

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GOVERNMENT ACCOUNTABILITY)
& OVERSIGHT,)

Plaintiff,)

v.)

Civil Action No. 1:24-cv-1829

DEPARTMENT OF ENERGY,)

Defendant.)

DECLARATION OF MATTHEW HARDIN

NOW COMES Matthew D. Hardin, and states as follows:

1. My name is Matthew D. Hardin. I am an adult and competent to testify to the matters set forth herein based upon my personal knowledge and based upon information gleaned in my capacity as counsel for the Plaintiff.
2. I obtained copies of the exhibits attached to and/or referenced in the Plaintiff’s Statement of Undisputed Facts from governmental websites. Specifically, Exhibit A was obtained from <https://www.energy.gov/articles/doe-update-public-interest-analysis-enhance-national-security-achieve-clean-energy-goals>. Exhibit B was obtained from <https://www.energy.gov/articles/us-department-energy-completes-lng-study-update-announces-60-day-comment-period>. Exhibit C was obtained from <https://www.energy.gov/articles/us-department-energy-reverses-biden-lng-pause-restores-trump-energy-dominance-agenda>.
3. Plaintiff expects that the documents at issue in this case will reveal, if they are released, that the study DoE undertook from January to December 2024 was an effort by the former Administration to obtain a conclusion that materially differed from the study

Plaintiff requested, which was conducted in 2023, and that the 2023 study remained consistent with previous DoE analyses. ECF No. 1-1. Plaintiff expects that the 2023 study did not support the then-desired policy to “pause” LNG exports toward reducing them, and Plaintiff’s original request supports the idea that the conclusions of the 2023 study were politically inconvenient for the former Administration, and that this is why senior political officials in the Biden Department of Energy “buried” that study. ECF No 1-1 at 2..

4. I declare penalty of perjury that the foregoing is true and correct.

Executed on: January 22, 2025

/s/ Matthew D. Hardin
Matthew D. Hardin