

November 14, 2019

U.S. Department of Energy Office of Fossil Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Dear Ms. Sweeny:

Enclosed please find SeaOne Corpus Christi, LLC's application for authority to export natural gas contained in or mixed with Compressed Gas Liquid ("CGL"TM) to certain Free Trade Agreement ("FTA") countries in or adjoining the Caribbean Basin and Gulf of Mexico.

SeaOne intends to use the Port of Corpus Christi as the point of export of CGL to power generation facilities to be constructed in Colombia in fulfillment of several recently awarded power tenders in the Pacific and Central regions in Colombia as well as a government-sanctioned concession for the development of a major energy port in Buenaventura, Colombia (Puerto Solo) that has provisional Colombian government approval to import as much as 1.9 Million barrels per a day of fuels and feedstocks. Service for these operations will require CGL transport vessels larger than those which can be efficiently operated out of SeaOne's Gulfport facility.

We have entered into land lease negotiations with the Port of Corpus Christi Authority, as well as with private landowners within the Port, regarding SeaOne's use of a location within the Port. Conclusion of these negotiations will be contingent on completion of the Department of Energy ("DOE") FTA authorization process, and will be finalized upon issuance of an order approving this application.

Consistent with the positions taken and the process used by SeaOne in DOE/FE Docket No. 14-83-CGL, we do not believe that CGL is "natural gas" within the meaning of Section 3 of the Natural Gas Act. We understand, however, that it is DOE's position that, to the extent that CGL contains significant quantities of methane intended use as such upon delivery and fractionation from the CGL solution, Section 3 is applicable. Thus, out of an abundance of caution, we are filing this application to cover such methane included in CGL exports.

Accordingly, through the attached application, we apply for authority to export methane added to and contained in or mixed with CGL.

44 Offices in 19 Countries

Squire Patton Boggs (US) LLP is part of the international legal practice Squire Patton Boggs, which operates worldwide through a number of separate legal entities.

Please visit squirepattonboggs.com for more information.

We are filing this application pursuant to this understanding in order to permit SeaOne to enter into agreements to export to Free Trade Agreement countries and to authorize exports of formulations containing methane. Our intention, at least during the early years of their operation, will be to fuel the Colombian facilities with propane (sourced from a third party during construction of the Texas facility) and other products consisting primarily of natural gas liquids. These fuel formulations, though they may contain trace amounts of naturally occurring methane, are not subject to regulation under Section 3.

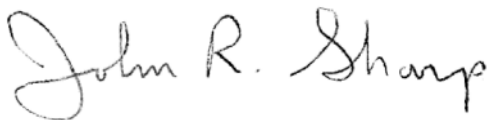
SeaOne's Texas facility will not be an LNG Terminal nor is it a facility or unit necessary for the interstate transportation of natural gas or any associated product. SeaOne expects to access either existing or newly-built intra-state pipelines, in either case owned and operated by third parties. . SeaOne's exports to Colombia will initially consist primarily of propane and liquefied petroleum gas, with the CGL fuel blends to be exported evolving as necessary in response to future economics and market demand.

Section 3(c) of the NGA, as amended by section 201 of the Energy Policy Act of 1992 (Pub. L. 102-146), requires that applications to authorize the export of natural gas to nations with which there is in effect a FTA requiring national treatment for trade in natural gas be deemed consistent with the public interests and granted without modification or delay. In light of its statutory obligation to grant such applications without delay or modification, license grant is non-discretionary and no Environmental Review under the National Environmental Policy Act (NEPA) is required or authorized.

Therefore, pursuant to Section 3 of the Natural Gas Act, 15 U.S.C. § 717b, and Part 590 of the regulations of the Department of Energy, 10 C.F.R Part 590 (2011), SeaOne Corpus Christi, LLC hereby files an original and three (3) copies of its Application for Authorization to Export methane added to, contained in or mixed with Compressed Gas Liquid to Certain Free Trade Agreement Countries. A check in the amount of \$50 is being provided under separate cover as the filing fee stipulated by 10 C.F.R § 590.207 (2011).

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact the undersigned at (303) 894-6183.

Respectfully submitted,



John R. Sharp
Counsel for SeaOne Corpus Christi, LLC

RECEIVED

By Docket Room at 12:24 pm, Nov 14, 2019

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

In the Matter of:

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SEAONE CORPUS CHRISTI, LLC

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Docket No. 19-___-CGL

**APPLICATION OF SEAONE CORPUS CHRISTI, LLC
FOR LONG-TERM AUTHORIZATION TO EXPORT NATURAL GAS
CONTAINED IN OR MIXED WITH COMPRESSED GAS LIQUID**

Pursuant to Section 3 of the Natural Gas Act ("NGA"), 15 U.S.C. Section 717b, and Part 590 of the Department of Energy's ("DOE") regulations, 10 C.F.R. Part 590 (2011), SeaOne Corpus Christi, LLC ("SeaOne") hereby submits this application to the Office of Fossil Energy ("FE") for long-term, multi-contract authorization to export natural gas contained in or mixed with Compressed Gas Liquid ("CGL") to nations located in or adjoining the Caribbean Basin and the Gulf of Mexico with which the United States has, or may enter into, Free Trade Agreements ("FTA") requiring national treatment for trade in natural gas (the "FTA Countries"). In support of this application, SeaOne respectfully offers the following:

I.

COMMUNICATIONS

Correspondence and communications regarding this application should be addressed to:

Dr. Bruce Hall SeaOne Corpus Christi, LLC 333 Clay Street – Suite 4700 Houston, TX 77002 Telephone: (713) 739-3030 Facsimile: (713) 739-1525 Email: brucehall@seaonecorp.com	Brian C. Brantley SeaOne Corpus Christi, LLC 333 Clay Street – Suite 4700 Houston, TX 77002 Telephone: (713) 739-3029 Facsimile: (713) 739-1525 Email: brianbrantley@seaonecorp.com	John R. Sharp, Esq. Squire Patton Boggs (US) LLP 1801 California Street, Suite 4900 Denver, CO 80202 Telephone: (303) 894-6183 Facsimile: (303) 894-9239 Email: john.sharp@squirepb.com
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Pursuant to Section 590.103(b) of the DOE regulations,¹ SeaOne hereby certifies that the persons listed above and the undersigned are the duly authorized representatives of SeaOne.

II. DESCRIPTION OF APPLICANT AND CGL

The exact legal name of the applicant is SeaOne Corpus Christi, LLC. SeaOne is a limited liability company formed under the laws of the State of Texas with its principal place of business located at 333 Clay Street, Suite 4700, Houston, Texas 77002. SeaOne is a wholly-owned subsidiary of SeaOne Holdings, LLC ("SOH"). SOH is a limited liability company formed under the laws of the State of Delaware with its principal place of business located at 333 Clay Street, Suite 4890, Houston, Texas 77002.

CGL is a compressed liquid product consisting of a custom manufactured mixture of hydrocarbon chemicals produced from oil and gas wells. While CGL solvated products are typically composed primarily of Natural Gas Liquids and have a much higher BTU content than the fuels we classify as "natural gas," the CGL products may contain various levels of methane and the process may be utilized as a means of transporting methane and methane/ngl mixtures. The CGL products may be used as fuels in generator burners configured to burn propane LPG or other high-Btu fuels that have traditionally not been subject to export controls. CGL may also provide feedstocks for the production of petrochemicals, fertilizers, vehicle or marine vessel fuels or a broad range of other products. This application is filed to cover the export of natural gas (methane serving as a proxy for "natural gas") contained in or mixed with CGL.

¹ SeaOne Corpus Christi, LLC requests waiver of Section 590.202(a) of DOE's regulations, 10 C.F.R. § 590.202(a), to the extent necessary to include outside counsel on the official service list in this proceeding.

III.
AUTHORIZATION REQUESTED

By the instant application, SeaOne requests long-term, multi-contract authorization to engage in exports of up to 548 Bcf/yr (1.5 Bcf/d) of natural gas contained in or mixed with CGL from the Port of Corpus Christi to any nation located in or adjoining the Caribbean Basin and the Gulf of Mexico with which the United States currently has, or may enter into, a Free Trade Agreement requiring national treatment for trade in natural gas, effective for a thirty (30) year term beginning on the date of the first export under the authorization. Prior to any export of CGL SeaOne will file the long-term export contracts for such products that are the subject of the authorization requested herein following execution of such agreements, which has yet to occur.²

SeaOne initially intends to export CGL from its proposed Texas Compressed Gas Liquid Production and Export Facility (the “Texas Facility”) that is anticipated to be located in the existing Port of Corpus Christi, Texas. SeaOne is expected to develop, site, own, and operate the Texas Facility and has entered into land lease negotiations with the Port of Corpus Christi, as well as private landowners within the Port. Negotiations will be finalized upon approval of this application. This requested authorization applies to CGL that may be exported from the Texas Facility. The equipment used for SeaOne’s CGL manufacturing process is modular and portable, and may be utilized at other sites. SeaOne may amend or supplement this application to include other locations as necessary.

SeaOne requests these authorizations both on its own behalf and as agent for other

² The terms of the individual contracts, including, but not limited to, commencement and termination dates, pricing, volumes and export destinations, will vary and be determined by market conditions.

parties who hold title to the commodities contained in CGL at the time of export.

SeaOne's negotiations with prospective customers are of a continuing nature. Therefore, SeaOne requests that export authority be granted on a long-term basis at all points of import to the FTA Countries located in or adjoining the Caribbean Basin and the Gulf of Mexico in order to provide SeaOne with the flexibility necessary to respond quickly to these marketing opportunities. As indicated in the cover letter accompanying this application and as discussed below, SeaOne Corpus Christi's initial deliveries of CGL are expected to be to Colombia, a country with which the United States has a free trade agreement. Because CGL is manufactured to customer specifications, SeaOne cannot be competitive if it must apply for export authorization for each transaction. The subject application is similar to other long-term export arrangements approved by DOE/FE.

IV. PUBLIC INTEREST

Section 3(c) of the NGA, as amended by the Energy Policy Act of 1992,³ provides that the importation and exportation of natural gas from or to a nation with which there is in effect a free trade agreement shall be deemed to be within the public interest and that applications for such importation and exportation shall be granted without modification or delay. Because SeaOne's application is for authorization to export CGL to FTA countries located in or adjoining the Caribbean Basin and the Gulf of Mexico, SeaOne submits that its application is within the public interest.

V. ENVIRONMENTAL IMPACT

In January 2004, the Port of Corpus Christi Authority developed and implemented

³ Pub. L. 102-486.

an extensive and effective continuing environmental review process, the Environmental Management System, which addresses the impacts and effects of facilities located within its boundaries. No Federal environmental review is required because the action herein requested is non-discretionary and must be forthcoming without modification or delay. Thus, there will not be a federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.*

VI. **REPORTING REQUIREMENTS**

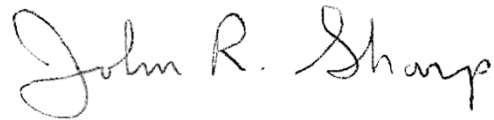
With respect to all exports made pursuant to the authorization requested herein, SeaOne will file with the DOE/FE in the month following the close of each calendar month, reports indicating by month the quantity of natural gas contained in or mixed with CGL. For purposes of reporting the volume of exports of natural gas contained in or mixed with CGL, SeaOne shall report, as a proxy for natural gas, the quantity of methane contained in or mixed with CGL in thousand standard cubic feet (Mcf). In accordance with Section 590.202(b) of DOE's regulations, SeaOne will supply transaction specific factual information "to the extent practicable."

VII. **CONCLUSION**

WHEREFORE, for the foregoing reasons SeaOne respectfully requests that the DOE/FE expeditiously consider the instant application and, pursuant to Section 3 of the NGA and Part 590 of the DOE's regulations, grant its request for long-term export authorizations. SeaOne submits that a grant of such authorizations is consistent with the public interest. Given the length of prior discussions with the DOE and FERC regarding CGL Production and Export

Facilities, SeaOne specifically requests DOE/FE's expeditious action on this application in order to assure that SeaOne is able to take advantage of business opportunities that SeaOne expects to materialize in the immediate future.

Respectfully submitted,

A handwritten signature in black ink that reads "John R. Sharp". The signature is written in a cursive, flowing style.

John R. Sharp
Squire Patton Boggs (US) LLP
Counsel to SeaOne Corpus Christi,
LLC

Dated at Washington, D.C., November 14, 2019

Appendix A
Verification

Appendix A

Verification

STATE OF TEXAS)
)
COUNTY OF HARRIS)

BEFORE ME, the undersigned authority, on this day personally appeared Bruce Hall, who, having been by me first duly sworn, on oath says that he is President and Chief Operating Officer of SeaOne Corpus Christi, LLC; that he is familiar with the contents of the foregoing Application; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

Sworn to and subscribed before me, a Notary Public, this 13 th day of November 2019.



Gretchen Hall
Notary Public

Appendix B

Opinion of Counsel

November 14, 2019

Office of Fuels Program
Fossil Energy, U.S. Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, D.C. 20585

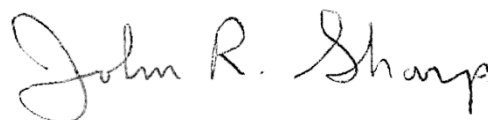
Re: SeaOne Corpus Christi, LLC, Application for Long-term Authorization to Export Natural Gas Contained in or Mixed with Compressed Gas Liquid to Colombia and other FTA countries located in or adjoining the Caribbean Basin and the Gulf of Mexico

Dear Sir:

This opinion of counsel is provided in accordance with the requirements of

Section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202(c). I have examined the Certificate of Incorporation of SeaOne Corpus Christi, LLC and other authorities as necessary, and have concluded that the proposed exportation of compressed gas liquid by SeaOne is within its corporate powers. Further, SeaOne is authorized to do business in Texas and other U.S. states and to engage in foreign commerce.

Respectfully submitted,

A handwritten signature in cursive script that reads "John R. Sharp". The signature is written in black ink and is positioned above the printed name and title.

John R. Sharp
Counsel for SeaOne Corpus Christi, LLC