



LNG: The U.S. and EU's Deal for Disaster

Following Russia's invasion of Ukraine, the European Union faces an energy crisis, leaving millions of residents in energy poverty and millions more in fear of coming winters.¹ A key part of the EU's solution calls for increased imports from the United States of liquefied "natural" gas, or LNG, totaling an extra 15 billion cubic meters in 2022 and 50 billion more annually until at least 2030.² A Food & Water Action Europe analysis finds that this misguided EU policy could generate 400 million metric tons of carbon dioxide (CO₂) equivalent annually, cost over €64 billion through 2025 and lock in fossil fuel infrastructure for decades. A better investment for the EU and our planet is a rapid transition to 100 percent renewable energy, avoiding significant fossil fuel emissions.

LNG: The Gas of the Future?

LNG is natural gas cooled to -161.2 degrees Celsius to facilitate shipping and storage.³ The U.S. supply typically originates from hydraulic fracturing, or fracking, an extremely dangerous process that jeopardizes communities and the climate alike.⁴ After traveling through pipelines, the gas is liquefied near coastal export terminals for transport. These facilities endanger nearby communities, threatening pollution and deadly explosions.⁵ From there, ocean tankers carry the LNG to import terminals abroad for regasification and distribution.⁶ After the sabotage of two gigantic gas pipelines in the North Sea, infrastructure protection has been ramped up across Europe, with LNG terminals potentially vulnerable.⁷

LNG is composed primarily of methane, the second leading contributor to climate change after CO₂. Methane's global warming potential is over 85 times that of CO₂ over a 20-year period.⁸ This means that even small leaks during LNG production and transport can have massive consequences.

LNG Will Exacerbate Dangerous CO₂ and Methane Emissions

The U.S. is now the world's largest LNG exporter, with exports averaging 0.32 billion cubic meters per day in the first half of 2022.⁹ Europe is its perfect match, being the biggest importer of LNG globally.¹⁰ In the first five months of 2022, over 70 percent of U.S. LNG exports went to Europe.¹¹ If this pace continues, U.S. exports to Europe will triple the extra 15 billion cubic meter promise.¹²

At a time when we desperately need to be pulling back on fossil fuels and cutting emissions, additional LNG imports will not "contribute to the fight against climate change" as the European Commission has claimed.¹³ Natural gas has been falsely touted as a bridge fuel for too long,¹⁴ and our analysis shows that this agreement will not significantly cut emissions.

Food & Water Action Europe finds that the lifecycle footprint of 50 billion cubic meters of LNG is nearly 400 million metric tons of CO₂-equivalent (using methane's 20-year global warming potential). If the U.S. delivered 50 billion cubic meters annually through 2029, this would amount to nearly 2.9 billion metric tons of CO₂-equivalent¹⁵ — equal to the emissions from over 621 million cars driven for one year. One year of emissions from 50 billion cubic meters of LNG would be equivalent to yearly emissions from 100 coal plants.¹⁶

Claiming LNG is better than Russian gas is dubious

Big Oil eagerly touts LNG as the climate-friendly alternative to Russian gas, but problems arise quickly, as a standard methane leakage rate from U.S.-sourced LNG has not been measured.¹⁷ Discerning methane emissions from LNG's lifecycle is difficult, as research has consistently underestimated reality and failed to appropriately study the problem.¹⁸ A report commissioned by the U.S. House of Representatives found that Big Oil knowingly misrepresents its emissions reporting to the Environmental Protection Agency (EPA) and that EPA methane figures underestimate emissions by 60 to 90 percent.¹⁹

These slight differences have major ramifications. For instance, consider the deal that French energy company Engie has made with NextDecade for 15 years of LNG.²⁰ NextDecade sources its gas from the Permian basin in the southwestern U.S., where estimates for fugitive methane emissions are far higher than the U.S. average.²¹ RMI estimates that, under a low leakage rate, emissions would be lower than for Russian gas. But under a high leakage assumption, Permian gas is worse by nearly 300 kilograms of CO₂-equivalent per barrel of oil equivalent — equal to over 136 kilograms of coal.²² Food & Water Action Europe's estimates are based on studies that use approximate methane leakage rates, one of the most impactful factors for emissions calculations, potentially undercounting the true impact of this agreement.²³

Infrastructure Buildouts Now Will Keep Us Trapped for Decades

On the U.S. side, there are seven large LNG export facilities capable of exporting 13.8 billion cubic feet per day by late 2022 when ongoing expansion is completed.²⁴ Research by the Institute for Energy Economics and Financial Analysis shows that, with one plant already under construction and coming online in 2025, the U.S. can meet its promises to Europe without building new infrastructure or signing new contracts.²⁵

Yet 24 projects are currently proposed, approved, or under consideration, as fossil fuel companies capitalize on a crisis to bury us deeper in debt to fossil fuels for years to come. According to the Environmental Integrity Project, the 24 LNG projects could emit over 90 million tons of CO₂ annually without even accounting for upstream or downstream emissions.²⁶

Looking to Europe exposes a similar pattern. There are 41 operating import facilities across the EU, with 7 under construction and another 26 planned.²⁷ Because onshore LNG terminals take several years to come online, Europe is also turning immediately to Floating Storage Regasification Units (FSRUs), with at least 20 planned.²⁸

FSRUs work with existing grid connection, but long-term contracts are needed to ensure steady supply.²⁹ This entrenches fossil fuels for decades to come, with countries desperate for a stopgap now signing onto 10-, 15-, or 20-year agreements.³⁰ FSRUs remain operational for over 20 years, while onshore import terminals last 40 years.³¹ If a terminal went into operation today, it could function until 2062 — far beyond what the planet can sustain. And because land-locked countries cannot directly receive LNG, the fossil gas industry is pushing buildouts of pipeline infrastructure to transport LNG inland, locking in even more fossil fuel infrastructure.³² This is in stark contrast with an announced decrease of 60 percent of EU final gas demand by 2030, as modeling under the REPowerEU plan forecasts.³³

While We Waste Money on Gas, Climate Goals Are Slipping Out of Reach

These decisions by the EU — imports, long-term contracts, FSRU leases, terminal and pipeline buildouts — will not come cheaply. Food & Water Action Europe estimates that, under the average U.S. LNG export price from January 2016 to July 2022 (thus, largely before the energy crisis), the cost of the chilled gas (50 billion cubic meters) would be €10.6 billion. Through 2025, that would cost over €35 billion.³⁴

However, since the onset of the conflict in Ukraine, prices have skyrocketed, with LNG prices up 1,900 percent from two years ago.³⁵ Because so much LNG is locked in long-term contracts with Asian or Middle Eastern clients, Europe needs to outbid those contracts plus the cost of breaking them.³⁶ Maintaining the level of imports needed will require consistent outbidding.³⁷ Combine this with the lack of supply, and high prices are expected to remain for at least three years, and some anticipate even through 2027.³⁸

For this reason, we estimate that, based on the 2022 average for U.S. LNG exports, 50 billion cubic meters could cost €19.6 billion for a mere 12.5 percent of overall EU gas demand. Through 2025 that could be over €64 billion.³⁹ Since the agreement continues until 2030 and prices may remain volatile, the real price tag may be far higher. Some countries are turning to long-term contracts as a cheaper option.⁴⁰ Long-term contracts offer security, while also providing the opportunity for oil and gas companies, already raking in billions, to lock in profits for decades to come.⁴¹

Infrastructure is not cheap either. The REPowerEU plan suggests that additional investments of €10 billion in new gas infrastructure are needed to compensate for the loss of Russian gas, which would come on top of the €13 billion worth of gas priority projects announced last year.⁴² This would total €23 billion worth of fossil gas infrastructure with an EU priority label.

Individual countries may invest more in their own infrastructure. Germany, for example, has passed a law to fast-track permitting and is building LNG terminals at eight times the normal speed.⁴³ Germany is looking to approve 11 terminals that would import until 2043, two years before the country's goal for achieving climate neutrality.⁴⁴ These plans already include five FSRUs, with 5- or 10-year contracts.⁴⁵ Germany has set aside €2.5 billion for four of these. Two permanent import terminals are also in planning, although the cost is unknown.⁴⁶

Claims that that terminals will be retrofitted for renewable energy sources once the immediate crisis ends are suspect, as the projects are backed by energy and utility companies looking primarily for profit.⁴⁷ Some of the German projects were opposed several years ago by local communities and environmental organizations, citing climate concerns and proximity to Wadden Sea National Park.⁴⁸ These concerns remain unaddressed.

Environmental Justice Must Remain at the Forefront

Such concerns are not without cause. The U.S. Department of Energy reports that LNG infrastructure leads to significant social and environmental harms, including the loss of food crops, decreased social and cultural cohesion, and increased vector-borne and communicable diseases. This is largely due to the potential for relocation or splintering of communities following large-scale projects such as LNG facilities.⁴⁹ In the U.S., communities have rallied against export facilities, as the destruction of natural habitats to pollute the air and our climate will never be in the public interest.⁵⁰

Continued fracking will also exacerbate existing harms to U.S. frontline communities. European countries have traditionally looked away from U.S. LNG in part because of its fracking origins. Now, Europe is eager to take this once-tainted LNG. But the dangers remain the same. Communities plagued by fracking experience well documented and severe environmental impacts, which fall disproportionately on frontline populations that include rural, lower-income communities and communities of color. Those living near fracking sites are at increased risk of contracting cancer and a host of other medical disorders, with pregnant women and children at even greater risk. 4

Even after all of this, U.S. production will not dig Europe out of its energy crisis — gas executives have said as much. The U.S. industry is not increasing production any further, keeping supplies tight and prices high.⁵⁵ This will hit the European public hardest, particularly lower-income individuals who pay disproportionately more for heating.⁵⁶ Experts anticipate that food bank participation in the Netherlands will rise 15 percent in the coming months, as families are forced to choose between eating and heating their homes across the region — all while Big Oil profits.⁵⁷

This Money Must Be Put Toward Renewables Instead

These resources and money should be used to build out the renewable grid instead of wasting it on fossil fuel buy-outs. With the EU promising net zero greenhouse gas emissions by 2050 and a 40 percent increase in renewable energy production by 2040, this development is desperately needed. The United Nations has warned that European countries cannot increase their fossil fuel use and that the climate crisis is already upon us.⁵⁸

Food & Water Action Europe finds that when looking at the 2022 average cost for LNG, the cost of renewables is far lower. For the price of 50 billion cubic meters, utility-scale solar power could provide over 540 million megawatt-hours (MWh), 11 percent more than LNG. Onshore wind power costs are similar, providing 515 million MWh. Scaling up renewables to this level would avoid over 500 million metric tons of fossil fuels, no matter if it is replaced with solar or wind.⁵⁹ The choice is clear.

Conclusion and Recommendations

We find that the EU's proposal for energy security serves oil and gas companies, not the European public. A rapid switch to domestic energy through renewables, coupled with energy efficiency and further reduction of demand, is the only way to truly establish energy security from external threats, whether it be war, climate disaster, or supply chain disruptions. It is also the only way to ensure that our planet remains livable and safe for future generations.

While acknowledging the energy crisis and the difficulty of securing energy for Europeans in a drastically changed context, Food & Water Action Europe recommends:

- An EU action plan, with decision makers using all possible levers to reduce the EU's
 fossil fuel dependence, including dependence on LNG. This plan must acknowledge that
 an additional 50 billion cubic meters of LNG until 2030 will burden the planet and
 communities with a high environmental and climate impact and represent an outsized
 target benefiting the fossil fuel industry but not Europeans in the medium and long terms.
- In line with a 60 percent decline in final gas demand by 2030 as modeled for the REPowerEU plan, decision makers need to map out milestones to decommission gas infrastructure in order to reduce costs for an inevitably decreasing number of gas consumers.
- Halting subsidies and other support for new LNG import and transport infrastructure on both the EU and national levels. This would protect consumers from risky lock-in to fossil gas dependence and costly stranded assets, and would avoid the undermining of EU and international efforts to cut methane emissions.
- Ending EU climate and energy policies that have a vested interest at their core. The
 fossil gas transport and extraction industry must be removed from decisive roles within
 legislation, and must be stopped from influencing, torpedoing, and slowing down laws to
 protect energy consumers, the environment, and our climate. This includes the EU Gas
 Package drafts currently ridden with conflicts of interest. The EU needs gas market rules
 that prepare for an ambitious phase-out of fossil gas while avoiding false solutions such
 as blending and fossil gas-based hydrogen.
- Urgently banning hydraulic fracturing and fracked gas imports in Europe. Bans on fracking and fracked gas must be a core element of any ambitious legislation tackling methane emissions, including the EU Methane Regulation.

Endnotes

- McHugh, David. "Europe is facing an energy crisis as Russia cuts gas. Here's why." PBS News. September 6, 2022; Jack, Victor. "Ukraine war heats up energy poverty debate." Politico. May 17, 2022.
- White House. [Fact sheet]. "United States and European Commission Announce Task Force to Reduce Europe's Dependence on Russian Fossil Fuels." March 25, 2022 at 1 to 2.
- ³ U.S. Energy Information Administration (EIA). "Natural gas explained. Liquefied natural gas." May 19, 2022.
- Kurmayer, Nikolaus J. "As imports of U.S. gas surge, so does concern over its environmental impact." *Euractiv*. Updated August 23, 2022; Food & Water Watch (FWW). [Fact sheet]. "Dangerously Deep: Fracking's Threat to Human Health." February 2021.
- EIA (May 2022); National Academies of Sciences, Engineering, and Medicine. (2021). [Prepublication copy]. *Preparing for LNG by Rail Tank Car: A Review of a U.S. DOT Safety Research, Testing, and Analysis Initiative*. Washington, DC: National Academies Press at 30; Lindstad, Elizabeth and Agathe Rialland. "LNG and cruise ships, an easy way to fulfill regulations versus the need for reducing GHG emissions." *Sustainability*. Vol. 12. 2020 at abstract; Gilbert, Alexander Q. and Benjamin K. Sovacool. "US liquefied natural gas (LNG) exports: Boom or bust for the global climate?" *Energy*. Vol. 141. December 2017 at abstract; Abrahams, Leslie S. et al. Carnegie Mellon University. "Life cycle greenhouse gas emissions from U.S. liquefied natural gas exports: Implication for end uses." *Environmental Science & Technology*. Vol. 49. 2015 at abstract.
- ⁶ EIA (May 2022).
- ⁷ Chestney, Nina. "Analysis: Exposed Europe steps up energy defenses after Nord Stream 'sabotage." *Reuters*. September 30, 2022.
- Nature. [Editorial]. "Control methane to slow global warming fast." *Nature*. Vol. 596. August 26, 2021 at 1; United Nations Economic Commission for Europe. "The challenge." Available at https://unece.org/challenge. Accessed September 2022 and on file with Food & Water Action Europe (FWAE).
- 9 Somasekhar, Arathy. "U.S. becomes top LNG exporter in first half of 2022 EIA." Reuters. July 25, 2022.
- European Commission. "Energy. Liquefied natural gas." Available at https://energy.ec.europa.eu/topics/oil-gas-and-coal/liquefied-natural-gas en. Accessed August 2022 and on file with FWAE.
- 11 Somasekhar (2022).
- Renshaw, Jarrett and Scott DiSavino. "Analysis: U.S. LNG exports to Europe on track to surpass Biden promise." Reuters. July 26, 2022.
- European Commission. "EU-U.S. LNG trade." 2022 at 2. Available at https://ec.europa.eu/energy/sites/ener/files/eu-us_lng_trade_folder.pdf. Accessed August 2022 and on file with FWAE.
- 14 Kemfert, Claudia et al. "The expansion of natural gas infrastructure puts energy transitions at risk." Nature Energy. Vol. 7. July 4, 2022 at 584; Storrow, Benjamin. "Gas, a 'bridge fuel,' dominates U.S. power at any price." E&E News. September 20, 2022; FWW. "Fracking's Bridge to Climate Chaos." January 2020 at 3.
- FWAE analysis of Roman-White, Selina et al. National Energy Technology Laboratory (NETL). Prepared for the U.S. Department of Energy (DOE). "Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States: 2019 Update." DOE/NETL-2019/2041. September 12, 2019 at 20; Abrahams, Leslie et al. Carnegie Mellon University. [Supplemental information]. "Life cycle greenhouse gas emissions from U.S. liquefied natural gas exports: Implications for end uses." Environmental Science & Technology. Vol. 49. February 2015 at 11 to 12. **Methodology Notes:** The NETL and Abrahams studies use a 100-year methane GWP of 36 and a 20-year methane GWP of 87 (p3 and p3238). Methane leakages are calculated by NETL from U.S. Environmental Protection Agency (EPA) data and use expected rates. Abrahams uses 3% for upstream and assumes no fugitive emissions during shipping. Averages were taken between these two studies and scaled up to 50 and 365 billion cubic meters (BCM). The conversation factor between BCM and megawatt-hours was 1 to 9,769,444.
- 16 EPA. "Greenhouse Gas Equivalencies Calculator." Energy and the Environment. Available at https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator. Accessed September 2022.
- Soraghan, Mike and Carlos Anchondo. "Does a crackdown on Russian gas help or hurt the climate?" E&E News. May 13, 2022; Kemfert et al. (2022) at 582.
- Balcombe, Paul et al. "Total methane and CO₂ emissions from liquefied natural gas carrier ships: The first primary measurements." Environmental Science & Technology. Vol. 56. June 2022 at 9632; Groom, Nichola and Valerie Volcovici. "Analysis: Biden plan to aid Europe with LNG poses risk to U.S. climate goals." Reuters. April 14, 2022; Stern, Jonathan P. Oxford Institute for Energy Studies. "Methane emissions from natural gas and LNG imports: An increasingly urgent issue for the future of gas in Europe." OIES Working Paper: NG, No. 165. November 2020 at vi.
- U.S. House of Representatives Majority Staff. Prepared for the Committee on Science, Space, and Technology. "Seeing CH4 Clearly: Science-Based Approaches to Methane Monitoring in the Oil and Gas Sector." June 2022 at 4 and 14.
- De Luna, Marcy. "Long-term U.S. LNG deals pick up as demand increases." *Reuters*. May 2, 2022.
- ²¹ Conway, T.J. et al. "Engie's U.S. LNG reversal: Emission cuts helped clinch the deal, but are they legit?" RMI. May 23, 2022.
- ²² *Ibid*; EPA (2022).
- ²³ Roman-White et al. (2019) at 9 and 18; Abrahams et al. (2015) at 3239 and 3241.

- ²⁴ DiSavino, Scott. "Factbox: Could the U.S. ship more LNG to Europe?" *Reuters*. July 11, 2022.
- Williams-Derry, Clark. Institute for Energy Economics and Financial Analysis. "The U.S. Can Increase LNG Exports to Europe. No New Contracts or Infrastructure Are Required." April 2022 at 1 to 2.
- Federal Energy Regulatory Commission (FERC). "North American LNG export terminals." Available at https://cms.ferc.gov/media/north-american-lng-export-terminals. Updated July 26, 2022; Shaykevich, Alexandra et al. Environmental Integrity Project. "Playing With Fire: The Climate Impact of the Rapid Growth of LNG." June 9, 2022 at 15.
- 27 Global Energy Monitor. "Europe Gas Tracker." Available at https://globalenergymonitor.org/projects/europe-gas-tracker/tracker-map. Accessed August 2022 and on file with FWAE; Pickrell, Emily. "Europe's warm embrace of LNG raises methane emissions concerns." Forbes. June 15, 2022.
- Rashad, Marwa and Christoph Steitz. "Analysis: As Germany joins LNG import race, a long and crowded track awaits." Reuters. April 20, 2022; Aitken, Greig et al. "Europe Gas Tracker Report." Global Energy Monitor. April 2022 at 15; Bussewitz, Cathy. "Europe plan for floating gas terminals raises climate fears." Associated Press. August 31, 2022.
- ²⁹ Shiryaevskaya, Anna. "Europe's plan to replace Russian gas stumbles on LNG bottlenecks." *Bloomberg.* May 23, 2022.
- 30 Schonhardt, Sara. "As Europe hunts for gas, where do the emissions go?" E&E News. August 3, 2022; "Germany commits \$3B to launch LNG imports chartering four FSRUs." Maritime Executive. May 5, 2022; de Luna (2022); Larkin, Abi. "Equinor signs SPA with Cheniere." LNG Industry. June 13, 2022.
- 31 Lempriere, Molly. "Is floating LNG really the best option for emerging economies?" Offshore Technology. Updated October 26, 2017; DOE. Global LNG Fundamentals. 2018 at 44.
- ³² Shiryaevskaya (2022); Aitken et al. (2022) at 4.
- European Commission. "Implementing the REPower EU Action Plan: Investment Needs, Hydrogen Accelerator and Achieving the Bio-Methane Targets." Working document. May 18, 2022 at 19.
- FWAE analysis of EIA. "Price of liquefied U.S. natural gas exports." Available at https://www.eia.gov/dnav/ng/hist/n9133us3m.htm. Accessed September 2022 and on file with FWAE. **Note:** These calculations are based on September Euro to Dollar conversions, which were 1 to 1.
- Renshaw and DiSavino (2022); Shah, Saeed and Anna Hirtenstein. "Europe scoops up LNG, choking off power supplies in poorer nations." Wall Street Journal. July 7, 2022.
- 36 Renshaw and DiSavino (2022).
- Eddy, Melissa and Stanley Reed. "Germany counts on chilled gas to keep warm over winter." New York Times. Updated July 28, 2022.
- 38 Brown, Sarah. "The EU's €250 Billion Gas Gamble." Ember Climate. May 11, 2022 at 3; Flowers, Simon. "What price LNG: The conundrum for buyers sourcing competitive gas." Wood Mackenzie. June 16, 2022.
- ³⁹ FWAE analysis of EIA (September 2022); European Commission (August 2022). **Note:** These calculations are based on September Euro to Dollar conversions, which were 1 to 1.
- Schonhardt (2022); Maritime Executive (2022); de Luna (2022); Larkin (2022); Bradshaw, Michael. Warwick Business School, University of Warwick. "Energy crisis: Why the UK will be at the mercy of international gas prices for years to come." The Conversation. August 31, 2022.
- 41 Slav, Irina. "Long term LNG contracts are the future for natural gas markets." Yahoo News, July 18, 2022.
- European Commission. [Press release]. "REPowerEU: A plan to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition." May 18, 2022; FWAE. [Press release]. "EU Commission slammed for backing gas megaprojects during COP26." November 10, 2021.
- Dumiak, Michael. "Germany rushes to build \$69M gas import terminal, its first." Engineering News-Record. July 11, 2022; Elliott, Stuart. "Feature: Germany in race against time to deploy new LNG import terminals." S&P Global. July 1, 2022.
- Kemfert et al. (2022) at 582; Die Bundesregierung. [Press release]. "Secure national energy supply." July 20, 2022. Available at https://www.bundesregierung.de/breg-de/aktuelles/sichere-gasversorgung-2037912.
- ⁴⁵ Reed, Stanley and Christopher F. Schuetze. "Germany announces new LNG facility, calling it a green move from Russian energy." *New York Times*. September 1, 2022; *Maritime Executive* (2022).
- ⁴⁶ Eddy and Reed (2022); Elliott (2022).
- Die Bundesregierung (2022); Reed and Schuetze (2022); "Germany's Cabinet moves to head off lawsuits against LNG terminals." *Maritime Executive*. May 11, 2022.
- ⁴⁸ Müller-Kraenner, Sascha and Constantin Zerger. [Press release]. "Success for climate protection: Uniper cancels planned LNG terminal in Wilhelmshaven and announces reorientation of the project." *Deutsche Umwelthilfe*. November 6, 2020.
- ⁴⁹ DOE (2018) at 109 to 110.
- Save RGV. Letter to Federal Energy Regulatory Commissioners. "Re: Rio Grande LNG, LLC (Docket # CP16-454-000, CP16-454-001, CP22-17-000) request for extension of time." April 27, 2022 at 2. Available at https://www.savergv.org/files/ugd/d1db5d_eeee8e69cab44fb497f6352728e1bed2.pdf.

- ⁵¹ Kurmayer (2022).
- Gorski, Irena and Brain S. Schwartz. "Environmental health concerns from unconventional natural gas development." Oxford Research Encyclopedia Global Public Health. February 2019 at 11 and 39; Castelli, Matthew. "Fracking and the rural poor: Negative externalities, failing remedies, and federal legislation." Indiana Journal of Law and Social Equality. Vol. 3, Iss. 2. May 2015 at 281 and 285 to 287; Zwickl, Klara. "The demographics of fracking: A spatial analysis for four U.S. states." Ecological Economics. Vol. 161. July 2019 at 202.
- McKenzie, Lisa M. et al. "Childhood hematologic cancer and residential proximity to oil and gas development." PLoS ONE. Vol. 12, No. 2. February 15, 2017; McKenzie, Lisa M. et al. "Ambient nonmethane hydrocarbon levels along Colorado's northern Front Range: Acute and chronic health risks." Environmental Science & Technology. Vol. 52. 2018 at 4514; Colborn, Theo et al. "Natural gas operations from a public health perspective." Human and Ecological Risk Assessment. Vol. 17, Iss. 5. September 2011 at abstract.
- Casey, Joan A. et al. "Unconventional natural gas development and birth outcomes in Pennsylvania, USA." Epidemiology. Vol. 21, No. 2. March 2016 at 8; Webb, Ellen et al. "Neurodevelopmental and neurological effects of chemicals associated with unconventional oil and natural gas operations and their potential effects on infants and children." Reviews on Environmental Health. Vol. 33, No. 1. 2018 at 1, 3, and 4.
- Tayeb, Zahra. "The U.S. shale industry can't step up oil and gas output fast enough to rescue Europe this winter, its bosses say." Business Insider Africa. September 15, 2022.
- ⁵⁶ Celasun, Oya et al. "How Europe can protect the poor from surging energy prices." *International Monetary Fund Blog.* August 3, 2022.
- Sharafedin, Bozorgmehr and Canan Sevgili. "Analysis: Forget showering, it's eat or heat for shocked Europeans hit by energy crisis." Reuters. August 29, 2022; Jack (2022); Global Witness. "US Gas Exporters Grabbed a Wartime Windfall From Russia's Attack on Ukraine and Dictated Biden's Response to the Conflict." September 2022.
- Van Hoof, Sam. "European Commission launches proposals to reach 55% emissions reduction by 2030." Sustainable Development Solutions Network. July 30, 2021; "Do not backtrack on climate goals amid energy crunch, UN tells EU." Al Jazeera. September 12, 2022.
- FWAE analysis of EIA (September 2022); Lazard. "Lazard's Levelized Cost of Energy Analysis Version 15.0." October 2021 at 6.