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

**In the matter of:**

**Sabine Pass Liquefaction, L.L.C.**

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)

**Docket No. 13-42-LNG**

**MOTION TO INTERVENE OF  
THE AMERICAN PETROLEUM INSTITUTE**

Pursuant to 10 C.F.R. 590.303, the American Petroleum Institute (“API”) files this motion to intervene in the above-captioned docket. In support, API states as follows.

**I. COMMUNICATIONS**

Any communications regarding this pleading should be addressed to:

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**II. BACKGROUND**

On April 2, 2013, Sabine Pass Liquefaction, L.L.C. (“SPL”) filed an application with the Department of Energy’s Office of Fossil Energy (“DOE/FE”) seeking a long-term multi-contract authorization to export domestically produced liquefied natural gas (“LNG”) up to the equivalent of 88.3 billion cubic feet (“Bcf”) of natural gas per year to Free Trade Agreement (“FTA”) countries and non-FTA countries. The authorization sought is for a 20-year period, commencing on the earlier of the date of first export or eight years from the date the authorization is issued. SPL proposes to export LNG from its Liquefaction Project, being developed by SPL and its

affiliate, Sabine Pass LNG, L.P. (“Sabine Pass LNG”), at the existing Sabine Pass LNG import, storage and vaporization terminal in Cameron Parish, Louisiana (“Sabine Pass LNG Terminal”) to any country that has, or in the future will have, the capacity to import LNG via ocean-going carrier, with which the United States has, or in the future enters into, an FTA requiring national treatment for trade in natural gas. SPL also proposes to export LNG from the Liquefaction Project to any country that does have, or in the future will have, the capacity to import LNG via ocean-going carrier, with which the United States does not have an FTA requiring national treatment for trade in natural gas. The deadline to intervene in the above-captioned proceeding is September 23, 2013.<sup>1</sup>

### **III. INTERVENTION**

API is a national trade association representing more than 500 member companies involved in all aspects of the oil and natural gas industry in the United States. Our members include owners and operators of LNG import and export facilities in the United States and around the world, as well as owners and operators of LNG vessels, global LNG traders, and manufacturers of essential technology and equipment used all along the LNG value chain. Our members also have extensive experience with the drilling and completion techniques used in shale gas development and in producing America’s natural gas resources in a safe and environmentally responsible manner. API thus has a direct and immediate interest in this docket which cannot be adequately protected by any other party. Accordingly, API should be permitted to intervene in this docket with full rights as a party.

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<sup>1</sup> 78 Fed. Reg. 44,934.

#### IV. CONCLUSION

For the reasons stated above, API respectfully requests that DOE/FE grant this timely motion to intervene and that API be accorded fully party status in any proceedings held by DOE/FE in this docket.

Respectfully submitted,

/s/ David L. Wochner  
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*Counsel for American Petroleum Institute*

Dated: September 23, 2013

## CERTIFICATE OF SERVICE

I certify that I have this 23rd day of September, 2013, service copies of the foregoing document filed 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: September 23, 2013

/s/ David L. Wochner  
David L. Wochner  
*Counsel for American Petroleum Institute*