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

In the matter of:

SABINE PASS LIQUEFACTION, LLC) FE DOCKET NO. 13-30-LNG
)

MOTION TO INTERVENE of TOTAL GAS & POWER NORTH AMERICA, INC.

Pursuant to 10 C.F.R. § 590.303, TOTAL GAS & POWER NORTH AMERICA, INC. (“TGPNA”) moves to intervene in the above captioned proceeding initiated by Sabine Pass Liquefaction, LLC (“Sabine Pass”) on February 27, 2013. In support hereof, TGPNA states as follows:

I. NOTICES AND COMMUNICATIONS

All correspondence, communications, pleadings, and other documents should be addressed to the following:

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II. DESCRIPTION OF TGPNA

TOTAL S.A., which is incorporated in France, together with its subsidiaries and affiliates (“Total”), is the fifth largest publicly traded integrated international oil and gas company in the world, with operations in more than 130 countries. Total has activities in every sector of the oil industry, including oil and natural gas exploration, development and production, refining, petrochemicals, specialty chemicals, trading and shipping of crude oil and petroleum products and marketing. TGPNA is an indirect, wholly-owned subsidiary of TOTAL S.A.

Total also is a leading player in the liquefied natural gas sector, with diversified positions both in the upstream and downstream portions of the LNG chain. In the United States, TGPNA has storage and regasification capacity for LNG imports at the Sabine Pass LNG terminal, which is owned by Sabine Pass LNG, L.P., and has contracted to purchase LNG that will be produced by Sabine Pass for export from Trains 3 and 5 of the terminal. TGPNA also has been continuously engaged in natural gas trading and marketing activities in the U.S. as part of Total since 1999.

III. FILING BY SABINE PASS

On February 27, 2013, Sabine Pass filed an application in the above-captioned proceeding seeking long-term authorization to export up to 91,250,000 million British thermal units per year of liquefied natural gas (“LNG”) pursuant to the LNG Sale and Purchase Agreement (FOB) (“SPA”) entered into between Sabine Pass, as seller and TGPNA, as buyer, dated December 14, 2012 (“February 27 Filing”). The February 27 Filing sought authorization to export LNG to any nation that currently has or in the future develops the capacity to import LNG and with which the United States currently has or in the future enters into a free trade agreement (“FTA”) requiring national treatment for trade in natural gas (“FTA Countries”);¹ and all countries that have not entered into an FTA with the United States requiring the national treatment for trade in natural gas, which currently have or in the future develop, the capacity to import LNG and with which trade is not prohibited by United States law or policy (“Non-FTA Countries”).


IV. MOTION TO INTERVENE

As the buyer under the SPA for which Sabine Pass is seeking export authorization in this proceeding, TGPNA has a direct and substantial interest in and will be directly affected by the outcome of this proceeding. TGPNA’s interests cannot be represented by any other party. Accordingly, TGPNA respectfully requests that it be permitted to intervene in this proceeding and be granted full rights to participate as a party.

¹ On July 11, 2013, the Department of Energy, Office of Fossil Energy (“DOE/FE”) DOE/FE issued DOE/FE Order No. 3306 Granting Authorization to Export LNG 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.

Respectfully submitted,

TOTAL GAS & POWER NORTH AMERICA,
INC.

By:  _____

CERTIFICATE OF SERVICE

I hereby certify that I have this day served via email and U.S. Mail, the foregoing document on the parties listed below:

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