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September 23, 2015

Mr. John Anderson
Office for Oil and Gas Global Security and Supply
U.S. Department of Energy, Office of Fossil Energy
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**Re: In the Matter of Sabine Pass Liquefaction, LLC
FE Docket Nos. 13-30-LNG, 13-42-LNG and 13-121-LNG
Request for Consolidated LNG Export Authorization**

Dear Mr. Anderson:

The U.S. Department of Energy (“DOE”), Office of Fossil Energy (“FE”) issued orders in the above-referenced dockets granting Sabine Pass Liquefaction, LLC (“SPL”) long-term, multi-contract authorization to export liquefied natural gas (“LNG”) by vessel to (i) nations with which the United States has entered into a free trade agreement (“FTA”) providing for national treatment for trade in natural gas, and with which trade is not prohibited by U.S. law or policy (“FTA Countries”);¹ and (ii) any other country with which trade is not prohibited by U.S. law or policy (“non-FTA Countries”).² The Stage 3 Orders authorized SPL to engage in exports of

¹ Sabine Pass Liquefaction, LLC, *Order Granting Authorization to Export Liquefied Natural Gas by Vessel Pursuant to the Long-Term Contract with Total Gas & Power North America, Inc. from the Sabine Pass LNG Terminal to Free Trade Agreement Nations*, DOE/FE Order No. 3306, FE Docket No. 13-30-LNG (Jul. 11, 2013) (the “DOE/FE Total FTA Order”); Sabine Pass Liquefaction, LLC, *Order Granting Authorization to Export Liquefied Natural Gas by Vessel Pursuant to the Long-Term Contract with Centrica plc from the Sabine Pass LNG Terminal to Free Trade Agreement Nations*, DOE/FE Order No. 3307, FE Docket No. 13-42-LNG (Jul. 12, 2013) (the “DOE/FE Centrica FTA Order”); Sabine Pass Liquefaction, LLC, *Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Sabine Pass LNG Terminal to Free Trade Agreement Nations*, DOE/FE Order No. 3384, FE Docket No. 13-121-LNG (Jan. 22, 2014), *Errata* (Feb. 24, 2015) (the “DOE/FE Order No. 3384”); and together with the DOE/FE Total FTA Order and the DOE/FE Centrica FTA Order, collectively, the “FTA Orders”).

² Sabine Pass Liquefaction, LLC, *Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Sabine Pass LNG Terminal Located in Cameron Parish, Louisiana, to Non-Free Trade Agreement Nations*, DOE/FE Order No. 3669, FE Docket Nos. 13-30-LNG, 13-42-LNG, 13-121-LNG (consolidated) (June 26, 2015) (the “DOE/FE Stage 3 Non-FTA Order”); and together with the FTA Orders, collectively, the “Stage 3 Orders”).

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domestically produced LNG from the Liquefaction Project.³ With the exception of the authorizations granted in FE Docket No. 13-121-LNG, the Stage 3 Orders authorized the export of LNG, pursuant to the terms of a particular LNG Sale and Purchase Agreement (“SPA”).⁴

In order to address certain requirements associated with the recent financing of the Liquefaction Expansion Project, SPL respectfully requests that DOE/FE amend and consolidate the authorizations granted in the Stage 3 Orders,⁵ to enable SPL to engage in long-term, multi-contract exports of natural gas in the form of LNG in an amount up to 503.3 billion standard cubic feet (“Bcf”) per year (or approximately 1.4 Bcf per day): (a) on its own behalf and as agent for third parties, in accordance with DOE/FE registration requirements; and (b) without reference to such exports occurring in accordance with the terms of a particular SPA.

SPL seeks such authorization for a 20-year term commencing when SPL commences commercial export of domestically sourced LNG from Train 5. In this regard, SPL’s delivery obligations under existing SPAs, are not tied to individual trains, but rather, become effective upon the date that specified trains become commercially operable. SPL has the flexibility to satisfy its delivery obligations under its SPAs with LNG from any train at the Sabine Pass LNG Terminal.

Description of Applicant:

The exact legal name of SPL is Sabine Pass Liquefaction, LLC. SPL is a Delaware limited liability company with its primary place of business located at 700 Milam Street, Suite 1900, Houston, TX 77002. SPL is an indirect subsidiary of Cheniere Energy, Inc., a Delaware

³ The Liquefaction Project is 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”). The Federal Energy Regulatory Commission (“FERC”) authorized the construction and operation of the Liquefaction Project consisting of four LNG production trains (*i.e.*, Trains 1, 2, 3 and 4). See *Sabine Pass Liquefaction, LLC & Sabine Pass LNG, L.P., Order Granting Section 3 Authorization*, 139 FERC ¶ 61,039 (2012), *reh’g & stay denied*, 140 FERC ¶ 61,076 (2012); *Sabine Pass Liquefaction, LLC & Sabine Pass LNG, L.P., Order Amending Section 3 Authorization*, 144 FERC ¶ 61,099 (2013); *Sabine Pass Liquefaction, LLC & Sabine Pass LNG, L.P., Order Amending Section 3 Authorization*, 146 FERC ¶ 61,117 (2014), *reh’g denied*, 148 FERC ¶ 61,200 (2014). FERC also authorized the construction and operation of the Liquefaction Expansion Project, consisting of the addition of a fifth and sixth liquefaction train (*i.e.*, Trains 5 and 6) to the Liquefaction Project. See *Sabine Pass Liquefaction Expansion, LLC, Sabine Pass Liquefaction, LLC, Sabine Pass LNG, L.P., & Cheniere Creole Trail Pipeline, L.P., Order Granting Authorization Under Section 3 of the Natural Gas Act and Issuing Certificate*, 151 FERC ¶ 61,012 (2015), *reh’g denied*, 151 FERC ¶ 61,253 (2015).

⁴ See *DOE/FE Total FTA Order*, Ordering Paragraph A; *DOE/FE Centrica FTA Order*, Ordering Paragraph A; See also *DOE/FE Stage 3 Non-FTA Order*, Ordering Paragraph A.

⁵ This filing is submitted pursuant to Section 590.201 of DOE’s regulations. 10 C.F.R. § 590.201 (2015). To the extent any information required under Section 590.201 is omitted herein, SPL incorporates by reference the relevant information provided in SPL’s applications filed in FE Docket Nos. 13-30-LNG, 13-42-LNG and 13-121-LNG.

corporation with its primary place of business located at 700 Milam Street, Suite 1900, Houston, TX 77002. SPL is authorized to do business in the States of Texas and Louisiana.

Contact Information:

SPL respectfully requests that the following individuals be included for purposes of receiving communications concerning this application:⁶

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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.⁷

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
Charles R. Scott
Attorneys for
Sabine Pass Liquefaction, LLC

LMT

⁶ SPL requests waiver of Section 590.202(a) of DOE's regulations, to the extent necessary to include outside counsel on the official service list. 10 C.F.R. §590.202(a).

⁷ *Id.* § 590.202(c).



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September 22, 2015

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Request for Consolidated LNG Export Authorization**

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) (2015). I have examined the Limited Liability Company Agreement of Sabine Pass Liquefaction, LLC ("Sabine Pass") and other authorities as necessary, and have concluded that the proposed exportation of LNG is within Sabine Pass' corporate powers. Further, Sabine Pass is authorized to do business in Louisiana and Texas, and to engage in foreign commerce.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Rina Chang", written over a horizontal line.

By: Rina Chang
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