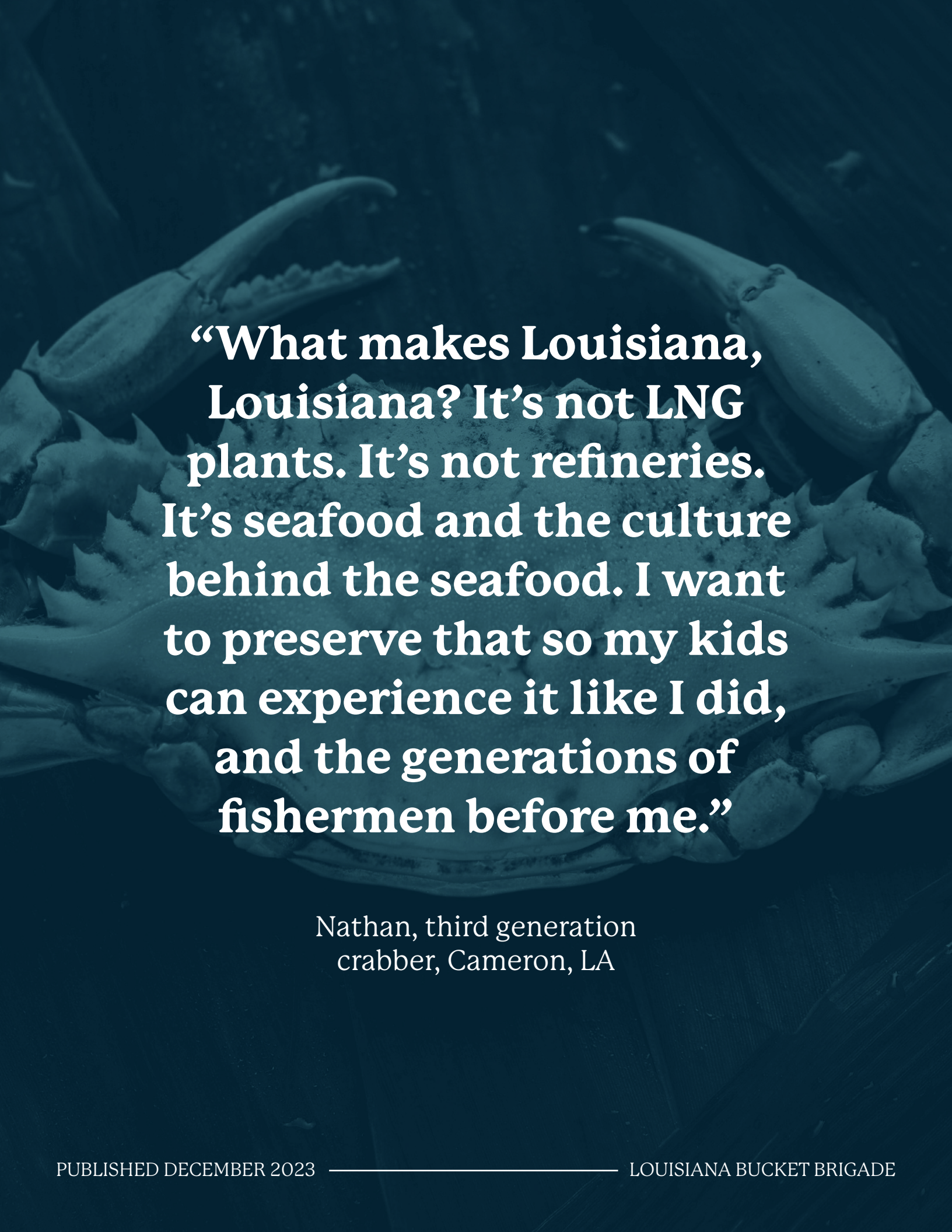


# Gas Export Spotlight:

Venture Global's  
Operational Failures  
& the Impacts on  
Fishermen







**“What makes Louisiana,  
Louisiana? It’s not LNG  
plants. It’s not refineries.  
It’s seafood and the culture  
behind the seafood. I want  
to preserve that so my kids  
can experience it like I did,  
and the generations of  
fishermen before me.”**

Nathan, third generation  
crabber, Cameron, LA

The fishermen of Cameron Parish are under threat from the gas export industry. No company poses a greater danger than Venture Global, which has an application pending for a second facility in Cameron Parish even as its first one, Calcasieu Pass, continues its disastrous operations. According to its own reports, Venture Global's Calcasieu Pass (CP) had over 2,000 permit violations in its first year of operation. It also destroyed a public boat launch on Davis Road, blocking crucial water access for local fishermen.

Destroying fishing access is not Venture Global's only contribution to record low catches. Its pollution, tanker traffic and the associated dredging seriously hamper fishing, shrimping, crabbing and oyster harvesting. Venture Global has been a disaster for fishermen.

Instead of spending money on maintenance or improving its operations in ways that could benefit the residents of Cameron Parish, Venture Global maximizes profits by using Louisiana as its dumping ground. According to Reuters, shipments from the CP facility in the first year and a half of operations fetched **\$18.2 billion dollars** in the global markets.<sup>1</sup> Contrast this with the local fishing families struggling to survive.

The purpose of this report is to ensure that state and federal officials, including the Department of Energy and President Biden, are aware of the significant operational problems and reporting failures that have been ongoing at Venture Global's Calcasieu Pass facility since beginning operations in January 2022. It is of utmost importance that Venture Global is not granted additional permits for any of its proposed gas export projects in Louisiana.

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<sup>1</sup> <https://www.reuters.com/business/energy/venture-global-lng-contract-fight-with-european-customers-2023-09-19/>






**“I am 60 years old, and as far as I can remember, my dad was in Castle Bayou right here, and Joe’s Cove catching oysters. As far back as I can remember, I’ve been in the boat with my dad. And my kids, in a few more years, the way things are, they won’t ever see that enjoyment.”**

Eddie LeJuine, lifelong  
Cameron fisherman



# Venture Global's Pattern of Underreporting its Accidents and Emissions at its Calcasieu Pass facility

**METHODOLOGY:** The information about Venture Global's self-reported accidents is taken from the company's reports to the Louisiana Department of Environmental Quality. The reports are available in the department's Electronic Data Management System, or EDMS.

<u>2022</u>		
Filed legally required letters to the state of Louisiana about its accidents within seven days of each accident		NO
Provided thorough information in its Semiannual Monitoring Report for the first half of 2022		NO
Provided information in its Semiannual Monitoring Report for the second half of 2022		YES including revisions for the entire year
<u>2023</u>		
Filed legally required letters to the state of Louisiana about its accidents within seven days of each accident		NO
Provided thorough information in its Semiannual Monitoring Report for the first half of 2023		NO



# Caught in the Act: Neighbors Document Pollution

Throughout the time that Venture Global CP has failed to file reports, neighbors have documented ongoing operational problems at the facility, including flaring that lasted for hours at a time. Just as in 2022, photographs of the facility taken in 2023 continue to show flaring night and day in far greater frequency than Venture Global reported.<sup>1</sup>

This documentation, as noted in the appendix, shows flaring on 71 separate days in the first half of 2023. Venture Global failed to report any problems for 34 of these days. Venture Global’s 2023 reports show 82 days of noncompliance.

While some of the reports reference releasing nitrogen oxides and carbon monoxide, there is no detail on the full suite of chemicals or the amounts released during these accidents. Methane, benzene and volatile organic

chemicals are among the chemicals likely released by Venture Global.

The Louisiana Department of Environmental Quality’s lackluster oversight has created a weak reporting environment within the state. However, even in this context, these Venture Global reports stand out for the paltry information provided.




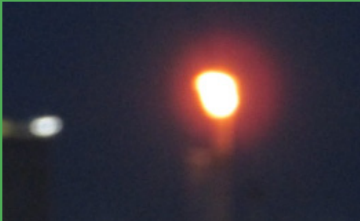
When neighbors’ documentation is combined with CP’s reports, operational problems are documented on 115 of 181 days in the first half of the year, or 63% of the time. However, this includes one reported accident occurring over a 78 day period between 3/8/23 and 5/25/23 which Venture Global reported lasting for only five hours. Excluding this one insufficiently reported accident, the number of days when flaring has been documented at the facility without corresponding information from the company would be to 69 days.

**What follows is some of the documentation from the unreported accidents.**








<sup>1</sup> <https://bit.ly/VGFlarePics>

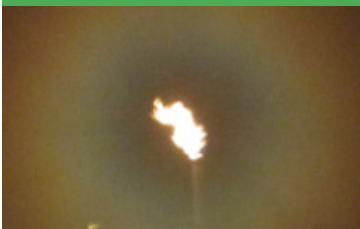
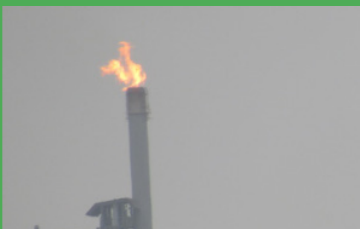


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	6:41 PM		8:13 PM

## MAY 3, 2023

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	2:11 PM		7:29 PM
		9:04 PM	

## MAY 9, 2023

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	12:42 PM		5:19 PM

MAY 19, 2023



8:46 AM



10:21 AM



8:23 PM



11:35 PM

JUNE 23, 2023



8:32 AM



6:32 PM

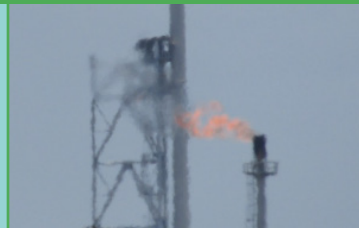


8:15 PM

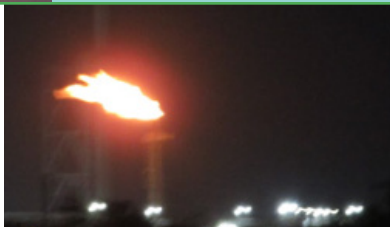
JUNE 25, 2023



2:25 AM



1:05 PM



8:58 PM



# Spotlight on Operations

## 2022

In its first year of operations, Venture Global Calcasieu Pass LNG had over 2,000 permit violations. There were two consistent themes from that year:

1. Ongoing accidents and flaring.
2. Failure to report those operational problems to the Louisiana Department of Environmental Quality (LDEQ) and to the Environmental Protection Agency (EPA). The ongoing flares, smoke and sirens were evident to anyone observing Calcasieu Pass, yet throughout 2022, the company did not file reporting letters, as required by the Clean Air Act.

The company finally came clean in its 2022 Title V Semiannual Monitoring report, submitted to the state in March of 2023.<sup>1</sup>

At that time, Venture Global submitted a revised Semiannual Monitoring report for the 1st half of 2022, and a new report for the 2nd half of the year, in which it finally acknowledged that its poor design and operational failures had caused the facility to be out of compliance with its permit for 83% of its operational time during the year.<sup>2</sup> This acknowledgment - and the significant amounts of carbon monoxide, nitrogen oxides, hazardous and toxic air pollutants and particulate matter emitted - was consistent with the ongoing flaring and poor air quality that neighbors documented. However, rather than submit plans to fix these operational problems, Venture Global requested that the Louisiana Department of Environmental Quality (LDEQ) raise its emission limits.

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<sup>1</sup> 2022 Revised Title V 1st Semiannual Monitoring Report. March 30, 2023. <https://edms.deq.louisiana.gov/app/doc/view?doc=137952622022>

<sup>2</sup> Title V 2nd Semiannual Monitoring Report. March 30, 2023. <https://edms.deq.louisiana.gov/app/doc/view?doc=13795260>



## 2023

Venture Global submitted a Title V Semiannual Monitoring report to the LDEQ for the period from January 1 to June 30, 2023, as required by the Clean Air Act. As in its first report in 2022, Venture Global reported few accidents. This lack of reporting contrasts with neighbors' experiences of smoke, flares and sirens. The company also provided no explanation about design fixes or repair of equipment failures from preceding reports.

What follows is an analysis of the most recently filed Semiannual Monitoring report submitted by Venture Global to the LDEQ on October 4, 2023.

Venture Global reported that CP has been in violation of its permit for 82 days in the first 240 days of the year, often with multiple pieces of equipment exceeding permitted pollution limits on the same days. However, when compared to neighboring residents' documentation of flaring at the facility over the same time period, the company is under reporting, as documented on page 3 - 5.

The Semiannual Monitoring report does not provide adequate detail on the facility's inability to abide by its permit. For example, one row in the report notes that the Acid Gas Thermal Oxidizers (EQT 0030) were out of compliance for 78 days (3/8/23 - 5/25/23), yet the total duration of this accident is reported to be only 5 hours. The company's explanation does not adequately address this discrepancy, and simply concludes that "operating conditions were returned to compliance."

Seventy-five percent of the permit violations reported were due to ongoing problems with the facility's turbines, which provide power to the entire terminal. The facility's turbines were also the cause of over half of its permit violations in 2022.

This continuation into 2023 is concerning, as Venture Global stated that it had already taken corrective measures at the end of last year to fix its turbine issues. In its response to LDEQ's Compliance Order and Notice of Potential Penalty (CONPP) sent to the facility for its significant noncompliance in 2022, the company went as far as to say "due to the installation and availability of the Energy Management System, which removes the need for manual adjustments and reduces the potential for excess emissions... these matters cannot be considered ongoing." Venture Global then argued that because the issue is not ongoing, there is no basis for the Compliance Order issued by LDEQ.

If this issue had been resolved in 2022, as Venture Global stated, why are the facility's turbines still the primary source of the problem?

While it is clear that Venture Global has not resolved the issues with its turbines, LDEQ has still not refuted the company's claims and has agreed to resolve the CONPP with Venture Global behind closed doors.

# Constant Flaring

Photographs and observation of the facility have allowed us to better understand how problematic Venture Global's operations are in the absence of transparency from the company. We [first published concerns](#) about operational problems and under-reporting at the facility in July 2022, after regular observations of the facility's flare raised concern among residents of Cameron.<sup>1</sup> While at the time there was little information from the company about operational problems, residents' concerns were confirmed nearly a year later, after the company finally submitted revised monitoring reports from 2022 and admitted to being out of compliance with its permit for 83% of the year.

This pattern of under-reporting its accidents even as it flares excessively has continued through Venture Global's second year of operation. Documenting the facility's flaring helps ensure that Venture Global's sparse, self-reported, information provided to the state does not go unchallenged. Without photographs by Cameron Parish residents, the only information we would have about Venture Global's operations would be the company's incomplete and inaccurate self-reports.

# Permit Modification

While Venture Global CP maintains its pattern of underreporting, the LDEQ is considering granting an air permit modification. Rather than requiring compliance, a modification would make its massive amounts of pollution retroactively legal, thereby rewarding Venture

Global for its shoddy operations. The permit modification would increase pollution from this facility, including an increase in flaring hours from the current permit of 60 hours per year to 500 hours per year, an 833% increase. The facility is also seeking a 17% increase in the release of toxic, hazardous, teratogenic, mutagenic or carcinogenic pollutants.

# Enforcement by LDEQ

The LDEQ issued a Compliance Order and Notice of Potential Penalty (CONPP) to Calcasieu Pass LNG on June 26, 2023. The agency cited Venture Global for numerous failures to abide by the terms of its permit, as well as State of Louisiana statutes. Not only was the facility consistently exceeding its emission limits, it also failed to report accidents as required by law.

While this should have been a positive step toward holding Calcasieu Pass LNG accountable, LDEQ has been complacent following Venture Global's response to the CONPP. The company claims that all of its operational problems from 2022 have been resolved, and therefore there is no basis for the enforcement action. However, its own reporting from the first half of 2023, as well as documentation of the facility's flaring from this year, strongly indicate otherwise.

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<sup>1</sup> <https://labucketbrigade.org/wp-content/uploads/2022/08/SpeedOverSafety.pdf>

# Recommendations

Venture Global has made \$18.2 billion dollars by abusing the state of Louisiana. We strongly encourage the Biden administration, the Department of Energy, the Federal Energy Regulatory Commission, the Louisiana Department of Environmental Quality and all other state and federal regulators to take into consideration Venture Global's mismanagement and operational failures at its Calcasieu Pass facility. This company's current and proposed gas export facilities are clearly not in the public interest.

Given its past performance and its incentive to make money, it is not reasonable to think that this company can ever operate in a manner that respects state or federal laws, let alone the local community. Given this reality, we recommend:

1. The LDEQ deny the permit modifications for Venture Global CP and shut the facility down for its failure to comply with the law throughout its operations.
2. Compensation paid to the fishermen by Venture Global for two years of lost wages and mental duress.
3. The LDEQ fine Venture Global for CP's violations to the fullest extent of the law.
4. The LDEQ, Department of Natural Resources, EPA, Department of Energy and Federal Energy Regulatory Commission deny permits for the proposed CP2 facility.
5. State and federal agencies revoke existing permits for the Plaquemines gas export terminal. According to reports to FERC, this facility would be "technologically identical" to Calcasieu Pass, a pending disaster for people who live in that area.<sup>1</sup>
6. The Department of Energy should deny Venture Global's export authorization for Venture Global's CP2 facility and overhaul the agency process for determining the public interest.

## Credits:

Written by Shreyas Vasudevan  
and Anne Rolfes

Researched by Shreyas Vasudevan

Photo Credits: Carlos Silva on behalf of the  
Louisiana Bucket Brigade, Lori Cooke

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<sup>1</sup> Page 3. APPLICATION OF VENTURE GLOBAL PLAQUEMINES LNG, LLC. United States Department of Energy, Office of Fossil Energy and Carbon Management. March 11, 2022.  
<https://www.energy.gov/sites/default/files/2022-03/Plaquemines%20LNG%20DOE%20Amendment%20Application%20re%20Peak%20Liquefaction.pdf>



# 2023 Calcasieu Pass Flare Logs

## Graph Key

-  78-day period when Venture Global reported an accident lasting only 5 hours
-  Days when community reporting of flaring align with Venture Global's reporting
-  Days when community members reported flaring, but there is no corresponding reporting from Venture Global

JANUARY	
1/9/2023	5:29 PM
1/11/2023	5:45 PM
1/13/2023	12:47 AM
1/13/2023	9:48 AM
1/13/2023	7:09 PM
1/14/2023	10:39 AM
1/15/2023	6:38 PM
1/18/2023	7:19 AM
1/21/2023	6:41 AM

JANUARY CONTINUED	
1/23/2023	4:55 AM
1/26/2023	6:43 AM
1/26/2023	
1/28/2023	9:51 PM
1/28/2023	9:05 AM
1/28/2023	9:05 AM
FEBRUARY	
2/1/2023	2:19 PM
2/2/2023	5:56 AM
2/12/2023	5:10 PM
2/12/2023	5:33 PM
2/12/2023	5:42 PM
2/12/2023	6:00 PM
2/12/2023	6:12 PM
2/12/2023	7:21 PM
2/18/2023	6:10 AM
2/28/2023	11:26 PM
MARCH	
3/2/2023	7:20 PM
3/3/2023	11:18 AM
3/12/2023	6:22 PM

MARCH	
3/13/2023	7:29 AM
3/17/2023	7:35 PM
APRIL	
4/1/2023	4:37 PM
4/1/2023	7:59 PM
4/2/2023	7:37 AM
4/2/2023	10:40 AM
4/2/2023	8:55 PM
4/3/2023	9:48 AM
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4/4/2023	11:45 AM
4/11/2023	12:19 PM
4/12/2023	4:42 PM
4/12/2023	5:38 PM
4/12/2023	7:59 AM
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4/15/2023	9:49 AM
4/15/2023	4:12 PM
4/17/2023	8:50 PM
4/18/2023	5:26 PM
4/18/2023	6:19 PM
4/18/2023	8:22 PM

APRIL	
4/19/2023	2:03 PM
4/19/2023	6:15 PM
4/19/2023	8:47 PM
4/20/2023	8:22 PM
4/23/2023	6:28 AM
4/23/2023	7:51 AM
4/25/2023	7:22 PM
4/30/2023	1:28 PM
4/30/2023	3:57 PM
MAY	
5/1/2023	1:14 PM
5/1/2023	2:20 PM
5/1/2023	6:41 PM
5/1/2023	8:13 PM
5/2/2023	6:18 AM
5/2/2023	11:22 AM
5/2/2023	6:49 AM
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5/3/2023	11:21 PM
5/3/2023	2:11 PM
5/3/2023	7:29 PM
5/3/2023	9:04 PM

MAY CONTINUED	
5/4/2023	6:11 AM
5/4/2023	7:49 PM
5/5/2023	5:12 AM
5/5/2023	12:47 PM
5/5/2023	4:13 PM
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5/10/2023	12:00 AM
5/10/2023	3:08 PM
5/10/2023	10:03 PM
5/11/2023	5:37 AM

MAY CONTINUED	
5/11/2023	9:51 AM
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5/16/2023	6:51 PM
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5/27/2023	9:59 PM
5/28/2023	7:18 AM
5/29/2023	10:06 AM
5/29/2023	3:22 PM



MAY CONTINUED	
6/2/2023	7:15 PM
6/2/2023	9:31 PM
6/4/2023	1:31 PM
6/4/2023	9:03 PM
6/5/2023	7:15 PM
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6/24/2023	12:42 PM
6/24/2023	3:28 PM
6/25/2023	2:37 AM
6/25/2023	1:05 PM

MAY CONTINUED	
6/25/2023	8:58 PM
6/26/2023	3:14 PM
6/26/2023	9:16 PM
6/27/2023	12:22 PM
6/27/2023	1:26 PM
6/28/2023	2:35 PM



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