

From: [McCallum-George, Dionne](#)
To: [FERGAS](#)
Subject: FW: eService: Sabine Pass Liquefaction, LLC, Docket No. 10-111-LNG
Date: Wednesday, May 04, 2016 10:11:56 AM
Attachments: [Sabine Liquefaction Letter Amending DOE Non-FTA Stage 1 and 2 Order.pdf](#)

From: McCallum-George, Dionne
Sent: Tuesday, April 12, 2016 3:04 PM
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Subject: eService: Sabine Pass Liquefaction, LLC, Docket No. 10-111-LNG

The attached document was filed with the U.S. Department of Energy, Fossil Energy in the above-referenced docket. In reviewing our records it is not clear that the attached filing was served on the official service list. Accordingly, electronic service is being provided to you.

Thank you,

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filed/w DOE 10/29/15

October 29, 2015

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**Re: In the Matter of Sabine Pass Liquefaction, LLC
FE Docket No. 10-111-LNG
Request for Amendment to Authorizations to Provide for Make-up Period**

Dear Mr. Anderson:

On August 7, 2012, the U.S. Department of Energy (“DOE”), Office of Fossil Energy (“DOE/FE”) granted Sabine Pass Liquefaction, LLC (“SPL”) final long-term, multi-contract authorization in the above-captioned proceeding to export liquefied natural gas (“LNG”) by vessel to all nations with which the United States has not entered into a free trade agreement providing for national treatment for trade in natural gas, and with which trade is not prohibited by U.S. law or policy.¹ The Stages 1 and 2 Orders authorized SPL to engage in exports of domestically produced LNG from the Liquefaction Project, Trains 1 through 4 (the “Liquefaction Project”).²

¹ *Sabine Pass Liquefaction, LLC, Opinion and Order Conditionally Granting Long-Term Authorization to Export Liquefied Natural Gas From Sabine Pass LNG Terminal to Non-Free Trade Agreement Nations*, DOE/FE Order No. 2961, FE Docket No. 10-111-LNG (May 20, 2011); *Sabine Pass Liquefaction, LLC, Final Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas From Sabine Pass LNG Terminal to Non-Free Trade Agreement Nations*, DOE/FE Order No. 2961-A, FE Docket No. 10-111-LNG, (Aug. 7, 2012), *Errata Notice* (Sept. 4, 2012), *reh’g denied sub nom. Sabine Pass Liquefaction, LLC, Opinion and Order Denying Request for Rehearing of Order Denying Motion for Late Intervention, Dismissing Request for Rehearing of Order No. 2961-A, and Dismissing Motion for a Stay Pendente Lite*, DOE/FE Order No. 2961-B, FE Docket No. 10-111-LNG (Jan. 25, 2013). [hereinafter, collectively, *Stages 1 and 2 Orders*].

² The Liquefaction Project is being developed by SPL and its affiliate, Sabine Pass LNG, L.P. (“Sabine Pass LNG”), at the existing Sabine Pass LNG import, storage and vaporization terminal in Cameron Parish, Louisiana (“Sabine Pass LNG Terminal”). The Federal Energy Regulatory Commission (“FERC”) authorized the construction and operation of the Liquefaction Project consisting of four LNG production trains (*i.e.*, Trains 1, 2, 3 and 4). See *Sabine Pass Liquefaction, LLC & Sabine Pass LNG, L.P.*, 139 FERC ¶ 61,039 (2012), *reh’g & stay denied*, 140 FERC ¶ 61,076 (2012); *Sabine Pass Liquefaction, LLC & Sabine Pass LNG, L.P., Order Amending Section 3 Authorization*, 144 FERC ¶ 61,099 (2013); *Sabine Pass Liquefaction, LLC & Sabine Pass LNG, L.P., Order Amending Section 3 Authorization*, 146 FERC ¶ 61,117 (2014), *reh’g denied*, 148 FERC ¶ 61,200 (2014).

SPL hereby respectfully requests that DOE/FE amend³ the Stages 1 and 2 Orders to provide for a make-up period during which SPL will be permitted to continue exporting LNG from the Sabine Pass LNG Terminal for a total of three years following the end of the 20-year term established by the Stages 1 and 2 Orders (the “Make-up Period”).⁴

The Stages 1 and 2 Orders authorized SPL to export natural gas in the form of LNG in an amount up to 803 billion standard cubic feet (“Bcf”) per year (or approximately 2.2 Bcf per day) from the Liquefaction Project. During the Make-up Period, SPL will export LNG volumes that it was unable to export during the original export period, up to the total volume authorized for export by the Stages 1 and 2 Orders, as may be amended.⁵

³ This filing is submitted pursuant to Section 590.201 of DOE’s regulations. 10 C.F.R. § 590.201 (2015). To the extent any information required under Section 590.201 is omitted herein, SPL incorporates by reference the relevant information provided in SPL’s application filed in FE Docket No. 10-111-LNG.

⁴ The requested authorization is consistent with DOE/FE’s recent practice of granting long-term LNG export authorization with a three-year make-up period, as was most recently the case in the authorization granted to SPL to export additional volumes of LNG from the Sabine Pass LNG Terminal. See *Sabine Pass Liquefaction, LLC, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Sabine Pass LNG Terminal Located in Cameron Parish, Louisiana, to Non-Free Trade Agreement Nations*, Ordering Paragraph C, DOE/FE Order No. 3669, FE Docket Nos. 13-30-LNG, 13-42-LNG & 13-121-LNG (June 26, 2015). See also *Cheniere Marketing, LLC & Corpus Christi Liquefaction, LLC, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed Corpus Christi Liquefaction Project to be Located in Corpus Christi, Texas, to Non-Free Trade Agreement Nations*, Ordering Paragraph C, DOE/FE Order No. 3638, FE Docket No. 12-97-LNG (May 12, 2015); *Dominion Cove Point LNG, LP, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Cove Point LNG Terminal in Calvert County, Maryland, to Non-Free Trade Agreement Nations*, Ordering Paragraph C, DOE/FE Order No. 3331-A, FE Docket No. 11-128-LNG (May 7, 2015); *Freeport LNG Expansion, L.P. et al., Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Freeport LNG Terminal on Quintana Island, Texas, to Non-Free Trade Agreement Nations*, Ordering Paragraph C, DOE/FE Order No. 3357-B, FE Docket No. 11-161-LNG (Nov. 14, 2014); *Freeport LNG Expansion, L.P. et al., Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Freeport LNG Terminal on Quintana Island, Texas, to Non-Free Trade Agreement Nations*, Ordering Paragraph C, DOE/FE Order No. 3282-C, FE Docket No. 10-161-LNG (Nov. 14, 2014); *Cameron LNG, LLC, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Cameron LNG Terminal in Cameron Parish, Louisiana, to Non-Free Trade Agreement Nations*, Ordering Paragraph C, DOE/FE Order No. 3391-A, FE Docket No. 11-162-LNG (Sept. 10, 2014).

⁵ On April 20, 2015, SPL filed an application seeking additional long-term, multi-contract authorization to export LNG in an amount up to the equivalent of 203 Bcf per year of natural gas, from the Liquefaction Project. That application is pending in FE Docket No. 15-63-LNG.

Description of Applicant:

The exact legal name of SPL is Sabine Pass Liquefaction, LLC. SPL is a Delaware limited liability company with its primary place of business located at 700 Milam Street, Suite 1900, Houston, TX 77002. SPL is an indirect subsidiary of Cheniere Energy, Inc., a Delaware corporation with its primary place of business located at 700 Milam Street, Suite 1900, Houston, TX 77002. SPL is authorized to do business in the States of Texas and Louisiana.

Contact Information:

SPL respectfully requests that the following individuals be included for purposes of receiving communications concerning this application:⁶

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Opinion of Counsel:

Enclosed herewith as Appendix 1 is an Opinion of Counsel in accordance with the requirements of Section 590.202(c) of DOE's regulations.⁷

Should you have any questions about the foregoing, please feel free to contact the undersigned at (212) 318-3009.

Respectfully submitted,

/s/ Lisa M. Tonery
Lisa M. Tonery
Charles R. Scott
Attorneys for
Sabine Pass Liquefaction, LLC

⁶ SPL requests waiver of Section 590.202(a) of DOE's regulations, to the extent necessary to include outside counsel on the official service list. 10 C.F.R. § 590.202(a).

⁷ *Id.* § 590.202(c).



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October 29, 2015

Office for Oil and Gas Global Security and Supply
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**Re: In the Matter of Sabine Pass Liquefaction, LLC
FE Docket No.10-111-LNG
Amendment to Authorizations to Provide for Make-up Period**

Dear Sir or Madam:

This opinion of counsel is provided in accordance with the requirements of section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202(c) (2015). I have examined the Limited Liability Company Agreement of Sabine Pass Liquefaction, LLC ("Sabine Pass") and other authorities as necessary, and have concluded that the proposed exportation of LNG is within Sabine Pass' corporate powers. Further, Sabine Pass is authorized to do business in Louisiana and Texas, and to engage in foreign commerce.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Rina Chang", written over a horizontal line.

By: Rina Chang
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