30(b)(6) Deposition Testimony of Matthew Stobart on behalf of CB&I (Excerpt)  
(2/16/2021)
In the Matter Of:

ACT v

PSCAA

MATTHEW STOBART

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the most conservative calculators we could find, and
it's why -- one of the reasons why we used it. It
gave us cushion, basically, to not violate
something.

Q. Okay. Well, the 75.7 number, though,
would be -- would be more conservative, wouldn't it?

A. I think not than the new met- --
calc- -- Cummins calculation method. I think they'd
probably be pretty similar. I'm not sure.

Can you scroll up?

I think we might actually say what it
is.

Q. Oh, yeah, sure. I'm just trying to get
whatever information you have to share on this.

(Witness reviewing document.)

A. No, it doesn't look like it's --

Yeah, you can scroll down again, please.

Q. Okay. Do you know what of this
information was communicated to PSE?

A. I think we told them that -- that, you
know, it looked like the composition had changed
again, and we were able to -- basically, the message
we were passing on to them is that the design will
still work, but in order to maintain a methane
number of 80, we may have to turn down the LNG
production rate a little bit.

Q. Okay. And that means -- well, all right. Let me ask a little differently.

So is -- based on the 2019 feed gas composition, is Tacoma LNG capable of producing 250,000 gallons of LNG per day with a methane number of 80?

A. Based on the calculations from this exact composition, we would not, no. We would -- we would have to turn down the production level a little bit in order to not exceed the heat, the maximum heat to the flare.

Q. And, you know, I was saving that till later, but let's talk about that now for a minute. Can you tell me what the max heat input is for the flare's large warm burner?

A. Yeah. On a lower heating value, I think it's 34; and higher heating value, it's 37.2.

Q. Okay. So that --

A. Million BTUs per hour, right? Sorry.

Q. Yeah. That's sort of the source of my misunderstanding because I've seen some different information on that.

You know, my understanding was that 37.2 was a creature of the flaring cases but that the
burner might be able to actually handle more.

And I'm wondering, as CBI was, you know, involved in -- in designing the facility, what -- what maxes out the flare? Like, how -- how much can the flare handle?

A. Oh, on the warm side, it's the numbers I just stated: 34 million on a million BTUs per hour lower heating value; and 37.2 on the upper.

Q. Okay. Okay.

So anything above and beyond 37.2 in the flare, the flare can't combust it?

A. I do not know what will happen to it. That's a better question for LFG; that that's the capacity that they've stated. It's the capacity we asked for. And I would imagine they have some contingency built into it. I mean, the thing is not going to fall apart if you get to 37.3 or something, but it's -- it's not designed to do that.

Q. Okay. Well, am I right that it's -- it's -- the burner is the same size as the large cold burner?

A. No, it's not. The large cold burner is actually larger.

Q. Okay. Well, we'll take a look at some pictures of it a little later, and you can -- you
can help me with that. Let's stay on this for now.

A. Okay.

Q. All right. Just staying on this --

Mr. Mullen's email for a moment.

Do you see the portion of this discussing limitations CBI is working under and the lever -- there's a discussion of levers to pull?

A. Yeah. Uh-hmm.

Q. Okay. Can you explain that to me and help me with cut temperatures for heavies and that information?

A. Yes. The cut temperature for heavies is the temperature that we, basically, run the gas at through the first heat exchanger to try to knock out some of the heavies, and it is adjustable; we can adjust it. We can raise that temperature or lower that temperature. If we want to take out more, we'll lower the temperature; if we want to take out less, we can raise the temperature.

And that's the first lever that we're talking about. We -- we have flexibility. You know, some LNG plants don't have that flexibility. It's a set number and it's not variable based on the design that they use. But we -- we have a flexible design where we can -- we can vary it.