

 ORIGINAL



UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY

In the Matter of )  
ConocoPhillips Company )

Docket No. 09-92-LNG

**MOTION OF FREEPORT LNG DEVELOPMENT, L.P. TO INTERVENE**

Pursuant to 10 C.F.R. § 590.303, Freeport LNG Development, L.P. (“Freeport LNG”) hereby moves to intervene in this proceeding initiated by ConocoPhillips Company’s (“ConocoPhillips”) application filed on August 31, 2009 through which ConocoPhillips seeks blanket authorization to engage in short-term exports of previously imported liquefied natural gas (“LNG”) from the U.S. to various foreign countries (“Application”). In support hereof, Freeport LNG states as follows:

**I.**

**COMMUNICATIONS AND CORRESPONDENCE**

Communications and correspondence regarding this docket should be directed to the following representatives of Freeport LNG:

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## II.

### **IDENTITY AND INTEREST OF FREEPORT LNG**

Freeport LNG is the owner, developer and operator of an LNG import terminal located on Quintana Island, Texas. Freeport LNG was recently granted blanket authorization to engage in short-term exports of up to 24 billion cubic feet (“Bcf”) of foreign-sourced LNG from its Quintana Island terminal to various foreign countries for a two-year period beginning May 28, 2009.<sup>1</sup> In its Application, ConocoPhillips notes that the blanket export authorization it is seeking in this docket is “substantially similar” to the authorization recently granted to Freeport LNG, and further requests that that the blanket export authorization which it seeks “be applicable to exports from the [Freeport LNG] terminal.” (Application at 3.)

## III.

### **CONOCOPHILLIPS’S FILING**

On August 31, 2009, ConocoPhillips filed an Application pursuant to Section 3 of the Natural Gas Act, 15 U.S.C. § 717b, and Part 590 of the U.S. Department of Energy’s (“DOE’s”) regulations, 10 C.F.R. Part 590 (2009). In its Application, ConocoPhillips requests that the DOE’s Office of Fossil Energy issue an order granting ConocoPhillips blanket authorization for a two-year period commencing on the date of authorization to engage in short-term exports of up to 500 Bcf of previously-imported LNG, on a cumulative basis from the U.S., specifically from Freeport LNG’s Quintana Island terminal, to the United Kingdom, Belgium, Spain, Portugal, Turkey, Brazil, Argentina, Chile, Mexico, the Dominican Republic, Japan, South Korea, India, China, Taiwan, France, and/or Italy, as well as any country with the capacity to import ocean-going LNG, and with which trade is not prohibited by U.S. law or policy.

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<sup>1</sup>*Freeport LNG Development, L.P.*, DOE/FE Order No. 2644, issued May 28, 2009.

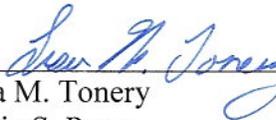
IV.

**INTERVENTION**

As noted above, ConocoPhillips is seeking authorization herein to export previously-imported LNG from Freeport LNG's Quintana Island terminal. Accordingly, Freeport LNG has an immediate, direct and substantial legal and economic interest in matters raised by ConocoPhillips's Application. These interests cannot be adequately represented by any other party. The intervention of Freeport LNG in this docket is therefore in the public interest.

WHEREFORE, Freeport LNG requests that it be permitted to intervene in this docket with full rights as a party.

Respectfully submitted,

By   
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*Attorneys for Freeport LNG Development, L.P.*

Dated: September 18, 2009

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on the parties listed

below:

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Dated at Washington, DC. this 18<sup>th</sup> day of September, 2009.

  
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Nick McMann  
*Paralegal on behalf of  
Freeport LNG Development, L.P.*