

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

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

**JORDAN COVE ENERGY PROJECT L.P. REQUEST
FOR AN EXTENSION OF TIME TO ANSWER
MOTIONS TO INTERVENE AND PROTESTS**

Pursuant to Sections 590.303(e) and 590.304(f) of the regulations of the Department of Energy (DOE),¹ Jordan Cove Energy Project L.P. (Jordan Cove) requests a one-week extension of time until April 14, 2016 to file answers to the motions to intervene, protests and comments filed in this proceeding on March 23, 2016.

Good cause exists to grant Jordan Cove the requested extension of time. On March 3, 2016, the Federal Register published the Notice of the DOE's Office of Fossil Energy (DOE/FE) of Jordan Cove's Amendment of Application in the above-captioned docket, setting March 23, 2016 as the deadline for interventions and protests. As of that deadline, counsel for Jordan Cove were served with fewer than half of the filings that, as of today's date, counsel understand were filed timely and subsequently docketed by DOE/FE. The docket in DOE/FE's Electronic Docket Room for this proceeding showed filings additional to those that had been served on Jordan Cove's counsel, but counsel were unable to obtain copies because the links to those filings in DOE/FE's Electronic Docket Room were not functioning correctly. When conferring with the Docket Room Manager regarding that technical problem, counsel learned that the list of filings in the electronic docket was not complete because some filings had been made through regulations.gov, rather than through fergas@hq.doe.gov. Only as of today, has counsel for

¹ 10 C.F.R. §§ 590.303(e) and 590.304(f).

Jordan Cove been able to confirm with the Docket Room Manager the complete list of filings and obtain copies of all of them. This delay of more than a week beyond the deadline for interventions and protests to obtain a complete set of those filings has deprived Jordan Cove of a reasonable period of time within which to review and respond to them. Under these circumstances, DOE/FE should conclude that good cause exists for the one-week extension requested by Jordan Cove.²

No interested participant or party to this proceeding would be prejudiced by the grant of the requested extension for the short period of time of seven days. DOE/FE is not expected to take action on the pending Amendment of Application until such time as the Federal Energy Regulatory Commission (FERC) completes the rehearing process with respect to Jordan Cove's facilities application in FERC Docket No. CP13-483-000.

For these reasons, Jordan Cove respectfully requests that DOE/FE grant an extension of time from April 7, 2016 to April 14, 2016 for Jordan Cove's answers to the interventions and protests filed on March 23, 2016 in this proceeding.

Dated: March 31, 2016

Respectfully submitted,

By: /s/ Joan M. Darby
Joan M. Darby
Beth L. Webb
Blank Rome LLP
1825 Eye Street, N.W.
Washington, DC 20006
(202) 420-2200

Attorneys for Jordan Cove Energy Project L.P.

² DOE/FE has granted similar extensions to other LNG export projects. *See, e.g., Pangea LNG (North America) Holdings, LLC*, FE Docket No. 12-184-LNG (May 16, 2013) (granting eight-day extension); *Excelerate Liquefactions Solutions I, LLC*, FE Docket No. 12-146-LNG (Feb. 15, 2013) (granting fifteen-day extension).

CERTIFICATE OF SERVICE

I hereby certify that, on this 31st day of March 2016, I have caused a copy of the **REQUEST FOR AN EXTENSION OF TIME TO ANSWER MOTIONS TO INTERVENE AND PROTESTS** filed by Jordan Cove Energy Project L.P. on March 31, 2016 in FE Docket 12-32-LNG to be served by email on the individuals listed on the Service List for that docket, as well as persons who filed for intervention as of March 23, 2016, as follows:

Landowners United - Clarence Adams	adams@mcsi.net
The American Public Gas Association - David Schryver - William T. Miller	dschryver@apga.org wmiller@mbolaw.com
Citizens Against LNG - Jody McCaffree -Curt Clay	mccaffrees@frontier.com curtclay@gmail.com
Klamath-Siskiyou Wildlands Center - Lesley Adams - Joseph Vaile	lesley@rogueriverkeeper.org joseph@kswild.org
Sierra Club - Nathan Matthews - Kathleen Krust	nathan.matthews@sierraclub.org kathleen.krust@sierraclub.org
Oregon Women's Land Trust – Francis Eatherington	francis@douglasfast.net
Oregon Wild – Doug Heiken	dh.oregonwild@gmail.com
Wim De Vriend	costacoosta@coosnet.com
Evans Schaaf Family LLC Deborah Evans and Ron Schaaf	debron3@gmail.com
Industrial Energy Consumers of America – Paul N. Cicio	pcicio@ieca-us.org
Stacey and Craig McLaughlin	stacey@mountaintopinsight.com
American Petroleum Institute – Benjamin Norris David L. Wochner, K&L Gates LLP Sandra E. Safro, K&L Gates LLP Michael L. O'Neill, K&L Gates LLP	NorrisB@api.org david.wochner@klgates.com sandra.safro@klgates.com mike.oneill@klgates.com

/s/ Joan M. Darby