

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

**In the Matter Of:**

*ACT v*

*PSCAA*

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*MATTHEW STOBART*

*February 16, 2021*

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

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

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

10 Can you scroll up?

11 I think we might actually say what it  
12 is.

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

15 (Witness reviewing document.)

16 A. No, it doesn't look like it's --  
17 Yeah, you can scroll down again, please.

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

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

1 **production rate a little bit.**

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

4 So is -- based on the 2019 feed gas  
5 composition, is Tacoma LNG capable of producing  
6 250,000 gallons of LNG per day with a methane number  
7 of 80?

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

13 Q. And, you know, I was saving that till  
14 later, but let's talk about that now for a minute.

15 Can you tell me what the max heat input  
16 is for the flare's large warm burner?

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

19 Q. Okay. So that --

20 **A. Million BTUs per hour, right? Sorry.**

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

24 You know, my understanding was that 37.2  
25 was a creature of the flaring cases but that the

1 burner might be able to actually handle more.

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

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

9 Q. Okay. Okay.

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

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

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

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

24 Q. Okay. Well, we'll take a look at some  
25 pictures of it a little later, and you can -- you

1 can help me with that. Let's stay on this for now.

2 **A. Okay.**

3 Q. All right. Just staying on this --  
4 Mr. Mullen's email for a moment.

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

8 **A. Yeah. Uh-hmm.**

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

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

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