



David L. Wochner

Practice Area Leader - Policy and Regulatory

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OVERVIEW

David Wochner advises, represents, and advocates on behalf of a wide range of energy industry clients, focusing on natural gas, LNG, and oil related matters, as well as offshore energy infrastructure development. With nearly 25 years in Washington, D.C., he regularly advises clients on critical federal regulatory and policy issues that impact energy infrastructure and commodities. Over the years, David has appeared regularly on behalf of clients before the Federal Energy Regulatory Commission (FERC); the Departments of Energy, the Interior, and Transportation; EPA; and on Capitol Hill. In 2010-2011, he served as lead Washington counsel on behalf of a major international drilling company in multiple Congressional and federal agency investigations and hearings related to the Gulf of Mexico *Deepwater Horizon* oil spill, including House Committees on Energy and Commerce, Natural Resources and the Judiciary, and the Bureau of Safety and Environmental Enforcement (BSEE) and its predecessor agencies.

David's clients include natural gas and LNG marketers, importers, exporters and project developers; financial institutions and hedge funds; offshore energy project developers; oil and gas pipelines and shippers; oil and gas drilling companies; and state and provincial government officials.

His experience includes counseling and representing clients in matters concerning:

- U.S. liquefied natural gas (LNG) exports and imports.
- Interstate natural gas, oil, and oil product pipelines' operations and policies before FERC.
- Natural gas trading operations, including NAESB agreements, interstate transportation capacity, and asset management arrangements.
- U.S. federal, state, and local authorities' roles in the development of energy infrastructure.
- Safety regulations under the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Part 193, applicable to pipelines and LNG facilities.
- Congressional investigations into oil and natural gas related matters, including oil spills.

- Minerals Management Service (MMS) and Bureau of Ocean Energy Management (BOEM) leasing issues associated with offshore energy facilities, including LNG terminals, wind and hydrokinetic power facilities, and natural gas pipelines.
- Development of stakeholder engagement strategies for energy infrastructure projects.

Additionally, David serves as co-practice area leader for the global policy and regulatory practice.

ACHIEVEMENTS

- Selected as one of The *Best Lawyers in America* for work in Energy Regulatory Law by Best Lawyers (2017, 2018, 2019)
- Selected as a “Rising Star” in Energy by the 2013-2015 editions of Super Lawyers
- Recipient, 2007 Burton Award for Legal Achievement for “Liquefied Natural Gas (LNG) Litigation After the Energy Policy Act of 2005,” Energy Law Journal (November 14, 2006)

PROFESSIONAL / CIVIC ACTIVITIES

- Chair, Georgetown University Law Center National Law Alumni Board
- Member, Energy Bar Association

SPEAKING ENGAGEMENTS

- Speaker, “Making American Energy Great Again? The Trump Administration's Use of Regulation and Policy to Impact Global Energy Markets,” World Energy Engineering Conference, Charlotte, NC, (October 18, 2018)
- Speaker, “The U.S. Offshore: Outstanding Opportunity or Onerous Obstacle,” “Issues of Offshore Wind Power Generation: Key Issues for Offshore Wind Power”, Japan Overseas Institute, Tokyo, (September 13, 2018)
- Speaker, “LNG and U.S. Trade Developments,” Bank of America Merrill Lynch, Teleconference, (April 20, 2018)
- Speaker, “Contracts and Offtake Agreements: A Legal View,” Bank of America Merrill Lynch U.S. LNG Prospects Conference, New York, (March 9, 2018)
- Speaker, “US Infrastructure Cooperation | US Energy / Infrastructure Investment Opportunities Analysis,” Beijing, (April 18, 2017)
- Speaker, “New Administration Policies: How to Maximize Your Business for Growth,” OCTANe - Orange County, CA (January 19, 2017)
- Speaker, “Winter is Coming: The Regulatory Onslaught Against Oil & Gas Midstream Infrastructure,” Credit Suisse Restructuring Mini-Conference - Houston, Texas (February 1, 2016)

- Speaker, “U.S. Environmental Standards and Regulations for Shale Gas Development,” U.S.-China Shale Gas Training Program, Environmental Policy and Technology for Shale Gas Development - Beijing, China (December 3-4, 2015)
- Speaker, “Developments in North American Oil, Gas and LNG,” Australian Institute of Energy - Perth (September 29, 2015)
- Speaker, “Developments in North American Oil, Gas and LNG,” K&L Gates - Singapore (March 26, 2015)
- Speaker, “Regulatory Risk Factors for US LNG Export Projects,” Hart Energy North American LNG Exports Conference (November 20, 2014)
- Speaker, Seoul LNG Seminar (March 25, 2014)
- Speaker, “U.S. LNG Exports: Consideration of the 'Public Interest,’” 4th Annual North American LNG Exports Conference (December 11, 2013)
- Speaker, Tokyo LNG Seminar (September 10, 2013)
- Speaker, “Responsible Shale Development - Industry Perspectives,” K&L Gates Second Annual Alaska Oil & Gas Conference, (July 10, 2013)
- Speaker, “U.S. LNG Exports: Policy and Political Issues,” LNG Export Forum North America (May 16-18, 2012)
- Speaker, “Obtaining Permits for LNG Export,” 2nd Annual North American LNG Exports Conference (December 1, 2011)
- Leader, Workshop: “Addressing the Impact of Legal & Regulatory Issues on the Shale Gas Industry,” World Shale Gas Conference 2011 (November 7-11, 2011)
- Speaker, “Federal Agency Jeopardy: An Insider's Guide to the Federal Regulation of Energy Companies and Commodities,” ACC 2011 Annual Meeting (October 23–26, 2011)
- Moderator, “Key Policy Developments and their Impact on Offshore Wind,” Offshore Wind Power North America - Boston, MA (February 1-2, 2011)
- Speaker, “Issues for Obtaining Liquefaction and Export Authority,” Prospects for North American LNG Exports Program (November 11, 2010)
- Co-Leader, “Shale Gas Legal and Regulatory Issues Master Class,” World Shale Gas Conference and Exhibition (November 3-5, 2010)
- Speaker, “Managing Regulatory Hurdles in Offshore Wind Projects,” EUPEC 2010 – 13th Annual Energy & Environment Conference (February 2, 2010)
- Speaker, “U.S. Climate Change Regulation: A Framework for Business Planning For a Sustainable Midstream Industry,” Gas Processors Association – Houston Chapter Annual Conference (October 13, 2009)
- Panel Moderator, Platts Gas Interchangeability and Quality Forum, Washington, DC (November 19–20, 2008)

- Speaker, “Improving Stakeholders Perception of LNG,” 15th International Conference and Exhibit on Liquefied Natural Gas (LNG 15) - Barcelona, Spain (April 25, 2007)
- Speaker, “Regulating Gas Composition: The U.S. Regulatory System and Its Impact on the Globalization of LNG,” Gas Technology Institute Global LNG Interchangeability Conference (September 11–12, 2006)
- Speaker, “LNG Market Outlook,” Valve Manufacturers Association’s Annual Market Outlook Workshop (August 18, 2005)

EDUCATION

- J.D., Georgetown University Law Center, 2002
- B.S.F.S, Georgetown University School of Foreign Service, 1996 (*Certificate in Arab Studies*)

ADMISSIONS

- Bar of District of Columbia
- Bar of Maryland (Inactive)

THOUGHT LEADERSHIP POWERED BY HUB

- 24 February 2021, The Colors of Hydrogen: Simple or Oversimplified? (*Podcast*)
- 27 January 2021, Leveraging the Existing U.S. Natural Gas Pipeline System for Hydrogen Transportation (*Podcast*)
- 26 January 2021, Distinguished Speaker Series with FERC Commissioner Neil Chatterjee (*Webinar*)
- 13 January 2021, Opportunities for Hydrogen in the Biden Administration (*Podcast*)
- 16 December 2020, Incentives and Tax Issues Impacting the Australian Hydrogen Sector (*Podcast*)
- 19 November 2020, Blending Hydrogen Into U.S. Natural Gas Pipelines: Three Issues to Resolve (*BlogPost*)
- 18 November 2020, Very Long Duration Storage (*Podcast*)
- 5 November 2020, Energy & Environmental Policy in the Next Administration (*Webinar*)
- 23 October 2020, Hydrogen Rising: EU and UK Hydrogen Strategies and Incentives (*Podcast*)
- 21 October 2020, Hydrogen Rising: A Sustainable Energy Source on the Brink of Commercial Scale Development (*Podcast*)
- 17 September 2020, Senate ENR Committee Holds Hearing on FERC Commissioner Nominees (*BlogPost*)
- 15 September 2020, Senate ENR Hearing Slated for FERC Nominees (*BlogPost*)
- 28 July 2020, Trump Nominates Clements, Christie to FERC (*BlogPost*)

- 23 July 2020, A New Normal? Trump Administration Retooling of Core NEPA Elements (*Alerts/Updates*)
- 9 June 2020, COVID-19: President Trump's Invocation of Emergency Authority to Streamline Environmental Review for Infrastructure Projects (*Alerts/Updates*)
- 4 June 2020, COVID-19: America's Return to Work: Liability and Risk Mitigation Outlook (*Webinar*)
- 28 April 2020, COVID-19: America's Path Forward: Returning to Work (*Webinar*)
- March 2020, COVID-19: Analysis of White House National Emergency Declaration and Implementation (*Webinar*)
- 12 March 2020, COVID-19: Federally Regulated Energy Businesses (*Alerts/Updates*)
- 17 February 2020, Certain Uncertainty at FERC: Areas to Watch in 2020 for Natural Gas Pipelines and LNG and Hydropower Facilities (*Alerts/Updates*)
- 28 October 2019, 2019 Offshore Wind Handbook (*Alerts/Updates*)
- 5 June 2019, Congressional Investigations 101: Prudence is Your Watchword (*Podcast*)
- 7 February 2019, Navigating Environmental Policy in a Divided Government (*Alerts/Updates*)
- 19 December 2018, Winds of Change (*BlogPost*)
- 14 November 2018, 2018 Offshore Wind Handbook (*Alerts/Updates*)
- 20 June 2018, DOE Takes Concrete Steps to Streamline Permitting and Reassure Global LNG Markets (*Alerts/Updates*)
- 26 April 2018, A Policy Revolution to Match the Shale Revolution? (*Alerts/Updates*)
- 4 August 2017, FERC Welcomes New Commissioners, Quorum Restored (*BlogPost*)
- 12 June 2017, Energy Department Seeks Input on Regulatory Reform (*Alerts/Updates*)
- 3 May 2017, President Trump's Latest Executive Order a Potential Boon for Offshore Energy Development (*Alerts/Updates*)
- 24 March 2017, Avangrid Wins Latest BOEM Auction for Offshore North Carolina Lease and Moves Towards Full Commercial Lease (*Alerts/Updates*)
- 23 March 2017, Avangrid Wins Latest BOEM Auction for Offshore North Carolina Lease and Moves Towards Full Commercial Lease (*BlogPost*)
- 16 March 2017, Developers Submit Unsolicited Requests for Wind Leases Offshore Massachusetts and New York (*Alerts/Updates*)
- 16 March 2017, Developers Submit Unsolicited Requests for Wind Leases Offshore Massachusetts and New York (*BlogPost*)

- 19 December 2016, Antitrust Claims: A Novel Line of Attack by Groups Opposing Natural Gas Infrastructure Projects (*Alerts/Updates*)
- 25 October 2016, Paris Agreement to Enter into Force: Implications for Enforcement in the United States and Internationally (*Alerts/Updates*)
- 17 August 2016, Another Step Toward North Carolina Offshore Wind: Proposed Offshore Wind Farm Lease Announced (*Alerts/Updates*)
- 4 August 2016, CEQ Issues Final Greenhouse Gas Guidance Directing Federal Agencies to Consider Climate Change in their NEPA Reviews (*Alerts/Updates*)
- 12 July 2016, Regulating Exploration on the Arctic OCS: Interior Finalizes Rules for Oil and Gas Exploratory Drilling on the Arctic Outer Continental Shelf (*Alerts/Updates*)
- 1 July 2016, Federal Judge: Authority Lacking for Regulation of Hydraulic Fracking (*Alerts/Updates*)
- 30 June 2016, Federal Court Upholds FERC's Approach on LNG Environmental Permitting and Shifts Focus to Challenges to DOE's Environmental Review (*Alerts/Updates*)
- 23 June 2016, President Obama Signs Pipeline Safety Law: Significant Additional Mandates for PHMSA and Potential for More Rulemakings to Come (*Alerts/Updates*)
- Spring 2016, Environmental Policy Quarterly (*Alerts/Updates*)
- 3 March 2016, Shake-Ups Planned for Pipeline Safety Regulation (*Alerts/Updates*)
- 26 February 2016, The European Commission Approves an Energy Security Package Emphasizing Infrastructure Development and LNG Imports (*Alerts/Updates*)
- 17 December 2015, Presidential Memorandum Promotes Pre-Project Mitigation and Restoration Banking: Implications for Energy Projects and Related Development (*Alerts/Updates*)
- 3-4 December 2015, U.S. Environmental Standards and Regulations for Shale Gas Development (*Presentations*)
- 6 October 2015, Arctic Development: Presentation Slides (*Presentations*)
- 29 September 2015, Developments in North American Oil, Gas and LNG (*Presentations*)
- 21 July 2015, FERC Rejects Requests for Clarification but Provides Additional Details Regarding Pipeline Modernization Surcharge Mechanisms (*Alerts/Updates*)
- 29 April 2015, FERC Policy Statement Regarding Pipeline Recovery of System Modernization Costs (*Alerts/Updates*)
- 24 April 2015, Newly Installed FERC Chairman Norman Bay's Past Opinions Signal Preference for Energetic Use of Commission Authority (*Articles*)
- 23 September 2013, LNG: A Global and U.S. Perspective (*Podcast*)

OTHER PUBLICATIONS

- “Pipeline Projects Face New Questions On Landowner Rights,” *Law360*, 6 November 2019
- “When States Fail To Act On Federal Pipeline Permits,” *Law360*, 24 July 2017
- Co-author, “Antitrust: A New Line Of Attack Against Pipelines,” *Energy Law 360* (February 13, 2017)
- Co-author, “Antitrust Claims: A Novel Line of Attack by Groups Opposing Natural Gas Infrastructure Projects,” *The Override* (January 2017)
- Co-author, “Paris Agreement to Enter into Force: Implications for Enforcement in the United States and Internationally,” *The National Law Review* (October 25, 2016)
- Co-Author, CEQ Issues Final Greenhouse Gas Guidance Directing Federal Agencies to Consider Climate Change in Their NEPA Reviews, *Pratt's Energy Law Report, Vol. 16-9*, (October 2016)
- Co-author, “K&L Gates: How will the U.S. Presidential Election Affect the Energy Landscape,” *Cajing* (September 23, 2016)
- Author, “The Implications of Final Rule Regulating Arctic OCS Drilling,” *Alaska Journal of Commerce* (September 18, 2016)
- Co-author, “Federal Court Upholds FERC’s Approach on LNG Environmental Permitting and Shifts Focus to Challenges to DOE’s Environmental Review,” *Pratt's Energy Law Report* (September 2016)
- “The European Commission Approves an Energy Security Package Emphasizing Infrastructure Development and LNG Imports,” *Pratt's Energy Law Report*, May 2016
- Co-author, “FERC’s Jurisdiction Now Reaches Ethane Pipelines Too,” *Energy Law 360* (February 27, 2014)
- Co-author, “The Development of U.S. Shale Gas Resources: Regulation and Litigation,” *Managing Power Magazine* (September 1, 2011)
- Commentator, “Pro-drilling GOPer wins Va. governor’s race, fueling push for 2011 lease sale,” *Inside Energy* (November 9, 2009)
- Commentator, “MMS issues rules for renewable projects on the OCS, eases way for offshore wind,” *Inside FERC* (April 24, 2009)
- Co-author, “LNG Importer Focus Turns to US Interchangeability Rules,” *LNG Journal* (November/December 2007)
- Co-author, “Reviewing LNG Regulations,” *Pipeline and Gas Technology* (November 2007)
- Author, “Middle Eastern Oil and Gas,” *CQ Press* (2007)
- Co-author, “European LNG Developers Face Complex Commercial Landscape,” *Oil & Gas Journal* (April 9, 2007)

- Co-author, "Liquefied Natural Gas (LNG) Litigation After the Energy Policy Act of 2005," *Energy Law Journal* (November 14, 2006)
- Co-author, "Florida's Gas Composition Decision Offers Preliminary Guidelines for US LNG Imports," *LNG Journal* (May 2006)
- Co-author, "LNG's Final Hurdle," *Public Utilities Fortnightly* (March 2006)
- Co-author, "Sandia LNG Study Changes Landscape for Terminal Siting," *LNG Observer* (April–June 2005)

NEWS & EVENTS

- 7 October 2020, K&L Gates Energy Practice Releases First-of-Kind Hydrogen Handbook to Help Clients Capitalize on Growing Global Hydrogen Sector (*Press Release, Practice & Regional News*)

MEDIA MENTIONS

- Quoted, "Democrat-Controlled Senate Sets Stage for New FERC Majority, Policy Direction," *S&P Global*, 7 January 2021
- Quoted, "Biden May Have to Tread Carefully with Energy Nominees, Policy Experts Say," *S&P Global*, 2 December 2020
- Quoted, "DC Circ. Fails To Clear The Air On FERC's Climate Duties," *Energy Law360*, 9 May 2019
- Quoted, "Offshore Crude Exports Hopefuls May Face Project Permitting Pains," *SPG Global*, 1 April 2019
- Quoted, "For Energy Projects, GHG Scrutiny Now A Fact of Life," *Energy Law 360* (April 2, 2014)
- Quoted, "Panel to Obama: Overhaul 1970s energy policies," *Politico* (January 28, 2014)
- Quoted, "Freeport won't likely appeal 'bogus' DOE order: CEO," *Platts Gas Daily* (December 12, 2013)
- Quoted, "US LNG export 'sweet spot' may be elusive: officials," *Platts LNG Daily* (December 11, 2013)
- Quoted, "Industrial energy group calls US LNG export policy unfair, but opponents claim argument misleads," *Inside FERC* (November 11, 2013)
- Quoted, "Shutdown Will Grind New Energy Projects To A Halt," *Energy Law 360* (October 1, 2013)
- Quoted, "Analysis: Companies may turn to courts on U.S. natural gas export push," *Reuters* (June 18, 2013)
- Quoted, "DOE Seen Delaying LNG Export Licenses Next Year," *Argus Media* (December 14, 2012)

AREAS OF FOCUS

- Public Policy and Law
- Environment, Land, and Natural Resources

- Liquefied Natural Gas
- Offshore Wind Energy
- Oil and Gas
- Power
- U.S. Congressional Investigations
- U.S. National Security Law and Policy

INDUSTRIES

- Energy
- Utilities

EMERGING ISSUES

- Hydrogen

REPRESENTATIVE EXPERIENCE

- Draft written testimony and prepare senior executive of major international drilling company for oral testimony before the United Kingdom House of Commons Select Committee on Energy and Climate Change related to offshore drilling issues after the 2010 Gulf of Mexico Deepwater Horizon oil spill.
- Counsel and represent a major international drilling company in multiple Congressional investigations and hearings related to the 2010 Gulf of Mexico Deepwater Horizon oil spill.
- Advise offshore LNG import project developer on regulatory and policy issues associated with the Deepwater Port Act, including Governors' veto authority, interagency dispute resolution, and obtaining offshore leases from MMS for associated pipelines and cables.
- Advise large offshore energy company with regard to BOEM leasing and BSEE enforcement matters related to offshore drilling activities.
- Advise and represent a European offshore wind project developer bidding in a U.S. BOEM lease sale off the coast of Maryland, including advice on the regulatory process and competition rules applicable to bidding.
- Serve as lead regulatory counsel on behalf of a major international LNG importer in natural gas interchangeability proceedings on multiple interstate pipelines and in defense against allegations of infrastructure harm.
- Serve as lead counsel for large natural gas producer regarding the development and acquisition of capacity on multiple pipelines in the Marcellus Shale production area, including negotiating 20-year precedent agreements with pipeline companies

- Represent start-up company involved in natural gas vehicles industry in advocacy efforts on Capitol Hill related to passage of the NATGAS Act, encouraging use of natural gas as a transportation fuel.
- Represent independent natural gas producer in the Marcellus Shale in FERC proceedings seeking the abandonment of interstate natural gas pipelines and conversion to gathering lines
- Advise and represent large southeast electric cooperative in negotiation and drafting of precedent agreements with two long-haul interstate natural gas pipelines
- Advise large southeast electric cooperative on PHMSA compliance matters related to oil pipeline crossing property
- Advise large southeast electric cooperative on negotiation of NAESB gas supply agreements.
- Advise and negotiate on behalf a major IOC in all regulatory and commercial matters associated with acquisition of LNG export and pipeline transportation capacity at the Elba Island LNG terminal.
- Advise and negotiate on behalf of a major Asian NOC on regulatory and commercial matters associated with acquisition of LNG export capacity at a U.S. East Coast LNG terminal.
- Advise and represent large global oil and gas trading company on FERC regulatory matters, including the transfer of natural gas supply and transportation contracts, verification of compliance with FERC regulations and policies, and representation before FERC in applications for waivers of FERC's tying prohibition to effectuate the sale and purchase.
- Advise and represent developer of offshore CNG export facility in the Gulf of Mexico in regulatory proceedings before the Maritime Administration (MARAD) and US Coast Guard
- Advise and represent US LNG export project developer on CFIUS matters, including engagement with Treasury Department and the U.S. Department of Energy related to foreign investment in LNG infrastructure by Middle East-based sovereign wealth fund
- Advise LNG export project developer on all regulatory matters related to negotiation of 20-year interstate pipeline capacity precedent agreement with large interstate natural gas pipeline company, including open season obligations, asset management arrangements, capacity release provisions, negotiated rate agreements, and analysis of FERC policy on buy-sell transactions for LNG export projects and related feed gas pipelines
- Advise NextDecade on all regulatory aspects related to the siting and construction of the Rio Grande LNG export facility and Rio Bravo interstate natural gas pipeline in Texas, including the FERC Natural Gas Act Sections 3 and 7 proceedings and the DOE LNG export license proceedings
- Advise major European oil and gas company on regulatory requirements related to the abandonment of pipeline on the U.S. outer continental shelf (OCS).
- Advise large oil and gas trade association on White House Council on Environmental Quality engagement related to proposed modifications to the body's regulations related to implementation of NEPA

- Represent the American Petroleum Institute in appeal before the U.S. Court of Appeals for the DC Circuit related to the Federal Energy Regulatory Commission's and the Department of Energy's consideration of GHGs, climate change, and upstream and downstream indirect effects from LNG and natural gas pipeline infrastructure development
- Represent the American Petroleum Institute in appeal before the U.S. Court of Appeals for the DC Circuit related to the Federal Energy Regulatory Commission's and the Department of Energy's consideration of GHGs, climate change, and upstream and downstream indirect effects from LNG and natural gas pipeline infrastructure development
- Draft comments on behalf of large oil and gas trade association in major regulatory rulemaking before the U.S. Department of Energy related to analysis and consideration of greenhouse gas emissions (GHGs) and climate change in the agency's NEPA regulatory review process for multiple large-scale liquefied natural gas export facilities
- Advise large oil and gas trade association on White House Council on Environmental Quality engagement to proposed modifications to the body's regulations related to implementation of NEPA
- Draft comments on behalf of large oil and gas trade association in major regulatory rulemaking before the U.S. Department of Energy related to analysis and consideration of greenhouse gas emissions (GHGs) and climate change in the agency's NEPA regulatory review process for multiple large-scale liquefied natural gas export facilities
- Advise large energy infrastructure hedge fund with over US\$6B under management on U.S. LNG export issues, including development of strategies to address political and policy issues at DOE and FERC.
- Advise and represent US LNG export project developer in negotiations with US Export-Import Bank related to various financing and funding mechanisms for LNG offtake from US Gulf Coast facility
- Advise and represent US LNG export project developer on CFIUS matters, including engagement with Treasury Department and the U.S. Department of Energy related to foreign investment in LNG infrastructure by Chinese investment fund
- Advise and represent client seeking approval of LNG export facility production capacity increase in engagement with FERC, PHMSA, EPA and OSHA related to federal regulations governing non-hydrocarbon hazardous substances onsite, including PHMSA Part 193, EPA RMP, and OSHA PSM programs
- Serve as lead regulatory and policy counsel on behalf of Australian-based Liquefied Natural Gas Ltd. in efforts to develop the 8 mtpa Magnolia LNG export facility in Lake Charles, Louisiana, including representing the client before FERC, DOE, PHMSA and the U.S. Coast Guard
- Represent and advise the Government of the Province of New Brunswick, Canada, on LNG and natural gas matters, including participation in proceedings at FERC, PHMSA, and US Coast Guard related to LNG import and export terminal, maritime transit, and pipeline safety issues.