Strom
The Americas and the Caribbean
LNG and Power Generation

Larine A. Moore
U.S. Department of Energy
FE-34
P.O. Box 44375
Washington DC 20026-4375

April 14, 2014

Re: Strom, Inc.
FE Docket No. 14-57-LNG
Application for Long-Term Authorization to Export Liquefied Natural Gas
To **Other Non-Free Trade Agreement Countries** ("ONFTA").

Dear Ms. Moore:

Strom, Inc. ("Strom") is developing a project to export liquefied natural gas ("LNG") from the State of Florida, U.S.A. The LNG will be liquefied at our proposed 70 acres site located in Starke, Florida ("SFL") utilizing modular, scalable, portable LNG systems ("MLNG") such as those marketed by such companies as General Electric's ("GE") "LNG in a Box," Cryostar, Hamworthy, Chart, Linde, Air-Products, Siemens, Stirling Cryogenics, and/or other similar systems. Some of these MLNG can be mobilized in "less than three months". Each of these MLNG can produce from "500 to 50,000 gallons of LNG per day". As demand increases, Strom intends to continuously add MLNG units to increase production of LNG. Strom has begun the process of securing Federal Energy Regulatory Commission's ("FERC") authority for use of MLNG for such purpose.

On March 24, 2014 Strom filed a motion for declaratory order ("MDO") with the FERC relating to the regulation and permitting of these MLNG systems. On March 27th 2014 FERC established a comment period on our Docket which ends on April 18, 2014.

Strom also intends to comply with Section 3 of the Natural Gas Act requiring pre-filing and will work with the FERC to ensure we are in compliance with FERC's rules. Pre-filing will be completed no later than September, 2014. This application to DOE/FE, however, is Strom's second application (the "Application") for authorization to export an amount not to exceed a total of 7 Billion Standard Cubic Feet per year of liquefied natural gas ("LNG") over a twenty-five year period. We further request that our authorization begin either on the date of first export or five years after authorization is granted, whichever occurs first.

Such long-term authorization should permit us to export LNG which will be liquefied utilizing MLNG at Strom's proposed SFL to Other Non-Free Trade Agreement Countries ("ONFTA") excluding those authorized under Strom's application to export to Specific Non-Free Trade Agreement countries ("SNFTA") which included: The Bahamas, Haiti, Jamaica, Antigua and Barbuda, St. Lucia, Curacao, Aruba, Grenada, Dominica, Cayman Islands, St. Kitts and Nevis, St. Marten, St. Martin, Turks and Caicos Islands, Guadeloupe, Martinique, St. Vincent and the Grenadines, Tortola BVI, Anguilla, St. Barthelemy , and Montserrat which has or in the future develops the capacity to import LNG via approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers, and with which trade is not otherwise prohibited by United States law or policy. These ONFTA countries do not currently have FTA with the United States but may develop FTA in the future.

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We have submitted the application filing fee of $50.00. Please acknowledge receipt of this Application by date-stamping it and return an electronic receipt of its filing to Strom.

Respectfully submitted,

Mr. Michael Lokey, CEO
Strom, Inc.
1228 East 7th Ave.
Tampa, FL 33605
Contact: 727-230-8840
mlokey@stromlng.com

Attachments

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

14-57-LNG

STROM, INC.

Docket No.14-__-LNG

APPLICATION OF STROM, INC. FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS TO OTHER NON-FREE TRADE AGREEMENT COUNTRIES ("ONFTA")

Communications regarding this application should be addressed to:

Mr. Michael Lokey, CEO
Strom, Inc.
1228 East 7th Ave.
Tampa, FL 33605
Contact: 727-230-8840
mlokey@stromlng.com

February 19, 2014

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

Strom, Inc. **Docket No.14-_-LNG**

LNG APPLICATION OF STROM, INC., FOR LONG-TERM AUTHOIUZATION TO EXPORT LIQUEFIED NATURAL GAS TO OTHER NON-FREE TRADE AGREEMENT COUNTRIES

In accordance with Section 3 of the Natural Gas Act[1] and Part 590 of the regulations of the Department of Energy ("DOE")[2] Strom, Inc. ("Strom") formally remits this application ("Application") to the DOE Office of Fossil Energy ("DOE/FE") for long-term, multi-contract authorization to export up to a total of 7 BSCF per annum[3] of liquefied natural gas ("LNG") for a 25-year period, commencing on the earlier of the date of first export or five years from the date the requested authorization is granted. Strom requests that such authorization allow it to export LNG from its proposed liquefaction location in Starke, Florida ("SFL") utilizing modular, scalable, portable LNG systems ("MLNG") such as systems marketed General Electric ("GE") "LNG in a Box," Cryostar, Hamworthy, Chart, Linde, Air-Products, Siemens, Stirling Cryogenics, and/or other similar systems. Some of these MLNG can be mobilized in "less than three months". Each of these MLNG can produce from "500 to 50,000 gallons of LNG per day". As demand increases, Strom intends to continuously add MLNG units to increase production of LNG. Such permit should grant Strom the authorization to export to Other Non-Free Trade Agreement Countries ("ONFTA"), excluding those authorized under Strom's application to export to Specific Non-Free Trade Agreement countries ("SNFTA") which included: The Bahamas, Haiti, Jamaica, Antigua and Barbuda, St. Lucia, Curacao, Aruba, Grenada, Dominica, Cayman Islands, St. Kitts and Nevis, St. Marten, St. Martin, Turks and Caicos Islands, Guadeloupe, Martinique, St. Vincent and the Grenadines, Tortola BVI, Anguilla, St. Barthelemy , and Montserrat, which has or in the future develops the capacity to import LNG via approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers, and with which trade is not otherwise prohibited

[1] 15 U.S.C. § 717b (2011).
[2] 10 C.F.R. § 590 (2011).
[3] Approximately 7 billion standard cubic feet ("bscf") per year. This represents the maximum total of LNG that Strom expects to export in any year during the period of authorization to ONFTA countries.

by United States law or policy. These ONFTA do not currently have FTA with the United States but may develop Free Trade Agreements ("FTA") in the future.[4]

Strom has filed a motion for declaratory order ("MDO") with the Federal Energy Regulatory Commission (FERC) requesting clarification of FERC's authority or intension to regulate MLNG as proposed by Strom in its motion to FERC.[5] This is the third application Strom has submitted to the DOE/FE relating to the proposed export of LNG. The United States does not currently have an FTA requiring national treatment for trade in natural gas and LNG with ONFTA; the ONFTA have developed or in the future will develop the capacity to import LNG via approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers.

As noted earlier, Strom has remitted a first application with DOE/FE to export liquefied natural gas to FTA countries; this application, however, seeks authorization pursuant to Section 3(c) of the NGA. Conversely, this third application is related to receiving authority to export liquefied natural gas to ONFTA and is submitted for review under Section 3 (a) of the NGA.

Further, this application shall be reviewed under Section 3(a) of the NGA, which "creates a rebuttable presumption that a proposed export of natural gas is in the public interest." Under this standard, the DOE/FE "must grant [an export] application unless those who oppose the application overcome that presumption."

Strom understands that DOE/FE will perform a public interest analysis and review before it grants Strom's ONFTA authorization."[6]

In support of this Application, Strom respectfully states the following:

I.

DESCRIPTION OF APPLICANT

The exact legal name of the applicant is Strom, Inc. Strom is a Corporation organized under the laws of the State of Florida. The principal place of business of Strom is located at 1228 East 7th Ave. Tampa, FL 33605. The Strom's MLNG will be located in Starke, Florida on a 70+/- acres parcel.

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[4] The United States currently has FTA requiring national treatment for trade in natural gas and LNG with Australia, Bahrain, Canada, Chile, Columbia, Dominican Republic, El Salvador, Guatemala, Honduras, Israel, Jordan, Korea, Mexico, Nicaragua, Oman, Peru, Panama, and Singapore. The FTA with Costa Rica does not require national treatment for trade in natural gas.

[5] See Strom, Inc. motion for declaratory order Docket #CP14-121-000 with FERC dated March 27, 2014.

[6] The NGA provides that the DOE shall issue such authorization to export LNG "providing it is consistent with the public interest"

Stocks in Strom are held equally by Mr. Michael Lokey, Mr. Dean Wallace and Atlantic Development, LLC. Each stockholder of Strom is either U.S. Citizens or Permanent Resident of the United States. Each Stockholder of Strom has consistently resided in the United States for at last 13 years. Strom is a majority owned minority and woman owned business. Strom's subsidiary Atlantic Renewable Resources, Inc. is currently under contract with client in the Caribbean to provide 24/7 power "utilizing LNG". Strom continues to develop relationship with a large portfolio of commercial entities in the Caribbean and Latin America to provide LNG for transportation, power generation and other purposes. The principles of Strom have in excess of 25 years in alternative and renewable energy. Strom's primary geographic business focus is Central and South America, Caribbean ("Locations") and the U.S., regions where use of diesel is the primary source of energy production access to LNG is limited. Strom maintains a large network of affiliates throughout these Locations. To demonstrate Strom's involvement in these Locations, Strom was one of the first companies to execute long term agreement with a major commercial client in the Caribbean for power generation using LNG.

II.

COMMUNICATIONS

Communications regarding this application should be directed to the following:

Michael Lokey, CEO
Strom, Inc.
1228 East 7th Ave.
Tampa, FL 33605
Contact: 727-230-8840
mlokey@stromlng.com

III.

AUTHORIZATION REQUESTED

Strom requests long-term, multi-contract authorization to export up to a total of 7 Billion Standard Cubic Feet per annum of liquefied natural gas ("LNG") to be produced in SFL for a period of 25 years beginning the earlier of the dates of first export, or the fifth anniversary of the date authorization is granted by DOE/FE. Strom requests that such long-term authorization provide for export from its SFL to ONFTA that

has, or in the future will have, the capacity to import LNG via approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers, and with which the United States does not currently have, but in the future may have, an FTA requiring the national treatment for trade in natural gas and LNG.

No facility modifications or additions will be required in order for Strom to export LNG from the United States. Strom will liquefy natural gas utilizing MLNG technology at its SFL subject to Federal Energy Regulatory Commission ruling pursuant to Strom's MDO[7] which seeks a formal ruling from FERC regarding the use of MLNG technology for such purposes. By utilizing MLNG technology, Strom would be able to expedite exportation of LNG. These MLNG, as Strom contends in its filing with FERC, do not require FERC approval.

Strom will transport the LNG from the SFL within the United States over both highways and via rail, and will transport LNG to buyers in approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers. Containers and carriers used for transportation within the United States will comply with all Association of American Railroads and United State Department of Transportation regulations, and the third parties with which Strom will be contracting to handle such transportation will comply with all hazardous material and cryogenic handling regulations and requirements, including employee training, in addition to obtaining any state permits required for transportation of LNG.

The natural gas or feed gas ("NG") to be liquefied and exported by Strom will be produced MLNG at Strom's SFL. Strom's MDO, pursuant to FERC Docket number CP14-121-000, supports Strom's intensions to produce LNG utilizing MLNG technology. The NG to be liquefied will come from the robust and liquid United States natural gas market, which now includes NG produced from shale deposits.

Specifically, Strom's source of NG for liquefaction will be from one of or a combination of two NG pipeline companies regulated by FERC ("Suppliers") and currently supplies NG for sale in Florida; Strom's SFL borders a CSX rail and has NG access within proximity of NG lines. These Suppliers include **1)** Florida Gas Transmission Company ("FGTC") and the **2)** Gulfstream Natural Gas Systems ("GNGS"). Additionally,

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[7] See Strom, Inc. motion for declaratory order Docket #CP14-121-000 with FERC dated March 27, 2014. http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20140327-3073

the Florida Public Service Commission ("FPSC") recently approved Sabal Trail Transmission ("STT")[8] which will provide NG through Southwest Alabama, through Georgia and down to central and south Florida. Upon completion of the STT, Strom intends to acquire additional NG from STT. Strom will be purchasing NG from FGTC, GNGS and/or STT under long term purchase agreements. Strom also intends to acquire NG from utilities that have excess NG, and which have obtained appropriate regulatory approval, if required, for the sales of such excess capacity.

Strom has entered into a purchase option agreement for its SFL which is its specific NG liquefaction and export location, as described earlier. This 70+/- acres parcel, as described is Appendix C, provides Strom the specific location for liquefaction of NG utilizing MLNG technology. This location coupled with FERC's expeditious processing of Strom's MDO suggest Strom would be in a position to expedite liquefication of NG. DOE/FE has previously found that this commitment conforms to the requirements of 10 C.F.R. § 590.202(b), which calls upon applicants to supply transaction-specific information "to the extent practicable."[9] As noted above, Strom is currently involved in negotiations with NG Suppliers, and will file all executed long- term contracts with the DOE/FE under seal, following their execution. Strom expects to begin exporting LNG from its SFL 2014 or 2016, at the earliest.

Strom's ISO containers will be equipped with secured GPS devices and will be monitored 24/7/365. Additionally, Strom will develop specific routes for transporting its containers, any deviations will be automatically alerted at our 24/7/365 operation center. Additionally, our operation will have 24/7/365 monitoring and security. Each employee of Strom will undergo background checks to ensure compliance with federal laws and regulations and to ensure no prohibited individuals have access to our equipment, material or supplies. These background checks will continue on a regular basis to ensure continued compliance.

Delivery from the SFL shall be daily using authorized 10,000 gallons ISO modular containers. Strom

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[8] See FPSC approval document http://www.floridapsc.com/home/news/?id=1093

[9] *Sabine Pass Liquefaction, LLC,* FE Docket No. I 0-85-LNG, Order No. 2833 (Sept. 7, 20 I 0). I 0 C.F.R. 590.202(b) requests certain information, "to the extent applicable," and "supported to the extent practicable by necessary data or documents," regarding the source and security of the natural gas supply proposed for export, including contract volume and a description of the specific gas reserves supporting the project during the time of the requested export authorization; see also, Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC, FE Docket No. 10-160-LNG, Order No. 2913 (February 10, 2011).

also intends to produce LNG from the SFL for domestic consumption in remote regions of Florida and for transportations and industrial uses in the remaining Southeastern USA. The long-term authorization requested by Strom is also compatible with the principles established by DOE/FE's Policy Guidelines,[10] which promote free and open trade by minimizing federal control and involvement in energy markets, and DOE Delegation Order No. 0204-111, which requires "consideration of the domestic need for the gas to be exported."

As DOE/FE recently has recognized, United States consumers currently have access to substantial quantities of natural gas, as a result of, among other things, technological advances that have allowed for development of previously undeveloped reserves of domestic shale gas.[11]

In accordance with the AEO2014 Early Release Overview ("AEO2014"), "cumulative production of dry natural gas from 2012 to 2040 in the AEO2014 Reference case is about 11% higher than in AEO2013 primarily reflecting continued growth in shale gas production resulting from the dual application of horizontal drilling and hydraulic fracturing. Another contributing factor is ongoing drilling in shale and other plays with high concentrations of NGL and crude oil, which in energy-equivalent terms have a higher value than dry natural gas. Cumulative production levels for tight gas and onshore associated-dissolved gas from oil formations exceed those in AEO2013 through 2040 by 9% and 36%, respectively, making material contributions to the overall increase in production. In the AEO2014 Reference case, the United States becomes a net exporter of LNG in 2016, and it becomes an overall net exporter of natural gas in 2018, two years earlier than in AEO2013. U.S. exports of LNG from new liquefaction capacity are expected to surpass 2 Tcf by 2020 and increase to 3.5 Tcf in 2029. Large volumes of domestic shale gas reserves and its development and extraction, as well as continued low production costs, will enable the United States to develop significant quantities of natural gas and LNG, which will be able to meet domestic demand for decades to come, and, as a result, also will provide an over-capacity of natural gas and LNG that would be available for export. The decrease in natural gas prices from 2008 to 2010 provides evidence of such over-capacity. Ongoing improvements in advanced technologies for crude oil and natural gas production continue to lift domestic

[10] Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas, 49 Fed. Reg. 6,684 (Feb. 22, 1984).
[11] Cheniere Marketing, LLC, FE Docket No. I 0-31-LNG, Order No. 2795 (June 1, 2010)

MSC

supply and reshape the U.S. energy economy. Domestic production of crude oil (including lease condensate) increases sharply in the AEO2014 Reference case, with annual growth averaging 0.8 million barrels per day (MMbbl/d) through 2016, when it totals 9.5 MMbbl/d.... While domestic crude oil production is expected to level off and then slowly decline after 2020 in the Reference case, natural gas production grows steadily, with a 56% increase between 2012 and 2040, when production reaches 37.6 trillion cubic feet (Tcf)." As outlined in AEO 2014, natural gas supply continues to exceed projections.

Strom will produce LNG at its SFL for export and domestic consumption in transportation, industrial, commercial and other uses. These quantities are relatively small when compared to those included in recent export applications received by the DOE/FE. DOE/FE's approval of this Application will benefit small to medium size companies, in addition to supporting President Obama's National Export Initiative signed in 2010.[12]

IV.

PUBLIC INTEREST

Section 3(a) of the NGA creates a rebuttable presumption that an application for export of LNG is in the public interest, and the DOE/FE will grant such application unless the presumption of public interest is overcome by an applicant's opponents. When evaluating applications for natural gas exports, the DOE/FE seeks to "minimize federal control and involvement in energy markets and promote a balanced and mixed energy resource system." The focus of the DOE/FE's public interest evaluation is on the domestic need for the LNG proposed to be exported. In addition, the DOE/FE considers any threat to the security of domestic natural gas supplies potentially created by the proposed export, as well as "any other issue determined to be appropriate, including whether the arrangement is consistent with DOE's policy of promoting competition in the marketplace by allowing commercial parties to freely negotiate their own trade arrangements," and environmental effects of the proposed export.

Strom is seeking to export to ONFTA countries, as outlined above. Compared to other DOE/FE approved and pending Non-FTA applications, this authorization will provide an immediate positive impact on

[12] Exec. Order No. 13534,75 Fed. Reg. 12433 (March II, 2010).

America's ability to provide unfettered access to America's "cheap natural gas". This would allow companies like Strom to operate MLNG liquefaction of natural gas closer to the "area of need", subject to the appropriate local and federal approval.

These ONFTA countries rely almost exclusively on diesel as a source for power generation, industrial, commercial and transportation. Granting this request will reduce global carbon emissions, promote American products, create jobs, and promote democracy and our social values in each of the ONFTA countries.

Additionally, should this application be approved and Strom is successfully in its ongoing discussions with companies in each ONFTA as outlined in this request, the United States will have the ability to promote improved environmental and economic policies as the ONFTA benefits from low cost LNG from the United States. As such, this application is consistent with the "public interest" standards. Strom further states that the need for natural gas exports; United States Energy Policy and global effects; along with additional benefits are satisfied by this application pursuant to DOE/FE rules and regulations. Strom is not aware of any other DOE/FE rules that would prohibit DOE/FE from granted this authorization.

A. Need for Natural Gas Export.

In accordance with the AEO2014 Early Release Overview ("AEO2014"), "cumulative production of dry natural gas from 2012 to 2040 in the AEO2014 Reference case is about 11% higher than in AEO2013 primarily reflecting continued growth in shale gas production resulting from the dual application of horizontal drilling and hydraulic fracturing. Another contributing factor is ongoing drilling in shale and other plays with high concentrations of NGL and crude oil, which in energy-equivalent terms have a higher value than dry natural gas. Cumulative production levels for tight gas and on shore associated-dissolved gas from oil formations exceed those in AEO2013 through 2040 by 9% and 36%, respectively, making material contributions to the overall increase in production. In the AEO2014 Reference case, the United States becomes a net exporter of LNG in 2016, and it becomes an overall net exporter of natural gas in 2018, two years earlier than in AEO2013. U.S. exports of LNG from new liquefaction capacity are expected to surpass 2 Tcf by 2020 and increase to 3.5 Tcf in 2029. Large volumes of domestic shale gas reserves and its development and extraction, as well as continued low production costs, will enable the United States to develop significant

quantities of natural gas and LNG, which will be able to meet domestic demand for decades to come, and, as a result, also will provide an over-capacity of natural gas and LNG that would be available for export. The decrease in natural gas prices from 2008 to 2010 provides evidence of such over-capacity. Ongoing improvements in advanced technologies for crude oil and natural gas production continue to lift domestic supply and reshape the U.S. energy economy. Domestic production of crude oil (including lease condensate) increases sharply in the AEO2014 Reference case, with annual growth averaging 0.8 million barrels per day (MMbbl/d) through 2016, when it totals 9.5 MMbbl/d.... While domestic crude oil production is expected to level off and then slowly decline after 2020 in the Reference case, natural gas production grows steadily, with a 56% increase between 2012 and 2040, when production reaches 37.6 trillion cubic feet (Tcf)." As outlined in AEO 2014, natural gas supply continues to exceed projections.

As the DOE/FE expressly noted in the Sabine authorization, "natural gas production associated with exports will result in increased production that could be used for domestic requirements, if market conditions warrant such use." Since Sarbanes and the other authorizations, it is safe to say that there is a need to export domestic gas and this application serves the public interest even more that it did at the time of the Sarbanes and other approvals.

Considering the small volume of LNG Strom is requesting to export compared to the increased production and export outlook in the AOE2014 and the authorized authority already granted and pending before DOE/FE, Strom's request to export LNG to these ONFTA would have an insignificant impact on LNG supply for the domestic market. If the projections are revised downwards, the larger authorized or pending export suppliers such as the authority granted in Sarbanes and others should be considered for amendment(s) due to the extremely large volume granted. Energy Policy and Global affects are outlined, below.

B. United States Energy Policy and Global Affects

The AOE2014 provides quantified analysis that U.S. has and will have ample supply of liquefied natural gas to meet domestic demands to 2040. As such, and even if those projections are adjusted downwards, the minimal amount in Strom's request will have little to no impact on domestic energy security. Conversely,

the impact related to these ONFTA will provide greater energy security in the U.S. By purchasing LNG from the U.S., these ONFTA will be less likely to rely on countries with which the U.S. may have an antagonistic relationship or no diplomatic ties.

By fostering better relationships with these ONFTA through Strom's application, Americans will enjoy greater security within the ONFTA countries, and recognized for its export of a key fuel source that affects the daily lives of people living in the ONFTA countries.

Furthermore, Strom also intends to purchase excess supply on natural gas for liquefaction thereby mitigating or limiting the impact of affecting domestic consumption. There are other important benefits by authorizing this application, too.

As noted earlier, to mitigate the impact of global warming, every nation must do its part, as such, these ONFTA will burn cleaner fuel, instead of diesel, which result in reduced global warming and create American jobs. With the inability of these ONFTA countries to produce LNG, they will be forced to find alternatives supply countries or continue burning diesel or bunker fuel contrary to the United States clean energy goals. As such, by authorizing this application, Americans, both domestic and afar, will benefit from cleaner air and job opportunities both in the ONFTA countries and the United States. This would also support President Obama's National Export Initiative signed in 2010. The DOE/FE noted this important criterion in its first order. There are additional benefits to promote the "public interest" that should also be pointed out, here.

C. Additional Benefits

The United States has been instrumental in providing capital to countries near and far through lending and economic aid and assistance. As these ONFTA countries gain access to lower cost of fuel, savings in energy production could be passed on to local consumers who in turn could invest in manufacturing and other industries. As a result, the U.S. could benefit from lower cost of imports of certain goods and services from the ONFTA countries.

Additionally, we would benefit from having to supply less economic and military aid/assistance to these ONFTA countries. These ONFTA countries often turn to the United States in times of economic hardship or

military needs, by providing them with low cost LNG, they would rely less on the United States in the future as their economy stabilizes and they have a constant and reliable source of cleaner and less expensive fuel which is mutually beneficial.

Finally, it is important to note that a significant amount of business in the ONFTA countries such as the hospitality industry, industrial, power generation, manufacturing and transportation are owned by American firms. So, by providing low cost LNG to these ONFTA countries, American business will benefit, directly and indirectly. This would lead to more secure employment for Americans employed in the U.S. that provide goods and services to these ONFTA countries.

IV.

ENVIRONMENTAL IMPACT

As stated above, in the majority of cases, no new facilities (or modifications to any existing facilities) would be required in order for Strom to liquefy and export LNG. In the limited cases in which the owners of natural gas facilities that sell and deliver natural gas to Strom opt to make minor modifications to their facilities to either accommodate the additional volume of natural gas resulting from such deliveries, or to account for the temperature requirements of natural gas versus other liquefied petroleum products, those owners of the facilities will obtain the necessary state, local, or federal permits before any such modifications or deliveries occur. Approval of this Application therefore would not constitute a federal action significantly affecting the human environment within the meaning of the National Environmental Policy Act.[13] Secondly, since Strom intends to utilize MLNG technology to liquefy NG, any environmental impact would be none to minimal. The design and specification of these MLNG systems will meet all local and federal environmental permitting requirements and permitted by the appropriate governing agency to the manufacturer.

The MLNG will be connected directly to the NG Supplier and able to demobilize in a "moment's notice." These MLNG are often referred in the industry as "plug and play". They are modular systems

[13] 42 U .S.C. § 4231 , et seq.; Categorical Exclusion 85.7, I 0 C.F.R. Part I 021 , Subpart D, Appendix B.

designed to be assembled in a "few months rather than years" and provides for efficient and expeditious demobilization and relocation.

V.

APPENDICES

The following exhibits are submitted as part of this Application:

Appendix A Verification

Appendix B Opinion of Counsel

Appendix C Specific Liquefaction Location- Lease Option Agreement

VI.

CONCLUSION

WHEREFORE, for the reasons set forth above, Strom respectfully requests that DOE/FE grant the long-term, multi-contract export authorization requested herein. DOE/FE has deemed requests such as this complies with the NGA and DOE/FE rules pursuant to recent DOE/FE orders.

Respectfully submitted,

Mr. Michael Lokey, CEO
Strom, Inc.
1228 East 7th Ave.
Tampa, FL 33605
Contact: 727-230-8840
mlokey@stromlng.com

APPENDIX A

CERTIFIED STATEMENT

County of Pinellas

State of Florida

I, Michael Lokey, being duly sworn on his oath, do hereby affirm that I am CEO of Strom, Inc.; that I am familiar with the contents of this application; and that the matters set forth therein are true and correct to the best of my knowledge, information and belief.

Michael Lokey

Sworn to and subscribed before me, a Notary Public, in and for the State of Florida, this 18th day of ~~January~~ April, 2014

Cj Sexton

4/18/14

CRAIG SEXTON
Notary Public - State of Florida
My Comm. Expires Dec 28, 2014
Commission # EE 41752

NATOLI-LAPIN LLC

Natoli-Lapin, LLC
304 Park Avenue South, 11th Floor
New York, NY 10010
(212) 537- 4436
Moshe@LanternLegal.com

February 7, 2014

Mr. John A. Anderson
Office of Fossil Energy
U.S. Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: Strom Inc.
Application for Long-Term Authorization to Export Liquefied Natural Gas

Dear Mr. Anderson:

This opinion is submitted pursuant to 10 C.F.R. 590.202(c) of the Department of Energy administrative procedures. We have acted as counsel to Strom, Inc., a Florida Corporation (the "Company") in connection with a review of the Company's Articles of Incorporation to ensure compliance with 10 C.F.R. 590.202(c).

In rendering this opinion, we have reviewed and relied upon originals or copies of the Articles of Incorporation of the Company, as filed on July 25, 2013 with the Florida Secretary of State dated as of July 25, 2013, and the above-referenced application to the U.S. Department of Energy (the "Application").

The opinion set forth below is limited to the Florida Act as in effect on this date. We express no opinion as to the applicability or effect of any other laws of such jurisdiction or the laws of any other jurisdictions.

Based on the foregoing, we are of the opinion that the proposed export of natural gas, as described in the Application, is within the powers of the Company.

Very truly yours,

Moshe D. Lapin, Esq.
Natoli-Lapin, LLC
304 Park Ave. South 11th Floor
New York, NY 10010
212-537-4436
Moshe@LanternLegal.com

NON-BINDING LETTER OF INTENT

This Non-Binding Letter of Intent ("Letter") is made on this 14th day of April, 2014, by and between the following parties: Strom, Inc., Florida (hereinafter referred to as the "Buyer"); and WWONE Starke, LLC (hereinafter referred to as the "Seller").

In consideration of the mutual promises and covenants herein, the parties hereby agree as follows:

1. BROKER

The legal broker in this transaction shall be [redacted]

2. PROPERTY DESCRIPTION

Property: +/- 70 acres Sec 33 Township 6S Range 22E Bradford County.

3. DUE DILIGENCE

[redacted]

4. CLOSING DATE

Closing: 60 days from Effective Date of Contract.

5. PURCHASE PRICE

Seller and Buyer agree that the price shall be: [redacted]

6. DEPOSIT

Deposit due upon execution of formal Contract: [redacted]

7. EXPENSES

Closing costs: all paid by Buyer including, without limitation, documentary stamp tax on deed, title and lien searches, title insurance policy premium, taxes and insurance.

8. DISCLOSURE

Upon execution, Buyer shall have the right to utilize this Letter in any permitting inquiry or supply this information to any governmental authority on a "need to know basis". [redacted]. Buyer understands that this is not a final agreement to purchase and shall not cause any obligation to Seller prior to closing.

9. BROKER COMMISSION

Pursuant to separate agreement between Seller and Broker, Seller agrees to pay the Transaction Broker any commission due to Transaction Broker as a direct result of any closing of purchase between the Buyer and Seller.

10 [redacted]

receive prior to the final purchase agreement. This agreement [redacted] is negotiated in good faith and both Buyer and Seller shall make reasonable good faith efforts to enter into a formal contract and to close. [redacted]

11. ACCEPTANCE

This Letter shall expire at [redacted] unless executed by Seller and Buyer. Upon execution by Seller and return to Buyer, Buyer shall execute within 24 hours and return to Seller. Electronic Receipt of the fully executed Offer to Purchase by Seller is acceptable to Buyer.

12. GOOD FAITH AGREEMENT

The below signatures constitute both parties expression that they are willing to proceed in good faith to negotiate a mutually acceptable Purchase. Execution of this Proposal shall not obligate either party to accept any particular terms, but will preclude both parties from insisting on any terms that are inconsistent with those terms described in this [redacted]. It is expressly agreed that the form and content of the final purchase agreement must be mutually acceptable to both parties, their respective counsel, and Strom, Inc., board of directors, and that if a mutually acceptable final purchase agreement is not agreed to, executed and delivered by both parties on or [redacted], neither party shall have any further obligation to continue negotiating with the other.

Notwithstanding anything in this Letter to the contrary, THIS IS FOR DISCUSSION PURPOSES ONLY AND NO BINDING AGREEMENT SHALL EXIST UNLESS AND UNTIL A FORMAL CONTRACT IS EXECUTED AND DELIVERED BY BOTH PARTIES.

BUYER: NAME: STROM INC.

X _____

Michael E. Lokey, CEO

Accepted this 15th day of April, 2014

SELLER: NAME: WWONE STARKE, LLC.

BY: Weekley Bros, Leasing Ltd., Manager

By: D. Weekley Enterprises, LLC, Its General Partner

X _____

Daniel D. Weekley, Manager

Accepted this 14TH day of April, 2014

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

STROM, INC.

Docket No.14-__-LNG

APPLICATION OF STROM, INC. FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS TO OTHER NON-FREE TRADE AGREEMENT COUNTRIES ("ONFTA")

Communications regarding this application should be addressed to:

Mr. Michael Lokey, CEO
Strom, Inc.
1228 East 7th Ave.
Tampa, FL 33605
Contact: 727-230-8840
mlokey@stromlng.com

April 14, 2014

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

Strom, Inc. **Docket No.14-_-LNG**

LNG APPLICATION OF STROM, INC., FOR LONG-TERM AUTHOIUZATION TO EXPORT LIQUEFIED NATURAL GAS TO SPECIFIC NON-FREE TRADE AGREEMENT COUNTRIES

In accordance with Section 3 of the Natural Gas Act[1] and Part 590 of the regulations of the Department of Energy ("DOE")[2] Strom, Inc. ("Strom") formally remits this application ("Application") to the DOE Office of Fossil Energy ("DOE/FE") for long-term, multi-contract authorization to export up to a total of 7 BSCF per annum[3] of liquefied natural gas ("LNG") for a 25-year period, commencing on the earlier of the date of first export or five years from the date the requested authorization is granted. Strom requests that such authorization allow it to export LNG from its proposed liquefaction location in Starke, Florida ("SFL") utilizing modular, scalable, portable LNG systems ("MLNG") such as systems marketed General Electric ("GE") "LNG in a Box," Cryostar, Hamworthy, Chart, Linde, Air-Products, Siemens, Stirling Cryogenics, and/or other similar systems. Some of these MLNG can be mobilized in "less than three months". Each of these MLNG can produce from "500 to 50,000 gallons of LNG per day". As demand increases, Strom intends to continuously add MLNG units to increase production of LNG. Such permit should grant Strom the authorization to export to Other Non-Free Trade Agreement Countries ("ONFTA"), excluding those authorized under Strom's application to export to Specific Non-Free Trade Agreement countries ("SNFTA") which included: The Bahamas, Haiti, Jamaica, Antigua and Barbuda, St. Lucia, Curacao, Aruba, Grenada, Dominica, Cayman Islands, St. Kitts and Nevis, St. Marten, St. Martin, Turks and Caicos Islands, Guadeloupe, Martinique, St. Vincent and the Grenadines, Tortola BVI, Anguilla, St. Barthelemy , and Montserrat, which has or in the future develops the capacity to import LNG via approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers, and with which trade is not otherwise prohibited

[1] 15 U.S.C. § 717b (2011).
[2] 10 C.F.R. § 590 (2011).
[3] Approximately 7 billion standard cubic feet ("bscf") per year. This represents the maximum total of LNG that Strom expects to export in any year during the period of authorization to ONFTA countries.

by United States law or policy. These ONFTA do not currently have FTA with the United States but may develop Free Trade Agreements ("FTA") in the future.[4]

Strom has filed a motion for declaratory order ("MDO") with the Federal Energy Regulatory Commission (FERC) requesting clarification of FERC's authority or intension to regulate MLNG as proposed by Strom in its motion to FERC.[5] This is the third application Strom has submitted to the DOE/FE relating to the proposed export of LNG. The United States does not currently have an FTA requiring national treatment for trade in natural gas and LNG with ONFTA; the ONFTA have developed or in the future will develop the capacity to import LNG via approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers.

As noted earlier, Strom has remitted a first application with DOE/FE to export liquefied natural gas to FTA countries; this application, however, seeks authorization pursuant to Section 3(c) of the NGA. Conversely, this third application is related to receiving authority to export liquefied natural gas to ONFTA and is submitted for review under Section 3 (a) of the NGA.

Further, this application shall be reviewed under Section 3(a) of the NGA, which "creates a rebuttable presumption that a proposed export of natural gas is in the public interest." Under this standard, the DOE/FE "must grant [an export] application unless those who oppose the application overcome that presumption."

Strom understands that DOE/FE will perform a public interest analysis and review before it grants Strom's ONFTA authorization."[6]

In support of this Application, Strom respectfully states the following:

I.

DESCRIPTION OF APPLICANT

The exact legal name of the applicant is Strom, Inc. Strom is a Corporation organized under the laws of the State of Florida. The principal place of business of Strom is located at 1228 East 7th Ave. Tampa, FL 33605. The Strom's MLNG will be located in Starke, Florida on a 70+/- acres parcel.

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[4] The United States currently has FTA requiring national treatment for trade in natural gas and LNG with Australia, Bahrain, Canada, Chile, Columbia, Dominican Republic, El Salvador, Guatemala, Honduras, Israel, Jordan, Korea, Mexico, Nicaragua, Oman, Peru, Panama, and Singapore. The FTA with Costa Rica does not require national treatment for trade in natural gas.

[5] See Strom, Inc. motion for declaratory order Docket #CP14-121-000 with FERC dated March 27, 2014.

[6] The NGA provides that the DOE shall issue such authorization to export LNG "providing it is consistent with the public interest"

Stocks in Strom are held equally by Mr. Michael Lokey, Mr. Dean Wallace and Atlantic Development, LLC. Each stockholder of Strom is either U.S. Citizens or Permanent Resident of the United States. Each Stockholder of Strom has consistently resided in the United States for at last 13 years. Strom is a majority owned minority and woman owned business. Strom's subsidiary Atlantic Renewable Resources, Inc. is currently under contract with client in the Caribbean to provide 24/7 power "utilizing LNG". Strom continues to develop relationship with a large portfolio of commercial entities in the Caribbean and Latin America to provide LNG for transportation, power generation and other purposes. The principles of Strom have in excess of 25 years in alternative and renewable energy. Strom's primary geographic business focus is Central and South America, Caribbean ("Locations") and the U.S., regions where use of diesel is the primary source of energy production access to LNG is limited. Strom maintains a large network of affiliates throughout these Locations. To demonstrate Strom's involvement in these Locations, Strom was one of the first companies to execute long term agreement with a major commercial client in the Caribbean for power generation using LNG.

II.

COMMUNICATIONS

Communications regarding this application should be directed to the following:

Michael Lokey, CEO
Strom, Inc.
1228 East 7th Ave.
Tampa, FL 33605
Contact: 727-230-8840
mlokey@stromlng.com

III.

AUTHORIZATION REQUESTED

Strom requests long-term, multi-contract authorization to export up to a total of 7 Billion Standard Cubic Feet per annum of liquefied natural gas ("LNG") to be produced in SFL for a period of 25 years beginning the earlier of the dates of first export, or the fifth anniversary of the date authorization is granted by DOE/FE. Strom requests that such long-term authorization provide for export from its SFL to ONFTA that

has, or in the future will have, the capacity to import LNG via approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers, and with which the United States does not currently have, but in the future may have, an FTA requiring the national treatment for trade in natural gas and LNG.

No facility modifications or additions will be required in order for Strom to export LNG from the United States. Strom will liquefy natural gas utilizing MLNG technology at its SFL subject to Federal Energy Regulatory Commission ruling pursuant to Strom's MDO[7] which seeks a formal ruling from FERC regarding the use of MLNG technology for such purposes. By utilizing MLNG technology, Strom would be able to expedite exportation of LNG. These MLNG, as Strom contends in its filing with FERC, do not require FERC approval.

Strom will transport the LNG from the SFL within the United States over both highways and via rail, and will transport LNG to buyers in approved ISO IM07/TVAC-ASME LNG containers transported on ocean-going carriers. Containers and carriers used for transportation within the United States will comply with all Association of American Railroads and United State Department of Transportation regulations, and the third parties with which Strom will be contracting to handle such transportation will comply with all hazardous material and cryogenic handling regulations and requirements, including employee training, in addition to obtaining any state permits required for transportation of LNG.

The natural gas or feed gas ("NG") to be liquefied and exported by Strom will be produced MLNG at Strom's SFL. Strom's MDO, pursuant to FERC Docket number CP14-121-000, supports Strom's intensions to produce LNG utilizing MLNG technology. The NG to be liquefied will come from the robust and liquid United States natural gas market, which now includes NG produced from shale deposits.

Specifically, Strom's source of NG for liquefaction will be from one of or a combination of two NG pipeline companies regulated by FERC ("Suppliers") and currently supplies NG for sale in Florida; Strom's SFL borders a CSX rail and has NG access within proximity of NG lines. These Suppliers include **1)** Florida Gas Transmission Company ("FGTC") and the **2)** Gulfstream Natural Gas Systems ("GNGS"). Additionally,

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[7] See Strom, Inc. motion for declaratory order Docket #CP14-121-000 with FERC dated March 27, 2014. http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20140327-3073

the Florida Public Service Commission ("FPSC") recently approved Sabal Trail Transmission ("STT")[8] which will provide NG through Southwest Alabama, through Georgia and down to central and south Florida. Upon completion of the STT, Strom intends to acquire additional NG from STT. Strom will be purchasing NG from FGTC, GNGS and/or STT under long term purchase agreements. Strom also intends to acquire NG from utilities that have excess NG, and which have obtained appropriate regulatory approval, if required, for the sales of such excess capacity.

Strom has entered into a purchase option agreement for its SFL which is its specific NG liquefaction and export location, as described earlier. This 70+/- acres parcel, as described is Appendix C, provides Strom the specific location for liquefaction of NG utilizing MLNG technology. This location coupled with FERC's expeditious processing of Strom's MDO suggest Strom would be in a position to expedite liquefication of NG. DOE/FE has previously found that this commitment conforms to the requirements of 10 C.F.R. § 590.202(b), which calls upon applicants to supply transaction-specific information "to the extent practicable."[9] As noted above, Strom is currently involved in negotiations with NG Suppliers, and will file all executed long- term contracts with the DOE/FE under seal, following their execution. Strom expects to begin exporting LNG from its SFL 2014 or 2016, at the earliest.

Strom's ISO containers will be equipped with secured GPS devices and will be monitored 24/7/365. Additionally, Strom will develop specific routes for transporting its containers, any deviations will be automatically alerted at our 24/7/365 operation center. Additionally, our operation will have 24/7/365 monitoring and security. Each employee of Strom will undergo background checks to ensure compliance with federal laws and regulations and to ensure no prohibited individuals have access to our equipment, material or supplies. These background checks will continue on a regular basis to ensure continued compliance.

Delivery from the SFL shall be daily using authorized 10,000 gallons ISO modular containers. Strom

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[8] See FPSC approval document http://www.floridapsc.com/home/news/?id=1093

[9] *Sabine Pass Liquefaction, LLC,* FE Docket No. I 0-85-LNG, Order No. 2833 (Sept. 7, 20 I 0). I 0 C.F.R. 590.202(b) requests certain information, "to the extent applicable," and "supported to the extent practicable by necessary data or documents," regarding the source and security of the natural gas supply proposed for export, including contract volume and a description of the specific gas reserves supporting the project during the time of the requested export authorization; see also, Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC, FE Docket No. 10-160-LNG, Order No. 2913 (February 10, 2011).

also intends to produce LNG from the SFL for domestic consumption in remote regions of Florida and for transportations and industrial uses in the remaining Southeastern USA. The long-term authorization requested by Strom is also compatible with the principles established by DOE/FE's Policy Guidelines,[10] which promote free and open trade by minimizing federal control and involvement in energy markets, and DOE Delegation Order No. 0204-111, which requires "consideration of the domestic need for the gas to be exported."

As DOE/FE recently has recognized, United States consumers currently have access to substantial quantities of natural gas, as a result of, among other things, technological advances that have allowed for development of previously undeveloped reserves of domestic shale gas.[11]

In accordance with the AEO2014 Early Release Overview ("AEO2014"), "cumulative production of dry natural gas from 2012 to 2040 in the AEO2014 Reference case is about 11% higher than in AEO2013 primarily reflecting continued growth in shale gas production resulting from the dual application of horizontal drilling and hydraulic fracturing. Another contributing factor is ongoing drilling in shale and other plays with high concentrations of NGL and crude oil, which in energy-equivalent terms have a higher value than dry natural gas. Cumulative production levels for tight gas and onshore associated-dissolved gas from oil formations exceed those in AEO2013 through 2040 by 9% and 36%, respectively, making material contributions to the overall increase in production. In the AEO2014 Reference case, the United States becomes a net exporter of LNG in 2016, and it becomes an overall net exporter of natural gas in 2018, two years earlier than in AEO2013. U.S. exports of LNG from new liquefaction capacity are expected to surpass 2 Tcf by 2020 and increase to 3.5 Tcf in 2029. Large volumes of domestic shale gas reserves and its development and extraction, as well as continued low production costs, will enable the United States to develop significant quantities of natural gas and LNG, which will be able to meet domestic demand for decades to come, and, as a result, also will provide an over-capacity of natural gas and LNG that would be available for export. The decrease in natural gas prices from 2008 to 2010 provides evidence of such over-capacity. Ongoing improvements in advanced technologies for crude oil and natural gas production continue to lift domestic

[10] Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas, 49 Fed. Reg. 6,684 (Feb. 22, 1984).
[11] Cheniere Marketing, LLC, FE Docket No. I 0-31-LNG, Order No. 2795 (June 1, 2010)

MSC

supply and reshape the U.S. energy economy. Domestic production of crude oil (including lease condensate) increases sharply in the AEO2014 Reference case, with annual growth averaging 0.8 million barrels per day (MMbbl/d) through 2016, when it totals 9.5 MMbbl/d.... While domestic crude oil production is expected to level off and then slowly decline after 2020 in the Reference case, natural gas production grows steadily, with a 56% increase between 2012 and 2040, when production reaches 37.6 trillion cubic feet (Tcf)." As outlined in AEO 2014, natural gas supply continues to exceed projections.

Strom will produce LNG at its SFL for export and domestic consumption in transportation, industrial, commercial and other uses. These quantities are relatively small when compared to those included in recent export applications received by the DOE/FE. DOE/FE's approval of this Application will benefit small to medium size companies, in addition to supporting President Obama's National Export Initiative signed in 2010.[12]

IV.

PUBLIC INTEREST

Section 3(a) of the NGA creates a rebuttable presumption that an application for export of LNG is in the public interest, and the DOE/FE will grant such application unless the presumption of public interest is overcome by an applicant's opponents. When evaluating applications for natural gas exports, the DOE/FE seeks to "minimize federal control and involvement in energy markets and promote a balanced and mixed energy resource system." The focus of the DOE/FE's public interest evaluation is on the domestic need for the LNG proposed to be exported. In addition, the DOE/FE considers any threat to the security of domestic natural gas supplies potentially created by the proposed export, as well as "any other issue determined to be appropriate, including whether the arrangement is consistent with DOE's policy of promoting competition in the marketplace by allowing commercial parties to freely negotiate their own trade arrangements," and environmental effects of the proposed export.

Strom is seeking to export to ONFTA countries, as outlined above. Compared to other DOE/FE approved and pending Non-FTA applications, this authorization will provide an immediate positive impact on

[12] Exec. Order No. 13534,75 Fed. Reg. 12433 (March II, 2010).

America's ability to provide unfettered access to America's "cheap natural gas". This would allow companies like Strom to operate MLNG liquefaction of natural gas closer to the "area of need", subject to the appropriate local and federal approval.

These ONFTA countries rely almost exclusively on diesel as a source for power generation, industrial, commercial and transportation. Granting this request will reduce global carbon emissions, promote American products, create jobs, and promote democracy and our social values in each of the ONFTA countries.

Additionally, should this application be approved and Strom is successfully in its ongoing discussions with companies in each ONFTA as outlined in this request, the United States will have the ability to promote improved environmental and economic policies as the ONFTA benefits from low cost LNG from the United States. As such, this application is consistent with the "public interest" standards. Strom further states that the need for natural gas exports; United States Energy Policy and global effects; along with additional benefits are satisfied by this application pursuant to DOE/FE rules and regulations. Strom is not aware of any other DOE/FE rules that would prohibit DOE/FE from granted this authorization.

A. Need for Natural Gas Export.

In accordance with the AEO2014 Early Release Overview ("AEO2014"), "cumulative production of dry natural gas from 2012 to 2040 in the AEO2014 Reference case is about 11% higher than in AEO2013 primarily reflecting continued growth in shale gas production resulting from the dual application of horizontal drilling and hydraulic fracturing. Another contributing factor is ongoing drilling in shale and other plays with high concentrations of NGL and crude oil, which in energy-equivalent terms have a higher value than dry natural gas. Cumulative production levels for tight gas and on shore associated-dissolved gas from oil formations exceed those in AEO2013 through 2040 by 9% and 36%, respectively, making material contributions to the overall increase in production. In the AEO2014 Reference case, the United States becomes a net exporter of LNG in 2016, and it becomes an overall net exporter of natural gas in 2018, two years earlier than in AEO2013. U.S. exports of LNG from new liquefaction capacity are expected to surpass 2 Tcf by 2020 and increase to 3.5 Tcf in 2029. Large volumes of domestic shale gas reserves and its development and extraction, as well as continued low production costs, will enable the United States to develop significant

quantities of natural gas and LNG, which will be able to meet domestic demand for decades to come, and, as a result, also will provide an over-capacity of natural gas and LNG that would be available for export. The decrease in natural gas prices from 2008 to 2010 provides evidence of such over-capacity. Ongoing improvements in advanced technologies for crude oil and natural gas production continue to lift domestic supply and reshape the U.S. energy economy. Domestic production of crude oil (including lease condensate) increases sharply in the AEO2014 Reference case, with annual growth averaging 0.8 million barrels per day (MMbbl/d) through 2016, when it totals 9.5 MMbbl/d.... While domestic crude oil production is expected to level off and then slowly decline after 2020 in the Reference case, natural gas production grows steadily, with a 56% increase between 2012 and 2040, when production reaches 37.6 trillion cubic feet (Tcf)." As outlined in AEO 2014, natural gas supply continues to exceed projections.

As the DOE/FE expressly noted in the Sabine authorization, "natural gas production associated with exports will result in increased production that could be used for domestic requirements, if market conditions warrant such use." Since Sarbanes and the other authorizations, it is safe to say that there is a need to export domestic gas and this application serves the public interest even more that it did at the time of the Sarbanes and other approvals.

Considering the small volume of LNG Strom is requesting to export compared to the increased production and export outlook in the AOE2014 and the authorized authority already granted and pending before DOE/FE, Strom's request to export LNG to these ONFTA would have an insignificant impact on LNG supply for the domestic market. If the projections are revised downwards, the larger authorized or pending export suppliers such as the authority granted in Sarbanes and others should be considered for amendment(s) due to the extremely large volume granted. Energy Policy and Global affects are outlined, below.

B. United States Energy Policy and Global Affects

The AOE2014 provides quantified analysis that U.S. has and will have ample supply of liquefied natural gas to meet domestic demands to 2040. As such, and even if those projections are adjusted downwards, the minimal amount in Strom's request will have little to no impact on domestic energy security. Conversely,

the impact related to these ONFTA will provide greater energy security in the U.S. By purchasing LNG from the U.S., these ONFTA will be less likely to rely on countries with which the U.S. may have an antagonistic relationship or no diplomatic ties.

By fostering better relationships with these ONFTA through Strom's application, Americans will enjoy greater security within the ONFTA countries, and recognized for its export of a key fuel source that affects the daily lives of people living in the ONFTA countries.

Furthermore, Strom also intends to purchase excess supply on natural gas for liquefaction thereby mitigating or limiting the impact of affecting domestic consumption. There are other important benefits by authorizing this application, too.

As noted earlier, to mitigate the impact of global warming, every nation must do its part, as such, these ONFTA will burn cleaner fuel, instead of diesel, which result in reduced global warming and create American jobs. With the inability of these ONFTA countries to produce LNG, they will be forced to find alternatives supply countries or continue burning diesel or bunker fuel contrary to the United States clean energy goals. As such, by authorizing this application, Americans, both domestic and afar, will benefit from cleaner air and job opportunities both in the ONFTA countries and the United States. This would also support President Obama's National Export Initiative signed in 2010. The DOE/FE noted this important criterion in its first order. There are additional benefits to promote the "public interest" that should also be pointed out, here.

C. Additional Benefits

The United States has been instrumental in providing capital to countries near and far through lending and economic aid and assistance. As these ONFTA countries gain access to lower cost of fuel, savings in energy production could be passed on to local consumers who in turn could invest in manufacturing and other industries. As a result, the U.S. could benefit from lower cost of imports of certain goods and services from the ONFTA countries.

Additionally, we would benefit from having to supply less economic and military aid/assistance to these ONFTA countries. These ONFTA countries often turn to the United States in times of economic hardship or

military needs, by providing them with low cost LNG, they would rely less on the United States in the future as their economy stabilizes and they have a constant and reliable source of cleaner and less expensive fuel which is mutually beneficial.

Finally, it is important to note that a significant amount of business in the ONFTA countries such as the hospitality industry, industrial, power generation, manufacturing and transportation are owned by American firms. So, by providing low cost LNG to these ONFTA countries, American business will benefit, directly and indirectly. This would lead to more secure employment for Americans employed in the U.S. that provide goods and services to these ONFTA countries.

IV.

ENVIRONMENTAL IMPACT

As stated above, in the majority of cases, no new facilities (or modifications to any existing facilities) would be required in order for Strom to liquefy and export LNG. In the limited cases in which the owners of natural gas facilities that sell and deliver natural gas to Strom opt to make minor modifications to their facilities to either accommodate the additional volume of natural gas resulting from such deliveries, or to account for the temperature requirements of natural gas versus other liquefied petroleum products, those owners of the facilities will obtain the necessary state, local, or federal permits before any such modifications or deliveries occur. Approval of this Application therefore would not constitute a federal action significantly affecting the human environment within the meaning of the National Environmental Policy Act.[13] Secondly, since Strom intends to utilize MLNG technology to liquefy NG, any environmental impact would be none to minimal. The design and specification of these MLNG systems will meet all local and federal environmental permitting requirements and permitted by the appropriate governing agency to the manufacturer.

The MLNG will be connected directly to the NG Supplier and able to demobilize in a "moment's notice." These MLNG are often referred in the industry as "plug and play". They are modular systems

[13] 42 U .S.C. § 4231 , et seq.; Categorical Exclusion 85.7, I 0 C.F.R. Part I 021 , Subpart D, Appendix B.

designed to be assembled in a "few months rather than years" and provides for efficient and expeditious demobilization and relocation.

V.

APPENDICES

The following exhibits are submitted as part of this Application:

Appendix A Verification

Appendix B Opinion of Counsel

Appendix C Specific Liquefaction Location- Lease Option Agreement

VI.

CONCLUSION

WHEREFORE, for the reasons set forth above, Strom respectfully requests that DOE/FE grant the long-term, multi-contract export authorization requested herein. DOE/FE has deemed requests such as this complies with the NGA and DOE/FE rules pursuant to recent DOE/FE orders.

Respectfully submitted,

Mr. Michael Lokey, CEO
Strom, Inc.
1228 East 7th Ave.
Tampa, FL 33605
Contact: 727-230-8840
mlokey@stromlng.com

APPENDIX A

CERTIFIED STATEMENT

County of Pinellas

State of Florida

I, Michael Lokey, being duly sworn on his oath, do hereby affirm that I am CEO of Strom, Inc.; that I am familiar with the contents of this application; and that the matters set forth therein are true and correct to the best of my knowledge, information and belief.

Michael Lokey

Sworn to and subscribed before me, a Notary Public, in and for the State of Florida, this 18th day of ~~January~~ April, 2014

Cj Sexton

4/18/14

CRAIG SEXTON
Notary Public - State of Florida
My Comm. Expires Dec 28, 2014
Commission # EE 41752

NATOLI-LAPIN LLC

Natoli-Lapin, LLC
304 Park Avenue South, 11th Floor
New York, NY 10010
(212) 537- 4436
Moshe@LanternLegal.com

February 7, 2014

Mr. John A. Anderson
Office of Fossil Energy
U.S. Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: Strom Inc.
Application for Long-Term Authorization to Export Liquefied Natural Gas

Dear Mr. Anderson:

This opinion is submitted pursuant to 10 C.F.R. 590.202(c) of the Department of Energy administrative procedures. We have acted as counsel to Strom, Inc., a Florida Corporation (the "Company") in connection with a review of the Company's Articles of Incorporation to ensure compliance with 10 C.F.R. 590.202(c).

In rendering this opinion, we have reviewed and relied upon originals or copies of the Articles of Incorporation of the Company, as filed on July 25, 2013 with the Florida Secretary of State dated as of July 25, 2013, and the above-referenced application to the U.S. Department of Energy (the "Application").

The opinion set forth below is limited to the Florida Act as in effect on this date. We express no opinion as to the applicability or effect of any other laws of such jurisdiction or the laws of any other jurisdictions.

Based on the foregoing, we are of the opinion that the proposed export of natural gas, as described in the Application, is within the powers of the Company.

Very truly yours,

Moshe D. Lapin, Esq.
Natoli-Lapin, LLC
304 Park Ave. South 11th Floor
New York, NY 10010
212-537-4436
Moshe@LanternLegal.com

NON-BINDING LETTER OF INTENT

This Non-Binding Letter of Intent ("Letter") is made on this 14th day of April, 2014, by and between the following parties: Strom, Inc., Florida (hereinafter referred to as the "Buyer"); and WWONE Starke, LLC (hereinafter referred to as the "Seller").

In consideration of the mutual promises and covenants herein, the parties hereby agree as follows:

1. BROKER

The legal broker in this transaction shall be [redacted]

2. PROPERTY DESCRIPTION

Property: +/- 70 acres Sec 33 Township 6S Range 22E Bradford County.

3. DUE DILIGENCE

[redacted]

4. CLOSING DATE

Closing: 60 days from Effective Date of Contract.

5. PURCHASE PRICE

Seller and Buyer agree that the price shall be: [redacted]

6. DEPOSIT

Deposit due upon execution of formal Contract: [redacted]

7. EXPENSES

Closing costs: all paid by Buyer including, without limitation, documentary stamp tax on deed, title and lien searches, title insurance policy premium, taxes and insurance.

8. DISCLOSURE

Upon execution, Buyer shall have the right to utilize this Letter in any permitting inquiry or supply this information to any governmental authority on a "need to know basis". [redacted]. Buyer understands that this is not a final agreement to purchase and shall not cause any obligation to Seller prior to closing.

9. BROKER COMMISSION

Pursuant to separate agreement between Seller and Broker, Seller agrees to pay the Transaction Broker any commission due to Transaction Broker as a direct result of any closing of purchase between the Buyer and Seller.

10 [redacted]

receive prior to the final purchase agreement. This agreement [redacted] is negotiated in good faith and both Buyer and Seller shall make reasonable good faith efforts to enter into a formal contract and to close. [redacted]

11. ACCEPTANCE

This Letter shall expire at [redacted] unless executed by Seller and Buyer. Upon execution by Seller and return to Buyer, Buyer shall execute within 24 hours and return to Seller. Electronic Receipt of the fully executed Offer to Purchase by Seller is acceptable to Buyer.

12. GOOD FAITH AGREEMENT

The below signatures constitute both parties expression that they are willing to proceed in good faith to negotiate a mutually acceptable Purchase. Execution of this Proposal shall not obligate either party to accept any particular terms, but will preclude both parties from insisting on any terms that are inconsistent with those terms described in this [redacted]. It is expressly agreed that the form and content of the final purchase agreement must be mutually acceptable to both parties, their respective counsel, and Strom, Inc., board of directors, and that if a mutually acceptable final purchase agreement is not agreed to, executed and delivered by both parties on or [redacted], neither party shall have any further obligation to continue negotiating with the other.

Notwithstanding anything in this Letter to the contrary, THIS IS FOR DISCUSSION PURPOSES ONLY AND NO BINDING AGREEMENT SHALL EXIST UNLESS AND UNTIL A FORMAL CONTRACT IS EXECUTED AND DELIVERED BY BOTH PARTIES.

BUYER: NAME: STROM INC.

X _____

Michael E. Lokey, CEO

Accepted this 15th day of April, 2014

SELLER: NAME: WWONE STARKE, LLC.

BY: Weekley Bros, Leasing Ltd., Manager

By: D. Weekley Enterprises, LLC, Its General Partner

X _____

Daniel D. Weekley, Manager

Accepted this 14TH day of April, 2014