website Pembina is described as "The Project Parent Corporation". *See https://www.jordancovelng.com/project/parent-corporation*

Attachment 11 is my final piece of evidence confirming that all Jordan Cove's strings are pulled at Pembina headquarters in Calgary, Alberta. It's the personal experience of a Coos County resident who tried to deal with Jordan Cove's local representatives.

The LNG industry, in its own safety recommendations (see chart on page 5), recognizes that despite its good safety record, absolute safety cannot guaranteed. This may be an understatement because large catastrophes have hit the industry, anyway. They have primarily involved LNG terminals, but our fear is that future disasters could involve the LNG tankers, either by human error, sabotage, terrorism or precipitated by the massive earthquake-tsunami that is predicted to have a 40% chance of striking Coos Bay during the next 50 years. See **Attachment 12**, which is a 2012 press release regarding the extensive research by Oregon State scientists led by Dr. Chris Goldfinger, establishing that Coos Bay is mathematically overdue for a major earthquake/tsunami.

Since such an event is extremely likely to strike during Jordan Cove's useful life, it raises serious fears not only for the terminal but also for any LNG tankers in the bay, which are very unlikely to be able to escape to the ocean before the tsunami hits – ten minutes after the offshore earthquake.[3]

It has been very rewarding for Jordan Cove to subsidize County Commissioner John Sweet, because he has been unabashedly pro-Jordan Cove, always describing the LNG terminal as the answer to all our prayers. **Attachment 13** displays Sweet's slavish pro-Jordan Cove bias, as recorded during a meeting of the local League of Women Voters.

Also – and this has nothing directly to do with election law, but it may support the case – Sweet and the other County Commissioners are very aware of a so-called lease with Jordan Cove that looks suspiciously like a legal bribe, and a promise of more to come. I am referring to **Attachment 14**, titled "Interruptible Transportation Purchase Agreement", according to which for 10 years already, Jordan Cove has been paying the County $300,000 a year to "lease" space on an existing, underused 12-inch County-owned gas pipeline – capacity they have never used, and will never need to use if they build their own 36" pipeline, as planned. But money speaks, especially to John Sweet, and Jordan Cove has also promised the County Commissioners a $200,000 bonus "if and when Construction is Commenced on an LNG facility within the boundaries of Coos County, Oregon." (Perhaps the excessive capitalization is designed to impress.)

I hope that you will look into my complaint with respect to the alleged election law violations, and if my allegations are proven right, I hope that whatever fines are levied will be such that Jordan Cove will be effectively deterred from engaging in this behavior again. Given its outrageous spending, any kind of fine should be very large, but also since **Attachment 15**, a recent article in the Portland Oregonian, shows that the company has been spending $10 million a month to push through its project. Also according to this article, Oregon's Secretary of State is unwilling to look into these shady matters.

If there is any other information you would like me to supply, please let me know. I would appreciate a confirmation receipt, and learning what you find out. Thank you for your service.

Sincerely,

Wim de Vriend

OFFICIAL STAMP
LINDA SUE BRAGG
NOTARY PUBLIC - OREGON
COMMISSION NO. 940418
MY COMMISSION EXPIRES JUNE 28, 2019

NOTARY:

[3] An excellent article about this event and the science, aimed at the general public, was the one by Kathryn Schulz: "The Really Big One - An earthquake will destroy a sizable portion of the coastal Northwest. The question is when." *The New Yorker Magazine*, July 20, 2015.

ATTACHMENTS:

1. Campaign contributions by Jordan Cove to John Sweet and other politicians, and to oppose the May 2017 Coos County initiative.

2. Campaign expenditures against the May 2017, Coos County initiative.

3. Article: "Measure opponents exceed $1 million in combined donations and spending."

4. Letter decision by Canada's National Energy Board, granting gas export 'licence' to Jordan Cove.

5. Article: "Geopolitical case for Jordan Cove"

6. Page 4-1031 from Jordan Cove FEIS, calculating potential number of burn victims.

7. Article: "Canadian firm applies to build $10-billion Jordan Cove project in Oregon".

8. Appendix A – Project Description.

9. Article: "Pembina says Jordan Cove LNG terminal budget to be reviewed in 2018."

10. Letters confirming Jordan Cove "wholly owned subsidiary of Pembina".

11. Statement by Larry S. Mangan.

12. Press release: OSU: "13-year Cascadia study complete – and earthquake risk looms large."

13. Blog article: "Sweet: 'There is no plan B.' "

14. Interruptible Transportation Purchase Agreement.

15. Article: "Jordan Cove LNG campaign contributions raise questions."

WELLS FARGO

Jurat Certificate

OFFICE OF
GENERAL COUNSEL

2018 OCT 12 AM 11: 33

State of Oregon

County of Coos

Subscribed and sworn to (or affirmed) before me on this 10th

day of October, 2018, by Wim De Vriend

Place Seal Here

OFFICIAL STAMP
CATHLEEN MAGANN
NOTARY PUBLIC - OREGON
COMMISSION NO. 935134
MY COMMISSION EXPIRES JANUARY 06, 2019

Notary Signature [signature]

Description of Attached Document

Type or Title of Document Complaint

Document Date October 9, 2018 Number of Pages 8

Signer(s) Other Than Named Above None

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Campaign contributions by Jordan Cove LNG

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Search Criteria : Tran Start Date = 10/01/2008, Tran End Date = 10/01/2018, Tran Type = Contribution, Contributor/Payee Name starts with Jordan Cove LNG, Filer Committee ID = John Sweet, Tran Amount From = 1.00, Tran Amount To = 1000000, Contributor Type = Business Entity

** out-of-state contributor

Help

Results : 20 records found for the above search criteria

Tran ID	Tran Date	Status	Filer/Committee	Contributor/Payee	Sub Type	Amount
2942570	08/24/2018	Original	ChamberPAC	Jordan Cove LNG	Cash Contribution	$25,000.00
2946990	08/24/2018	Original	Committee to Elect John Sweet	Jordan Cove LNG	Cash Contribution	$10,000.00
2924982	08/21/2018	Original	Oregon Business & Industry Candidate PAC	Jordan Cove LNG	Cash Contribution	$10,000.00
2931673	08/17/2018	Original	Committee to Elect Betsy Johnson	Jordan Cove LNG	Cash Contribution	$2,000.00
2945989	08/17/2018	Original	Committee to Elect John Sweet	Jordan Cove LNG	Cash Contribution	$10,000.00
2920617	08/15/2018	Original	Werner for Oregon	Jordan Cove LNG	Cash Contribution	$2,000.00
2931589	08/10/2018	Original	Brad Witt for State Representative	Jordan Cove LNG	Cash Contribution	$2,000.00
2915589	08/03/2018	Original	Friends of David Brock Smith	Jordan Cove LNG	Cash Contribution	$2,000.00
2926291	08/03/2018	Original	Gomberg for State Rep	Jordan Cove LNG	Cash Contribution	$1,000.00
2815683	04/20/2018	Original	Werner for Oregon	Jordan Cove LNG	Cash Contribution	$500.00
2819455	04/20/2018	Original	Gomberg for State Rep	Jordan Cove LNG	Cash Contribution	$1,500.00
2518282	09/11/2017	Original	Oregon Business & Industry Candidate PAC	Jordan Cove LNG	Cash Contribution	$605.00
2545982	05/03/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG **	Cash Contribution	$236,500.00
2537382	04/24/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$1,155.00
2511901	03/07/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$8,000.00
2511902	03/07/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$7,500.00
2511903	03/07/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$1,500.00
2511900	02/15/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$10,500.00
2259434	05/24/2016	Original	Friends of Tobias Read	Jordan Cove LNG LLC **	Cash Contribution	$1,000.00
2123328	12/19/2015	Original	Friends of Val Hoyle	Jordan Cove LNG LLC PAC **	Cash Contribution	$5,000.00

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Campaign contributions by Jordan Cove LNG to Save Coos Jobs committee

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Voting | Elections | State Archives | Audits

Transaction Search Results

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* in-kind expenditure

** out-of-state contributor

Search Criteria : Tran Start Date = 10/01/2016, Tran End Date = 10/02/2017, Tran Type = Contribution, Filer/Committee Name contains 'Save Coos Jobs' Contributor/Payee Name starts with Jordan Cove

Help

Results : 8 records found for the above search criteria

Tran ID	Tran Date	Status	Filer/Committee	Contributor/Payee	Sub Type	Amount
2545982	05/03/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG **	Cash Contribution	$236,500.00
2537382	04/24/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$1,155.00
2529302	04/10/2017	Original	Save Coos Jobs Committee	Jordan Cove Energy Project LP **	Cash Contribution	$115,000.00
2516478	03/20/2017	Original	Save Coos Jobs Committee	Jordan Cove Energy Project LP **	Cash Contribution	$216,000.00
2511901	03/07/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$8,000.00
2511902	03/07/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$7,500.00
2511903	03/07/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$1,500.00
2511900	02/16/2017	Original	Save Coos Jobs Committee	Jordan Cove LNG	In-Kind Contribution	$10,500.00

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Elections Division • 255 Capitol St NE, Ste 501 • Salem OR 97310
Phone: 503-986-1518 or 1-866-673-VOTE • Fax: 503-373-7414 • orestar-support.sos@oregon.gov

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3,170•00 +
1,428•30 +
49,183•00 +
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2

Campaign expenditures by Save Coos Jobs committee

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Transaction Search Results

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In-kind expenditure
Out-of-state contributor

Search Criteria : Tran Start Date = 10/01/2016, Tran End Date = 10/02/2017, Tran Type = Expenditure, Filer/Committee Name contains 'Save Coos Jobs' Tran Amount From = 1.00, Tran Amount To = 1000000

Help

Results : 41 records found for the above search criteria

Tran ID	Tran Date	Status	Filer/Committee	Contributor/Payee	Sub Type	Amount
2600823	08/23/2017	Original	Save Coos Jobs Committee	C&E Systems	Cash Expenditure	$55.00
2585984	07/27/2017	Original	Save Coos Jobs Committee	C&E Systems	Cash Expenditure	$55.00
2573817	07/03/2017	Original	Save Coos Jobs Committee	Banelli's	Cash Expenditure	$453.53
2571475	06/12/2017	Original	Save Coos Jobs Committee	C&E Systems	Cash Expenditure	$275.00
2571483	05/31/2017	Original	Save Coos Jobs Committee	Miscellaneous Cash Expenditures $100 and under	Cash Expenditure	$15.00
2556514	05/22/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$801.20
2556515	05/22/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$7,083.36
2556516	05/22/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$10,000.00
2552511	05/15/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$9,020.00
2552612	05/15/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$10,465.20
2552924	05/15/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$46,250.00
2551132	05/11/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$34,200.00
2551133	05/10/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$7,133.14
2548531	05/09/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$2,070.00
2551134	05/08/2017	Original	Save Coos Jobs Committee	Media Analysis, Inc	Cash Expenditure	$9,975.39
2548092	05/08/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$3,170.00
2548094	05/08/2017	Original	Save Coos Jobs Committee	C&E Systems	Cash Expenditure	$1,428.30
2546379	05/04/2017	Original	Save Coos Jobs Committee	Media Analysis, Inc	Cash Expenditure	$49,183.00
2546380	05/04/2017	Original	Save Coos Jobs Committee	Fallinkir Research Strategies, LLC	Cash Expenditure	$10,950.00
2548093	05/04/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$3,021.36

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55,000•00 +
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Tran ID	Tran Date	Status	Filer/Committee	Contributor/Payee	Sub Type	Amount
2548094	05/08/2017	Original	Save Coos Jobs Committee	C&E Systems	Cash Expenditure	$1,428.30
~~2546379~~	~~05/04/2017~~	~~Original~~	~~Save Coos Jobs Committee~~	~~Media Analysis, Inc~~	~~Cash Expenditure~~	~~[illegible]~~
~~[illegible]~~	~~05/04/2017~~	~~Original~~	~~Save Coos Jobs Committee~~	~~Fallinkir Research Strategies, LLC~~	~~Cash Expenditure~~	~~[illegible]~~
~~[illegible]~~	~~05/04/2017~~	~~Original~~	~~Save Coos Jobs Committee~~	~~Morel Ink~~	~~Cash Expenditure~~	~~[illegible]~~
2545979	05/03/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$30,270.50
2545980	05/03/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$16,750.00
2543095	05/02/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$3,975.86
2545354	05/02/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$5,857.61
2543094	04/26/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$1,771.25
2538242	04/25/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$18,987.75
2538243	04/25/2017	Original	Save Coos Jobs Committee	Media Analysis, Inc	Cash Expenditure	$42,268.00
2537384	04/24/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$45,150.00
2537386	04/24/2017	Original	Save Coos Jobs Committee	Fallinkir Research Strategies	Cash Expenditure	$12,500.00
2537383	04/20/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$27,243.00
2533175	04/19/2017	Original	Save Coos Jobs Committee	Media Analysis, Inc	Cash Expenditure	$44,561.00
2531046	04/13/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$16,423.76
2531047	04/13/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$4,109.00
2529304	04/11/2017	Original	Save Coos Jobs Committee	C&E Systems	Cash Expenditure	$350.56
2529301	04/10/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$12,000.00
2525716	04/05/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$194.00
2525713	03/28/2017	Original	Save Coos Jobs Committee	Morel Ink	Cash Expenditure	$2,463.75
2525714	03/28/2017	Original	Save Coos Jobs Committee	Morel Ink	Personal Expenditure for Reimbursement	$329.00
2525715	03/28/2017	Original	Save Coos Jobs Committee	Morel Ink	Personal Expenditure for Reimbursement	$3,780.00
2516476	03/20/2017	Original	Save Coos Jobs Committee	Direct Action Partners Inc	Cash Expenditure	$55,000.00
2516477	03/20/2017	Original	Save Coos Jobs Committee	ProspectPDX	Cash Expenditure	$36,000.00

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205.587.48 + 378.985.04 = TOTAL # 584,572.52

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https://theworldlink.com/news/local/govt-and-politics/measure-opponents-exceed-million-in-combined-donations-and-spending/article_ebd14cc0-9194-59b4-9fa0-8740e9090684.html

Measure opponents exceed $1 million in combined donations and spending

SPENCER COLE The World May 15, 2017

The first FERC-hosted scoping session on the Jordan Cove Energy Project will be held in Coos Bay on Tuesday from 4 p.m. to 7 p.m. at Sunset Middle School at 245 S. Cammann St.

COOS COUNTY — More than $1 million dollars has been donated or spent to crush a controversial ballot measure that targets the proposed Jordan Cove liquid natural gas export terminal and Pacific Connector Gas Pipeline. The staggering amount has made the campaign the county's most expensive in its history.

As of Sunday afternoon, the Save Coos Jobs Committee, the opposition group to Measure 6-162, which its petitioners call "The Coos County Right to a Sustainable Energy Future Ordinance" — had spent or received $1,042,294 for its operations, about

50 times the amount the Yes on Measure 6-162 Committee has been able to raise or spend.

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ESTABLISHING A COMMUNITY BILL OF RIGHTS PROVIDING FOR A SUSTAINABLE ENERGY FUTURE

Section 1. Purpose

Whereas, we the people of Coos County possess the inherent and inalienable right to govern our own community, as secured by the Declaration of Independence's reaffirmation of the right of people to alter or abolish their government if it renders self-government impossible, and of the Oregon Constitution's recognition that —"All power is inherent in the people, and all free governments are founded on their authority, and instituted for their peace, safety, and happiness;" and

Whereas, we the people of Coos County understand the current system of municipal governance fails to recognize the self-governing authority of the people of Coos County because corporations may assert their "rights" to override our laws, our local government operates on the assumption that corporate rights trump those of the people, our municipal government can be preempted by state or federal legislators and agencies, and our municipality is banned from adopting laws which have not been authorized by the state; and

Whereas, we the people of Coos County have experienced substantial population loss in recent decades due to ill-advised and non-sustainable development policies; and

Whereas, we the people of Coos County have experienced firsthand the harmful effects of unchecked resource extraction, and recognize that the pace and scope of extraction, transportation, production and use of hydraulically fractured fossil fuels in this country along with investments in other non-sustainable energy systems violate the right of Coos County residents to a sustainable energy future; and

Whereas, we the people of Coos County recognize the importance of healthy and thriving natural communities and ecosystems and that non-sustainable energy system projects threaten those natural systems; and

Whereas, we the people of Coos County, in recognition of our current dependence on fossil fuels, find it necessary to halt irresponsible energy resource extraction, transportation, and management – locally and globally – by asserting our inherent right to local self-government by enacting law which recognizes that the residents and ecosystems of Coos County have the right to a healthy, natural climate unaltered by the transporting, handling, production, and burning of fossil fuels and other non-sustainable energy systems; and

Whereas, we the people of Coos County see the need to build energy independence – independence from the vicissitudes of the electrical grid, especially the vicissitudes of price and availability – freeing the county from centralized energy systems which produce non-sustainable power; and

Whereas, we the people of Coos County hereby declare that our current municipal system of governance is illegitimate and that we adopt this ordinance to create a new system of municipal

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governance which recognizes our self-governing authority and which secures and protects our rights to a sustainable energy future;

Now, therefore, the people of Coos County hereby adopt this Ordinance, which shall be known and may be cited as "The Coos County Right to Sustainable Energy Future Ordinance."

Section 2. Definitions

(a) "Corporation," means any corporation, limited partnership, limited liability partnership, business trust, public benefit corporation, business entity, or limited liability company organized under the laws of any state of the United States or under the laws of any country.

(b) "Energy systems" means those systems producing, generating, distributing, transmitting, or transporting energy and power.

(c) "Engage in fossil fuel transportation" means transportation of fossil fuels, including but not limited to, coal, natural gas, liquid natural gas, and oil by road, rail, pipeline, or waterway destined for energy production. It shall not include the transportation of fossil fuels for residential, commercial, or industrial use for on-site power, heat consumption and vehicle fuels.

(d) "Non-sustainable energy systems" means those systems that are controlled by state and [illegible]

The polarizing measure on Tuesday's ballot would prohibit the transportation of fossil fuels within the county as well as the development of any "non-sustainable" energy systems, particularly hydraulic and pneumatic fracturing.

The ban would not apply to infrastructure already in place such as on-site heating or affect fuel for vehicles.

A large chunk of Save Coos' funds have come from one donor, Jordan Cove, the Veresen Inc. owned, Calgary, Alberta-based company behind the two natural gas projects.

The foreign energy company alone has donated nearly $600,000 in cash and in-kind donations.

"Why so much? It's simple, this is very important to us," Jordan Cove spokesperson Michael Hinrichs said. "We think it has consequences to the project absolutely but beyond that it will have negative consequences for Coos County."

On May 1, Pembina Pipeline Corp. purchased Veresen in a deal valued at $9.7 billion, including debt, a move that many in the natural gas industry believe will solidify its projects' chances.

Only two in-state organizations have contributed to the Save Coos Jobs campaign: a labor organization in Portland donated $5,000 and the Coos-Curry County Farm Bureau chipped in another $1,000, both were cash contributions.

By comparison, the Yes on Measure 6-162 Committee has spent or received $18,745.

The majority of its funds have come in the form of small cash contributions from in-state and in-county donors as well as from the ballot authors' own bank accounts.

To date, the Yes Campaign has received $13,460 in cash and in-kind donations and spent just over $5,000.

The committee has focused its expenditures locally: taking out around $1,500 in ads from The World Newspaper and $510 with South Coast Shopper, while spending just shy of $400 on Amazon and $351 at Staples.

Conversely, Save Coos Jobs has committed $440,139 of its massive war chest to several advertising, canvassing and polling firms; all out of Portland.

The advertising expenditures includes $136,000 with Media Analysis, Inc., $113,000 to Prospect PDX and more than $20,000 with Morel Ink.

The committee also paid nearly $150,000 to Direct Action Partners Inc., a Portland-based, national marketing firm that specializes in canvassing and signature gathering.

It spent another $23,450 for surveying and polling from Patinkin Research Strategies.

The Portland polling company boasts on its website that it is in one of the most accurate in the country and has a list of ballot measures it claims to have helped pass or defeat.

The disparity in spending and available funds is apparent across the county.

Save Coos Jobs yard signs vastly outnumber Yes on 6-162 signs: on Newmark Avenue in Coos Bay, "No" signs outnumber "Yes" signs by about ten to one.

A quick drive down Oregon Route 42 from Coos Bay to Coquille will yield a trip dotted with only a few blue “Yes” signs, surrounded by clusters of red “No” signs.

Digital and print advertising has been no different: Save Coos Jobs' television and radio commercials have been running almost nonstop for the past week, with one involving a farmer saying the measure would violate personal property rights.

Various flyers assailing the proposed ordinance have been delivered by mail across the area as well.

The No Campaign has also been widely visible online leading up to election day, with ads popping up virtually anytime a resident accesses the internet.

The countywide ad blitz has spared no one, including the measure’s co-author, local activist Mary Geddry, who said she had one appear while she was playing a game on her smartphone.

On Saturday, the ballot’s most vocal backer admitted the massive amount of eleventh-hour ads were impressive.

The heavy saturation of negative ads drove Geddry to release a final online ad of her own which read “Isn’t this just wrong? Fossil-fuel funded PAC threatens lawsuits unless Coos County votes in the company’s interests.”

Geddry said she was skeptical of her ads' efficacy.

“It’s our latest salvo,” she explained. “I’m not sure if we can breach the hull of their campaign dreadnought, but we sure can try.”

Mike Krumper, a retired Coos Health and Wellness employee, has donated more than $4,000 to the Yes Campaign.

He said despite the disparities in committee spending, he felt the cause for the Yes Campaign was far from hopeless.

“I would prefer not to be helpless,” he said. “I would prefer to be angry instead, especially with the county commissioners.”

While Coos County’s three commissioners have yet to take an official, unified stance on the measure, all three have spoken out against it separately.

“It’s just a ridiculous piece of legislation,” Commissioner John Sweet said. “I don’t think we have the right to tell people what they can and cannot carry into this county on state highways.”

Commissioner Bob Main has been highly critical of the measure since it was introduced, arguing the ordinance seeks to change both Oregon's and the United States' constitutions and prohibit Coos County from receiving even wind energy from neighboring counties.

Commissioner Melissa Cribbins, a former attorney, asserted that the measure is unconstitutional.

“I don’t think the Constitution gets any stronger because Coos County says it is,” she said, noting the Second Amendment Preservation Measure passed in 2015, which gave the sheriff the ability to choose which state and federal laws were unconstitutional, had little, if any teeth.

According to Cribbins, the two measures are similar in the sense that they both create legal gray areas and expose local law enforcement to future liability.

When asked if she or the other commissioners felt conflicted going against the wishes of some of their constituents, Cribbins said there were other avenues to oppose LNG and fossil-fuel projects.

“I know people see this as a way to stop Jordan Cove,” she said. “And I know there’s a lot of my constituents who don’t like Jordan Cove, who are concerned about the effects of LNG, but if they don’t like LNG they need to fight it through the FERC — Federal Energy Regulatory Commission — process, that’s the right way to do it because this measure puts the county in a position where we have to decide how we are going to deal with a law that is going to get challenged immediately in the courts and runs the chance of costing the county a lot in legal fees.”

The commissioners' stances on the proposed ordinance have bolstered a cohort of business and government officials that have drawn battle lines opposing it in recent months.

The opposition group includes the Port of Coos Bay and the Bay Area Chamber of Commerce.

Coos Bay’s mayor Joe Benetti is a sitting member on the Save Coos Jobs Committee, while Cribbins was featured on its initial press release condemning the measure.

On Friday, both said they did not feel conflicted about siding against their constituents in favor of a group that is largely backed by out-of-state money.

“It’s a bad bill,” Benetti said. “It’s unlawful and it would stifle commerce and business in my opinion.”

He said both groups had out-of-area backing: Save Coos Jobs with Jordan Cove, while Yes on 6-162 has the Community Environmental Legal Defense Fund (CELDF), a Pennsylvania-based nonprofit that provides legal assistance to citizens seeking to pass legislation that asserts “the right to local self-government and the rights of nature.”

While the East Coast, environmental nonprofit provides legal advice and helped craft the language in the ordinance, the group has made no monetary donations.

"They're both outside interests but the difference is (our) committee was formed by locals, this was the intent and we were fortunate enough to get the money from Jordan Cove, which allowed us to go out and campaign against this [measure] immediately," Benetti said. "I think that's the difference here, this outside interest has put out initiatives throughout the country and in different states and came here and had an advocate get with them on it."

Kai Huschke, Northwestern organizer for CELDF, disputed this account.

He said Geddry had approached the nonprofit around three years ago for help with the measure.

According to Huschke, critics of CELDF that accuse it of advancing its own out-of-state agenda are misguided in their arguments.

"Realistically, we are a tiny nonprofit of about a dozen employees and volunteers that doesn't exist without people in places like Coos County doing what they do," he said. "It's not really our agenda, it's the community's agenda that we just happen to provide support for."

Geddry also disputed Benetti's claim.

"To pretend that (Save Coos Jobs) is a local campaign is laughable," she said. "There is no local volunteer base, everything is paid for and run out of Portland."

Regardless, to ignore CELDF's influence would be misleading.

On its website the nonprofit claims nearly 200 communities have adopted "CELDF-drafted Community Bills of Rights laws that transition them from merely regulating corporate harms to stopping those harms by asserting local, democratic control directly over corporations."

The nonprofit also assisted with the language on a 2018 statewide ballot measure — also co-authored by Geddry — which seeks to amend Oregon's State Constitution.

Like the proposed Coos County ordinance, the measure would effectively prohibit corporations from using the courts to overturn local laws. Moreover, the state measure would provide a pathway for communities to pass — in theory — laws that cannot be overturned by state or federal law.

Geddry said that measure's existence makes the county ordinance's questionable future easier to stomach.

"This has really been a successful campaign for us — regardless of what happens on Tuesday night — because Jordan Cove has verified everything we have been trying to express to the traditional environmental activist-type groups," she added. "Those groups need different tools in the armory to really fight against these projects."

Reporter Spencer Cole can be reached at 541-269-1222, ext. 249, or by email at Spencer.Cole@theworldlink.com Follow him on Twitter: @spencerdcole.

Spencer Cole

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National Energy Board | Office national de l'énergie

LETTER DECISION

File OF-EI-Gas-GL-J705-2013-01 01
20 February 2014

Mr. Kevan King
Senior Vice President, General Counsel and Secretary
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222 – 3rd Avenue SW
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Facsimile 403-213-3648

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Dear Mr. King and Mr. Smith:

Jordan Cove LNG L.P. (Jordan Cove LNG) 9 September 2013 Application for a Licence to Export Natural Gas pursuant to Section 117 of the *National Energy Board Act* (NEB Act) National Energy Board (Board) Reasons for Decision

Recent developments in gas production technology have resulted in a significant increase in the Canadian gas resource base and North American gas supply. One of the major impacts of this increase is lower demand for Canadian gas in traditional gas markets in the United States and eastern Canada. As a result, the Canadian gas industry is seeking to develop access to overseas gas markets.

On 9 September 2013, Jordan Cove LNG applied to the Board pursuant to section 117 of the NEB Act for a licence (Licence) authorizing the export of natural gas (Application). Jordan Cove LNG seeks a licence duration of 25 years, starting on the date of first export with an annual volume of 16.03 billion cubic metres (10^9m^3) [1] of natural gas, which corresponds to a natural gas equivalent of 1.55 billion cubic feet per day (Bcf/d)[2], and a maximum quantity of 442.68 10^9m^3 over the term of the licence[3]. The proposed export points would be at the points at which natural gas crosses the Canada/U.S. border via existing natural gas pipelines near Kingsgate, British Columbia and near Huntingdon, British Columbia.

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[1] Applied-for annual quantity not including tolerance
[2] As calculated by the Board from Jordan Cove LNG's applied for export volume of 565.75 Bcf/year divided by 365 days
[3] As calculated by the Board, Jordan Cove LNG's applied for maximum term quantity of 15.63 trillion cubic feet (Tcf) is equivalent to 442.68 10^9 m^3 using a conversion of 35.301 cf/m^3 and includes the applied-for tolerance and ramp-up

The quantity of gas requested for export under the Licence is necessary to support a liquefied natural gas (LNG) export facility to be located at the Port of Coos Bay, Oregon.

Board Decision

We have decided to issue a licence to Jordan Cove LNG, subject to the approval of the Governor in Council, to export natural gas with the terms and conditions described in Appendix I to this letter. Our role, under s. 118 of the NEB Act, is to assess whether the natural gas proposed to be exported does not exceed the surplus remaining after due allowance has been made for the reasonably foreseeable requirements for use in Canada, having regard to trends in the discovery of gas in Canada (Surplus Criterion).

In fulfilling this mandate, we recognize that Canadian natural gas requirements are met within a North American integrated market. Depending on regional characteristics, exports and imports contribute to either gas supply or gas demand. It is in this context that we must consider whether the Surplus Criterion in the NEB Act is satisfied.

We have determined that the quantity of gas proposed to be exported by Jordan Cove LNG is surplus to Canadian needs. The Board is satisfied that the gas resource base in Canada, as well as North America, is large and can accommodate reasonably foreseeable Canadian demand, the natural gas exports proposed in this Application, and a plausible potential increase in demand.

We note that the evidence in this Application is generally consistent with the Board's own market monitoring. Recent studies of natural gas resources uncovered significant amounts in the Western Canada Sedimentary Basin and in the United States (U.S.). The North American gas market is a mature marketplace characterized by a large number of buyers and sellers, an extensive and growing pipeline and storage network and a sophisticated commercial structure. Since deregulation of Canadian gas markets in 1985, gas markets in North America have functioned efficiently and there is no evidence to suggest that they will not continue to do so in the future.

Natural Gas Export Regulation

The Board's regulation of natural gas exports is governed by a statutory framework that includes the following three components:

- that all natural gas exports must be authorized by an order or licence[4];
- that the Board must satisfy itself that the gas to be exported by licence is surplus to Canadian requirements[5]; and
- that all exports are reported[6].

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[4] Section 116 of the NEB Act
[5] Section 118 of the NEB Act
[6] Section 4 of the *National Energy Board Export and Import Reporting Regulations*

Appendix I

Terms and Conditions of the Licence to be Issued for the Export of Natural Gas

General

1. Jordan Cove LNG L.P. (Jordan Cove LNG) shall comply with all of the terms and conditions contained in this licence unless the Board otherwise directs.

Licence Term, Conditions and Point of Export

2. Subject to Condition 3, the term of this licence shall commence on the date of Jordan Cove LNG's first natural gas export via the Canada/U.S. natural gas pipeline network and shall continue for a period of 25 years thereafter.

3. This Licence shall expire 10 years from the date of issuance, unless exports from Canada have commenced on or before that date.

4. The quantity of natural gas that can be exported under the authority of this licence is:

    a. Maximum annual quantity that may be exported in any 12-month period, including the 15 per cent tolerance, may not exceed 18.43 10^9m^3;

    b. Maximum term quantity may not exceed 442.68 10^9m^3.

5. Natural gas will be exported from Canada at the natural gas pipeline export points near Kingsgate, British Columbia and near Huntingdon, British Columbia.

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https://www.gjsentinel.com/news/western_colorado/geopolitical-case-for-jordan-cove/article_cd728716-b64a-11e8-9ed7-10604b9f7e7c.html

Sep 12, 2018

Geopolitical case for Jordan Cove

By DENNIS WEBB

Coos County Commissioner, John Sweet, far right, speaks during a meeting on the Jordan Cove project held at Colorado Mesa University on Tuesday, September 11, 2018.

Buy Now

Chancey Bush

Federal administration and elected officials in Grand Junction Tuesday touted not just the job benefits but the geopolitical case for liquefied natural gas export projects like Jordan Cove in Oregon, while an official for that project said space in it is being set aside for gas production from the Rockies.

Jordan Cove project supporters U.S. Sen. Cory Gardner and U.S. Rep. Scott Tipton, both Colorado Republicans, met at Colorado Mesa University in a roundtable discussion on the project that included Francis "Frank" Fannon, assistant secretary of the State Department for energy resources, and Joe Balash, assistant secretary of the Interior Department for land and minerals management. Also participating were local Jordan Cove boosters including county commissioners from Mesa, Garfield and Rio Blanco counties, and a county commissioner from Coos County, Oregon, where the Jordan Cove project would be built.

"This project is amazing. .... Colorado gas has the opportunity to really fuel the world," Fannon said.

Balash said energy provides freedom to move and grow.

"That is something that we can export to our friends and allies," he said.

Gardner said Taiwan is closing down its nuclear power production and will need to find energy to replace it.

"We have an opportunity to provide geopolitical security to a great ally like Taiwan and to have those jobs being created here," he said.

He said Russia seeks to control and manipulate other countries that depend on its energy exports, and if the United States provides allies with energy to power their economies and save their sovereignty, "that's a pretty powerful tool."

Said Fannon, "Russians use their gas for power, they use their oil for money."

He said Lithuania was able to counter that power by developing an LNG import facility that forced Russia's Gazprom gas supplier to lower its prices.

Fannon said of Jordan Cove, "This project and this kind of work, I can't overstate the importance of the contribution to global energy security."

Stuart Taylor, senior vice president for marketing and new ventures for Jordan Cove LNG, which is part of Canada-based Pembina, said it was a "huge achievement" for Jordan Cove when the Federal Energy Regulatory Commission recently laid out a schedule under which it expects to decide on the project in late 2019. That would allow Jordan Cove to stick to its planned schedule for beginning to ship gas in 2024, when the global demand for LNG is expected to begin exceeding supply, he said.

"We've had great success. There will continue to be regulatory challenges. We need all the support we can get at the state level, at the federal level, in order to keep progressing," he said.

Said Tipton, "Somebody will supply the (LNG) product. Why not us, why not here?"

He said gas can be supplied in an environmental fashion by Colorado producers.

"Nobody will do it better, nobody will do it more responsibly than we will right here," he said.

Jordan Cove is being touted by backers of Western Slope natural gas production as a likely new and long-term outlet for locally produced gas, although it also is expected to get gas from other sources as well, including Canada.

On Tuesday, Taylor said Jordan Cove plans to specifically hold space in the project for Rockies producers.

That space currently may amount to about 75 million to 150 million cubic feet a day, which Taylor acknowledged doesn't sound like a lot in the context of a project that could initially ship 1.3 billion cubic feet a day. But he explained that what's being envisioned is an opportunity within that reserved space for Rockies producers to specifically receive Asian prices for gas, which even after the costs of liquefying and shipping the gas would mean a considerably higher profit margin compared to selling gas on the open market.

"We're excited to work with the Colorado producers," Taylor said.

As for the initial Rockies gas volume envisioned under such an arrangement, "We'd like to start there and see where we go," he said.

Meanwhile, Jordan Cove more generally should help support western United States gas prices by providing a major new outlet for gas, and Taylor said it also could help replace what's expected to be a shrinking California market.

Diane Schwenke, president and chief executive officer of the Grand Junction Area Chamber of Commerce, said one of the things that most excites her about Jordan Cove is the potential for it to provide 20-year contracts for gas producers, providing stability for not just those companies but the many small businesses they support. Businesses want consistency and a level playing field for future investment, she said.

"From our standpoint that is huge," she said.

Mesa County Commissioner Rose Pugliese said stabilization of the energy industry also helps allow for diversifying the economy, such as by investing in infrastructure that benefits things such as tourism and recreation.

"It opens us up to a lot more opportunities," she said.

Quint Shear, a board member and past president of the West Slope Colorado Oil and Gas Association, said the industry has the production capacity and has made the investments that could help meet the needs of a project like Jordan Cove. He noted the benefits that industry provides to small manufacturers, machine shops, welders and other companies that provide services to it.

Coos County Commissioner John Sweet said the project would be vital for his county, which has struggled for decades with the slowdown in the logging industry, and would benefit from the high-paying jobs and big boost to the property tax base. He said the county currently is struggling badly enough financially it has a hard time keeping its jail open.

While timber and lumber products are still a big part of the economy, "We need another leg to our economic stool and this will help provide that," he said.

Sweet's visit to Colorado this week was to include a stop at a local drilling rig site Tuesday as he works to learn more about natural gas production. While he strongly favors the Jordan Cove project, he said a vocal minority opposes it, in part due to the lack of oil and gas drilling in Oregon and the fears about its impacts that can result.

"I think it's important to be able to respond to the concerns and allegations," he said in explaining his desire to learn more about the industry himself.

Balash used Tuesday's event to tout efforts by the Trump administration to reduce regulatory and bureaucratic hurdles to oil and gas development, such as by imposing deadlines and even page-count limits when it comes to environmental reviews and the documents associated with them.

"We're starting to see some real results there," he said.

Taylor said regulatory certainty is important to Jordan Cove as well.

"I can't tell you enough the cloud of doubt that hangs over this project, and it hurts from a competition perspective. Our competitors use the doubt against us," he said.

He said the market wonders as well, with LNG buyers prone to look elsewhere if they worry about Jordan Cove's prospects in the regulatory process.

And Pembina's own board also looks for certainty about the potential for success for the Jordan Cove project, which is currently costing some $10 million a month in permitting and other expenses.

Meanwhile, observers from Balash to Gardner worry about what Colorado voters might decide on this fall's ballot, which includes a measure that would require 2,500-foot setbacks between drilling and homes and vulnerable areas such as streams, lakes, parks and open space. The industry and its supporters say the measure could largely shut down drilling in Colorado.

Balash said he thinks there needs to be more consideration about the "moral argument why our energy is important."

"I think that's an element to the conversation that may be missing around here," he said.

Gardner said if energy production is stopped, "The same people who are worried about Russians taking over are going to take away one of the most powerful tools we have in diplomacy to counter Russia."

navigation channel. At this point, one tug would drop lines, and the remaining two tugs would assist the LNG vessel throughout its transit of the Coos Bay navigation channel through the breakwater and offshore. If conditions are deemed not appropriate to leave the facility, the LNG vessel would remain at the pier. For most deep draft vessels, a speed of 4 to 6 knots is maintained while they transit the Coos Bay navigation channel. The total distance an LNG vessel would travel from the entrance of the ship channel to the end of the jetties is approximately 1.7 nmi. LNG vessels would require a minimum depth and width in the Coos Bay navigation channel. The present channel depth and width would be acceptable for the safe transit of a nominal size/capacity 148,000 m^3 LNG vessel with the aid of high tides.

During its approximately eight-mile transit, the LNG vessel would pass by the Southwest Oregon Regional Airport and the neighborhoods of Empire, Barview, and Charleston to the east and the uninhabited North Spit to the west. The LNG vessel would cross Southwest Oregon Regional Airport's main runway designed for instrument landings. The issue of an LNG vessel passing through the flight path of the airport's main runway was discussed between Jordan Cove and the FAA airport authority during the development of the WSA. The current height limitation imposed on marine traffic in the Coos Bay navigation channel by the FAA is 137 above ground level. This equates to a height of 167 feet AMSL. The FAA indicated that as long as vessels did not exceed the maximum height of 167 feet AMSL, they would not have any objections to vessels passing through the flight path of the main runway. In its development of the WSA, Jordan Cove verified the highest height to the mast of existing LNG vessels with a capacity of 148,000 m^3 is 139 feet above mean sea level. Since the development of the WSA, newly constructed LNG vessels could exceed the 167 feet AMSL. In response to a FERC data request on July 21, 2015, Jordan Cove reviewed the global inventory of the LNG vessels that could call on the LNG terminal and all of the LNG vessels would have a maximum height of 167 AMSL or less. Jordan Cove has agreed to amend the FAA's Form 7460 to reflect the change in LNG vessel height. If the FAA agrees with this change to the height of the LNG vessels, there would no longer be a NPH pertaining to the height of LNG vessels.

Hazard Zones Associated with the Proposed Route

The only area of land that would be overlapped by Zone 1 in the LNG vessel's transit to the proposed terminal would be a small portion of the western side of Empire and a small portion of the eastern side of the uninhabited North Spit. During transit, Zone 2 would overlap portions of the neighborhoods of Charleston, Barview, and Empire to the east and most of the North Spit to the west. Near the proposed terminal, Zone 2 would overlap the Roseburg Forest Products site and a portion of the Southwest Oregon Regional Airport's main runway. During transit, Zone 3 would overlap portions of the cities of Coos Bay and North Bend.

Estimates for the number of structures and the population within the Zones of Concern were provided in sections 4.7.1.2 and 4.8.1.1 of the FEIS the FERC issued in May 2009 for the previously proposed Jordan Cove LNG import terminal in Docket No. CP07-444-000. No residential structures, hotels, or motels were identified within Zone 1 (within 1,640 feet of the waterway). There are about 11 hotels or motels, and about 5,457 residential structures, including single family homes, apartments, and mobile homes, within Zones 2 and 3 combined, between 0.3 and 2.2 miles outside of the waterway. We estimated that there are approximately 16,922 people total residing within the Zones of Concern.

Canadian firm applies to build $10-billion Jordan Cove LNG project in Oregon

THE CANADIAN PRESS

The Canadian Press

September 22, 2017
11:25 AM EDT
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September 22, 2017
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Filed under
PMN Business

CALGARY — The Canadian company whose proposal to build an LNG export terminal in Oregon was derailed by U.S. regulators last year has resubmitted its application for a bigger, more expensive project.

Calgary-based Veresen Inc. (TSX:VSN) said Thursday its Jordan Cove project is now estimated to cost about US$10 billion to build, up from US$7.5 billion under its previous proposal, and would have capacity of 7.8 million tonnes per year, up from six million.

The project includes a liquefied natural gas terminal in Coos Bay, Ore., and a 370-kilometre pipeline that will bring natural gas originating in the U.S. Rockies and British Columbia from a southern Oregon hub to the terminal.

Veresen CEO Don Althoff said the new proposal submitted to the U.S. Federal Energy Regulatory Commission has undergone changes to overcome landowner complaints that led to FERC's ruling in 2016 that its negative impacts outweighed its public benefits.

FERC also found that demand for the project had not been adequately demonstrated.

"Our significant efforts to optimize the design to minimize its environmental footprint and accommodate landowner requests, as well as the support of our world-class LNG buyers, should result in the receipt of the positive regulatory decisions required to build Jordan Cove," Althoff said in a statement.

The company said Friday it would not provide further comment.

AltaCorp Capital analyst Dirk Lever said the routing changes should make FERC approval more likely.

plant, makes more than 50 pipeline route adjustments and promises to use trenchless drilling techniques to minimize environmental impacts at water crossings, Veresen said.

Unemployment, $24,000-a-year drug costs threaten to devastate this couple's retirement plans

Lever said a soon-to-close $9.7-billion friendly takeover of Veresen by Calgary-based rival Pembina Pipeline (TSX:PPL) improves chances the LNG project will be built because the resulting company will be much larger with more financial clout.

He said Jordan Cove would be the first LNG export facility on the U.S. West Coast, where it will have an advantage over existing facilities on the U.S. Gulf Coast because it is closer to key Asian markets.

How Trump's attack on Chrystia Freeland may have been the catalyst that clinched a new trade deal

Veresen said it hopes to make a final investment decision on the project in 2019 and start shipping LNG in 2024 provided that FERC issues a draft environmental impact statement early next year and approves the project by the end of next year.

Canada's LNG export industry has stumbled recently, with the $28-billion Aurora LNG project cancelled earlier this month and the $36-billion Pacific NorthWest LNG project near Port Edward, B.C., shut down in July, both due to poor market prospects for LNG.

A small project called Woodfibre LNG is the only Canadian West Coast LNG export project approved by its owners.

Follow @HealingSlowly on Twitter.

PMN BUSINESS

Gasoline-like substance linked to private residence in Surrey, B.C.

Washouts fixed on tracks to Churchill, Man., but service may wait until spring

As joblessness falls, skilled workers might be hard to find

'Venom' sets October record with $80M; 'Star Is Born' soars

Ick factor: NYC so far turns up nose at food-scrap recycling

8

Appendix A

Project Description

I. Project Summary

1. The proposed Jordan Cove LNG export terminal ("**Jordan Cove**") is a facility designed to produce and export liquefied natural gas ("**LNG**"). Jordan Cove will be located on the west coast of the United States ("**U.S.**"), within Oregon's International Port of Coos Bay, adjacent to the communities of North Bend and Coos Bay, Oregon. Jordan Cove is owned by Jordan Cove Energy Project L.P. ("**JCEP**"), a subsidiary of Jordan Cove LNG L.P. (the "**Applicant**"), both owned by Veresen Inc. ("**Veresen**").

2. Jordan Cove will have an initial capacity of 6 MMt/y from four trains ("**Phase 1**"), with each train producing 1.5 MMt/y. To produce this amount of LNG, Jordan Cove will require a supply of natural gas of 1.03 Bcf/d, with approximately 918 MMcf/d being delivered to the inlet of the Jordan Cove liquefaction plant. The difference is required for pipeline fuel and losses and for power generation. In response to market demand, Jordan Cove may be expanded to produce up to 9 MMt/y, through the construction of two additional 1.5 MMt/y trains (for a total of six trains) ("**Phase 2**"). In aggregate, the expanded facility will require a natural gas supply of 1.55 Bcf/d with approximately 1.38 Bcf/d being delivered at the Jordan Cove inlet, and the difference being used for pipeline fuel and losses and for power generation.

3. The proposed location of Jordan Cove has benefits for Canada, Western Canada's natural gas producers, and Alberta's petrochemical industry. By utilizing existing natural gas transmission systems in Alberta and British Columbia, natural gas supplies for Jordan Cove can be entirely sourced from the Western Canadian Sedimentary Basin ("**WCSB**"), keeping pipelines and related facilities used and useful, resulting in lower tolls. The petrochemical facilities located at Joffre and Fort Saskatchewan, Alberta, rely on ethane feedstock produced by the extraction plants located on the west-leg of Alberta's natural gas transmission system. Maximizing gas flows through the west-leg delivery system contributes to providing ethane feedstock to Alberta's petrochemical industry. Overall, Jordan Cove will allow for efficient expansion of Canada's natural gas market opportunities.

4. Use of the existing natural gas pipeline networks of both TransCanada PipeLines and Spectra will help to reduce or eliminate both timing and cost risks associated with new, large-scale, pipeline infrastructure development. With respect to the TransCanada pipeline network, natural gas will be transported on the NOVA Gas Transmission Ltd. system and Foothills Pipe Lines (South B.C.) Ltd. system to the

Canada/U.S. border for export at Kingsgate. With respect to gas transportation by Spectra, gas supplies will be gathered and transported on Spectra's BC system through to Kingsvale where, under a proposed common rate structure with FortisBC, supplies will be transported to the Canada/U.S. border for export at Kingsgate. Gas volumes could also flow on the Spectra system to the Canada/U.S. border for export at Sumas, with subsequent swap, exchange or transportation to Jordan Cove.

5. For gas exported at Kingsgate, gas supplies will be transported on the Gas Transmission Northwest system (**"GTN"**) to the Malin Hub, located near Malin, Oregon. From the Malin Hub, gas supplies will be transported by the proposed Pacific Connector Gas Pipeline (**"Pacific Connector"**) to Jordan Cove. All existing pipeline routes, as well as the location of Jordan Cove and the Pacific Connector are shown on Figure 1.

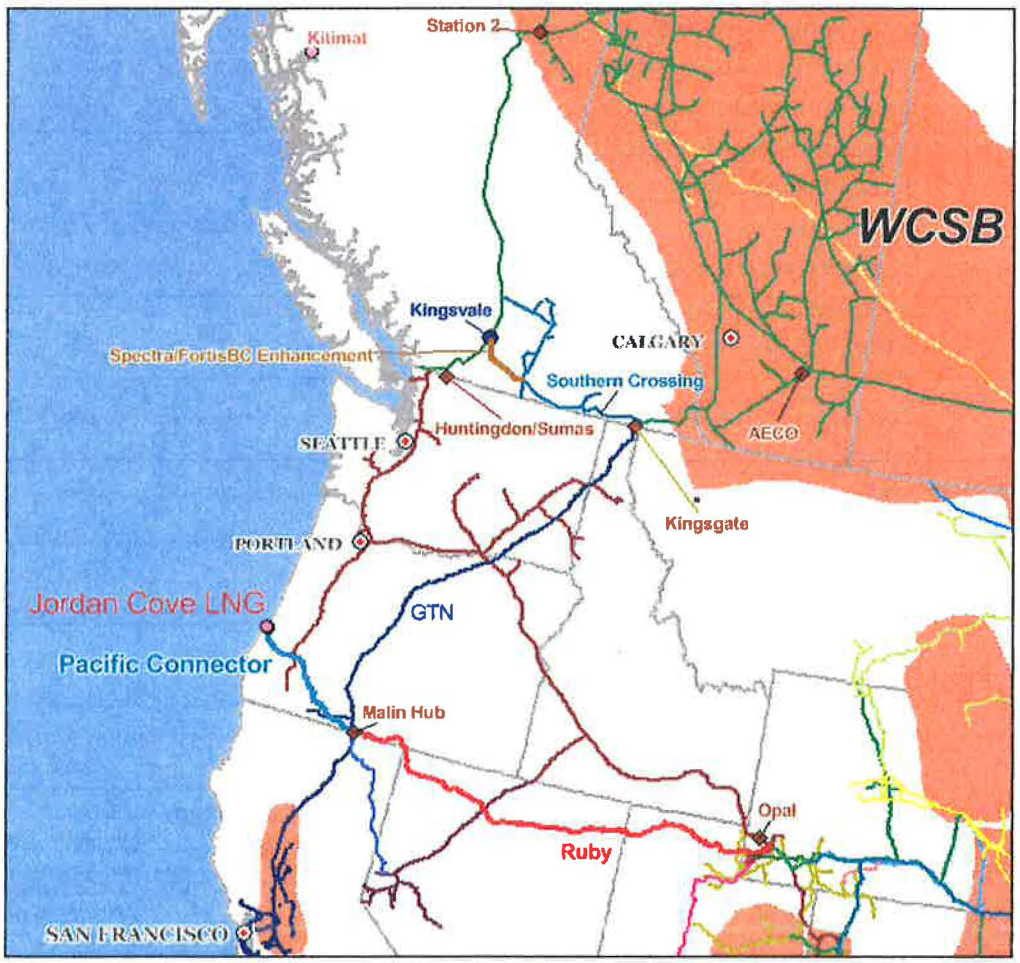

Figure 1: Existing Western North America Pipelines – with Jordan Cove and Pacific Connector

6. In addition to natural gas supplied from conventional and unconventional gas resources in the WCSB, it is possible that long-term gas supplies for LNG export through Jordan Cove could be sourced from the U.S. Rocky Mountain region ("**US Rockies**"). In this regard, Kinder Morgan's Ruby Pipeline will interconnect with Pacific Connector at the Malin Hub and provide access to the US Rockies. However, to create flexibility in the sourcing of natural gas for Jordan Cove, the Applicant is requesting authorization from the National Energy Board to export the full amount of gas required to support Jordan Cove at full build-out from Canada.

7. Jordan Cove and the Pacific Connector will each be offered to prospective long-term customers (terminal capacity holders and pipeline shippers, respectively) on a toll model, pursuant to which the sourcing of natural gas supplies will be arranged by individual customers of Jordan Cove and Pacific Connector. The Applicant will not be directly involved in the purchase or sale of natural gas, but will act as agent and facilitator to its customers with respect to the exportation of gas from Canada.

8. Customers may own proprietary reserves in the WCSB or have access to their own internal gas trading and marketing capabilities. Customers may also choose to use a third party gas trading and marketing company to source gas supplies. Alternatively, it is possible that an aggregated group of natural gas producers will provide natural gas under term contracts. It is also possible that a combination of some or all of these strategies may be implemented.

9. JCEP is in commercial discussions with a number of LNG customers for the off-take of a portion or all of the initial 6 MMt/y of available LNG from Jordan Cove. Once customers have been secured for Phase 1, JCEP will enter into discussions for the additional 3 MMt/y of LNG capacity available in Phase 2. Possible market players include Asia Pacific consumption markets, international energy traders, and major energy companies. JCEP is seeking customer contracts with initial terms of twenty-five (25) years for each of Jordan Cove and Pacific Connector.

10. The advanced status of Jordan Cove and Pacific Connector within the U.S. regulatory approval process provides a high degree of confidence that a Final Investment Decision ("**FID**") will be possible by the end of 2014. Subject to completion of all regulatory approvals, it is expected that construction of Jordan Cove, and Pacific Connector will commence in early 2015, with commercial operations expected to begin in early 2019.

II. Project Facility Descriptions

11. Jordan Cove consists of natural gas receipt and conditioning equipment, liquefaction facilities, two full-containment LNG storage tanks, an LNG carrier berth and cargo

loading system, and a dedicated power plant. These facilities, as shown on Figure 2, will be developed on approximately 400 acres of land owned by an affiliate of the Applicant, which are zoned industrial or marine-dependent industrial. The location of Jordan Cove was chosen for its wide open channel, access to existing natural gas infrastructure, ease of construction due to mild temperatures, and access to labour and housing requirements for construction and operations.

Figure 2: Layout of Proposed Jordan Cove Facilities

12. Gas supply to Jordan Cove will be delivered by Pacific Connector. Pacific Connector is owned equally by the Applicant and a subsidiary of The Williams Company ("**Williams**"), a major U.S. natural gas pipeline and energy company. As shown in Figure 3, Pacific Connector is a 232-mile, 36-inch diameter pipeline which will extend from the Malin Hub to Jordan Cove. The pipeline will have an initial capacity in excess of 1 Bcf/d, powered by a 41,000 horsepower gas turbine compressor station. With additional compression, Pacific Connector's capacity may be expanded to an amount in excess of 1.5 Bcf/d. Williams is the EPC development partner and has responsibilities for regulatory processing, development and construction of the Pacific Connector.

Figure 3: Proposed Pacific Connector, Malin Hub to Jordan Cove

13. At the Jordan Cove site, gas supplies, after treatment through a gas conditioning facility, will be liquefied using the Black & Veatch PRICO® liquefaction process. Once the natural gas is liquefied, it will be stored at -162 Celsius in two, 160,000 cubic meter full-containment storage tanks prior to being available for loading into LNG cargo ships.

14. Electrical power requirements for the liquefaction facility will be provided by a dedicated 420 megawatt power plant located adjacent to the liquefaction facilities and referred to as the South Dunes Power Plant. This natural gas fueled, combined cycle generating plant will power the refrigeration systems in the natural gas liquefaction process, and supply steam to the pipeline gas conditioning units. The South Dunes Power Plant will be owned and operated by an affiliate of the Applicant.

III. U.S. Regulatory Summary

15. Jordan Cove has been under development since 2005, initially as an import facility and subsequently as an export facility following significant changes to gas supply availability within North America. Jordan Cove was approved for construction and operation as an LNG import facility by the U.S. Federal Energy Regulatory Commission ("**FERC**") in late 2009. At that same time Pacific Connector was also authorized for construction by the FERC, which would allow for the flow of natural gas to western U.S. markets from Jordan Cove. No facilities were ever constructed under these previous authorizations.

16. In mid-May 2013, JCEP achieved a major regulatory milestone to export natural gas by completing all requirements under the FERC Pre-Filing process, including

requirements under the *National Environmental Policy Act* ("***NEPA***"), an approximate one-year process. The Pre-Filing and *NEPA* processes allow for extensive public input and for the cooperation and participation of various U.S. federal agencies to coordinate the processes and environmental reviews needed in the authorization of large energy infrastructure projects such as LNG terminals and interstate pipelines. Following completion of the Pre-Filing and *NEPA* processes, JCEP filed a formal application with the FERC, in late-May 2013, seeking authorization to construct Jordan Cove, and thus the export of LNG.

17. Regulatory approval by the FERC authorizing construction of Jordan Cove is expected by the latter part of 2014. The four-year construction period of Jordan Cove is expected to begin in early 2015, with facility commissioning in late 2018 and commercial operations beginning by early 2019. A copy of the FERC filing can be found at: http://elibrary.ferc.gov/idmws/docket_search.asp under Docket CP13-483.

18. With completion of the FERC Pre-Filing and *NEPA* processes, Pacific Connector Gas Pipeline, LP, the owner of the Pacific Connector gas pipeline project, filed a completed FERC application in June 2013 for authorization to construct the Pacific Connector pipeline, which would allow for the transportation of natural gas to Jordan Cove and thus to enable the export of natural gas. Approval for this project is also expected by late 2014, with construction initiation to allow for commercial operations to be concurrent with Jordan Cove in early 2019. A copy of the filing can be found at: http://elibrary.ferc.gov/idmws/docket_search.asp under Docket CP13-492.

19. JCEP holds a licence to export up to 9 MMt/y of LNG, for thirty (30) years, to countries with which the U.S. has a Free Trade Agreement ("**FTA**"). A copy of the FTA approval can be found at: http://www.fossil.energy.gov/programs/gasregulation/authorizations/Orders_Issued_2011/ord3041.pdf.

20. In March 2012, JCEP filed an application with the U.S. Department of Energy to export LNG to non-FTA countries, which, at the time of the Applicant's filing of an application for a licence to export gas with the National Energy Board, has the Jordan Cove facility in the top four of qualified facilities (out of twenty-plus applicants) seeking non-FTA approval. Jordan Cove's application to export LNG to non-FTA countries can be found at: http://www.fe.doe.gov/programs/gasregulation/authorizations/2012_applications/12_32_LNG_Application.pdf.

21. Authorization to construct the South Dunes Power Plant is governed by the Oregon Department of Energy – Energy Facilities Siting Council. A notice of intent was filed

by JCEP in August 2012 and a formal application will be filed in the fall of 2013. Once filed, a copy of the application will be available at: http://www.oregon.gov/energy/Siting/Pages/SDP.aspx. Regulatory approval for the power plant is expected mid-2014, allowing for construction to begin concurrently with the LNG facility in early 2015.

22. Jordan Cove and Pacific Connector are in receipt of local land use approvals, including all consents required from Coos County and the City of Coos Bay, Oregon. A local government approval is required from the City of North Bend, Oregon for the North Point Workforce Housing ("**NPWH**") complex. A Conditional Use Permit application will be submitted to the City of North Bend for the NPWH in the fall of 2013.

23. Other federal, state and local applications required for Jordan Cove and Pacific Connector are being made as required to meet a FID in late 2014. These include, but are not limited to, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, U.S. Coast Guard, U.S. Fish and Wildlife Service, National Marine Fisheries Service, Federal Aviation Administration, U.S. Bureau of Land Management, U.S. Forest Service, U.S. Bureau of Reclamation, Oregon Department of Environmental Quality, Oregon Department of Water Resources, Oregon Department of Land Conservation and Development, Oregon Division of State Lands, Oregon Department of Fish and Wildlife, Oregon Department of Transportation, Native American Heritage Commission, Oregon State Historic Preservation Office, and numerous county planning departments.

IV. Project Sponsor and Ownership

24. JCEP is a Delaware limited partnership, duly registered to conduct business in the State of Oregon. The general partner of JCEP is Jordan Cove Energy Project, L.L.C., a Delaware limited liability company. The two limited partners in JCEP own equal interests in both JCEP and its general partner. The first, the Applicant, a Delaware limited partnership, owns seventy-five percent of each entity. The Applicant is indirectly wholly-owned and controlled by Veresen, a Canadian public corporation based in Calgary, Alberta. The second limited partner, Energy Projects Development L.L.C., a Colorado limited liability company, owns twenty-five percent of each entity and is in turn owned by various private individuals, all of whom are U.S. citizens. Veresen expects to acquire the twenty-five percent interest in JCEP and its general partner from Energy Projects Development L.L.C.

25. Veresen is a diversified energy infrastructure company that owns and operates stable, long-life energy infrastructure assets across North America. Over the last fifteen

years, Veresen has focused on three principal business lines: pipelines, midstream and power. Veresen's experience with these large-scale energy infrastructure assets will play a key role in the construction and operation of Jordan Cove.

9

NATURAL GAS — 03 Nov 2017 | 09:29 UTC — Houston

Pembina says Jordan Cove LNG terminal budget to be reviewed in 2018

Author Harry Weber John McManus
Editor Richard Rubin
Commodity Natural Gas
Tags henry-hub

The new operator of the proposed Jordan Cove LNG export terminal in Oregon said Friday it has become more positive about its potential with the shorter route it offers to Asia and the interest it continues to receive from prospective buyers of its supply.

But Pembina Pipeline cautioned that development and construction costs would play into its decisions about future budgeting for the project.

Pembina did not immediately respond to a query for comment on whether the company, which took over the project after acquiring fellow Canadian pipeline operator Veresen last month, is fully committed to seeing Jordan Cove through to completion.

"Clearly, it is a huge project and we're looking at it carefully," Pembina CEO Mick Dilger said during a conference call with analysts to discuss third-quarter financial results. "It does have a significant burn rate, and we have to carefully review the risk-to-reward profile."

Dilger said that analysis would be done as part of the company's 2018 budget review. Burn rate refers to how quickly a developer spends its development and operating budget for a project, a factor that could lead to cost overruns. Jordan Cove has not yet reached a final investment for the project.

Jordan Cove would provide an outlet for Rockies gas producers who have been getting squeezed from all directions as a result of growing Permian production, steadily declining Southwest demand, as well as pushback from US Northeast expansions bringing more gas into the Midwest markets.

Basis at Rockies supply hubs has seen steady downward pressure this year as a result of increasing competition from other supply regions, data compiled by Platts Analytics' Bentek Energy show.

Basis pricing at the Opal hub in southwest Wyoming averaged a 28 cents/MMBtu discount to Henry Hub through the first 10 months of the year, 10 cents weaker than the same time period in 2016, Platts Analytics data show.

INSUFFICIENT DEMAND CITED

In September, prior to the combination with Pembina, Veresen filed its second formal application to US regulators seeking approval of Jordan Cove, betting

commercial support it received since its first request would push the project over the finish line after more than four years of trying.

The current crop of US LNG export developers that are still going through the regulatory process have been struggling amid fears of a global supply glut to sign long-term agreements with buyers to help raise the billions of dollars they need to build their terminals.

Several, including NextDecade's Rio Grande LNG project in Brownsville, Texas, have delayed final investment decisions and extended expected in-service dates.

Others are eyeing creative ways to prove viability, such as Tellurian's decision to buy gas-producing assets in Louisiana that will provide access to cheap supplies to its proposed Driftwood **LNG** export terminal.

Tellurian also has floated the idea of fixed prices for shipments to Asia.

It was Jordan Cove's failure to show sufficient demand for its project to outweigh any negative impacts from the construction that was cited by the Federal Energy Regulatory Commission as a key reason for the agency's March 2016 permit denial.

Less than two weeks later, Veresen announced that it had signed a preliminary agreement covering key commercial terms with one Japanese firm, Jera, and the next month it reached a preliminary agreement with another, Itochu.

FERC refused to reconsider the initial application, which was filed in May 2013, but left open the opportunity for Veresen to file a new request.

With Veresen now under its fold, Pembina is left with the decision making about Jordan Cove's future.

The company reiterated Friday that it is targeting a final investment decision for 2019 and an in-service date of 2024. In a slide presentation accompanying its investor call, a plus sign was next to both dates, suggesting that FID and in-service could be pushed later.

In the meantime, the company is proceeding through the FERC process and working on finalizing existing agreements with offtakers, as well as securing agreements for its remaining capacity.

The preliminary offtake deals with Jera and Itochu cover approximately half the 1 Bcf/d of capacity of Jordan Cove's initial phase and 77% of the capacity of the Pacific Connector pipeline that would supply feedgas to the terminal.

Executives said they expect a FERC permit decision during the latter part of 2018.

"I would characterize where we are now is having gone from neutral to favorable on the project," Dilger said. "We have been around the world meeting with potential customers. It does seem to us the timing and location of the project are favorable, and we are seeing quite a substantial interest in the project."

--Harry Weber, harry.weber@spglobal.com
--John McManus, john.mcmanus@spglobal.com
--Edited by Richard Rubin, richard.rubin@spglobal.com

10

Jordan Cove
Energy Project, L.P.

October 4, 2017

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Jordan Cove Energy Project L.P. – Docket No. CP17-495-000
Supplemental Information

Dear Ms. Bose:

On September 21, 2017, Jordan Cove Energy Project L.P. ("JCEP") filed an application pursuant to Section 3(a) of the Natural Gas Act ("NGA"), as amended,[1] and Parts 153 and 380 of the regulations of the Federal Energy Regulatory Commission ("Commission"),[2] for authorization to site, construct, and operate certain liquefied natural gas facilities. In the application, JCEP notified the Commission that its parent, Veresen Inc., had announced that it would be acquired by Pembina Pipeline Corporation ("Pembina"), a Canadian corporation, and that the closing was scheduled for the third or fourth quarter of 2017. Pembina is a publicly-traded corporation, listed on the New York Stock Exchange and the Toronto Stock Exchange, and a leading transportation and midstream service provider that has been active in the energy industry for over 60 years.

On October 2, 2017, Pembina acquired 100 percent of the outstanding shares of Veresen Inc. and JCEP is now a wholly owned subsidiary of Pembina. To reflect the closing of this transaction, enclosed please find a revised Exhibit B to the application and a revised Form of Notice to reflect this supplement, as necessary.

Should you have any questions, please contact me at rose.haddon@jordancovelng.com or (866) 227-9249.

Sincerely,

/s/ Rose Haddon
Rose Haddon
Director, Regulatory Affairs
Jordan Cove Energy Project L.P.
Pacific Connector Gas Pipeline, LP

cc: John Peconom (FERC)

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[1] 15 U.S.C. § 717b(a)(2012).

[2] 18 C.F.R. Pts. 153 and 380 (2017).

Jordan Cove Energy Project L.P.
Exhibit B
Docket No. CP17-495-000

Explanation of Financial and Corporate Relationships

Jordan Cove Energy Project L.P. ("JCEP") is a Delaware limited partnership with a primary place of business located at 5615 Kirby, Suite 500, Houston, Texas 77005. Jordan Cove Energy Project L.P. is a wholly-owned subsidiary of Jordan Cove LNG L.P. The ultimate parent of JCEP is Pembina Pipeline Corporation ("Pembina"), an Alberta corporation. Pembina is a publicly-traded corporation listed on the New York Stock Exchange and the Toronto Stock Exchange. Please see the attached organizational chart which details the corporate subsidiaries and affiliates of JCEP.

JCEP is also affiliated with Pacific Connector Gas Pipeline, LP. Like JCEP, PCGP is a subsidiary of Jordan Cove LNG L.P., and the ultimate parent of PCGP is Pembina.

Pacific Connector
GAS PIPELINE

October 4, 2017

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Pacific Connector Gas Pipeline, LP – Docket No. CP17-494-000
Supplemental Information

Dear Ms. Bose:

On September 21, 2017, Pacific Connector Gas Pipeline, LP ("PCGP") filed an application pursuant to Section 7(c) of the NGA,[1] and Parts 157 and 284 of the Commission's regulations,[2] for a certificate of public convenience and necessity authorizing PCGP to construct, install, own, and operate a new natural gas pipeline. In the application, PCGP notified the Commission that its parent, Veresen Inc., had announced that it would be acquired by Pembina Pipeline Corporation ("Pembina"), a Canadian corporation, and that the closing was scheduled for the third or fourth quarter of 2017. Pembina is a publicly-traded corporation, listed on the New York Stock Exchange and the Toronto Stock Exchange, and a leading transportation and midstream service provider that has been active in the energy industry for over 60 years.

On October 2, 2017, Pembina acquired 100 percent of the outstanding shares of Veresen Inc. and PCGP is now a wholly owned subsidiary of Pembina. To reflect the closing of this transaction, enclosed please find a revised Exhibit D to the application and a revised Form of Notice to reflect this supplement, as necessary.

Should you have any questions, please contact me at rose.haddon@jordancovelng.com or (866) 227-9249.

Sincerely,

/s/ Rose Haddon
Rose Haddon
Director, Regulatory Affairs
Jordan Cove Energy Project L.P.
Pacific Connector Gas Pipeline, LP

cc: John Peconom (FERC)

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[1] 15 U.S.C. § 717f (2012).
[2] 18 C.F.R. Pts. 157 and 284 (2017).

Pacific Connector Gas Pipeline, LP
Exhibit D
Docket No. CP17-494-000

Pacific Connector Gas Pipeline, LP

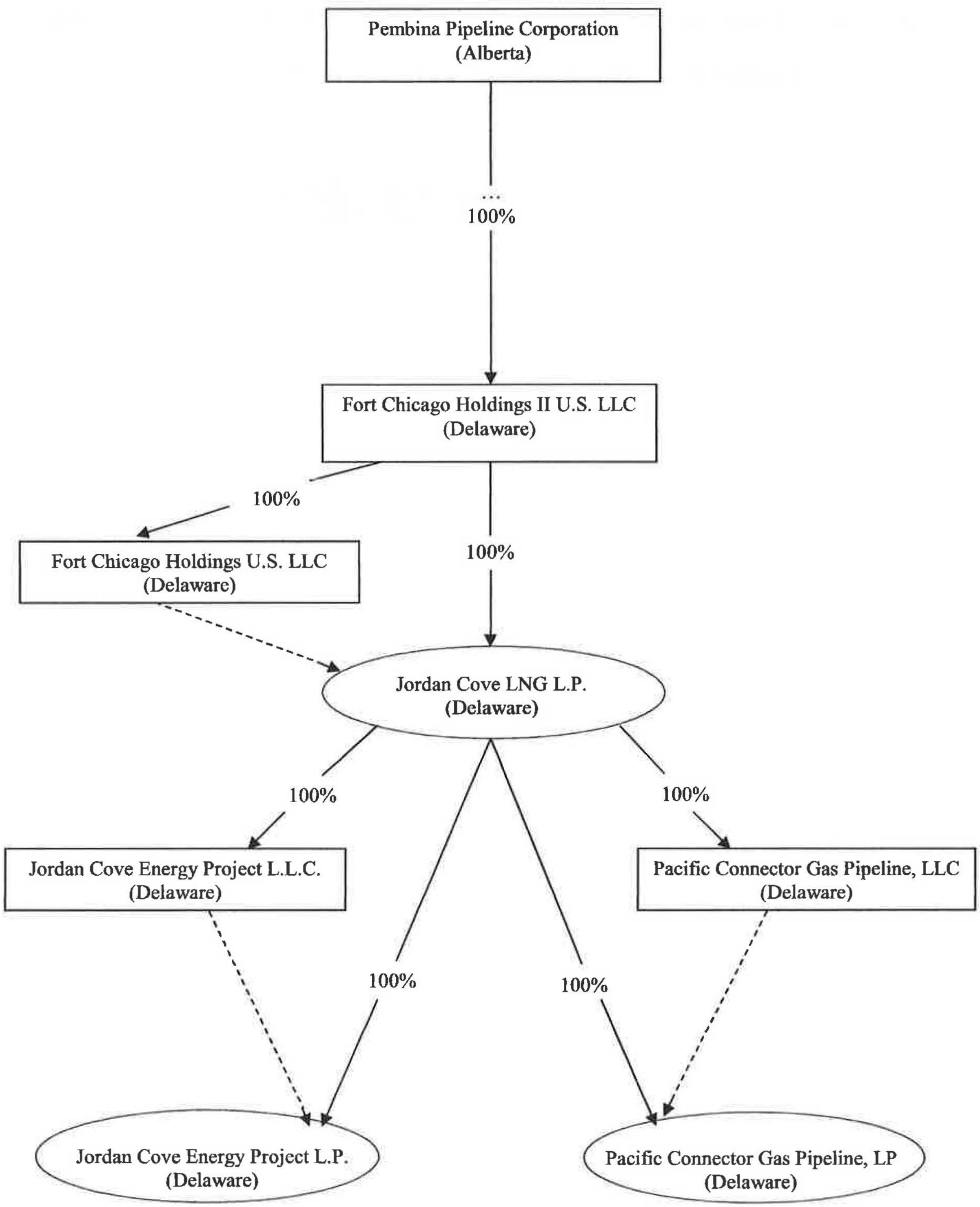
Subsidiaries and Affiliates

Pacific Connector Gas Pipeline, LP ("PCGP") is a limited partnership organized under the laws of the State of Delaware. PCGP is a subsidiary of Jordan Cove LNG L.P., a wholly-owned subsidiary of Pembina Pipeline Corporation ("Pembina"), an Alberta corporation. Pembina is a publicly-traded corporation listed on the New York Stock Exchange and the Toronto Stock Exchange. Please see the attached organizational chart.

PCGP is also affiliated with Jordan Cove Energy Project L.P. ("JCEP"). Like PCGP, JCEP is a subsidiary of Jordan Cove LNG L.P., which is in turn an indirect wholly-owned subsidiary of Pembina.

JORDAN COVE ENERGY PROJECT

OWNERSHIP DIAGRAM



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 4th day of October, 2017.

/s/ Victoria R. Galvez
Victoria R. Galvez

11

Statement of Larry S. Mangan Oct. 7. 2018

My name is Larry Mangan. I am retired wildlife biologist with the U.S. Department of the Interior. My wife Sylvia and I live on Haynes Inlet, a branch of the Coos Bay estuary.

On April 14, 2017 I noticed two jet skis (personal watercraft each with one operator) traversing a portion of Haynes Inlet at high water, immediately east of our home. Both jet skis appeared to have rods or antennas on them, and my first thought was that they may be individuals working for Jordan Cove LNG or Pacific Gas Connector, Jordan Cove's pipeline company, surveying the area with on-board GPS equipment as they traversed portions of the bay across property we own. (Besides our property on dry land we also own several lots located in Haynes Inlet that are mudflats at low tide and covered by water at high tide).

In early March 2017, Mr. Robert Reinbold, Land Manager for the Pacific Connector Gas Pipeline and Jordan Cove LNG company, had informed us by Fed Ex overnight letter, that our ranch was proposed to be crossed by the preferred alternative for their methane gas pipeline. Among other requests in the letter, Mr. Reinbold had asked for written permission to enter our property to conduct surveys. In a postal letter, in an email and by conversation with Mr. Reinbold, we adamantly refused giving Jordan Cove LNG and Pacific Gas Connector and any of their agents permission to enter or cross our property, insisting that they would be trespassed if they so attempted.

So when we noticed the jet skis crossing our property, we were very curious if they were operated by employees or agents of the two aforementioned companies. Within minutes of observing the two watercraft I telephoned Mr. Reinbold, who has an office in Medford, and asked him if the individuals operating the jet skis which were crossing our property out in the bay could be their employees or contractors. I also asked him about some engineering aspects of the pipeline. To both questions he answered that he didn't know for sure the answers, and then he said, to the best of my recollection: 'Well, I wouldn't be able to get a hold of anyone in the main office to check today anyway, because the office is in Canada and it's a national holiday there.' (not an exact quote, but close).

Indeed, it turns out that April 14, 2017 (Good Friday) was a statutory holiday in Canada.

This conversation indicates to me that their activities here in Coos Bay were being controlled and managed by individuals in Canada.

Signed

Larry S. Mangan

93780 Hillcrest Lane
North Bend, OR. 97459

OFFICIAL SEAL
ERIK TURNER
NOTARY PUBLIC - OREGON
COMMISSION NO. 949506
MY COMMISSION EXPIRES APRIL 25, 2020

Oct 8, 2018

State of OREGON
County of COOS

I certify that this is a true and correct copy of a document in the possession of LARRY S MANGAN
Dated: 10/8, 2018

OFFICIAL SEAL
ERIK TURNER
NOTARY PUBLIC - OREGON
COMMISSION NO. 949506
MY COMMISSION EXPIRES APRIL 25, 2020

Notary Public – State of Oregon

13-year Cascadia study complete – and earthquake risk looms large

08/01/2012

CORVALLIS, Ore. – A comprehensive analysis of the Cascadia Subduction Zone off the Pacific Northwest coast confirms that the region has had numerous earthquakes over the past 10,000 years, and suggests that the southern Oregon coast may be most vulnerable based on recurrence frequency.

Written by researchers at Oregon State University, and published online by the U.S. Geological Survey, the study concludes that there is a 40 percent chance of a major earthquake in the Coos Bay, Ore., region during the next 50 years. And that earthquake could approach the intensity of the Tohoku quake that devastated Japan in March of 2011.

"The southern margin of Cascadia has a much higher recurrence level for major earthquakes than the northern end and, frankly, it is overdue for a rupture," said Chris Goldfinger, a professor in OSU's College of Earth, Ocean, and Atmospheric Sciences and lead author of the study. "That doesn't mean that an earthquake couldn't strike first along the northern half, from Newport, Ore., to Vancouver Island.

"But major earthquakes tend to strike more frequently along the southern end – every 240 years or so – and it has been longer than that since it last happened," Goldfinger added. "The probability for an earthquake on the southern part of the fault is more than double that of the northern end."

The publication of the peer-reviewed analysis may do more than raise awareness of earthquake hazards and risks, experts say. The actuarial table and history of earthquake strength and frequency may eventually lead to an update in the state's building codes.

"We are considering the work of Goldfinger, et al, in the update of the National Seismic Hazard Maps, which are the basis for seismic design provisions in building codes and other earthquake risk-mitigation measures," said Art Frankel, who has dual appointments with the U.S. Geological Survey and the University of Washington.

STORY BY:

Mark Floyd,
541-737-0788

SOURCE:

Chris Goldfinger,
541-737-5214

AVAILABLE PHOTO(S):
(click to download)

Coos Bay bridge

COOS COUNTY

Sweet: "There is no plan B"

January 11, 2015 by magix 34 Comments

The county will "just shrivel up and rot"

The League of Women Voters held a discussion yesterday at the Coos Bay Fire Hall about the CEP (Community Enhancement Plan). It was more a promotion than a discussion, actually, because the only people presenting or taking questions were proponents of the plan. Commissioner John Sweet and Coos Bay City Councilwoman Jennifer Groth offered a primer about enterprise zones and when I arrived about 45 minutes late there was the familiar pie chart on the board showing the various allocations of what should public tax money. The South Coast Community Foundation will receive its 50%, 25% to the so-called waterfront improvement plan and the remainder divided between the actual taxing districts.

Roughly thirty people were in attendance and based upon the questions it is clear not all were in favor of either Jordan Cove or the CEP. One woman asked if the CEP work group had actually done an analysis of the actual economic impact of supporting the worker camps and the increase in traffic and crime. "Have you allocated enough funds to cover the city's expenses?" Sweet explained the work group had not done an actual study but he was confident there would be enough money.

Others asked if the work group had looked at worst case scenarios. "What happens if Jordan Cove doesn't happen," asked one teacher. "Worse, what happens if Jordan Cove is built and then shuts down?"

"Are we going to be left with that eyesore and all the pollution," asked another.

When Sweet replied that "there is no plan B" half the room gasped audibly. Sweet quickly retreated by assuring the crowd there is no need to plan because Jordan Cove was working on contracts with big Asian energy companies that "don't go out of business" and are "not in China." Sweet said he had complete confidence in Jordan Cove because they have already spent $200 million, (a drop in the bucket for oil and gas), and continue to spend $10 million each month so they are not likely to walk away.

Sweet then asked, "What pollution?" Mouths fell open.

If the company does walk away, or does not receive the required state and federal permits before the end of June 2016, the county will face a $2 million budget shortfall, according to Commissioner Bob Main. Sweet said that without a payment from Jordan Cove through the CEP the commission will have to "make drastic cuts in services" in this next budget cycle. While there is no firm agreement with Jordan Cove to make payments in lieu of taxes via the CEP, company spokesman Michael Hinrichs doesn't expect a FERC approval before 2016 and there are other hurdles to cross.

Thanks to Sweet and Cribbins willingness to give part of the county's share to the waterfront enhancement component of the CEP, even if Jordan Cove breaks ground in time to actually begin making payments, it will not be enough money to avoid layoffs at the county.

Mike Graybill was in attendance and asked if it might not be a good idea to avoid "external dependencies" to which Sweet replied, "we have to be dependent." Without Jordan Cove "Coos County will shrivel up and rot!"

Coos County Assessor Steve Jansen, also in attendance, informed the crowd that the worker camp under the McCullough bridge will "cost almost $750 million" and taxes will be paid to the North Bend Urban Renewal Agency.

Meanwhile, the commissioners held their first strategic planning town hall meeting Friday in Bandon. Earlier this week I asked Cribbins via email for a copy of the strategic plan and she explained that, "We are not presenting and editing a final plan at this meeting, rather, we are seeking input from the public to add to the input the we have received from county employees, department heads, and elected officials." Considering there is no plan B, this now makes sense.

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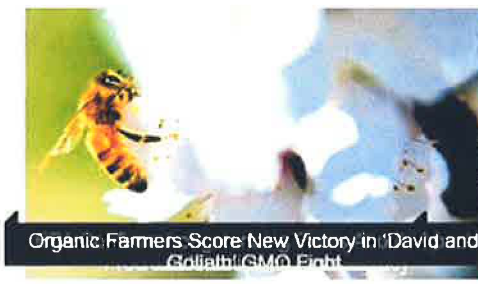

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INTERRUPTIBLE TRANSPORTATION

PURCHASE AGREEMENT

THIS INTERRUPTIBLE TRANSPORTATION PURCHASE AGREEMENT (this "Agreement"), is made and entered into this 31st day of August, 2007, by and between **COOS COUNTY, OREGON, acting by and through its Board of Commissioners** ("Coos County") and Jordan Cove Energy Project, LP, a Delaware Limited Partnership ("Jordan Cove").

RECITALS:

A. Coos County owns and operates a natural gas pipeline;

B. Jordan Cove desires to purchase prepaid interruptible transportation on the Coos County Pipeline at a rate of $0.10 per MMBtu, escalated as set forth in this Agreement; and

C. Coos County agrees to sell such prepaid interruptible transportation and to negotiate an interruptible transportation services agreement on the Pipeline with Jordan Cove, on the terms and conditions set forth in this Agreement.

NOW THEREFORE in consideration of the mutual covenants and agreements set forth, the parties hereto agree as follows:

ARTICLE I
DEFINITIONS

1.1 Definitions. As used in this Agreement, the following words and terms shall have the following meanings:

"Abandons all Efforts to Construct an LNG Facility" means if and when Jordan Cove makes a final decision to cease all efforts to construct a Liquid Natural Gas ("LNG") facility within the boundaries of Coos County, Oregon, and withdraws all applications from the applicable governmental authorities seeking approval for such a facility or, if such applications have not yet been filed, notifying such governmental authorities that Jordan Cove has no intention of seeking such approval. The applicable government authorities shall include, but are not limited to, the Federal Energy Regulatory Commission ("FERC"), the Oregon Public Utility Commission, and the Coos County Planning Department.

"Construction is Commenced" means to begin on-site construction or on-site modifications, including site clearing, grading, dredging, or landfill.

"Commercial Operation" means the date an LNG facility in Coos County, Oregon receives its first shipment of liquefied natural gas for processing.

"Effective Date" means August 15, 2007.

published by the United States Department of Labor, Bureau of Labor Statistics for the immediately preceding twelve (12) month period.

2.2 Notwithstanding the escalation provisions outlined in Section 2.1 above, the Prepurchase Rate shall not be increased to a rate that exceeds the Zone 1 Rate minus the PCGP Rate minus .5 cents (PCGP Rate – Zone 3 Rate - $.005).

2.3 Interruptible Transportation Prepayments. In consideration for Prepaid Interruptible Transportation, Jordan Cove shall pay Coos County the sum of $200,000 upon execution of this Agreement, and shall pay an additional $25,000 beginning on September 1, 2007 and then each month thereafter (except in the event of a Suspension in accordance with this Agreement), due on the first day of the month, until the termination of the Prepay Period. In addition, Jordan Cove shall pay Coos County an additional $200,000 due if and when Construction is Commenced on an LNG facility within the boundaries of Coos County, Oregon. (The foregoing payments are referred to as the "Interruptible Transportation Prepayments").

2.4 Obligations of Coos County. Coos County agrees that as long as this Agreement is in effect, Coos County will not (a) sell, lease, dispose of, transfer or encumber any portion or all of the Pipeline to any person, firm or entity, without making such transfer or encumbrance subject to Jordan Cove's rights under this Agreement, or (b) provide the equivalent curtailable transportation services on the Pipeline for a rate that is less than the Prepurchase Rate then in effect with out the consent of Jordan Cove. Nothing in this Agreement shall prohibit, restrict, or limit the price and terms at which Coos County can provide transportations services subordinate to the services prepurchased under this Agreement.

2.5 Default by Coos County. Coos County shall be in default under this Agreement if Coos County fails to cure after thirty (30) days written notice form Jordan Cove that Coos County has failed to fulfill any of the Obligations in Section 2.4, above. In the event Coos County is in default under this Agreement, Jordan Cove shall have the right, after expiration of the above thirty (30) day notice period, to terminate this Agreement by providing written notice to Coos County. If Jordan Cove terminates this Agreement as a result of Coos County's default under this Agreement, Jordan Cove is relieved of any further obligation to make Interruptible Transportation Prepayments and Jordan Cove may seek damages for the reduction in the fair market value of the Agreement to Jordan Cove as a result of Coos County's failure to fulfill its obligations under Section 2.4, above.

2.6 Default by Jordan Cove. Jordan Cove shall be in default under this Agreement if Jordan Cove fails to cure after thirty (30) days written notice from Coos County that Jordan Cove has (a) failed to fulfill any payment obligation pursuant to the terms and conditions of this Agreement, or (b) failed to fulfill any other obligation hereunder. In the event that Jordan Cove is in default under this Agreement, Coos County shall have the right, after expiration of the above thirty (30) day notice period, to terminate this Agreement by providing written notice to Jordan Cove. If Coos County terminates this Agreement as a result of Jordan Cove's default, Coos County shall retain all prior payments that Jordan Cove has made to Coos County and all remaining payments through the end of the Prepay Period, adjusted for present value at a discount rate of four percent (4%) per year, shall immediately become due and payable.

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POLITICS & ELECTIONS

Jordan Cove LNG campaign contributions raise questions

Updated Sep 22;
Posted Sep 22

(Fotolia/TNS)

By Ted Sickinger, tsickinger@oregonian.com
The Oregonian/OregonLive

Controversy over foreign meddling in the 2016 Election has been swirling around Washington D.C. since the day Donald Trump was elected president.

But some southern Oregon residents are convinced they've got their own case of foreign interference. And if it's not OK for the Russians, they say, why would it be OK for Canadians?

"Something sure smells, even if they somehow tweaked the system to make this appear legal," said Larry Mangan of North Bend.

Jordan Cove, a subsidiary of Calgary-based Pembina Pipeline Corp., has made $150,000 in political campaign contributions since Sept. 2017, according to Oregon's campaign finance database. The money went to state and local candidates and political action committees that support its plan to build an export terminal for liquefied natural gas on the North Spit of Coos Bay and a 36-inch diameter feeder pipeline that would stretch across southern Oregon.

Here's the potential problem: Jordan Cove LNG, the Coos Bay business to which most of those contributions are attributed, is registered as a foreign partnership and a foreign limited liability company with the Oregon Secretary of State's office, one with its principal office in Calgary, Canada. And the campaign finance manual published by its[1] election division says that federal regulations prohibit foreign nationals, corporations and partnerships from making campaign contributions. Period.

Application for Authority to Transact Business - Foreign Limited Liability Company

Secretary of State - Corporation Division - 255 Capitol St NE, Suite 151 - Salem, OR 97310-1327 - http://www.FilingInOregon.com - Phone (503) 986-2200

FILED
SEP 22 2014
OREGON
SECRETARY OF STATE

REGISTRY NUMBER: 1048559-94
For office use only

In accordance with Oregon Revised Statute 192.410-192.490, the information on this application is public record. We must release this information to all parties upon request and it will be posted on our website.

For office use only

Please Type or Print Legibly in Black Ink. Attach Additional Sheet if Necessary.

1) NAME: JORDAN COVE LNG LLC a Limited Liability Company of Delaware
NOTE: (Must contain the words "Limited Liability Company" or the abbreviations "LLC" or "L.L.C.") Must be identical to the name of record in home jurisdiction.

2) REGISTRY NUMBER IN HOME JURISDICTION 5203760
OR: CERTIFICATE OF EXISTENCE (ATTACHED)
(Please provide a web-verifiable registry number from the entity's home jurisdiction. Certain states, such as Delaware and New Jersey, do not provide status information online. Entities from such places must instead attach an official certificate of existence, current within 60 days of delivery to this office.)

3) DATE OF ORGANIZATION: August 24, 2012
DURATION, IF NOT PERPETUAL:

7) REGISTERED AGENT'S PUBLICLY AVAILABLE ADDRESS:
(Must be an Oregon Street Address, which is identical to the registered agent's business office.)
388 State Street, Suite 420
Salem, Oregon 97301

8) ADDRESS OF PRINCIPAL OFFICE OF THE BUSINESS:
Suite 900, 222 - 3rd Avenue SW
Calgary, Alberta, Canada T2P 0B4

Jordan Cove LNG's business registration in Oregon.

Oregon's campaign finance manual does not address the domestic subsidiaries of foreign corporations. But federal rules do, and Oregon Elections Director Steve Trout said those rules would apply here, too. The federal rules say a domestic subsidiary can set up "a segregated fund" that can make contributions to candidates, but only if the foreign parent does not finance the election contributions, either directly or indirectly, or participate in decisions about the expenditures.

There is no segregated fund listed in Oregon's campaign finance database. And Michael Hinrichs, a spokesman for Jordan Cove, said Friday that all the political contributions are direct from Jordan Cove Energy Project LP, a domestic company registered in Delaware. "The funds for this come from Pembina's U.S. assets. Those funds are generated in the U.S. and stay in the U.S. This is in line with Oregon and federal regulations."

Hinrichs also said a foreign partnership registered in Oregon simply means it's domiciled out of state.

A few of the contributions in the last year identify the company he cited as the contributor. But most are attributed to Jordan Cove LNG, a business entity that alternately lists addresses in Coos Bay, downtown Portland, and even at Hinrich's home. Pembina describes Jordan Cove LNG as a "wholly-owned subsidiary" and Jordan Cove's website describes itself as "a Pembina company."

Jordan Cove LNG is financed by Pembina. Those expenditures are considerable, and public. In early August, Pembina executives addressed financial analysts after the release of the company's second quarter earnings. Scott Burrows, Pembina's chief financial officer, said the company had budgeted $10 million a month in development costs for the Jordan Cove project this year.

Trout, the elections director, agreed that the Oregon campaign manual does identify the prohibitions against foreign contributions. But he said the Elections Division only launches an inquiry when it receives a formal complaint. As of Friday afternoon, he said, the division had not received a complaint about Jordan Cove.

In fact, the Election Division did receive a formal complaint Friday. "I'm asking you to investigate what seems to be sizable campaign contributions by a foreign entity during the present run-up to the November election," Wim de Vriend, a Coos Bay resident and opponent of the project, said in a letter to Secretary of State Dennis Richardson.

1

Trout later said he didn't know about the complaint. But his division responded promptly to de Vriend on Friday afternoon: "See page 30 of the 2018 Campaign Finance Manual (at the link below) which states in part, 'Foreign nationals are prohibited by federal law from making political contributions to influence the election of any candidate.' This prohibition is regulated by the Federal Elections Commission. Therefore, the Elections Division will not be opening an investigation into this matter."

Asked why the Oregon Elections Division declined to investigate a potential problem in local and state elections that it oversees, Trout said, "We don't like to be a gotcha agency. We want people to be able to comply with the rules and not pounce on them for making a mistake, which is why we identify federal requirements."

De Vriend told The Oregonian/OregonLive he was considering filing a federal complaint.

Tran ID	Tran Date	Status	Filer/Committee	Contributor/Payee	Sub Type	Amount
2932589	08/24/2018	Original	Friends of Duane Stark	Jordan Cove	Cash Contribution	$2,000.00
2942570	08/24/2018	Original	ChamberPAC	Jordan Cove LNG	Cash Contribution	$25,000.00
2949990	08/24/2018	Original	Committee to Elect John Sweet	Jordan Cove LNG	Cash Contribution	$10,000.00
2924982	08/21/2018	Original	Oregon Business & Industry Candidate PAC	Jordan Cove LNG	Cash Contribution	$10,000.00
2925431	08/17/2018	Original	Friends of Gary Leif	Jordan Cove Energy	Cash Contribution	$5,000.00
2931673	08/17/2018	Original	Committee to Elect Betsy Johnson	Jordan Cove LNG	Cash Contribution	$2,000.00
2945949	08/17/2018	Original	Committee to Elect John Sweet	Jordan Cove LNG	Cash Contribution	$10,000.00
2940681	08/17/2018	Original	Peter Courtney for State Senate	Jordan Cove Enervender Pm	Cash Contribution	$5,000.00
2920817	08/16/2018	Original	Werner for Oregon	Jordan Cove LNG	Cash Contribution	$2,000.00
2931589	08/10/2018	Original	Brad Witt for State Representative	Jordan Cove LNG	Cash Contribution	$2,000.00
2915589	08/03/2018	Original	Friends of David Brock Smith	Jordan Cove LNG	Cash Contribution	$2,000.00
2919931	08/03/2018	Original	Caddy McKeown for Representative	Jordan Cove Energy	Cash Contribution	$10,000.00
2926791	08/03/2018	Original	Gomberg for State Rep	Jordan Cove LNG	Cash Contribution	$1,000.00
2832616	06/04/2018	Original	Friends of Tim Freeman	Jordan Cove & Pacific Connector	Cash Contribution	$5,000.00
2824773	04/21/2018	Original	Oregonians to Maintain Community Standards	Jordan Cove Energy Project LP	Cash Contribution	$40,000.00
2815680	04/20/2018	Original	Werner for Oregon	Jordan Cove LNG	Cash Contribution	$500.00
2816754	04/20/2018	Original	Friends of Duane Stark	Jordan Cove	Cash Contribution	$500.00
2816758	04/20/2018	Original	Friends of Dallas Heard	Jordan Cove	Cash Contribution	$500.00
2818321	04/20/2018	Original	Citizens to Elect Carl Wilson	Jordan Cove Energy Project	Cash Contribution	$500.00
2818455	04/20/2018	Original	Gomberg for State Rep	Jordan Cove LNG	Cash Contribution	$1,500.00
2834153	10/05/2017	Original	The Roseburg Area Chamber Political Action Committee	Jordan Cove & Pacific Connector	Cash Contribution	$15,000.00
2618262	09/11/2017	Original	Oregon Business & Industry Candidate PAC	Jordan Cove LNG	Cash Contribution	$505.00
2619216	09/11/2017	Original	Caddy McKeown for Representative	Jordan Cove LNG LLC PAC	Cash Contribution	$6,000.00

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Jordan Cove contributions in Oregon's database.

One of the biggest recipients of Jordan Cove's largesse this year has been John Sweet, a Coos County commissioner who's up for reelection in November. Sweet has been vocal in his support of the LNG terminal for the last decade, saying it's the vital ingredient in resuscitating Coos County's economic fortunes. Jordan Cove has poured $20,000 into his campaign coffers this year, making the company his biggest campaign supporter.

Sweet recently returned from Colorado, where he and the Pembina executive in charge of Jordan Cove, Stuart Taylor, met with gas producers, local politicians and Francis Fannon, assistant secretary for energy resources at the U.S. State Department. Colorado producers are big supporters of Jordan Cove as a potential outlet for their gas to customers in Asia.

Contacted Friday about Jordan Cove's contributions, Sweet said, "I'm perfectly satisfied that what was done is legal. If you have questions you need to ask Jordan Cove. I'm happy the way it was done."

His opponent, Katy Eymann, is an outspoken critic of the project, along with her husband, former Oregon Secretary of State Bill Bradbury. She's miffed that the current secretary of state hasn't stepped in.

Eymann also claims Jordan Cove is indirectly putting more money into local races without its name on it. She points to Jordan Cove's largest contribution this cycle: $40,000 to Oregonians to Maintain Community Standards, a political action committee for the trade unions. That was one contribution that lists the Delaware registered partnership identified by Hinrichs. Eymann claims that PAC recycles money to other trade union PACS, which then finance activities for local candidates.

"I'm going to be doing a mailer reminding people not to let your vote be bought by a foreign corporation," Eymann said.

Jordan Cove has spread the wealth to other candidates, most of them with districts close to the terminal or along the pipeline route as well: $15,000 to Rep. Caddy McKeown, D-Coos Bay; $5,000 to Rep. Gary Leif, R-Roseburg; $5,000 to Douglas County Commissioner Tim Freeman; $2,500 to Rep. David Gomberg, D-Central Coast; $2,500 to Rep. Werner Reschke, R-Klamath Falls; $2,500 to Rep. Duane Stark, R-Grants Pass; and $2,000 to Rep. David Brock Smith, R-Port Orford. It also has contributed $2,000 each to Sen. Betsy Johnson, D-Scappoose and Rep. Brad Witt, D-Clatskanie.

"We support organizations and candidates that share our interests in economic development," Hinrichs said.

- Ted Sickinger

tsickinger@oregonian.com

503-221-8505; @tedsickinger

1

Clarification: A foreign partnership registered in Oregon is one domiciled outside the state.