

RECEIVED

By Docket Room at 1:37 pm, Aug 28, 2015

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

In the matter of:

Venture Global Calcasieu Pass, LLC

)
)
)

FE Docket No. 15-25-LNG

**MOTION TO INTERVENE OF
THE AMERICAN PETROLEUM INSTITUTE**

Pursuant to 10 C.F.R. 590.303, the American Petroleum Institute (“API”) files this motion to intervene in the above-captioned docket. In support, API states as follows.

COMMUNICATIONS

Any communications regarding this pleading should be addressed to:

Benjamin Norris
Senior Counsel
American Petroleum Institute
1220 L Street, N.W.
Washington, D.C. 20005
Telephone: 202.682.8000
NorrisB@api.org

David L. Wochner
Sandra E. Safro
Michael L. O’Neill
K&L Gates, LLP
1601 K Street, N.W.
Washington, D.C. 20006
Telephone: 202.778.9100
david.wochner@klgates.com
sandra.safro@klgates.com
mike.oneill@klgates.com

BACKGROUND

On February 9, 2015, Venture Global Calcasieu Pass, LLC (“Venture Global”) filed an application with the Department of Energy’s Office of Fossil Energy (“DOE/FE”) seeking a long-term multi-contract authorization to export domestically produced liquefied natural gas (“LNG”) up to the equivalent of 0.36 billion cubic feet (“Bcf”) of natural gas per day to non-Free Trade Agreement (“non-FTA”) countries. Venture Global seeks this authorization to export natural gas as LNG on its own behalf and as agent for others for a 25-year period, commencing

on the earlier of the date of first export or seven years from the date DOE/FE authorizes the proposed exports. Venture Global proposes to liquefy the natural gas at the proposed Venture Global Calcasieu Pass facility located along the Calcasieu Ship Channel for export via ocean-going vessel to any nation that currently has or develops the capacity to import LNG, with which the United States does not have an FTA requiring national treatment for trade in natural gas, and with which trade is not prohibited by U.S. law or policy. The deadline to intervene in the above-captioned proceeding is August 28, 2015.¹

INTERVENTION

API is a national trade association representing more than 625 member companies involved in all aspects of the oil and natural gas industry in the United States. Our members include owners and operators of LNG import and export facilities in the United States and around the world, as well as owners and operators of LNG vessels, global LNG traders, and manufacturers of essential technology and equipment used all along the LNG value chain. Our members also have extensive experience with the drilling and completion techniques used in shale gas development and in producing America's natural gas resources in a safe and environmentally responsible manner. API thus has a direct and immediate interest in this docket which cannot be adequately protected by any other party. Accordingly, API should be permitted to intervene in this docket with full rights as a party.

¹ 80 Fed. Reg. 36,977 at 36,978 (June 29, 2015).

CONCLUSION

For the reasons stated above, API respectfully requests that DOE/FE grant this timely motion to intervene and that API be accorded fully party status in any proceedings held by DOE/FE in this docket.

Respectfully submitted,

/s/ David L. Wochner

David L. Wochner

Sandra E. Safro

Michael L. O'Neill

K&L Gates, LLP

1601 K Street, N.W.

Washington, D.C. 20006

Telephone: 202.778.9100

david.wochner@klgates.com

sandra.safro@klgates.com

mike.oneill@klgates.com

Counsel for American Petroleum Institute

Dated: August 28, 2015

CERTIFICATE OF SERVICE

I certify that I have this 28th day of August, 2015, serviced copies of the foregoing document filed with the DOE/FE on the designated representatives of all of the parties to this proceeding, in accordance with 10 C.F.R. § 590.107(a).

Dated: August 28, 2015

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