

John S. Decker jdecker@velaw.com  
Tel +1.202.639.6599 Fax +1.202.879.8899

July 6, 2015

**By Email**

Mr. John Anderson  
Office of Fuels Programs, Fossil Energy  
U.S. Department of Energy  
Docket Room 3E-042  
Forrestal Building  
1000 Independence Avenue, SW  
Washington, DC 20585

Re: American LNG Holdings LLC, FE Docket No. 14-209-LNG, *Status Update*

Dear Mr. Anderson:

On December 31, 2014, American LNG Marketing LLC (“American LNG”) filed an application (“Application”) with the Department of Energy Office of Fossil Energy (“DOE/FE”) requesting long-term multi-contract authorization to export domestically produced liquefied natural gas (“LNG”) from a natural gas liquefaction project under construction on the northern portion of the Hialeah Rail Yard near Medley, Florida.<sup>1</sup> On March 18, 2015, American LNG received Order 3601 Granting Long-term, Multi-contract Authorization to Export LNG to Free Trade Agreement Nations. American LNG still seeks authorization from DOE/FE to export LNG to any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas and with which trade is not prohibited by U.S. law or policy (“NFTA Approval”).

In January 2014, Florida East Coast Railway (“FECR”) and GE Transportation (“GE”) announced that FECR was buying 24 of GE’s new ES44c-4 locomotives configured to be capable of being fueled by diesel and/or LNG. By substituting LNG for diesel fuel, FECR believes it will reduce its emissions (a significant environmental benefit valued by its shipping customers); save money on fuel and maintenance; and enjoy higher expected in-service time on its locomotives. In early 2014, LNG Holdings (Florida) LLC (“Holdings”)

---

<sup>1</sup> The location of the Hialeah Facility is further described in Appendix C and Appendix D (including latitude and longitude) of the Application.


began developing a site on which to locate a micro-LNG facility that would support FECR's fueling operations. That facility would become known as the "Hialeah Facility."

As part of its development activities, on March 3, 2014, Holdings entered into a letter of commitment for engineering and fabrication capacity reservation to secure manufacturing capacity with a liquefaction technology provider ("Technologist") for the Hialeah Facility. On May 27, 2014, Holdings entered into a purchase order with the Technologist to supply the liquefaction equipment for the Hialeah Facility. On June 9, 2014, Holdings entered into a Design-Build Agreement with an EPC contractor for the balance of plant scope to install liquefaction equipment for the Hialeah Facility. On November 21, 2014, Holdings entered into a LNG Purchase and Sale Agreement with FECR. On November 24, 2014, Holdings entered into a loan agreement with several banks to finance the Hialeah Facility.

On June 3, 2015, American LNG submitted a request for expedited approval citing that the record in this proceeding is complete, and there are no material issues outstanding. American LNG requested that DOE/FE grant the requested authorization no later than June 15, 2015. There will be no new construction or change in operation at the Hialeah Facility as a result of the NFTA Approval.<sup>2</sup> Therefore, DOE/FE's grant of non-FTA authorization today for the Hialeah Facility will not *cause* any environmental impacts.<sup>3</sup>

American LNG believes that it has satisfied all the criteria for the issuance of the NFTA Approval and respectfully requests that DOE issue the order as soon as possible.

Respectfully submitted,



John S. Decker

Cc: Service List, Docket No. 14-209-LNG

---

<sup>2</sup> All underground, subsurface, and foundation work at the Hialeah Facility is complete. All equipment necessary to conduct plant operations at the Hialeah Facility has been manufactured, delivered, and installed. All of the remaining activity on the Hialeah Facility relates to the installation of above ground piping and electrical connections between the skids in our modular design.

<sup>3</sup> Holdings has obtained all necessary governmental approvals to construct Hialeah Facility.