



**ORIGINAL**

**UNITED STATES OF AMERICA  
BEFORE THE  
DEPARTMENT OF ENERGY/ OFFICE OF FOSSIL ENERGY**

**Golden Pass Products LLC**

)

**FE Docket No. 12 - 156 - LNG**

**MOTION OF GOLDEN PASS PRODUCTS LLC  
FOR EXTENSION OF TIME TO FILE ANSWER TO PROTESTS**

Pursuant to the Department of Energy (“DOE”) Regulations at 10 C.F.R. §§ 590.302 and 304, Golden Pass Products LLC (“GPP”) hereby moves that the DOE Office of Fossil Energy (“OFE”) grant an extension of time to file an Answer to the protests of the Sierra Club and the American Public Gas Association (“APGA”), to and including February 28, 2013. In support of this Motion, GPP respectfully states as follows:

1. On October 26, 2012, GPP filed an application under Section 3 of the Natural Gas Act, 15 U.S.C. § 717b, and Part 590 of the DOE Regulations, 10 C.F.R. §§ 590.101 – 590.505 (2012), for authorization to export domestically produced liquefied natural gas (“LNG”) via ocean-going vessel, up to the equivalent of 740 billion cubic feet (“Bcf”) of domestically produced natural gas equivalent per year, equal to 15.6 million metric tons per annum (“MTPA”), and other related activities. Notice of GPP’s Application was published in the *Federal Register* on December 6, 2012.<sup>1</sup> On February 4, 2013, motions to intervene and protests were filed by the Sierra Club and APGA.

2. Due to the complexity of the issues and the voluminous nature of the protests,<sup>2</sup> as

---

<sup>1</sup> *Golden Pass Products LLC*, FE Docket No. 12–156–LNG, 77 Fed. Reg. 72,837 (December 6, 2012).

<sup>2</sup> Staff of DOE/FE have advised counsel for GPP that as of the the time this Motion is filed, the Sierra Club has **not** filed the 100 numbered exhibits identified in its Protest, although the Protest states that these exhibits are “attached.” Moreover, GPP counsel has not received service from the Sierra Club of its Protest or the exhibits.

well as the pending February 25, 2013 deadline for Reply Comments on the DOE 2012 LNG Export Study,<sup>3</sup> which also involves GPP's application in this proceeding, GPP respectfully submits that a 9-day extension of the 15-day deadline for Answers provided for in 10 C.F.R. § 590.304 is warranted. The OFE has granted longer extensions in similar circumstances. See Letter from OFE to counsel dated May 3, 2012, in *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, Docket No. FE11-161-LNG (15-day extension of time), and *Gulf Coast LNG Export, L.L.C.*, Docket No. FE12-05-LNG (Letter dated August 17, 2012, granting 13-day extension of time).

WHEREFORE, for the foregoing reasons, GPP requests an extension of time for filing Answers to the Protests filed in this proceeding to and including February 28, 2013.

Respectfully submitted,

**Golden Pass Products LLC**

  
Kevin M. Sweeney

John & Hengerer  
1730 Rhode Island Ave., NW  
Suite 600  
Washington, DC 20036  
202-429-8802  
ksweeney@jhenergy.com

Blaine Yamagata  
Vice President and General Counsel  
Golden Pass Products LLC  
333 Clay Street, Suite 802  
Houston, TX 77002  
713-860-6352  
blaine.yamagata@gpterminal.com

**Attorneys for  
Golden Pass Products LLC**

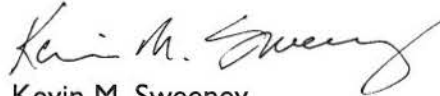
---

<sup>3</sup> *Freeport LNG Expansion, L.P., and FLNG Liquefactions, L.L.C.*, FE Docket No. 10-161-LNG, 77 Fed. Reg. 73627 (December 11, 2012).

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document filed today with the DOE/FE on the designated representatives of all of the parties to this proceeding in accordance with 10 C.F.R. § 590.107(a).

Dated at Washington, DC, this 6th day of February, 2013.



Kevin M. Sweeney  
John & Hengerer  
1730 Rhode Island Ave., NW  
Suite 600  
Washington, DC 20036  
(202) 429-8802  
ksweeney@jhenergy.com