

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY



IN THE MATTER OF) DOCKET NO. 08-70-LNG
FREEPORT LNG DEVELOPMENT, L.P.)

MOTION TO INTERVENE OUT-OF-TIME
OF BG LNG SERVICES, LLC

Pursuant to 10 C.F.R. § 590.303, BG LNG Services, LLC (“BGLS”) hereby moves to intervene out-of-time in this proceeding concerning an application filed by Freeport LNG Development, L.P. (“Freeport LNG”) on August 1, 2008. In support of this request, BGLS respectfully states the following:

I.
COMMUNICATIONS

The names and addresses of the persons to whom service is to be made and to whom communications are to be addressed in this proceeding are:

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**II.
IDENTIFICATION OF MOVANT**

The exact legal name of the movant is BG LNG Services, LLC. BGLS is organized under the laws of the state of Delaware and has its principal place of business at 5444 Westheimer, Houston, Texas 77056. BGLS imports LNG that is delivered at the Lake Charles and the Elba Island Terminals under authorizations granted by the Department of Energy (“DOE”).

**III.
FREEPORT LNG’S APPLICATION**

On August 1, 2008, Freeport LNG filed an application pursuant to Section 3 of the Natural Gas Act, 15 U.S.C. § 717b, and Part 590 of the U.S. Department of Energy’s regulations, 10 C.F.R. Part 590 (2008). In the instant application, Freeport LNG is seeking blanket authorization to export LNG over a two-year period, on a short-term or spot market basis, in an amount up to the equivalent of 24 Bcf of natural gas that has been imported into the United States. Freeport LNG is seeking this authorization so that it may sell in non-U.S. markets any imported LNG that is not required for the operation of its facilities should U.S. market prices not support the sale of such imported LNG domestically.

**IV.
INTERVENTION**

Motions to intervene in this proceeding were due October 10, 2008. Due to an administrative error, BGLS sent its original intervention to an incorrect address and, as a result, its intervention was not received on the directed due date. No harm will result to any party as a result of BGLS’s late intervention as the proceeding is in its early stages.

Furthermore, BGLS agrees to accept the record as it stands. In these circumstances, BGLS submits that good cause exists to grant it leave to intervene herein.

As an importer of LNG, BGLS has a direct and substantial interest in matters raised by Freeport LNG's application in this docket. This interest cannot be adequately represented by any other party. The intervention of BGLS in this docket is therefore in the public interest.

**V.
CONCLUSION**

BGLS respectfully requests that it be granted leave to intervene out-of-time in the above-captioned proceeding, with full rights as a party thereto.

Respectfully submitted,


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October 27, 2008