

Dec. 19<sup>th</sup>, 2019



Administrator Howard Elliott  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

Re: Notice of Proposed Rule Making on changes to the Hazardous Materials Regulations that permit the bulk transport of Methane, refrigerated liquid, in rail tank cars.

Docket No. PHMSA-2018-0025 (HM-264)

Dear Administrator Elliott,

The Center for Liquefied Natural Gas (CLNG) appreciates the opportunity to express its support for the Notice of Proposed Rulemaking (NPRM) to change the Hazardous Materials Regulations (HMR) to allow for the bulk transport of Methane, refrigerated liquid, commonly known as liquefied natural gas (LNG) by rail tank cars.

CLNG advocates for public policies that advance the export of LNG from the United States to developed and emerging markets around the world. A committee of the Natural Gas Supply Association (NGSA), CLNG represents the full LNG value chain, including LNG producers, shippers, terminal operators, and developers, providing it with unique insight into the ways in which the vast potential of this abundant and versatile fuel can be fully realized.

LNG should be authorized for rail transportation because it is a safe method of transport that is currently missing from the list of commodities authorized for rail transportation simply due to a historical lack of need. However, the renaissance of the natural gas industry has created the need to transport LNG by rail. While pipelines are the preferred method of transporting natural gas, rail transportation could provide relief to pipeline-constrained areas of the country. For example, transporting LNG by rail could bring affordable energy relief to communities in New England clamoring for clean, affordable natural gas from nearby Pennsylvania but who are instead forced to rely on dirtier fuels or pay peak prices to heat their homes and buildings because of pipeline constraints. It could also aid in bringing natural gas out of the Permian Basin and Eagle Ford Shale to markets where the natural gas can be used; thus, mitigating wasteful flaring of this valuable resource into the atmosphere.

PHMSA regulations authorize the rail transportation of cryogenic liquids with similar properties to LNG, including refrigerated liquid carbon dioxide, argon, ethylene, and hydrogen chloride. In fact, ethylene, being a highly reactive molecule, has been safely transported in tank cars for 50 years. And while transportation of LNG by rail would be new in the United States, it is not a new way of transporting LNG in other countries around the world.

CLNG asks that PHMSA authorize LNG for rail transportation because there is a market need, and it is consistent with PHMSA's existing authorizations of other commodities.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "C. Riedl", written in a cursive style.

Charlie Riedl  
Executive Director  
Center for Liquefied Natural Gas