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UNITED STATES OF AMERICA

DEPARTMENT OF ENERGY

OFFICE OF FOSSIL ENERGY

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VENTURE GLOBAL PLAQUEMINES LNG, LLC) FE DOCKET NO. 16-28-LNG
_____)

APPLICATION TO AMEND EXPORT TERM
FOR EXISTING LONG-TERM AUTHORIZATIONS
THROUGH DECEMBER 31, 2050

August 12, 2020

By Electronic Mail

Mrs. Amy Sweeney
U.S. Department of Energy, Natural Gas Regulation
FE-34 - ROOM 3E-056
1000 Independence Avenue, S.W.
Washington DC 20585
FERGAS@HQ.DOE.GOV

Attention: Venture Global Plaquemines LNG, LLC
FE Docket No. 16-28-LNG
Application to Amend Export Term For Existing Long-Term Authorizations
Through December 31, 2050

Dear Mrs. Sweeney:

Venture Global Plaquemines LNG, LLC (“Plaquemines LNG”) has received two long-term authorizations from the Department of Energy, Office of Fossil Energy (“DOE/FE”) under section 3 of the Natural Gas Act (“NGA”) to export domestically produced liquefied natural gas (“LNG”). In accordance with the procedures set forth in 10 C.F.R. Part 590, Plaquemines LNG hereby submits to DOE/FE this Application to Amend Export Term For Existing Long-Term Authorizations Through December 31, 2050 (“Application”) pursuant to the final policy statement issued on July 29, 2020, entitled “Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050” (“Extension Policy Statement”).

In this Application, Plaquemines LNG requests extension of the existing 20-year term set forth in Order No. 4446 issued in FE Docket No. 16-28-LNG on October 16, 2019, for its long-term, multi-contract authorization to export LNG to Non-Free Trade Agreement (“non-FTA”) nations. Plaquemines LNG also requests a corresponding extension to the existing 25-year term set forth in Order No. 3866 issued in FE Docket No. 16-28-LNG on July 21, 2016, for its long-term, multi-contract authorization to export LNG to Free Trade Agreement (“FTA”) nations. In accordance with the Extension Policy Statement, Plaquemines LNG requests that the terms of each of these export authorizations be extended through December 31, 2050.

In support of this request, and consistent with the form specified in DOE/FE’s application template for term extensions for existing long-term authorizations (last updated July 29, 2020), Plaquemines LNG submits the following information.

Section I:

1. The relevant DOE/FE docket number is 16-28-LNG.

2. The authorization holder is Venture Global Plaquemines LNG, LLC.
3. Plaquemines LNG has authorization to export LNG by vessel from the proposed Venture Global Plaquemines LNG Project (“Plaquemines LNG Project”), a natural gas liquefaction and LNG export terminal located on the west bank of the Mississippi River, near river mile marker 55, in Plaquemines Parish, Louisiana.
4. Information on existing orders:

Order No. (date)	3866 (July 21, 2016)	4446 (Oct. 16, 2019)
Amendment (date)	None	None
FTA/non-FTA	FTA	Non-FTA
Export Volume	1,240 Bcf/yr	1,240 Bcf/yr

The cumulative authorized export volumes across all DOE/FE long-term orders are: 1,240 Bcf/yr (FTA) and 1,240 Bcf/yr (non-FTA).

5. The Federal Energy Regulatory Commission (“FERC”) issued its “Order Granting Authorizations Under Sections 3 and 7 of the Natural Gas Act” for the Plaquemines LNG Project, and the related Gator Express pipeline project, on September 30, 2019. 168 FERC ¶ 61,204 (2019). No requests for rehearing were filed.
6. Plaquemines LNG requests that the term of each of its export authorizations be extended through December 31, 2050.

Section II:

1. DOE/FE should grant Plaquemines LNG’s Application because it is in the public interest. As detailed in the Extension Policy Statement, extending the term of existing natural gas export authorizations is supported by DOE’s 2018 LNG Export Study, which concluded that the United States will experience net economic benefits from LNG exports through the period 2020-2050.¹ As DOE/FE also noted in the Extension Policy Statement, to the extent U.S. exports can diversify global LNG supplies and increase the volumes of LNG

¹ DOE/FE published the 2018 LNG Export Study on its website on June 7, 2018, and concurrently provided notice of the availability of the Study. *See* NERA Economic Consulting, *Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports* (June 7, 2018), *available at* <https://www.energy.gov/sites/prod/files/2018/06/f52/Macroeconomic%20LNG%20Export%20Study%202018.pdf> .

available globally, these exports will improve energy security for many U.S. allies and trading partners.

Plaquemines LNG intends to begin mobilization and early site preparation activities for the Plaquemines LNG Project in the second half of 2020 and anticipates that it will commence operations in 2023. The Plaquemines LNG Project will have an operational life that is expected to extend past 2050. Granting the term extensions sought by Plaquemines LNG in this Application will increase the volume of LNG that the Plaquemines LNG Project is able to export over the life of its authorizations. The requested extensions also will provide greater certainty about the long term regulatory support for LNG exports from the Plaquemines LNG Project and, thereby, assist the project in its commercial efforts to contract capacity on a very long-term basis. Therefore, and for all the reasons detailed in the Extension Policy Statement, the requested term extension is consistent with the public interest and should be granted.

2. In accordance with the National Environmental Policy Act of 1969 (“NEPA”), FERC issued a final environmental impact statement (“EIS”) for the Plaquemines LNG Project on May 3, 2019.² After an independent review, DOE/FE adopted the final EIS on May 17, 2019 (DOE/EIS-0539),³ and the U.S. Environmental Protection Agency published a notice of the adoption on May 24, 2019.⁴ There are no operational or physical changes to the Plaquemines LNG Project associated with the requested extension of the term of its export authorizations and no new construction is proposed. Accordingly, approval of this Application qualifies for a categorical exclusion under NEPA pursuant to the terms of 10 C.F.R. 1021.410, appendix B to subpart D of part 1021, Categorical Exclusion B5.7.

Pursuant to 10 C.F.R. § 590.103(c), Plaquemines LNG represents that, to the best of its knowledge, the same or a related matter is not being considered by any other part of the Department of Energy, including FERC, or any other Federal agency or department. Plaquemines LNG further represents that it is submitting the non-refundable filing fee of fifty dollars (\$ 50) required by 10 C.F.R. § 590.207 electronically and concurrently with this Application.

We hope this Application provides you with sufficient detail to grant the requested export term extensions in compliance with the Extension Policy Statement. Please feel free to contact the undersigned counsel for Plaquemines LNG if you have any questions or require additional information.

² Federal Energy Regulatory Commission, *Final Environmental Impact Statement for the Plaquemines LNG and Gator Express Pipeline Project*, Docket Nos. CP 17-66-000 and CP17-67-000 (May 3, 2019), available at: <https://www.ferc.gov/industries/gas/enviro/eis/2019/05-03-19-FEIS/05-03-19-FEIS.pdf> [hereinafter final EIS].

³ Letter from Amy Sweeney, DOE/FE, to Julie Roemele, U.S. EPA (May 17, 2019). See also Order No. 4446 at 36-41 (adopting the FERC EIS and discussing environmental issues).

⁴ U.S. Environmental Protection Agency, *Environmental Impact Statements; Notice of Availability*, 84 Fed. Reg. 24,134, 24,135 (May 24, 2019).

Sincerely,

/s/ J. Patrick Nevins

J. Patrick Nevins

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Counsel to Venture Global Plaquemines LNG, LLC

Appendix A

Verification

STATE OF VIRGINIA)
)
CITY OF ARLINGTON) SS:

Keith Larson, being first duly sworn on his oath deposes and says: that he is the General Counsel of Venture Global LNG, Inc., and an authorized representative of Venture Global Plaquemines LNG, LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contents thereof; that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief; and that he is authorized to execute and file the same with the U.S. Department of Energy.

Keith Larson

Keith Larson
General Counsel

Sworn to and subscribed before me this 12th day of August, 2020.

Annette B. Thrasher

Notary Public
In and For said City



My Commission Expires:



Appendix B

OPINION OF COUNSEL

Opinion of Counsel

This opinion is submitted pursuant to 10 C.F.R. 590.202(c) of the Department of Energy administrative procedures. The undersigned is General Counsel to Venture Global LNG, Inc. and an authorized representative of Venture Global Plaquemines LNG, LLC.

I have reviewed the organizational documents of Venture Global Plaquemines LNG, LLC, and it is my opinion that the proposed export of natural gas is within the company's limited liability company powers.

Respectfully submitted.



Keith Larson
General Counsel
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Dated: August 12, 2020

Certificate of Service

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Department of Energy, Office of Fossil Energy in this proceeding.

Dated at Washington, D.C. this 12th day of August, 2020.

/s/ Christopher M. Randall

Christopher M. Randall
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