

Save RGV
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Richard Glick, Chairman
Neil Chatterjee, Commissioner
James Danly, Commissioner
Allison Clements, Commissioner
Mark Christie, Commissioner

Federal Energy Regulatory Commission Attention: Kimberly Bose
888 First Street, N.E.
Washington, D. C. 20426

Dear Chairman Glick & Commissioners,

This letter is on behalf of Save RGV (formerly Save RGV from LNG), a Texas non-profit corporation which has been following the permitting process and proposed construction and operation of three LNG liquefaction/export terminals in the Brownsville Ship Channel near Port Isabel, Texas since 2014. The three LNG projects are Rio Grande LNG (CP16-454-000), Annova LNG (CP16-480-000) and Texas LNG (CP16-116-000).

As part of the EIS permitting process, and to ensure the safety of the proposed facilities and surrounding population, FERC required the three LNG projects to do a third-party launch failure analysis for SpaceX's planned launches of their Falcon 9 and Falcon Heavy rockets from their launch site near Boca Chica Beach, Texas. The three LNG projects are to be situated between 5 and 6 miles from the SpaceX launch site. The launch failure analysis information required was spelled out in detail in FERC's "Engineering information request #2:" dated October 27, 2016. FERC in subsequent correspondence reiterated this need to know "individual and cumulative launch failure impacts for this area" and "vulnerabilities and the relative likelihood of debris from a damaged launch vehicle impacting this site [Rio Grande LNG, Annova LNG and Texas LNG]".

The engineering firm used by FERC to assist with their analysis was Millennium Engineering and Integration Company. Their analysis was based on SpaceX's approved plan to launch its in-use Falcon 9 and Falcon Heavy rockets up to 12 times a year from their Boca Chica launch site. While the Millennium analysis itself is a non-public information document, the conclusion stated that the Falcon 9 and Falcon Heavy launches would not pose a significant risk to the proposed LNG terminals. Millennium, as part of their reporting, concluded that they could not complete a Starship analysis because of its experimental nature and there was at the time no definite knowledge that it would ever be launched near the projects being reviewed.

The launch failure analyses were completed and the conclusions included in all three projects' final EISs in 2019. Since then SpaceX has not launched a single Falcon 9 or Falcon Heavy rocket, and now has no plans to do so. SpaceX has instead dramatically changed its plans for the Boca Chica operations. It is now a development, construction, testing, and launch facility for its experimental Starship and Super Heavy booster. Together this will be the largest launch vehicle ever built. In terms of size, number of

engines, thrust and amount of fuel, it will dwarf the Falcon 9 and Falcon Heavy. The fuel will not be RP-1 but instead the more combustible methane and liquid oxygen.

Of the *twenty* items included in FERC's follow-up "Environmental and Engineering Information Request" of August 2, 2017, *seventeen* are based on the Falcon 9 and Falcon Heavy so are now irrelevant. A rocket development and testing facility is much more likely and is almost expected to have accidents/launch failures. In fact, there have already been 4 launch pad explosions of Starship prototypes. The Starship has 3 SpaceX-developed raptor engines. The Super Heavy booster, now under construction at Boca Chica, will have 27-33 raptor engines. A launch failure for the Super Heavy booster will be an order of magnitude greater in every respect.

When FERC granted the three LNG projects their permits in 2019, it was under the assumption that SpaceX launches at Boca Chica would pose no significant hazard to the LNG projects. That assumption can no longer be sustained. The safety of any facility that FERC permits is unequivocally a FERC responsibility. Therefore, we call on you to suspend the permits of Rio Grande LNG, Annova LNG and Texas LNG pending the completion of a new third-party launch failure analysis that determines whether or not the launching of Starship and Super Heavy booster rockets pose significant risks to the LNG facilities, project personnel during construction and operations, and LNG tankers traversing the Brownsville Ship Channel.

Sincerely,

Bill Berg for
Save RGV Board