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

*8:00 am Sept. 30, 2014. Late submission, filed after office hours.*

**In the matter of:**

**Gasfin Development USA, LLC**

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**Docket No. 13-161-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 December 24, 2013, Gasfin Development USA, LLC (“Gasfin”) 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 0.2 billion cubic feet (“Bcf”) of natural gas per day to non-Free Trade Agreement (“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. Gasfin proposes to export LNG from its project site presently under development along the Calcasieu River in Cameron Parish in Southwest Louisiana, to any nation that currently has or develops the capacity to import LNG, with which the United States does not have a FTA requiring national treatment for trade in natural gas or LNG with which trade is not prohibited by U.S. law or policy. The deadline to intervene in the above-captioned proceeding is September 29, 2014.<sup>1</sup>

### **III. INTERVENTION**

API is a national trade association representing more than 600 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.

### **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.

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<sup>1</sup> 79 Fed. Reg. 44,439.

Respectfully submitted,

/s/ David L. Wochner

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*Counsel for American Petroleum Institute*

Dated: September 29, 2014

## **CERTIFICATE OF SERVICE**

I certify that I have this 29th day of September, 2014, serviced 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 29, 2014

/s/ Michael L. O'Neill  
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*Counsel for American Petroleum Institute*