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March 24, 2010

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. 10-161-LNG; In the Matter of Freeport LNG Expansion, L.P.; FLNG Liquefaction, LLC; Application for Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries**

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  
Freeport LNG Expansion, L.P.  
FLNG Liquefaction, LLC

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)

Docket No. 10-161-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  
Shell Oil Company  
200 North Dairy Ashford, Room 3194  
Houston, TX 77009  
281-544-5721  
Candis.Fugitt@shell.com

John Paul Floom  
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1517 King Street  
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703-549-0888  
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On December 17, 2010, Freeport LNG Expansion, L.P., and FLNG Liquefaction, LLC (collectively "FLEX") filed a joint "Application For Long-Term Authorization To Export Liquefied Natural Gas to Non-Free Trade Agreement Countries" ("Application"), wherein, they requested authority to export from 9 million metric tons per annum to 225 million metric tons per annum of domestically produced liquefied natural gas ("LNG") from the Freeport Terminal, located on Quintana Island near

Freeport, Texas to any country (1) with which the United States does not have a free-trade agreement, (2) which has, or in the future develops, the capacity to import LNG, and (3) with which trade is not prohibited by law or policy of the United States. FLEX requested authorization for a twenty-five-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,

A handwritten signature in blue ink, appearing to read "John Paul Floom", written over a horizontal line.

John Paul Floom  
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1517 King Street  
Alexandria, VA 22314  
703-549-0888  
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**DATED: March 24, 2011**

**Attorney for Shell US Gas & Power LLC**

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY

In the Matter of )  
Freeport LNG Expansion, L.P. )  
FLNG Liquefaction, LLC )

Docket No. 10-161-LNG

VERIFICATION

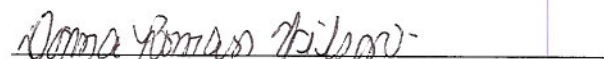
COMMONWEALTH OF VIRGINIA §  
CITY OF ALEXANDRIA §

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.

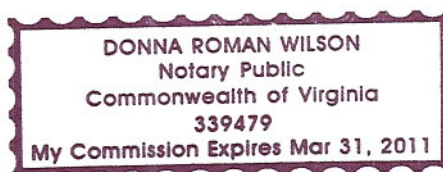


John Paul Floom  
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Subscribed and sworn to before me this 24<sup>th</sup> day of March, 2011.

  
Notary Public, Virginia

My Commission Expires: 3/31/2011



## 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 24<sup>th</sup> day of March, 2011.



John Paul Floom  
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703-549-0888  
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## 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 a copy of the foregoing document upon the following:

Les E. Lo Baugh, Esq.  
Brownstein Hyatt Farber Schreck, LLP  
2029 Century Park East, Suite 2100  
Los Angeles, CA 90067

John B. Tobola  
Vice President & General Counsel  
Freeport LNG Expansion, L.P.  
333 Clay St., Suite 5050  
Houston, TX 77002

Dated at Alexandria, Virginia, this 24<sup>th</sup> day of March, 2011.



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