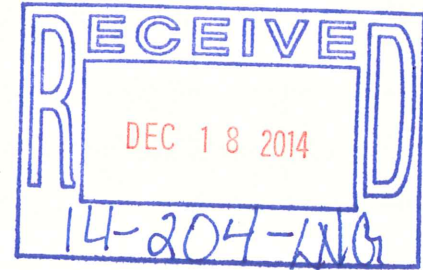


Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: 202.739.3000  
Fax: 202.739.3001  
www.morganlewis.com

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**Brett A. Snyder**  
Partner  
+1.202.739.5956  
bsnyder@morganlewis.com



December 18, 2014

**VIA HAND DELIVERY**

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

Re: Cameron LNG, LLC Application for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries

Dear Ms. Moore:

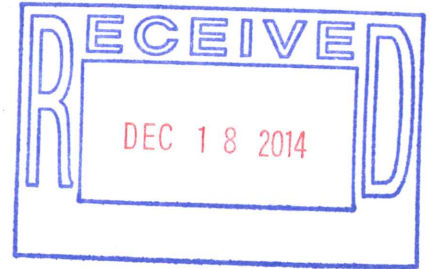
Enclosed please find the Application of Cameron LNG, LLC for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement countries and a check for \$50.00 in remittance of the filing fee. Please contact me if you have any questions regarding this submission.

Sincerely,

Brett A. Snyder  
*Counsel to Cameron LNG, LLC*

Enclosure

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY



Cameron LNG, LLC

)  
)  
)

FE Docket No. 14-204-LNG

**APPLICATION OF CAMERON LNG, LLC  
FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS  
TO FREE TRADE AGREEMENT COUNTRIES**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)<sup>1</sup> and Part 590 of the regulations of the Department of Energy (“DOE”),<sup>2</sup> Cameron LNG, LLC (“Cameron LNG”) submits this application (“Application”) for a long-term, multi-contract authorization to export up to 152 billion cubic feet (“Bcf”) per year (approximately equal to 2.95 million metric tons per annum (“MTPA”)) of liquefied natural gas (“LNG”) produced from domestic sources. Cameron LNG seeks this authorization for a 20-year period commencing on the earlier of the date of first commercial export or seven years from the date the requested authorization is granted.

In this Application, Cameron LNG seeks authorization to export LNG from the Cameron LNG terminal in Cameron Parish, Louisiana (“Cameron Terminal”) to any country with which the United States has, or in the future may have, a free trade agreement requiring national treatment for trade in natural gas (“FTA”).<sup>3</sup> Cameron LNG is requesting this authorization both on its own behalf and as agent for other parties who hold title to the LNG at the time of export.<sup>4</sup>

In support of this Application, Cameron LNG respectfully states the following:

---

<sup>1</sup> 15 U.S.C. § 717b (2010).

<sup>2</sup> 10 C.F.R. Part 590 (2014).

<sup>3</sup> The United States has FTAs in force with 20 countries. Those countries are Australia, Bahrain, Canada, Chile, Columbia, Costa Rica, Dominican Republic, El Salvador, Guatemala, Honduras, Israel, Jordan, South Korea, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, and Singapore.

<sup>4</sup> Cameron LNG is also separately filing for authorization to export an additional 152 Bcf per year to Non-FTA countries.

## **I. COMMUNICATIONS AND CORRESPONDENCE**

Any notices, pleadings or other communications concerning this Application should be addressed to:

Brett A. Snyder  
Mark R. Haskell  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, D.C. 20004  
(202) 739-3000  
bsnyder@morganlewis.com  
mhaskell@morganlewis.com

Julie A. Nelson  
VP Government Relations & Public Affairs  
2925 Briarpark Drive, Suite 1000  
Houston, TX 77042  
(832) 783-5572  
jnelson@cameronlng.com

The contact for any reports required in connection with the requested authorization is as follows:

John O'Leary  
Chief Operating Officer  
2925 Briarpark Drive, Suite 1000  
Houston, TX 77042  
(832) 783-5513  
joleary@CameronLNG.com

Julie A. Nelson  
VP Government Relations & Public Affairs  
2925 Briarpark Drive, Suite 1000  
Houston, TX 77042  
(832) 783-5572  
jnelson@cameronlng.com

## **II. DESCRIPTION OF THE APPLICANT**

The exact legal name of Cameron LNG is Cameron LNG, LLC. Cameron LNG is a limited liability company organized under the laws of Delaware. Cameron LNG is an indirect subsidiary of Sempra Energy, GDF SUEZ S.A., Mitsui & Co., Ltd., Mitsubishi Corporation, and

Nippon Yusen Kabushiki Kaisha.<sup>5</sup> Cameron LNG's executive offices are located at 2925 Briarpark Drive, Suite 1000, Houston, Texas 77042. Cameron LNG is currently engaged in the business of owning and operating the Cameron Terminal in Cameron Parish, Louisiana.

Cameron LNG holds two export authorizations from DOE/FE. First, Cameron LNG holds an authorization to export up to 620 Bcf per year, which is equivalent to approximately 12 MTPA, to any country with which the United States has, or in the future may enter into, a FTA requiring national treatment for trade in natural gas. DOE/FE granted Cameron LNG that authorization in Order No. 3059 dated January 17, 2012.<sup>6</sup> Second, Cameron LNG holds an authorization to export 620 Bcf per year of LNG to any country that has developed or in the future develops the capacity to import LNG via ocean-going carrier and with which the United States does not have an FTA requiring national treatment for trade in natural gas and LNG. DOE/FE approved that request on September 10, 2014 in Order No. 3391-A.<sup>7</sup> Cameron LNG's FTA and non-FTA export authorizations are not additive to one another.

Sempra LNG Marketing, LLC ("SLNG"), a subsidiary of Sempra Energy, has a blanket authorization to import LNG at the Cameron Terminal.<sup>8</sup> SLNG also has a blanket authorization to export previously imported (i.e., foreign sourced) LNG from the Cameron Terminal.<sup>9</sup> Nothing in this Application is intended to supersede or otherwise modify the import and export authorizations granted by DOE/FE to either Cameron LNG or SLNG.

---

<sup>5</sup> See *Cameron LNG, LLC*, Order No. 3452, FE Docket No. 14-001-CIC (June 27, 2014).

<sup>6</sup> *Cameron LNG, LLC*, DOE/FE Order No. 3059 (2012).

<sup>7</sup> *Cameron LNG, LLC*, DOE/FE Order No. 3391-A, FE Docket No. 11-162-LNG (Sept. 10, 2014).

<sup>8</sup> *Sempra LNG Marketing, LLC*, DOE/FE Order No. 3456 (2014).

<sup>9</sup> *Sempra LNG Marketing, LLC*, DOE/FE Order No. 2885 (2010).



### III. DESCRIPTION OF CAMERON LNG TERMINAL AND LIQUEFACTION PROJECT

In this Application, Cameron LNG seeks a long-term authorization to export additional volumes of domestically produced LNG from the Cameron Terminal. Cameron LNG is constructing and developing natural gas processing and liquefaction facilities to liquefy domestic natural gas at the Cameron Terminal for export to foreign markets (the “Liquefaction Project”). The Liquefaction Project facilities will be integrated into the existing Cameron Terminal facilities. Cameron LNG hereby incorporates by reference the description of the Cameron Terminal and the Liquefaction Project set forth in Cameron LNG’s application in FE Docket No. 11-145-LNG<sup>10</sup> and in DOE/FE Order No. 3059.<sup>11</sup>

On June 19, 2014, FERC issued an order that authorized Cameron LNG to site, construct, and operate the Liquefaction Project facilities (“FERC Order”).<sup>12</sup> As authorized by FERC, the aggregate maximum liquefaction capacity of the Liquefaction Project facilities under optimal conditions is 3,981 cubic meters per hour, which equates to approximately 14.95 MTPA.<sup>13</sup>

### IV. AUTHORIZATION REQUESTED

In this Application, Cameron LNG requests long-term, multi-contract authorization to export up to 152 Bcf per year (approximately 2.95 MTPA) of domestically produced LNG from the Cameron Terminal. This authorization is requested for a 20-year term commencing on the earlier of the date of first commercial export or seven years from the date on which authorization is granted by the DOE. Cameron LNG seeks authorization to export LNG to any country with which the United States has, or in the future may have, a FTA.

---

<sup>10</sup> See Application at 3-5, *Cameron LNG, LLC*, FE Docket No. 11-145-LNG (Nov. 10, 2011).

<sup>11</sup> See Order No. 3059 at 3-5.

<sup>12</sup> *Cameron LNG, LLC*, 147 FERC ¶ 61,230 (2014).

<sup>13</sup> *Id.* at P 8.

The volume of exported LNG for which Cameron LNG seeks authorization this Application is incremental to the 620 Bcf per year authorized by DOE/FE in DOE/FE Order No. 3059 in FE Docket No. 11-45-LNG.<sup>14</sup> In the FERC Order, FERC approved Cameron LNG's export project with a maximum capacity of 14.95 MTPA.<sup>15</sup> In its application in FE Docket No. 11-145-LNG, Cameron LNG sought and received authorization to export up to 12 MTPA or 620 Bcf per year, *i.e.*, 2.95 MTPA less than the maximum capacity of the facility. In this instant Application, Cameron LNG seeks authorization to export the remaining 2.95 MTPA, or 152 Bcf per year using the same conversion factor. If this Application is approved, Cameron LNG would have an aggregate FTA export authorization of 772 Bcf per year, which is equivalent to 14.95 MTPA. This would enable Cameron LNG to export LNG at a volume that equates to the peak capacity of the Liquefaction Project facilities at optimal conditions, which FERC determined is the appropriate measure of liquefaction capacity to be set forth in an application to be considered by FERC under Section 3 of the NGA.<sup>16</sup>

Cameron LNG requests authorization to export LNG on its own behalf (by holding title to the LNG at the time of export) or by acting as agent for others. In those instances in which Cameron LNG exports LNG on its own behalf, Cameron LNG will either take title to the gas at a point upstream of the Cameron Terminal or will purchase LNG from a customer of the Cameron Terminal prior to export. In other cases, Cameron LNG will act as agent for the customers of the Cameron Terminal without taking title to facilitate the export of the customer's LNG. To ensure that all exports are permitted and lawful under United States laws and policies, Cameron LNG will comply with all DOE/FE requirements for an exporter or agent.

---

<sup>14</sup> *Cameron LNG, LLC*, DOE/FE Order No. 3059, FE Docket No. 11-145-LNG (Jan. 7, 2012).

<sup>15</sup> *Cameron LNG, LLC*, 147 FERC ¶ 61,230 at P 8 (2014).

<sup>16</sup> *Sabine Pass Liquefaction, LLC*, 146 FERC ¶ 61,117 at P 12 (2014).

In Order No. 3059, DOE/FE approved Cameron LNG's proposal to register each LNG title holder for whom Cameron LNG seeks to export LNG as agent.<sup>17</sup> As approved therein, the registration is to include a written statement by the title holder acknowledging and agreeing to comply with all applicable requirements included in its export authorization. DOE/FE also approved Cameron LNG's proposal to file under seal with DOE/FE any relevant long-term commercial agreements that it reached with the LNG title holders on whose behalf the exports were performed. Cameron LNG seeks the same agent authority as that provided in Order No. 3059.

Cameron LNG also requests that DOE/FE not require the submission with this Application of transaction-specific information, pursuant to Section 590.202(b) of the DOE's regulations.<sup>18</sup> DOE/FE has previously found that, given the stage of development for these projects, it was appropriate for the applicants to submit such information "when practicable" (i.e., when the contracts reflecting such information are executed). In Order No. 3059, DOE/FE required Cameron LNG to submit transaction-specific information within 30 days of the execution of the applicable agreements. The submittal of the transaction-specific information identified in section 590.202(b) at the time the applicable agreements are executed is appropriate in light of current market conditions and contracting practices.

The long-term authorization requested in this application is necessary in order to enable Cameron LNG to export the maximum production capacity of the Project facilities for the full length of time for which Cameron LNG is already authorized to export LNG from the facilities.

---

<sup>17</sup> *Cameron LNG, LLC*, DOE Order No. 3059 at Section III(4) (2012).

<sup>18</sup> *See, e.g., Cameron LNG, LLC*, DOE Order No. 3059 (2012); *Sabine Pass Liquefaction, LLC*, DOE Order No. 2833 (2010). The transaction-specific information described in the regulations includes long-term supply agreements and long-term export agreements.



**V. STANDARD OF REVIEW**

Section 3(c) of the NGA requires that applications for authorization to export natural gas, including LNG, to nations with which there is in effect a FTA requiring national treatment for trade in natural gas be deemed consistent with the public interest and granted without modification or delay. The DOE has found that, in light of its statutory obligation to grant such applications without delay or modification, there is no need for the DOE to engage in any analysis of factors affecting the public interest.<sup>19</sup> This Application, which clearly falls within the scope of Section 3(c), should be processed and approved in accordance with this standard.

**VI. APPENDICES**

The following appendices are included with this Application:

- Appendix A                      Verification
- Appendix B                      Opinion of Counsel

**VII. CONCLUSION**

For the reasons set forth above, Cameron LNG respectfully requests that the DOE issue an order granting Cameron LNG authorization to export for a period of 20 years (commencing on the earlier of the date of first commercial export or seven years from the date the requested authorization is granted) up to 152 Bcf per year (equivalent to approximately 2.95 MTPA) of

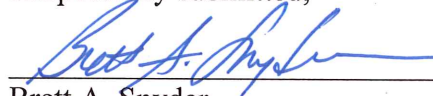
---

<sup>19</sup> *Id.*



LNG of domestically produced LNG to any country with which the United States has, or in the future may have, a FTA requiring national treatment for trade in natural gas.

Respectfully submitted,



---

Brett A. Snyder  
Mark R. Haskell  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, D.C. 20004  
(202) 739-3000  
bsnyder@morganlewis.com  
mhaskell@morganlewis.com


Dated: December 18, 2014

## **APPENDIX A**

**VERIFICATION**

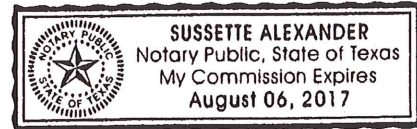
County of Harris     )  
                                  )  
State of Texas        )

BEFORE ME, the undersigned authority, on this day personally appeared John O’Leary, who, having been by me first duly sworn, on oath says that he is Chief Operating Officer for Cameron LNG, LLC, and is duly authorized to make this Verification on behalf of such company; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

  
John O’Leary

SWORN TO AND SUBSCRIBED before me on the 17<sup>th</sup> day of December, 2014.

  
Notary Public





## **APPENDIX B**

## OPINION OF COUNSEL

December 17, 2014

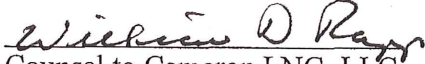
Mr. John A. Anderson  
Office of Fossil Energy  
U.S. Department of Energy  
Docket Room 3F-056, FE 50  
Forrestal Building  
1000 Independence Avenue, S.W.  
Washington, DC 20585

RE: Cameron LNG, LLC Application for Long-Term Authorization to  
Export Liquefied Natural Gas to Free Trade Agreement Countries

Dear Mr. Anderson:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the U.S. Department of Energy, 10 C.F.R. § 590.202(c) (2014). I am counsel to Cameron LNG, LLC ("Cameron LNG"). I have reviewed the organizational and internal governance documents of Cameron LNG and it is my opinion that the proposed export of natural gas as described in the application filed by Cameron LNG, to which this Opinion of Counsel is attached as Appendix B, is within the company powers of Cameron LNG.

Respectfully submitted,

  
Counsel to Cameron LNG, LLC