

No. \_\_\_\_\_

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

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TRAVIS DARDAR, NICOLE DARDAR, KENT DUHON, MARY ALICE  
NASH, JERRYD TASSIN, ANTHONY THERIOT, FISHERMEN INVOLVED  
IN SUSTAINING OUR HERITAGE, FOR A BETTER BAYOU, and  
NATURAL RESOURCES DEFENSE COUNCIL,

*Petitioners,*

v.

FEDERAL ENERGY REGULATORY COMMISSION,

*Respondent.*

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**JOINT PETITION FOR REVIEW**

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Pursuant to Section 19(b) of the Natural Gas Act, 15 U.S.C. § 717r(b), and Federal Rule of Appellate Procedure 15(a), Petitioners Travis Dardar, Nicole Dardar, Kent Duhon, Mary Alice Nash, Jerryd Tassin, Anthony Theriot, Fishermen Involved in Sustaining Our Heritage, For a Better Bayou, and Natural Resources Defense Council, (“Petitioners”) respectfully petition the United States Court of Appeals for the District of Columbia Circuit to review and set aside the following orders of the Federal Energy Regulatory Commission (“FERC” or “Commission”):

1. Order Granting Authorizations Under Section 3 and 7 of the Natural Gas Act, *Venture Global CP2 LNG, LLC*, Nos. CP22-21-000 & CP22-22-000, 187 FERC ¶ 61,199 (June 27, 2024) (“Authorization Order”) (attached as Exhibit A); and
2. Notice of Denial of Rehearing by Operation of Law and Providing for Further Consideration, *Venture Global CP2 LNG, LLC*, Nos. CP22-21-000 & CP22-22-000, 188 FERC ¶ 62,109 (August 29, 2024) (attached as Exhibit B).

These orders concern applications by Venture Global CP2 LNG, LLC and Venture Global CP Express, LLC, to construct and operate a 20 million metric ton per annum liquified natural gas export terminal called the CP2 LNG Project in Cameron Parish, Louisiana, and a new natural gas pipeline called the CP Express Pipeline Project that would include an approximately 85.4-mile-long mainline pipeline from Jasper County, Texas, to the proposed CP2 LNG export Project in Cameron Parish, Louisiana, as well as appurtenant facilities. Petitioners and, in the case of those petitioners that are organizations, their members have been and will be aggrieved by the approval, construction, and operation of the CP2 LNG Project and CP Express Pipeline Project.

Petitioners intervened before the Commission and timely requested rehearing of the Authorization Order.<sup>1</sup> This Court has jurisdiction and venue is proper under Section 19(b) of the Natural Gas Act, 15 U.S.C. § 717r(b). In accordance with Federal Rule of Appellate Procedure 15(c), the list of parties served with copies of this Joint Petition is attached as Exhibit C. This Petition for Review is timely because the Commission issued its Notice of Denial of Rehearing by Operation of Law and Providing for Further Consideration on August 29, 2024, and this Petition for Review was filed within sixty days.

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<sup>1</sup> FERC granted all but one of Petitioners' respective motions to intervene in the proceeding below. However, FERC denied intervention to Petitioner Fishermen Involved in Sustaining Our Heritage. *See* Authorization Order PP 15-17. Petitioners challenged this denial in their pending request for rehearing before FERC and take the position that the denial was arbitrary and capricious. Petitioners remain hopeful FERC will correct this unlawful and unjust error.

DATED: September 4, 2024

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Respectfully submitted,

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Dardar, Kent Duhon, Mary Alice Nash,  
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Better Bayou, and Fishermen Involved  
in Sustaining Our Heritage*

## EXHIBITS

- Exhibit A:** Order Granting Authorizations Under Section 3 and 7 of the Natural Gas Act, *Venture Global CP2 LNG, LLC*, Nos. CP22-21-000 & CP22-22-000, 187 FERC ¶ 61,199 (June 27, 2024).
- Exhibit B:** Notice of Denial of Rehearing by Operation of Law and Providing for Further Consideration, *Venture Global CP2 LNG, LLC*, Nos. CP22-21-000 & CP22-22-000, 188 FERC ¶ 62,109 (August 29, 2024).
- Exhibit C:** Official Service List in Federal Energy Regulatory Commission Docket Nos. CP22-21-000 and CP22-22-000.

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TRAVIS DARDAR, NICOLE  
DARDAR, KENT DUHON, MARY  
ALICE NASH, JERRYD TASSIN,  
ANTHONY THERIOT, FISHERMEN  
INVOLVED IN SUSTAINING OUR  
HERITAGE, FOR A BETTER BAYOU,  
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*Petitioners,*

v.

FEDERAL ENERGY REGULATORY  
COMMISSION,

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No. \_\_\_\_\_

**CORPORATE DISCLOSURE STATEMENT**

Fishermen Involved in Sustaining Our Heritage (FISH) is a community based non-profit organization based in Louisiana dedicated to championing the rights of commercial fishermen to flourish and prosper. FISH has no parent companies, and there are no publicly owned corporations that have a ten-percent or greater ownership interest in FISH.

For a Better Bayou is a community based non-profit organization based in Louisiana dedicated to protecting the people and environment of Southwest Louisiana. For a Better Bayou has no parent companies, and there are no publicly

owned corporations that have a ten-percent or greater ownership interest in For a Better Bayou.

Natural Resources Defense Council (NRDC) is a non-profit environmental and public health organization committed to protecting the public and environment through research and advocacy. NRDC has no parent companies, and there are no publicly owned corporations that have a ten-percent or greater ownership interest in NRDC.

DATED: September 4, 2024

/s/ Megan C. Gibson

Megan C. Gibson

Southern Environmental Law Center

## CERTIFICATE OF SERVICE

I certify that, on September 4, 2024, copies of this Petition for Review and exhibits were served on all parties admitted to participate in the agency proceedings by email to the official service list in Federal Energy Regulatory Commission Docket Nos. CP22-21-000 and CP22-22-000. As required by Federal Rule of Appellate Procedure 15(c)(2), a list of those so served is attached as Exhibit C.

In accordance with D.C. Cir. Rule 15(a), I further certify that I emailed a copy of the foregoing to the following:

Robert Solomon  
Solicitor  
Federal Energy Regulatory Commission  
888 First Street, NE  
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Robert.solomon@ferc.gov

DATED: September 4, 2024

/s/ Megan C. Gibson  
Megan Gibson  
Southern Environmental Law Center