

February 12, 2016

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U.S. Department of Energy (FE-34)
Office of Regulation and International Engagement, Office of Fossil Energy
Forrestal Building, Room 3E-042
1000 Independence Avenue SW
Washington, DC 20585

**Re: Request for Comments - 2014 EIA LNG Export Study and 2015 LNG Export
Study (80 Fed. Reg. 81300)**

Our client, SeaOne Gulfport LLC ("SeaOne"), has asked us to submit the following comments on its behalf.

SeaOne is a U.S. company whose parent, SeaOne Holdings, LLC, has developed a unique proprietary process to produce a hydrocarbon product ("Compressed Gas Liquid" or "CGL[®]") custom formulated to meet customer specifications designed to enable various end uses, ranging from petrochemical or fertilizer feedstocks to fuels with Btu contents varying from 1280 to 2800 Btu/scf. Though CGL is not "natural gas" within the meaning of the Natural Gas Act, it does contain natural gas (methane) in various concentrations depending on the desired end use.

SeaOne Caribbean, LLC, the parent of SeaOne, is currently developing a fuels export and delivery project to customers in the Caribbean and Central America. Though the company anticipates that sales will be primarily rich gas (having a high Btu) and natural gas products that are clearly distinguishable from "natural gas," it is possible that some end users will specify products at the low end of the CGL Btu range, and that such products will be put to end uses similar to those often associated with natural gas fuels, such as, a gas utility supplying gas to households. Accordingly, SeaOne, in order to assure that all of its future operations will be fully compliant with all applicable laws and

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policies, has applied for authorization to export any natural gas that may be contained in exported CGL. As a prospective exporter, SeaOne has an interest in this matter and appreciates the opportunity to submit comments on this important issue

SeaOne is currently authorized to export up to 1.5 Bcf per day of methane contained in CGL to end users in island and low lying coastal nations in the Caribbean and bordering the Gulf of Mexico. It is seeking authorization to make similar exports to similarly located countries that have not yet entered into Free Trade Agreements with the United States. Such an authorization is needed in order to provide full access to CGL technology for countries such as Jamaica, Aruba, Belize, Saint Vincent and the Grenadines and other Antilles island nations. These countries are among the U.S.'s closest friends and allies. The U.S. has firmly committed on numerous occasions to provide them with assistance in the transition to cleaner, more economic and more sustainable energy economies.

CGL technology can offer these countries a broader range of primary and secondary fuels that could fully replace the current use of fuel oil and other fossil fuels in the region without the need for substantial modification and expense. This can be accomplished with capital and operating costs well below those associated with more conventional natural gas technologies. It is difficult to see how it could be inconsistent with the U.S.'s public interest to allow free export of CGL to non-FTA countries in the Caribbean whether or not such exports might have some marginal impact on certain energy intensive US industries. Without access to natural gas or CGL these countries will be forced to continue their current dependence on coal, heavy fuel oil, diesel and similar fossil fuel products.

As DOE is aware, the island and coastal nations that SeaOne is seeking to serve have contributed little to global climate change, but face the greatest and most immediate risk from rising sea levels and adverse weather changes associated with that phenomenon. Small island voices were among those widely heard and respected at the recent COP 21 meeting in Paris, and the U.S. and other nations throughout the world made strong commitments to assist island and coastal nations in meeting the challenges posed by global climate change.

The U.S. has entered into agreements and understandings with island nations in the Caribbean which contemplate a role for natural gas products in the Caribbean Energy Security Initiative. President Obama reaffirmed these commitments last April at the time of his attendance at the U.S. - Caricom Summit. Discussions are continuing regarding steps to implement. In light of the close friendships and alliances between the U.S. and the Caribbean island and coastal nations and the U.S. Administration's strong commitment to reduce the threats posed by climate change and to assist these countries in the development of cleaner, more sustainable energy economies, it seems quite inappropriate for the U.S. Department of Energy to base "public interest"

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determinations regarding exports to these countries on analysis of economic details to determine whether any U.S. industry segment might suffer adverse impacts.

For the reasons outlined above, SeaOne respectfully requests that DOE revise its approach to public interest determinations with respect to its close allies in the Caribbean. U.S. natural gas should be made available, at least to these friends and allies, on a fair and non-discriminatory basis. Whether or not these countries have been able to complete the formalities associated with Free Trade Agreements they should be viewed as the U.S.'s close partners in the effort to reduce and mitigate carbon emissions and develop clean and sustainable energy economies, and treated the same as FTA partners with respect to access to clean energy resources.

Please feel free to call on us if further information on this subject is needed. Careful consideration of these comments is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'JG' followed by a large, stylized loop.

J. Gordon Arbuckle
Squire Patton Boggs (US) LLP