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**By DOE/FE at 4:42 pm, Jan 18, 2019**



January 18, 2019

Steven E. Winberg  
Assistant Secretary, Office of Fossil Energy  
U.S. Department of Energy  
Forrestal Building, Room 3E-042,  
1000 Independence Avenue SW  
Washington, DC 20585

RE: Natural Gas Contract Guidance: Filing of Contracts and Purchase  
Agreements Associated With the Export of Natural Gas

Dear Mr. Winberg:

Golden Pass Products LLC (“Golden Pass”) submits these comments in support of the separate Comments filed today in this proceeding by the Center for Liquefied Natural Gas (Center for LNG) regarding the proposed Interpretive Rule issued by the Office of Fossil Energy (FE) of the Department of Energy (DOE) on December 13, 2018, and published in the *Federal Register* on Wednesday, December 19, 2018.

Golden Pass wishes to emphasize in particular that contracts entered into by merchant liquefied natural gas (LNG) exporters to acquire supplies prior to the sale and physical transfer of LNG for export are beyond the legitimate scope of the filing requirement. Merchant exporters will hold a portfolio of such agreements, and will need to utilize them not only for exports but for domestic U.S. natural gas transactions. Fundamentally, these contracts do not govern the export of LNG, which would be governed by separate agreements that would be filed, providing DOE/FE will complete information regarding the relevant terms of all exports.

Accordingly, Golden Pass urges the DOE/FE to limit the requirement for filing supply agreements to contracts that provide for the transfer of title or physical custody of natural gas at the point of export in foreign commerce, as urged by the Center for LNG.

Respectfully submitted,  
Golden Pass Products LLC

A handwritten signature in blue ink, appearing to read "Joel Hindman", written in a cursive style.

J. Joel Hindman  
Regulatory Manager

**Moore, Larine**

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**From:** Kevin Sweeney <KSweeney@kmsenergylaw.com>  
**Sent:** Friday, January 18, 2019 4:17 PM  
**To:** FERGAS  
**Subject:** [EXTERNAL] Natural Gas Contract Guidance - Comments of Golden Pass Products, LLC  
**Attachments:** GPP Comments 1-18-19-DOE Proposed Interpretive Rule-Natural Gas Contract Guidance.pdf

Please find attached the Comments of Golden Pass Products, LLC, regarding the Proposed Interpretive Rule captioned "Filing of Contracts and Purchase Agreements Associated With the Export of Natural Gas," published in the Federal Register on December 19, 2018, 83 Fed.Reg. 65111.

Respectfully submitted,

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