

ATTORNEYS AT LAW

300 Sevilla Avenue • Suite 309 • Coral Gables, FL 33134 Tel: 305.921.9326 • Fax: 888.506.2833 • www.RuzLaw.com



September 16, 2013

Sent Via Facsimile 202.586.6050

Larine A. Moore U.S. Department of Energy FE-34 P.O. Box 44375 Washington, DC 22026-4375

Re:

In the Matter of GOVEN NATURAL GAS HOLDINGS, LLC

Application for Short-Term Blanket Authorization to Export Liquefied

Natural Gas

Dear Ms. Moore:

Enclosed for filing on behalf of Goven Natural Gas Holdings, LLC ("Goven") please find Goven's application for short-term blanket authorization to engage in exports of domestically-produced natural gas ("LNG") in an amount up to the equivalent of 2 billion standard cubic feet of natural gas over a two year term to various Latin American free trade agreement nations as stated in the enclosed application.

I have also enclosed a copy of the check related to the instant application which was mailed along with the physical copies of the application and related documentation earlier today.

Should you have any questions, please do not hesitate to contact me.

Very Truly Yours.

Rick Ruz, Esq.

UNITED STATES OF AMERICA DEPARTMENT OF ENERGY OFFICE OF FOSSIL ENERGY

In the matter of:)		
GOVEN NATURAL GAS HOLDINGS, I	.LC.)	FE: Docket No	

APPLICATION OF GOVEN NATURAL GAS HOLDINGS, LLC. FOR BLANKET AUTHORIZATION TO EXPORT LIQUID NATURAL GAS

Pursuant to Section 3 of the Natural Gas Act ("NGA")¹, Part 590 of the Department of Energy's ("DOE") regulations,² Office of Fossil Energy ("FE") and Section 201 of the Energy Policy Act of 1992 ("Energy Policy Act"), Goven Natural Gas Holdings, LLC ("Goven") hereby submits the instant application for blanket authorization to export domestically sourced liquefied natural gas ("LNG") to certain Latin American Free Trade Agreement ("FTA") nations, namely Dominican Republic, El Salvador, Honduras, Guatemala and Nicaragua. In support of this Application, Goven respectfully shows the following.

I. GENERAL

Correspondence and communications regarding this application should be addressed to the following:

Rick Ruz, Esq.	Lisette Rivera	
Rick Ruz, PLLC	Goven Natural Gas Holdings, LLC	
300 Sevilla Avenue	8550 W. Flagler Street	
Suite 309	Suite 121	
Coral Gables, FL 33134	Miami, Florida 33144	
Attorneys for the Applicant	Manager for the Applicant	

¹ 15 U.S.C. § 717b(2006).

² 10 C.F.R. Part 590. This application (the "Application") is structured to conform to 10 C.F.R. Part 590 Subpart B—Applications for Authorization to Import or Export Natural Gas.

II. BACKGROUND

Applicant's exact legal name is Goven Natural Gas Holdings, LLC. Goven is a limited liability company organized under the laws of the State of Florida, with its principal place of business at 8550 W. Flagler Street, Suite 121, Miami, Florida 33144. Goven seeks the instant authorization in order to export domestically produced natural gas to certain Latin American FTA nations, namely Dominican Republic, El Salvador, Honduras, Guatemala and Nicaragua ("Requested FTA Nations").

III. <u>AUTHORIZATION REQUESTED</u>

By the instant application, Goven requests authorization to export domestically produced natural gas to the aforementioned Requested FTA Nations, a combined total of up to 2 billion standard cubic feet of LNG over a two-year term. The requested authorization will enable Goven to participate in short-term or spot-market LNG transactions with customers within the Requested FTA Nations. Goven requests that effective start date be the first available date following the authorization of the instant application.

Although Goven has not yet entered into any contract for the export of LNG, it is currently negotiating with several prospective customers in the Requested FTA Nations. Goven's negotiations with prospective customers within the Requested FTA Nations are of a continuing nature. Goven cannot be competitive with other sellers if it must apply for export authorization for each transaction. Therefore Goven requests that such export authority be granted on a blanket basis at all existing points of export from the United States of America to the Requested FTA Nations to provide Goven with the flexibility necessary to respond quickly to these market opportunities.

From: Rick Ruz

IV. PUBLIC INTEREST

The Energy Policy Act provides that the importation of natural gas from or to a nation with which there is in effect a free trade agreement shall be deemed within the public interest, and that applications for such importation and exportation shall be granted without modification or delay. Because Goven's application is for the exportation of domestically sourced liquefied natural gas to the nations of Dominican Republic, El Salvador, Honduras, Guatemala and Nicaragua, all nations with which the United States has a free trade agreement, Goven submits that its application is within the public interest.

V. <u>ENVIRONMENTAL IMPACT</u>

No new facilities will be constructed in the United States for proposed importation and exportation of natural gas. Consequently, a granting this application will not be a federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act. Therefore, an environmental impact statement or environmental assessment is not required.

VI. REPORTING REQUIREMENT

With respect to all exports made pursuant to the authorization requested herein, Goven will undertake to file with the DOE/FE within 30 days following the close of each calendar month a report indicating whether exports have occurred, and if so, the details of each transaction, including the total volumes of exports in Mcf and average price for the exports per MMBtu at the international border. Whenever applicable, the reports shall include: (1) the name of the seller (supplier); (2) the name of the purchaser; (3) the estimated or actual duration of any agreements; (4) the name of the U.S. transporter(s); (5) the country of destination; (6) the point of exit, (7) volumes delivered at each point; (8) the price and whether the sales are made on an interruptible

or firm basis, and, if applicable, the unit (MMBtu) demand/commodity/reservation charge breakdown of the contract price. Goven will notify the DOE/FE in writing of the date of the first delivery of natural gas exported under the requested authorization within two weeks of such delivery.

VII. <u>CONCLUSION</u>

WHEREFORE, for the forgoing reasons Goven respectfully requests that the DOW/FE expeditiously consider the instant application and, pursuant to section 3 of the NGA and section 201 of the Energy Policy Act, grant its request for blanket export authorization. Goven can submit that a grant of such authorization would not be inconsistent with the public interest.

Respectfully Submitted,

Rick Ruz, PLLC Attorneys for Goven Natural Gas Holdings, LLC 300 Sevilla Avenue Suite 309 Coral Gables, FL 33134

Tel.: 305.921.9326 Fax: 888.506.2833

By:

Rick Ruz, Esq. / Florida Bar No. 42090

rickruz@ruzlaw.com