EDWARDS & ASSOCIATES

1517 KING STREET
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December 3, 2010

ORIGINAL

VIA HAND DELIVERY

Office of Fuels Programs, Fossil Energy U.S. Department of Energy Docket Room 3F-056, FE-50 Forrestal Building 1000 Independence Avenue, SW Washington, DC 20585



Re: FE Docket No. 10-111-LNG; In the Matter of Sabine Pass Liquefaction, LLC; Application for Long-Term Authorization to Export Liquefied Natural Gas

To whom it may concern:

Please find attached hereto for filing in the above-captioned proceeding an original and fifteen copies of the motion for leave to intervene of Shell US Gas & Power LLC. Also included are two copies, which should be date-stamped and returned to the courier.

Please contact the undersigned, if you have any questions regarding this filing.

Respectfully submitted,

John Paul Floom

Attorney for Shell US Gas & Power LLC

UNITED STATES OF AMERICA DEPARTMENT OF ENERGY OFFICE OF FOSSIL ENERGY

In the Matter of)	
Sabine Pass Liquefaction, LLC)	Docket No. 10-111-LNG

MOTION TO INTERVENE OF SHELL US GAS & POWER LLC

Pursuant to 10 C.F.R. § 590.303 (2010), Shell US Gas & Power LLC ("Shell")

hereby moves to intervene in the above-captioned proceeding. In support of its motion,

Shell states as follows:

The names and addresses of the persons upon whom all communications concerning this proceeding should be served are as follows:

Candis Fugitt John Paul Floom
Shell Oil Company Edwards & Associates
200 North Dairy Ashford, Room 3194 1517 King Street
Houston, TX 77009 Alexandria, VA 22314
281-544-5721 703-549-0888
Candis.Fugitt@shell.com jpf@kbelaw.com

On September 7, 2010, Sabine Pass Liquefaction, LLC ("Sabine Pass") filed an "Application For Long-Term Authorization To Export Liquefied Natural Gas" ("Application"), wherein, it requested authority to export up to 16 mtpa of domestically produced liquefied natural gas ("LNG") from the Sabine Pass LNG Terminal to any country (1) with which the United States does not have a free-trade agreement, (2) which has the capacity to import LNG, and (3) with which trade is not prohibited by law or policy of the United States. Sabine Pass requested authorization for a twenty-

year term, commencing on the earlier of the date of first export, or five years from the date of an order granting the Application.

Given that the Application is requesting broad authority to export LNG from the United States to nearly all other countries, worldwide, Shell has a direct interest in this proceeding. Shell, through its affiliates, is a major holder of LNG import capacity rights at U.S. LNG terminals. Further, Shell, through its affiliates, is a major producer of natural gas in the United States. The Application, if granted, could affect Shell's interest as an LNG importer and as a domestic natural gas producer due to the potential impacts on the markets for LNG and domestically produced natural gas. Thus, Shell has a substantial interest in, and will be directly affected by, the outcome of this proceeding. Further, no other party can adequately represent Shell's interests. Shell requests that it be permitted to intervene in this proceeding, and that it be granted full rights as a party to this proceeding.

Shell is continuing to study the Application and, as a result, is unable to state a position on the Application at this time.

WHEREFORE, Shell respectfully requests that its motion to intervene be granted.

Respectfully submitted,

John Paul Floom

Edwards & Associates

1517 King Street

Alexandria, VA 22314

703-549-0888

jpf@kbelaw.com

DATED: December 3, 2010

Attorney for Shell US Gas & Power LLC

UNITED STATES OF AMERICA **DEPARTMENT OF ENERGY** OFFICE OF FOSSIL ENERGY

In the Matter of)	
Sabine Pass Liquefaction, LLC)	Docket No. 10-111-LNC

VERIFICATION

COMMONWEATLH OF VIRGINIA CITY OF ALEXANDRIA

Pursuant to 10 C.F.R. § 590.103(b) (2010), John Paul Floom, being first duly sworn, affirms that he is authorized to execute this verification, that he has read the foregoing document, and that all facts stated herein are true and correct to the best of his knowledge, information, and belief.

John Paul Floom

Edwards & Associates

1517 King Street

Alexandria, VA 22314

703-549-0888

jpf@kbelaw.com

Subscribed and sworn to before me this 3rd day of December, 2010.

My Commission Expires: (2/31/2013



CERTIFICATE OF REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2010), I, John Paul Floom, hereby certify that I am a duly authorized representative of Shell US Gas & Power LLC, and that I am authorized to sign and file with the Office of Fossil Energy, on behalf of Shell US Gas & Power LLC, the foregoing document.

Dated at Alexandria, Virginia, this 3rd day of December, 2010.

John Paul Floom

Edwards & Associates

1517 King Street

Alexandria, VA 22314

703-549-0888

jpf@kbelaw.com

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 590.107(b) (2010), I hereby certify that I have this day served by regular mail, and by electronic mail, a copy of the foregoing document upon the following:

Patricia Outtrim

V.P. Government Affairs Cheniere Energy, Inc. 700 Milam Street, Suite 800

Houston, TX 77002

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666 Fifth Avenue

New York, NY 10103

tperez@fulbright.com

Dated at Alexandria, Virginia, this 3rd day of December, 2010.

John Paul Floom

Edwards & Associates

1517 King Street

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jpf@kbelaw.com