

RECEIVED

By Docket Room at 3:48 pm, Aug 15, 2014

NORTON ROSE FULBRIGHT

August 15, 2014

Mr. John Anderson
Office of Fuels Programs, Fossil Energy
U.S. Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Fulbright & Jaworski LLP
666 Fifth Avenue, 31st Floor
New York, New York 10103-3198
United States

Direct line +1 212 318 3009
lisa.tonery@nortonrosefulbright.com

Tel +1 212 318 3000
Fax +1 212 318 3400
nortonrosefulbright.com

**Re: In the Matter of Cheniere Marketing, LLC
FE Docket No. 12-99-LNG
Request to Add Corporate Affiliate as Additional Authorization Holder Under
DOE/FE Order No. 3164**

Dear Mr. Anderson:

On October 16, 2012, the U.S. Department of Energy ("DOE"), Office of Fossil Energy ("FE"), granted Cheniere Marketing, LLC ("CMI") long-term, multi-contract authorization to export liquefied natural gas ("LNG") by vessel to free trade agreement ("FTA") nations in DOE/FE Order No. 3164.¹ That order authorized CMI to engage in LNG exports from the proposed Corpus Christi Liquefaction Project ("CCL Project") being developed by CMI's affiliate, Corpus Christi Liquefaction, LLC ("CCL"), near Corpus Christi, Texas.² CMI hereby requests authorization from DOE/FE to include CCL as an additional authorization holder under DOE/FE Order No. 3164, for the reasons set forth below.³

¹ *Cheniere Marketing, LLC, Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed Corpus Christi Liquefaction Project to Free Trade Agreement Nations*, DOE/FE Order No. 3164 (2012).

² On August 31, 2012, CCL and Cheniere Corpus Christi Pipeline, L.P. filed an application with the Federal Energy Regulatory Commission ("FERC") for authorization to site, construct, and operate an LNG export and import facility and an associated interstate natural gas pipeline. That application is pending before FERC in Docket Nos. CP12-507-000 and CP12-508-000. On February 12, 2014, FERC issued a Notice of Schedule for Environmental Review of the CCL Project setting the planned schedule for environmental review as follows: (1) Issuance of a notice of availability of a final environmental impact statement by October 8, 2014; and (2) a 90-day federal authorization decision deadline of January 6, 2015.

³ This filing is submitted pursuant to Section 590.201 of DOE's regulations, 10 C.F.R. § 590.201 (2014). To the extent any information required under Section 590.201 is omitted herein, CCL incorporates by

Fulbright & Jaworski LLP is a limited liability partnership registered under the laws of Texas.

Fulbright & Jaworski LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP, Norton Rose Fulbright South Africa (incorporated as Deneys Reitz, Inc.), each of which is a separate legal entity, are members of Norton Rose Fulbright Verein, a Swiss Verein. Details of each entity, with certain regulatory information, are at nortonrosefulbright.com. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients.

The inclusion of CCL as an additional authorization holder is intended to better reflect the commercial structure adopted by the CCL Project subsequent to DOE/FE's issuance of DOE/FE Order No. 3164 and to facilitate financing of the CCL Project. Under the adopted commercial structure of the CCL Project, both CMI and CCL may source natural gas feedstock for the CCL Project and export LNG. To date, CCL has entered into eight LNG sale and purchase agreements ("SPAs") with six customers for the export of LNG from the CCL Project, as detailed below.

Set forth below is updated information consistent with this application:

Description of Applicant:

The exact legal name of CCL is Corpus Christi Liquefaction, LLC. CCL is a Delaware limited liability company with its primary place of business located at 700 Milam Street, Suite 800, Houston, TX 77002. CCL is a subsidiary of Corpus Christi LNG, LLC, which is a wholly-owned subsidiary of Cheniere LNG Terminals, LLC. Cheniere LNG Terminals, LLC is a wholly-owned subsidiary of Cheniere Development, Inc., which is a wholly-owned subsidiary of Cheniere Energy, Inc. CCL is authorized to do business in the State of Texas.

Contact Information:

CCL respectfully requests that the following individuals be included for purposes of receiving communications concerning this application:⁴

Patricia Outtrim
Rina W. Chang
Cheniere Energy, Inc.
700 Milam Street, Suite 800
Houston, TX 77002
Telephone: (713) 375-5000
Facsimile: (713) 375-6212
Email: pat.outtrim@cheniere.com
Email: rina.chang@cheniere.com

Lisa M. Toney
Tania S. Perez
Fulbright & Jaworski LLP
666 Fifth Avenue
New York, N.Y. 10103
Telephone: (212) 318-3009
Facsimile: (212) 318-3400
Email: lisa.toney@nortonrosefulbright.com
Email: tania.perez@nortonrosefulbright.com

reference the relevant information providing in CMI's application filed in FE Docket No. 12-99-LNG on August 31, 2012. Also on that date, as supplemented on October 10, 2012, CMI filed an application for authorization to export LNG from the CCL Project to non-FTA nations. That application remains pending before DOE/FE in FE Docket No. 12-97-LNG. Concurrent with this submission, CMI is filing under separate cover an amendment to that application seeking to include CCL as an additional applicant.

⁴ CMI requests waiver of Section 590.202(a) of DOE's regulations, 10 C.F.R. §590.202(a) to the extent necessary.

Commercial Development:

CCL has entered into the following eight SPAs for LNG exports from the CCL Project:

1. December 4, 2013, SPA with PT Pertamina (Persero) ("Pertamina") for approximately 0.76 million tonnes per annum ("mtpa") of LNG for a 20-year term.
2. April 1, 2014, SPA with Endesa Generación, S.A., subsequently assigned to Endesa S.A. ("Endesa"), for approximately 1.5 mtpa of LNG for a 20-year term.
3. April 7, 2014, SPA with Endesa for approximately 0.75 mtpa of additional LNG for a 20-year term.
4. May 30, 2014, SPA with Iberdrola, S.A. for initially approximately 0.4 mtpa of LNG, increasing to approximately 0.8 mtpa of LNG, for a 20-year term.
5. June 2, 2014, SPA with Gas Natural Fenosa LNG SL for approximately 1.5 mtpa of LNG for a 20-year term.
6. June 30, 2014, SPA with Woodside Energy Trading Singapore Pte Ltd for approximately 0.85 mtpa of LNG for a 20-year term.
7. July 1, 2014, SPA with Pertamina for approximately 0.76 mtpa of additional LNG for a 20-year term.
8. July 17, 2014, SPA with Électricité de France, S.A. for approximately 0.38 mtpa of LNG for a 20-year term.

Opinion of Counsel:

Enclosed herewith as Appendix 1 is an Opinion of Counsel in accordance with the requirements of Section 590.202(c) of DOE's regulations.⁵

⁵ 10 C.F.R. § 590.202(c).

Mr. John Anderson
August 15, 2014
Page 4

 NORTON ROSE FULBRIGHT

Should you have any questions about the foregoing, please feel free to contact the undersigned at (212) 318-3009.

Respectfully submitted,

/s/ Lisa M. Toney

Lisa M. Toney
Tania S. Perez
Charles Scott

*Attorneys for
Cheniere Marketing, LLC and
Corpus Christi Liquefaction, LLC*


LMT

VERIFICATION

State of Texas)

County of Harris)

BEFORE ME, the undersigned authority, on this day personally appeared Patricia Outtrim, who, having been by me first duly sworn, on oath says that she is the Vice President, Governmental and Regulatory Affairs, for Cheniere Energy, Inc. and is duly authorized to make this Verification; that she has read the foregoing instrument and that the facts therein stated are true and correct to the best of her knowledge, information and belief.



Patricia Outtrim

SWORN TO AND SUBSCRIBED before me on the 15th day of August, 2014.

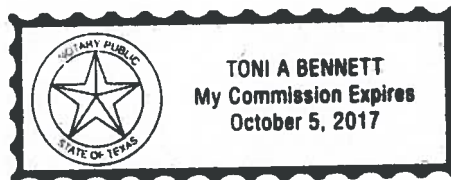


Name: Toni A. Bennett

Title: Notary Public

My Commission expires:

October 5, 2017





Cheniere Energy, Inc.
700 Milam, Suite 800
Houston, Texas 77002
phone: 713.375.5000
fax: 713.375.6000

August 15, 2014

Office of Fuel Programs, Fossil Energy
U.S. Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Ave., SW
Washington, D.C. 20585

**Re: In the Matter of Cheniere Marketing, LLC
FE Docket No. 12-99-LNG
Request to Add Corpus Christi Liquefaction, LLC
as Additional Authorization Holder
Under DOE/FE Order No. 3164
Opinion of Counsel**

Dear Sir or Madam:

This opinion of counsel is provided in accordance with the requirements of Section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202(c) (2014). I have examined the Limited Liability Company Agreement of Corpus Christi Liquefaction, LLC ("CCL") and other authorities as necessary, and have concluded that the proposed exportation of liquefied natural gas is within CCL's corporate powers. Further, CCL is authorized to do business in Texas, and to engage in foreign commerce.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Rina W. Chang". The signature is written in a cursive style and is positioned above a horizontal line.

By: Rina W. Chang, *Senior Counsel*
Cheniere Energy, Inc.
700 Milam Street, Suite 800
Houston, TX 77002
Phone: (713) 375-5528
Fax: (713) 375-6528
Email: Rina.Chang@cheniere.com