DICKSTEINSHAPIRO LLP

1825 Eye Street NW | Washington, DC 20006-5403
TEL (202) 420-2200 | FAX (202) 420-2201 | dicksteinshapiro.com

October 5, 2015

By Email and U.S. Mail
fergas@hq.doe.gov

Ms. Larine A. Moore
FE Docket Room Manager
U.S. Department of Energy
FE-34
PO Box 44375
Washington, D.C. 20026-4375

Re: Amendment of Application of Jordan Cove Energy Project L.P.
for Long-Term Authorization to Export Liquefied Natural Gas
to Non-Free Trade Agreement Nations, FE Docket No. 12-32-LNG

Dear Ms. Moore:

Please accept for filing the accompanying Amendment of Application of Jordan Cove Energy Project L.P. for Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (the "Amendment of Application") that is being transmitted to you on this date by email as indicated above. The Amendment of Application is accompanied by a PDF copy of a check in the amount of $50.00, made payable to the U.S. Department of Treasury, for the filing fee.

On this date, the undersigned is mailing an original and three copies of the Amendment of Application and the original check for the filing fee.

Please acknowledge receipt of this Amendment of Application by email to darbyj@dicksteinshapiro.com. Should you have any questions, please do not hesitate to contact me at (202) 420-2745. Thank you for your assistance.

Respectfully submitted,

/s/ *Joan M. Darby*

Attorney for
Jordan Cove Energy Project L.P.

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

In the Matter of:	)	
	)	**Docket No. 12-32-LNG**
JORDAN COVE ENERGY PROJECT L.P.	)	

AMENDMENT OF APPLICATION FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS TO NON-FREE TRADE AGREEMENT NATIONS

Communications regarding this application should be directed to:

Joan M. Darby
Beth L. Webb
Dickstein Shapiro LLP
1825 Eye Street NW
Washington, DC 20006

(202) 420-2200

webbb@dicksteinshapiro.com
darbyj@dicksteinshapiro.com

William (Bill) M. Fowler
Director, Regulatory Affairs
Jordan Cove LNG LLC
5615 Kirby Drive, Suite 500
Houston, TX 77005

(713) 400-2800

bfowler@vereseninc.com

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

In the Matter of:	**)**	
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JORDAN COVE ENERGY PROJECT L.P.	**)**	

AMENDMENT OF APPLICATION FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS TO NON-FREE TRADE AGREEMENT NATIONS

Pursuant to Section 3 of the Natural Gas Act (NGA), 15 U.S.C. § 717b, and Part 590 of the regulations of the Department of Energy (DOE), 10 C.F.R. Part 590, including specifically Section 590.407, Jordan Cove Energy Project L.P. (Jordan Cove) amends its application pending before the DOE Office of Fossil Energy (DOE/FE) in the above-captioned docket for long-term, multi-contract authorization to export liquefied natural gas (LNG) from Jordan Cove's proposed terminal to be located on Coos Bay in the State of Oregon (Facility) to any nation with which the United States does not have a Free Trade Agreement (FTA) requiring national treatment for trade in natural gas and LNG (such nations, "non-FTA nations" and the pending application, the "Non-FTA Application"). By DOE/FE Order No. 3413 issued in this docket on March 24, 2014, DOE/FE granted conditional authorization for Jordan Cove to export LNG by vessel up to the equivalent of 292 billion cubic feet per year (Bcf/yr) of natural gas (six million metric tons per annum (mtpa) of LNG) for a 20-year term to non-FTA nations (*Jordan Cove Conditional Non-FTA Order*). As set forth in greater detail below, by this Amendment of Application Jordan Cove requests that the final order in this proceeding grant authorization for Jordan Cove to export LNG up to the equivalent of 350 Bcf/yr of natural gas (6.8 million mtpa of LNG).

I.
COMMUNICATIONS

Communications regarding this application should be directed to:

Joan M. Darby
Beth L. Webb
Dickstein Shapiro LLP
1825 Eye Street NW
Washington, DC 20006

(202) 420-2200

webbb@dicksteinshapiro.com
darbyj@dicksteinshapiro.com

William (Bill) M. Fowler
Director, Regulatory Affairs
Jordan Cove LNG LLC
5615 Kirby Drive, Suite 500
Houston, TX 77005

(713) 400-2800

bfowler@veresenинc.com

II.
APPLICANT

As the *Jordan Cove Conditional Non-FTA Order* recites, Jordan Cove Energy Project L.P. is a Delaware limited partnership authorized to do business in the State of Oregon, its principal place of business is in Coos Bay, Oregon and its general partner is Jordan Cove Energy Project L.L.C., a Delaware limited liability company. It further recites that both Jordan Cove and its general partner are owned by two limited partners: (1) seventy-five percent by Jordan Cove LNG L.P., a Delaware limited partnership, which is wholly owned and controlled, indirectly, by Veresen, Inc., a Canadian corporation based in Calgary, Alberta; and (2) twenty-five percent by Energy Projects Development L.L.C., a Colorado limited liability company. As of January 1, 2015, Veresen, Inc. acquired the twenty-five percent share of the second limited partner and thus now holds a one hundred percent interest in Jordan Cove and its general partner.

III.
REQUESTED AMENDMENT

The *Jordan Cove Conditional Non-FTA Order* granted Jordan Cove conditional non-FTA authorization for an LNG export volume of up to the equivalent of 292 Bcf/yr of natural gas, which was the export volume that Jordan Cove requested in its Non-FTA Application. That Non-FTA Application, filed in March 2012, explained that the requested volume was consistent with the facility design for producing six million mtpa of LNG then being proposed in the pre-filing process at the Federal Energy Regulatory Commission (FERC) (at 1 n.1).[1] Jordan Cove's subsequent May 2013 FERC application in FERC Docket No. CP13-483-000, as well as FERC's November 2014 Draft Environmental Impact Statement (DEIS), recite the same production capacity of six million mtpa. Currently, however, as set forth in the Final Environmental Impact Statement (FEIS) issued on September 30, 2015, FERC recognizes the Facility capacity as up to a maximum production of 6.8 million mtpa of LNG. That larger capacity is based upon supplemental information on the performance characteristics of the Facility under a range of operating conditions that Jordan Cove filed with FERC on January 15, 2015 (the "FERC Filing," a copy of which is attached as Appendix A).

As set forth in the FERC Filing, the description of the Facility in Jordan Cove's FERC application was based on its nameplate capacity at 97% availability; that is, the Facility would be able to export six million mtpa of LNG based on 354 operating days per year at the

[1] Prior to commencing pre-filing at FERC, and hence prior to settling upon its facility design, Jordan Cove had sought and obtained FTA authorization for a larger export volume: DOE/FE Order No. 3041 issued in Docket No. 11-127-LNG on December 7, 2011 authorizes Jordan Cove to export LNG by vessel up to the equivalent of 438 Bcf per year of natural gas (nine million mtpa of LNG) for a 30-year term to FTA nations (*Jordan Cove FTA Order*). The requested volume in this Amendment of Application is not duplicative of the volume authorized in the *Jordan Cove FTA Order*.

design ambient air temperature of 72°F using design feed gas. Subsequent to filing its FERC application, Jordan Cove conducted engineering evaluations to determine the performance characteristics of the Facility under the full range of conditions that may occur during actual operation, including ambient air temperature, percentage availability of the Facility, and the composition of the feed gas. The results of the evaluations are presented in a Table, included in the FERC Filing, showing average and maximum capacities for Design, Expected and Maximum Production Cases. In short, the maximum production capacity of the Facility may be achieved with lean gas supplies and under optimal operating conditions. Jordan Cove explained in the FERC Filing that it was not proposing any changes to the Facility itself as described in its FERC application and evaluated by FERC in the DEIS, but was seeking FERC's recognition in the FEIS and the Commission order of the range of capacities, including the maximum production capacity, as reflected in the Table.

The more detailed engineering evaluations conducted by Jordan Cove also demonstrate that, apart from the incremental volumes at maximum rather than design production, the measurement conversion used by Jordan Cove in its Non-FTA Application underestimated export volumes. DOE regulations require applicants to provide requested export volumes in terms of Bcf of natural gas. 10 C.F.R. § 590.202(b)(1). In its Non-FTA Application, Jordan Cove converted the Facility's nameplate annual production of six million mtpa of LNG to 292 Bcf/yr of natural gas and the *Jordan Cove Conditional Non-FTA Order* authorizes exports up to the equivalent of 292 Bcf/yr of natural gas. However, the equivalence of metric tons of LNG to Bcf of natural gas is not based on a fixed conversion factor; rather, it is a function of the chemical composition of the gas supply. As the Table in the FERC Filing shows, even at the nameplate capacity of six million mtpa, up to the equivalent of 318 Bcf/yr of natural gas may be

available for export when the feed gas is lean. And, at the maximum production capacity of 6.8 million mtpa, up to the equivalent of 350 Bcf/yr of natural gas may be available for export.

This Amendment of Application seeks to align the pending FERC and DOE/FE proceedings. Just as the FERC Filing requested that FERC approve the production of LNG at the Facility's "range of capacities, up to and including the maximum production of 6.8051 [million mtpa] of LNG," this Amendment seeks DOE/FE's authorization of the attendant maximum export volume of up to the equivalent of 350 Bcf/yr of natural gas (based on a maximum production of 6.8 million mtpa of LNG).

IV.
CONSISTENCY WITH THE PUBLIC INTEREST

The *Jordan Cove Conditional Non-FTA Order* concluded that the likely net economic benefits and other non-economic or indirect benefits of Jordan Cove's proposed exports outweighed the potential negative impacts and found no basis to conclude that those exports will be inconsistent with the public interest (at 143). Those determinations would be equally applicable in a final order authorizing Jordan Cove's proposed exports at the Facility's maximum production capacity. Nothing has occurred in the regulatory and economic arenas in the eighteen months since the *Jordan Cove Conditional Non-FTA Order* issued that would change the fundamental conclusions of that order as applied to Jordan Cove's peak export volumes. And, the incremental amount to be added to Jordan Cove's authorized export volume to reflect the maximum production capacity does not justify a different outcome. In short, a final order authorizing LNG exports up to the equivalent of 350 Bcf/yr of natural gas would not be inconsistent with the public interest.

The findings in the *Jordan Cove Conditional Non-FTA Order* of regional economic benefits and international trade benefits (at 138 and 142) pertain equally to Jordan Cove's peak production. And, that Order's conclusions that "there will be substantial supply into the foreseeable future" (at 139) and that there will be net economic benefits from LNG exports despite some price increases (at 140) remain valid because the LNG Export Study[2] remains valid. In a recent final order authorizing non-FTA exports – Order No. 3638 issued on June 26, 2015 to Sabine Pass Liquefaction LLC for its Trains 5 and 6 (*Sabine 5&6 Non-FTA Order*) – DOE/FE acknowledged that the projections in EIA's most recent *Annual Energy Outlook*[3] "provide independent support using the most currently available data for the proposition that domestic supplies will be adequate both to meet domestic needs *and* to supply [Sabine's] exports and other final non-FTA LNG exports previously authorized by DOE/FE" (at 190) and recent data in AEO 2015 bolsters the LNG Export Study conclusion of net economic benefits for the United States from LNG exports (at 192).

An authorization for LNG exports up to the equivalent of 350 Bcf/yr of natural gas would serve as insurance for Jordan Cove that it will have adequate export authority should the Facility be able to sustain peak production. The increase over the volume authorized in the *Jordan Cove Conditional Non-FTA Order* is relatively modest, and in the context of overall authorized exports it is insignificant. DOE/FE's most recent non-FTA final order – Order No. 3690 issued on August 7, 2015 authorizing American LNG Marketing LLC to export up to a total volume of LNG equivalent to 3.02 Bcf/yr of natural gas (*American LNG Non-FTA Order*) –

[2] The LNG Export Study comprises two studies commissioned by the DOE: (1) *Effect of Increased Natural Gas Exports on Domestic Energy Markets* published in January 2012 by the U.S. Energy Information Administration (EIA); and (2) *Macroeconomic Impacts of LNG Exports from the United States* published in December 2012 by NERA Economic Consulting (NERA).

[3] U.S. Energy Information Administration, *Annual Energy Outlook 2015* (April 14, 2015), available at http://www.eia.gov/forecasts/aeo (AEO 2015).

acknowledges that the cumulative volume of exports authorized in final non-FTA orders to date, 10.00 Bcf per day (Bcf/d), is within the range of scenarios up to 12 Bcf/d analyzed in the LNG Export Study that NERA found would produce net economic benefits to the United States. *American LNG Non-FTA Order* at 130-131. Moreover, a subsequent study by EIA confirms benefits to the nation's economy at increased export levels up to 20 Bcf/d.[4] The larger LNG export volume of up to the equivalent of 350 Bcf/yr of natural gas, for which Jordan Cove seeks authorization in DOE/FE's final order in this proceeding, would add 0.96 Bcf/d to the currently authorized 10.00 Bcf/d total, well within the studied ranges of scenarios that produce benefits. In sum, the consistency with the public interest findings in the *Jordan Cove Conditional Non-FTA Order* remain valid and DOE/FE should confirm those findings in a final order authorizing the export of peak volumes from the Jordan Cove Facility.

V.
ENVIRONMENTAL IMPACT

FERC is leading the National Environmental Policy Act (NEPA) review of the Facility and its potential environmental impacts and DOE/FE is participating in that review as a cooperating agency. The FEIS concluded that the construction and operation of the Project would result in some limited adverse environmental impacts, but that most of those impacts would be reduced to less-than-significant levels with the implementation of mitigation measures, both those proposed by JCEP (and Pacific Connector Gas Pipeline) and those recommended in the FEIS.

[4] *Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets* published in October 2014 by the EIA.

The FEIS also reflects the Facility's range of capacities, including the maximum production capacity, as presented in the FERC Filing. It is anticipated that the FERC order to follow will approve Jordan Cove's production of LNG up to the Facility's maximum capacity, i.e., 6.8 million mtpa of LNG. As explained in the FERC Filing, Jordan Cove's request for FERC's approval of its maximum production capacity "does not involve any modification to the proposed Facility or any change to the environmental footprint evaluated in the DEIS, including air emissions during operation."[5] Accordingly, Jordan Cove's request that DOE/FE authorize LNG export volumes exports at the Facility's maximum production capacity does not entail environmental consequences.

VIII.
CONCLUSION

Jordan Cove respectfully requests that DOE/FE accept Jordan Cove's amendment of its pending Non-FTA Application and authorize Jordan Cove, in the final order to be issued in this proceeding, to export LNG up to the equivalent of 350 Bcf/yr of natural gas (6.8 million

[5] FERC Filing at 2; the explanatory footnote at 2 n.1 states the following:

> See DEIS at 4-884, Table 4.12.1.1-5, note a (emissions "[b]ased on maximum possible capacity of equipment to emit pollutants."). More specifically, total emissions authorized in the Air Contaminant Discharge Permit are not directly related to the LNG production rate. Rather the modeling is based on maximum firing of all equipment installed; including running of the installed spare gas turbine (i.e. power production up to 420MW which is considerably in excess of requirements at the maximum production requested to be authorized).

mtpa of LNG). For purposes of this Application, the undersigned certifies that she is a duly authorized representative of Jordan Cove. A verification is attached.

Dated: October 5, 2015

Respectfully submitted,

/s/ Joan M. Darby

By: _____

Joan M. Darby
Beth L. Webb
Dickstein Shapiro LLP
1825 Eye Street, N.W.
Washington, DC 20006
(202) 420-2200

Attorneys for Jordan Cove Energy Project L.P.

APPENDIX A

FERC FILING

DICKSTEINSHAPIRO LLP

1825 Eye Street NW | Washington, DC 20006-5403
TEL (202) 420-2200 | FAX (202) 420-2201 | dicksteinshapiro.com

January 15, 2015

Via Electronic Filing

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: Supplemental Information
Jordan Cove Energy Project, L.P., FERC Docket No. CP13-483-000

Dear Ms. Bose:

Jordan Cove Energy Project, L.P. (JCEP) hereby submits for filing in the above referenced docket supplemental information that is related to JCEP's application filed May 21, 2013 (Application) for authorization to site, construct and operate a natural gas liquefaction and liquefied natural gas (LNG) export facility on the North Spit of Coos Bay in unincorporated Coos County, Oregon (Facility). This Supplemental Information filing is comprised of the attached table setting forth the performance characteristics of the Facility under a range of operating conditions (Table) and the explanation below.

Consistent with the description of the Facility in the Application, the Draft Environmental Impact Statement dated November 7, 2014 (DEIS) states that JCEP "requested Commission approval to produce up to 6 million metric tons per annum (MMTPA) of LNG, using a supply of approximately 0.9 billion cubic feet per day (Bcf/d) of natural gas." The Table shows that the Application's description of the Facility was based on its nameplate capacity at 97% availability. In other words, the Facility would be capable of exporting 6 MMTPA of LNG based on 354 operating days per year at the design ambient air temperature (i.e. 72F) using design feed gas.

The Table also reflects the engineering evaluations for the Facility that JCEP has conducted to determine the performance characteristics of the Facility under the full range of conditions which may occur during actual operation. Such conditions, each of which may vary, include the ambient air temperature, the percentage availability of the Facility and the composition of the feed gas. The Table shows the range of LNG volumes the Facility would be capable of delivering annually under a reasonable range of these varying conditions, along with a corresponding range of required volumes of feed gas. In addition to the nameplate capacity at both 97% and 100% (i.e. design maximum capacity) availability shown in the Design Production Case, the Table also shows average and maximum capacities for both an Expected Production Case and a Maximum Production Case.

By this Supplemental Information filing, JCEP is proposing no changes to the Facility itself as it was described in JCEP's Application and evaluated in the DEIS. Rather, JCEP is requesting that the Table be incorporated into the record of this proceeding and that the FEIS and Commission

order reflect the Commission's approval of JCEP's production of LNG at the range of capacities reflected in the Table, up to and including the maximum production of 6.8051 MMTPA of LNG, using the range of volumes of feed gas, up to and including the maximum volume of 1.04 Bcf/d.

The requested approval is warranted. It does not involve any modification to the proposed Facility or any change to the environmental footprint evaluated in the DEIS, including air emissions during operation.[1] The requested approval is simply a recognition of (i) the peak production capacity of the proposed Facility under optimal operating conditions and (ii) the fact that actual operating conditions are likely to be more favorable than the conservative assumptions regarding operating conditions on which the nominal capacity is based. The Commission has acknowledged that "an accurate calculation of the maximum or peak capacity at optimal conditions may not be possible at the time an initial application for construction is filed" and that "it is appropriate for an ultimate authorization to reflect the maximum or peak capacity at optimal conditions as such a level represents the actual potential production of LNG."[2]

All information included in this filing is Public. This filing is being made electronically. All persons on the Official Service List will be served by email with a copy of this filing. Two courtesy paper copies and two CDs of this filing are being provided for the Office of Energy Projects (OEP), to the attention of Paul Friedman and Steven Busch, respectively, and one courtesy paper copy and one CD are being provided to John Scott at Tetra Tech, the third party environmental contractor for JCEP's project. Finally, all other persons listed below will be served by email with a copy of this filing and will be mailed a courtesy CD of the filing.

If you have any questions about this filing, please contact me at webbb@dicksteinshapiro.com or 202-420-4782 or my colleague Joan Darby at darbyj@dicksteinshapiro.com or 202-420-2745.

Respectfully submitted,

/s/ *Beth L. Webb*

Attorney for
Jordan Cove Energy Project, L.P.

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[1] [See DEIS at 4-884, Table 4.12.1.1-5, note a (emissions "[b]ased on maximum possible capacity of equipment to emit pollutants."). More specifically, total emissions authorized in the Air Contaminant Discharge Permit are not directly related to the LNG production rate. Rather the modeling is based on maximum firing of all equipment installed; including running of the installed spare gas turbine (i.e. power production up to 420MW which is considerably in excess of requirements at the maximum production requested to be authorized).

[2] *Sabine Pass Liquefaction, LLC*, 146 FERC ¶ 61,117 (2014) at P 12.

cc: Service List
Paul Friedman, OEP, FERC
Steven Busch, OEP, FERC
John Scott, Tetra Tech
Joe Iozzi, Tetra Tech
Paul Uncapher, North State Resources
Miriam Liberatore, BLM
Leslie Frewing, BLM
Wes Yamamoto, FS
Pam Sichting, FS
Kristen Hiatt, BOR
Tyler Krug, COE
Russ Berg, USCG
Marc Talbert, DOE
Teresa Kubo, EPA
Doug Young, FWS
Thomas Finch, DOT
Buddy Secor, DOT

Enclosure

Jordan Cove Energy Project, L.P.

FERC Docket No. CP13-483-000

DESIGN, EXPECTED AND MAXIMUM PRODUCTION CASES

			CONVERSION FACTOR: SCF PER TONNE				51,421	50,820	49,851
			ANNUAL	FEED GAS (3)			LNG LOADED IN VESSELS		
			PRDN (2)	LEAN	DESIGN	RICH	LEAN	DESIGN	RICH
	STRM DAY	PRDN INCR (1)	MMTPA	MMSCFD (STREAM DAY)			MMSCF/YEAR		
NAMEPLATE	354	N/A	6.0000	943.3	934.1	912.6	308,526	304,920	299,106
(97% AVAILABLE)				MMSCFD (STREAM DAY)			871.5	861.4	844.9
DESIGN PRODUCTION CASE				MMSCFD (AVG / CAL DAY)			845.3	835.4	819.5
DESIGN MAX	365	3.10%	6.1864				318,111	314,393	308,398
(100% AVAILABLE)									
AVG TEMP	354	5.60%	6.3360	996.1	986.4	963.7	325,803	321,996	315,856
(97% AVAILABLE)				MMSCFD (STREAM DAY)			920.3	909.6	892.2
EXPECTED PRODUCTION CASE				MMSCFD (AVG / CAL DAY)			892.6	882.2	865.4
AVG TEMP MAX	365	8.88%	6.5329				335,928	332,002	325,672
(100% AVAILABLE)					NOTE (4)				
LOWEST TEMP	354	10.00%	6.6000	1,037.6	1,027.5	1,003.8	339,379	335,412	329,017
(97% AVAILABLE)				MMSCFD (STREAM DAY)			958.7	947.5	929.4
MAXIMUM PRODUCTION CASE				MMSCFD (AVG / CAL DAY)			929.8	918.9	901.4
LOWEST TEMP MAX	365	13.42%	6.8051				349,925	345,835	339,241
(100% AVAILABLE)									

(1) PRODUCTION INCREASES DUE TO LOWER AMBIENT TEMPERATURE.

(2) NET LNG LIQUID VOLUME EQUIVALENT ACCOUNTING FOR APPROXIMATELY 1.5% BOG LOSS FROM PUMPED QUANTITY.

(3) AVERAGE OF FEED GAS REQUIRED DURING LOADING AND NOT LOADING (i.e. slightly lower volume required during loading).

(4) PCGP DESIGN BASIS 1.03 BSCFD (DELIVERED).

APPENDIX B

VERIFICATION

VERIFICATION

DISTRICT OF COLUMBIA

I, Joan M. Darby, being duly sworn on oath, hereby affirm that: I am a duly authorized representative of Jordan Cove Energy Project, L.P.; I am familiar with the contents of Jordan Cove's Amendment of Application for Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations; and, the matters set forth in the Amendment of Application are true and correct to the best of my knowledge, information and belief.

Joan M. Darby

Sworn to and subscribed before me,
a Notary Public in and for the
District of Columbia on
this 5th day of October, 2015

Notary Public

LYNDA JENKINS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires February 14, 2017