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

In the matter of:

FE DOCKET NO. 13-42-LNG

SABINE PASS LIQUEFACTION, LLC

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

Pursuant to 10 C.F.R. § 590.303, TOTAL GAS & POWER NORTH AMERICA, INC.

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("TGPNA") moves to intervene in the above captioned proceeding initiated by Sabine Pass

Liquefaction, LLC ("Sabine Pass") on April 2, 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:

Bruce E. Henderson TOTAL GAS & POWER NORTH AMERICA, INC. 1201 Louisiana Street, Suite 1600 Houston, TX 77002 713-647-4008

Fundi Mwamba TOTAL GAS & POWER NORTH AMERICA, INC. 1201 Louisiana Street, Suite 1600 Houston, TX 77002 713-647-4058 fundi.mwamba@total.com

and

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II. <u>DESCRIPTION OF TGPNA</u>

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 April 2, 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 Centrica plc (CENTRICA"), as buyer, dated March 22, 2013 ("March 22 Filing"). The March 22 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 is not prohibited by United States law or policy ("Non-FTA Countries").

IV. MOTION TO INTERVENE

As the buyer under a separate LNG Sale and Purchase Agreement (FOB) with Sabine Pass, as seller, for which Sabine Pass also is seeking export authorization in another proceeding (FE Docket No. 13-30-LNG), 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 12, 2013, the Department of Energy, Office of Fossil Energy ("DOE/FE") DOE/FE issued DOE/FE Order No. 3307 Granting Authorization to Export LNG by Vessel pursuant to the long-term contract with Centrica plc from the Sabine Pass LNG Terminal to Free Trade Agreement Nations.

Respectfully submitted,

TOTAL GAS & POWER NORTH AMERICA, INC.

G By:__

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by e-mail and U.S. Mail, the foregoing

Patricia Outtrim

document on the parties listed below:

Lisa Tonery Tania S. Perez Fulbright & Jaworski L.L.P. 666 Fifth Avenue New York, New York 10103 Itonery@fulbright.com tperez@fulbright.com *Attorneys for Sabine Pass Liquefaction, LLC*

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September 20, 2013