Regulation of LNG Exports

EBA Brown Bag – Introduction

Mustafa Ostrander

September 27, 2011
Welcome from the EBA’s Natural Gas Regulation Committee

Photo courtesy of http://ferc.gov/images/photogallery/Lng_sksummit.jpg
LNG Headlines in 2007

• “Analysts say record levels of LNG imports to US will not balance out lower Canadian gas imports”
  • Energy Trader, April 10, 2007
• “US imports 47% more LNG in Q1”
  • International Gas Report, April 23, 2007
• “EIA head forecasts sharp increase in imports of LNG to US market”
  • Oil Daily, April 30, 2007
• “US LNG imports expected to hit record in May-FERC”
  • Reuters, May 17, 2007
2011 Headlines

• “European buyers likely eager for US LNG exports”
  • SNL FERC Gas Report, March 23, 2011

• “US shale gas shapes up as LNG export rival”
  • Australian, May 23, 2011

• “New names join US LNG export race”
  • Petroleum Intelligence Weekly, Aug. 29, 2011

• “Japan to Boost LNG Imports From U.S. as Nuclear Power Declines”
  • San Francisco Chronicle, Sept. 13, 2011
Today’s Panelists & Agenda

- Greg Leonard, Vice President, Cornerstone Research
  - Analysis of domestic and international natural gas markets
  - Key market factors contributing to increased US LNG exports

- Edward Myers, Office of General Counsel, Dep’t of Energy
  - DOE authority over LNG imports/exports
  - Procedures for evaluating LNG export applications

- Richard W. Foley, Office of Energy Projects, FERC
  - FERC’s jurisdiction over LNG facilities and service
  - Procedures and milestones for LNG export applications

- Mustafa Ostrander, Hogan Lovells US LLP
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LNG Market Dynamics

Greg Leonard

September 27, 2011
Projected U.S. Net Imports of LNG
2005–2030

Net Imports (trillion cubic feet)

Source: U.S. Energy Information Administration Annual Energy Outlook
Projected U.S. Net Imports of LNG
2005–2030

Source: U.S. Energy Information Administration Annual Energy Outlook
U.S. Natural Gas Production by Source
1990–2035

Source: U.S. Energy Information Administration Annual Energy Outlook
U.S. Shale Gas and Shale Oil Plays
May 2011

Source: Energy Information Administration based on data from various published studies.
Updated: May 9, 2011
U.S. Proved Natural Gas Reserves
1980 – 2010

Source: BP Statistical Review of World Energy
Comparison of Natural Gas and Crude Oil Prices
1997 – 2007

$/MMBtu
0 2 4 6 8 10 12 14 16 18

U.S. - Henry Hub, Japan LNG cif, Average German Import Price cif, Canada (Alberta), Crude Oil - OECD Countries cif

Source: BP Statistical Review of World Energy 2011
Note:
cif = cost+insurance+freight (average prices)
Comparison of Natural Gas and Crude Oil Prices
1997 – 2010

$/MMBtu

Source: BP Statistical Review of World Energy 2011

Note:
cif = cost+insurance+freight (average prices)
U.S. LNG Exports: Basic Facts

- World LNG prices are commonly indexed at 11% to 15% of crude oil prices.

- With oil at $90 - $150 / bbl, indexed LNG prices are $10 - $25 / MMBtu.

- With Henry Hub prices at $4 to $6, the delivered cost of gas is $8 to $13 / MMBtu.

Cheniere Estimated Delivery Costs from Sabine Pass, LA

<table>
<thead>
<tr>
<th>($/MMBtu)</th>
<th>Europe Low</th>
<th>Europe High</th>
<th>Asia Low</th>
<th>Asia High</th>
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<tbody>
<tr>
<td>Henry Hub</td>
<td>$ 4.00</td>
<td>$ 6.50</td>
<td>$ 4.00</td>
<td>$ 6.50</td>
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<tr>
<td>Capacity Charge</td>
<td>$ 2.00</td>
<td>$ 3.00</td>
<td>$ 2.00</td>
<td>$ 3.00</td>
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<tr>
<td>Shipping</td>
<td>$ 1.00</td>
<td>$ 1.00</td>
<td>$ 2.80</td>
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<tr>
<td>Fuel/Basis</td>
<td>$ 0.60</td>
<td>$ 0.98</td>
<td>$ 0.60</td>
<td>$ 0.98</td>
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<tr>
<td>Delivered Cost</td>
<td>$ 7.60</td>
<td>$ 11.48</td>
<td>$ 9.40</td>
<td>$ 13.28</td>
</tr>
</tbody>
</table>

Source: Cheniere Energy, Inc. Corporate Presentation, August 2011
Major Trade Movements
Trade Flows Worldwide (*billion cubic meters*)
2005

Source: BP Statistical Review of World Energy
Major Trade Movements
Trade Flows Worldwide (billion cubic meters)
2010
Comparison of LNG Imports and Exports
2007 – 2010

Billion cubic meters

Imports

Exports

- North America
- South and Central America
- Europe and Eurasia
- Middle East
- Africa
- Asia Pacific

Source: BP Statistical Review of World Energy 2011
Natural Gas Import/Export Regulations

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September 27, 2011
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DOE’s Statutory Authority

- DOE/FE’s authority to regulate the imports and exports of natural gas arises under
  - section 3 of the Natural Gas Act, 15 USC 717b and
  - section 301(b) of the DOE Organization Act, 42 USC 7151
  - That authority was delegated to the Assistant Secretary for Fossil Energy in Redelegation Order No. 00-002.04E issued on April 29, 2011.

- The Secretary’s authority was established by the DOE Organization Act which transferred jurisdiction over imports and export authorizations from the Federal Power Commission.
Section 3(a) of the Natural Gas Act

- Section 3(a) of the Natural Gas Act, 15 USC 717b(a), sets forth the statutory criteria for review of an LNG export application.
  - No person shall export any natural gas from the United States to a foreign country or import any natural gas from a foreign country without first having secured an order of the [Secretary of Energy] authorizing it to do so. The [Secretary] shall issue such order upon application, unless after opportunity for hearing, [he] finds that the proposed exportation or importation will not be consistent with the public interest. The [Secretary] may by [the Secretary’s] order grant such application, in whole or part, with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.

- Standard of Review: Section 3(a) creates a rebuttable presumption that a proposed export of natural gas is in the public interest, and DOE must grant such an application unless those who oppose the application overcome that presumption.
Deemed Public Interest Applications

1992 EPAct created Section 3(c) of the Natural Gas Act

- Section 3(c) requires the following applications to be deemed consistent with the public interest and granted without modification or delay:
  - (Free Trade Countries) Applications to authorize the import and export of natural gas, including LNG, from and to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, and
  - (LNG Imports) Applications to authorize the import of LNG from other international sources
Free Trade Agreement Countries

- Free trade agreements that require national treatment for trade in natural gas with 15 countries:
  - Australia, Bahrain, Canada, Chile, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Peru, and Singapore

- Free trade agreements that do not require national treatment for trade in natural gas with two countries:
  - Costa Rica and Israel

- The United States has signed, but not ratified, free trade agreements with three countries, but Congress must enact legislation to approve and implement each agreement with:
  - Colombia, Korea, and Panama
Summary of Standard of Review

➢ Standard of Review

- Free Trade Agreement Countries and LNG Imports
  - By law, deemed to be consistent with the public interest
  - Authorization must be granted without modification or delay

- Exports to non-Free Trade Agreement Countries
  - Authorization must be granted unless after opportunity for hearing, proposed export found to not be consistent with the public interest
  - Authorization may be issued with terms and conditions as the Secretary may find necessary or appropriate
Range of Criteria for Evaluating the Public Interest

- Domestic need for the natural gas proposed for export
- Adequacy of domestic natural gas supply
- U.S. energy security
- Impact on U.S. GDP; consumers; and industry, including impact on domestic natural gas prices
- Jobs creation
- U.S. balance of trade
- International (geopolitical) considerations
- Environmental considerations
- Consistency with Departmental policy of promoting competition in the marketplace through free negotiation of trade arrangements
- Other issues raised by commenters and/or interveners deemed relevant to the proceeding

Criteria are non-Statutory

- Determined by DOE utilizing precedent of prior decisions and reasoned decision-making
- Publicly transparent – described in DOE Federal Register Notice of application
Key Information Evaluated by DOE

- Application
  - Report on natural gas resources and producing capacity
  - Report on domestic hydrocarbon liquids production from gas shales and other unconventional resources
  - Natural gas market analysis
- All public comments, protests, and interventions
- Applicant responses to protests and interventions

In reaching a decision, DOE will base its decision on evidence of record and arguments of the participants.
Sabine Pass pointed to a number of economic and public benefits likely to follow on a grant of the requested authorization, including:

- Direct creation or continuation of approximately 3,000 engineering and construction jobs during the design and construction of the Liquefaction Project.

- Indirect creation of 30,000-50,000 permanent jobs in the E&P sector.

- Improving U.S. balance of payments through the exportation of approximately 2 Bcf/d of natural gas valued by the applicant at approximately $5 billion and the displacement of $1.7 billion in natural gas liquids imports.

- Creation of approximately 150 to 250 full-time positions that will be required to maintain and operate the Liquefaction Project.
Studies introduced by applicant indicated LNG exports will result in a modest projected increase in domestic market price for natural gas, which reflects the increasing marginal costs of domestic production.

The public record supported the conclusion that the requested authorization will yield tangible benefits to the public whereas the allegations of negative impacts submitted by interveners opposing the application were not substantiated on the record. In particular, the interveners failed to offer any rebuttal studies of natural gas supply, demand and/or price analysis to support their claim the application was not consistent with the public interest.

Following a review of the record in this proceeding, DOE concluded that the opponents of the application had not demonstrated that a grant of the requested authorization would be inconsistent with the public interest, and DOE granted the requested authorization subject to terms and conditions.
## Applications to Export Domestically Produced LNG

<table>
<thead>
<tr>
<th>Company</th>
<th>Quantity</th>
<th>FTA</th>
<th>Non-FTA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sabine Pass Liquefaction LLC</td>
<td>2.2 Bcf/d (a)</td>
<td>Approved (30 years – begin NLT 10 years from 1st export)</td>
<td>Approved (20 years – begin NLT 5 years from 1st export)</td>
</tr>
<tr>
<td>Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC</td>
<td>1.4 Bcf/d (a)</td>
<td>Approved (25 years – NLT 5yrs from 1st export)</td>
<td>Under DOE Review (25 years – begin NLT 5 years from 1st export)</td>
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<tr>
<td>Lake Charles Exports LLC</td>
<td>2.0 Bcf/d (a)</td>
<td>Approved (25 years – NLT 10 years from 1st export)</td>
<td>Under DOE Review (25 years – NLT 10 years from 1st export)</td>
</tr>
<tr>
<td>Carib Energy (USA) LLC</td>
<td>11.53 Bcf/year</td>
<td>Approved (25 years – NLT 5 years from 1st export)</td>
<td>n/a</td>
</tr>
<tr>
<td>Dominion Cove Point LNG, LP</td>
<td>1.0 Bcf/d</td>
<td>In Process</td>
<td></td>
</tr>
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</table>

(a) Requested approval of this quantity for both FTA and non-FTA exports. Total facility is limited to this quantity.

- Also, Canada’s National Energy Board has two applications before it to export LNG from British Columbia
  - KM LNG Operating General Partnership (Kitimat LNG) – 0.725 Bcf/d
  - BC LNG Export Co-operative LLC – 0.125 Bcf/d
Questions?

Please view DOE/FE Order No. 2961, in FE Docket 10-111-LNG, issued May 20, 2011, to Sabine Pass Liquefaction, LLC, on the Natural Gas Regulation website at:

www.fossil.energy.gov
EBA Brown Bag
"Regulation of LNG Exports"
Sponsored by the Energy Bar Association
Natural Gas Regulation Committee
September 27, 2011
Washington, D.C.

Richard Foley
Federal Energy Regulatory Commission Staff
LNG Import/Export Terminals
FERC’s LNG / Pipeline Siting Authority

- Section 3 of the Natural Gas Act
  - Determination of consistency with the public interest

- Section 7 of the Natural Gas Act
  - Determination of public convenience and necessity

- Energy Policy Act of 2005
  - Assigns FERC exclusive siting authority—does not preempt other required federal authorizations
  - Mandates use of Pre-Filing Process for LNG terminals
  - Names FERC lead agency for NEPA review and coordinator of all federal authorizations
Multi-Agency Jurisdiction

FERC – Section 3 of the Natural Gas Act

FERC – Lead Agency for Environmental Impact Statement


USCG – 33 CFR Part 105 Facility Security

* The Pipeline could be non-jurisdictional to FERC
Pipeline Siting and Review Process

- FERC Regulations & Certificate Policy Statement
  - Avoid or Minimization of Effects
  - Application/Review Process
  - Agency Coordination
* Pipeline Certificate Process

Non-Environmental Review and Analysis
- Engineering – GQI, storage, hydraulic flow
- Tariff – rates, terms & conditions of service
- Policy – precedents, rules, regulations
- Accounting

Preparation of EA or EIS
- Water Resources
- Ecology – fish, wildlife, vegetation
- Cultural Resources – historic preservation
- Land use – recreation, aesthetics
- Soils and geology
- Air and noise
- Socioeconomic Impacts
- Alternatives
LNG Program

- Review, oversight, and inspection through project life-cycle.

- Goal = continued safe operation and system reliability.

- LNG Engineering Branch - *Pre*-Authorization Review

- LNG Compliance Branch - *Post*-Authorization Review
Pre-Authorization Review

• Detailed engineering design review of proposed facilities.

• Analysis of LNG hazards.

• Coordination with the U.S. Department of Transportation and the U.S. Coast Guard.
Phases of Project Review

- Project Preparation
  - The applicant working on its own
- Pre-Filing
  - FERC staff working with the applicant and stakeholders before the filing of an application
- Application Review
  - FERC staff working with the applicant and stakeholders after the filing of an application
- Post-Authorization
  - FERC staff working with the applicant and stakeholders to ensure compliance with conditions to the FERC approval
Project Review Process

1. Start of Pre-Filing Process
2. Scoping Meeting / Site Visit
3. Data Requests, Analysis & Agency Coordination
4. Notice of Application
5. Interventions & Protests
6. Issue DEIS
7. Public Meeting / Comments
8. Issue FEIS
9. Authorization / Denial

Safety & Engineering

- Cryogenic Design & Safety Review
- Waterway Suitability Assessment Review
- USCG Letter of Recommendation
Pre-filing Highlights 18 CFR 157.21

- Required for all LNG import terminals and associated pipelines
  - Voluntary for other regulated projects

- Begin process at least 6 months prior to filing an application

- Request an initial consultation with FERC to clarify project-specific needs – lesser LNG facility modifications may not require pre-filing.
Engineering Review

Onshore Facility Review
• LNG Hazards & Safety – Resource Report 11
• Coordination with U.S. DOT

Marine Safety Review
• Cargo Spill Hazard Analysis
• Coordination with U.S. Coast Guard
LNG Hazards

• Thermal Radiation
  – Review of Applicant’s Part 193 Exclusion Zone Analysis (Sec. 193.2057)
  – Radiant Heat Modeling with LNGFIREIII and FDS
  – ABS Model / Sandia National Laboratories 2008 Report

• Flammable Vapor Dispersion
  – Review of Applicant’s Part 193 Exclusion Zone Analysis (Sec. 193.2059)
  – Dispersion Modeling with DEGADIS, FDS
  – ABS Model / Sandia National Laboratories 2008 Report

• Vapor Cloud Explosion
  – Semi-Confined “Hot” Gas Overpressure Calculations
Cryogenic Design Review

- Marine Facilities
- LNG Pumps
- LNG Vaporizers
- Compressors & Blowers
- Process Vessels
- Process Piping Systems
- Instrument Pneumatic System
- Instrumentation & Controls
- Fuel Gas System
- Storage Tanks
- Electrical Systems
- Seismic Design Review
- Operational Reliability
- Training, Operation & Emergency Procedures
- 49 CFR 193 & NFPA 59A
Marine Traffic and Vessel Safety

- Letter of Intent Process Under 33 CFR 127
- NVIC 05-08: Guidance Related to Waterfront LNG Facilities
- Marine Safety Analysis – Thermal Radiation and Flammable Vapor Hazards
- U.S. Coast Guard Letter of Recommendation
Federal Agency Permit Scheduling and Consolidated Record Process

- Section 313 of EPAct & FERC Order No. 687
- Objectives
  - Coordinate Federal authorizations
  - Reduce redundancy of sequential processes
  - Expedite processing of all natural gas project permits and authorizations
- Other Federal Agencies
  - Contribute to FERC’s consolidated record
  - Comply with the schedule established
  - Provide a final decision within 90 days of FERC’s final environmental document - Unless other statutory timeframes exist
Post-Authorization Review

• Final facility design and engineering review.

• Inspection and oversight of LNG facility construction.

• Annual/biennial inspection of facility operations.
Construction Review Process

Owner’s Activities

- Satisfy Conditions
  - 1 - 12 months

- Construct Terminal
  - 36 - 48 months

- Cool-down & Start-up
  - 2 - 6 months

Issue Order

Approve Site Preparation

Approve Initial ERP and Cost-sharing

Review & Approve Final Design (multiple)

Authorize Cool-down Cargoes

Authorize Commencement of Service

Verify Final ERP and Cost-sharing

FERC Activities
Operational Review Process

• **Reporting Requirements**
  – Immediate Notification For Unusual/Significant Events
  – Semi-Annual Operational Reports.

• **Periodic Staff Technical Reviews & Site Inspections**
  – Import / Export = Annual Inspection
  – Peakshaver = Biennial Inspection

• **Enforcement**
  – Civil Penalties
  – Order requires facility to submit to all steps deemed necessary by the Commission to ensure the protection of life, health, property, and the environment during construction and operation of the project (including facility modification or cessation of operations).
Phased Authorizations

- **Commission Order:**
  - Initial Commission authorization
  - Contains environmental/engineering conditions considered necessary to ensure acceptable project
  - Based on Front End Engineering Design supplied by applicant

- **Authorization to Construct:**
  - Required prior to any site construction
  - Includes FERC approval of environmental conditions, Emergency Response Plan and Cost Sharing Plan, and engineering conditions related to public safety
  - Based on continuous staff review during Detailed Engineering Design Phase
Phased Authorizations – con’t

- Authorization to Operate:
  - Final Commission authorization
  - Will not be granted until all conditions of the Order are satisfied
  - Based on staff review and approval of Final Engineering Design
  - Oversight continued throughout operational life of facility
LNG Export Cases at FERC

• Sabine Pass Liquefaction & Export - CP11-72-000
  – Sabine Pass Liquefaction, LLC and Sabine Pass LNG, L.P.’s project will enable the Sabine Pass LNG terminal to liquefy domestic supplies for export. Was PF10-24-000.

• Freeport LNG Liquefaction & Export - PF11-2-000
  – Freeport LNG Development, L.P.; Freeport LNG Expansion, L.P.; and FLNG Liquefaction, LLC’s project modifies the Freeport Terminal to allow it to liquefy domestic supplies for export.

• Sabine Pass LNG Import & re-Export - CP04-47-001 & CP05-396-001

• Freeport LNG Import & re-Export – (combined with boil-off gas docket) CP03-75-003, CP03-75-004, CP05-361-001 & CP05-361-002

• Cameron LNG Import & re-Export - CP10-496-000
Contact

RICHARD FOLEY

Richard.Foley@ferc.gov

202-502-8955
Current and Recent FERC Cases Involving LNG Exports

Sabine Pass Liquefaction & Export - CP11-72-000

Sabine Pass Liquefaction, LLC and Sabine Pass LNG, L.P.’s project will enable the Sabine Pass LNG terminal to liquefy domestic supplies for export. Was PF10-24-000

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<tr>
<td>07/26/2010</td>
<td>20100726-5270</td>
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Availability: Public

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<td>08/04/2010</td>
<td>20100804-3008</td>
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Letter to Cheniere Energy, Inc. informing that FERC believes that beginning the Commission’s review of this proposal prior to the receipt of their application will greatly improve FERC’s ability to identify issues early and address them etc under PF10-24.

Availability: Public

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<td>10/29/2010</td>
<td>20101029-3002</td>
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Notice of intent to prepare an Environmental Assessment for the planned Sabine Pass Liquefaction Project and request for comments on environmental issues re Sabine Pass Liquefaction LLC, and Sabine Pass LNG, LP under PF10-24.

Comments to be received in Washington, DC on or before **November 29, 2010**.

No public scoping meetings.

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<th>CP11-72-000</th>
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<tbody>
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<td>01/28/2011</td>
<td>20110131-5063</td>
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Application of Sabine Pass Liquefaction, LLC and Sabine Pass LNG, L.P. For Authorization Under Section 3 of the Natural Gas Act

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<tr>
<td>02/11/2011</td>
<td>20110211-3000</td>
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Notice of Sabine Pass Liquefaction, LLC’s et al 1/31/11 filing of an application to site, construct, and operate liquefaction and export facilities (Liquefaction Project) at the existing Sabine Pass LNG Terminal etc under CP11-72.

Freeport LNG Liquefaction & Export - PF11-2-000:

Freeport LNG Development, L.P.; Freeport LNG Expansion, L.P.; and FLNG Liquefaction, LLC’s project modifies the Freeport Terminal to allow it to liquefy domestic supplies for export.


Issuance 01/05/2011 PF11-2-000 Letter order approving Freeport LNG Development, L.P.'s et al Pre-Filing Request for the Freeport LNG Liquefaction Project under PF11-2.

Project re-design efforts & re-submitals by project sponsor took extra time before NOI issuance

Issuance 08/18/2011 PF11-2-000 Notice of intent to prepare an environmental assessment for the planned Liquefaction Project, request for comments on environmental issues, and notice of public scoping meeting re Freeport LNG Development, LP et al under PF11-2.

The EA scoping period closed on September 19, 2011.
FERC Public Scoping Meeting
Freeport Liquefaction Project - Lake Jackson, Texas
7:00 PM - Thursday, September 8, 2011

Sabine Pass LNG Import & re-Export - CP04-47-001 & CP05-396-001

Prior to filing this Amendment, on September 26, 2008, Sabine Pass submitted to the Commission a request for a determination by the Director of the Commission's Office of Energy Projects that Sabine Pass's proposal to engage in LNG export services at its Cameron Parish, Louisiana LNG terminal would not be subject to the Commission's otherwise mandatory pre-filing procedures as set forth in Section 157.21 of the Commission's regulations. 18 C.F.R. §157.21(e)(2) (2008). 20080926-5083 – Not Docketed

On October 8, 2008, the Director issued a letter order finding that Sabine Pass's proposal to engage in LNG export services is exempt from the Commission's otherwise mandatory pre-filing procedures. 20081008-3003 - Not Docketed
Sabine Pass LNG, LP submits an application for limited amendment to the authorization granted by the Commission on 12/21/04 to operate its liquefied natural gas LNG terminal facility etc under CP04-47 et al.

Environmental Assessment for Sabine Pass LNG, LP's Sabine Pass LNG Export Project for February 2009 under CP04-47 et al.

Order amending Section 3 Authorizations re Sabine Pass LNG, L.P. under CP04-47 et al.

Freeport LNG Import & re-Export – (combined with boil-off gas docket) CP03-75-003, CP03-75-004, CP05-361-001 & CP05-361-002

For CP03-75-003 Prior to filing this Amendment, on October 14, 2008, and as subsequently supplemented, Freeport LNG submitted to the Commission a request for a determination by the Director of the Commission's Office of Energy Projects that Freeport LNG's proposal to engage in LNG export services would not be subject to the Commission's otherwise mandatory pre-filing procedures as set forth in Section 157.21 of the Commission's regulations. 20081014-5198, 20081016-5041 and 20081106-5088 – Not Docketed

On November 13, 2008, the Director issued a letter order finding that Freeport LNG's proposal to engage in LNG export services is exempt from the Commission's otherwise mandatory pre-filing procedures. 20081113-3000 – Not Docketed

For CP03-75-004 Prior to filing this Amendment, on November 12, 2008, Freeport LNG submitted to the Commission a request for a determination by the Director of the Commission's Office of Energy Projects that Freeport LNG's proposed boil-off gas (BOG) Liquefaction Project would not be subject to the Commission's otherwise mandatory pre-filing procedures as set forth in Section 157.21 of the Commission's regulations. 20081112-5119 – Not Docketed

On December 9, 2008, the Director issued a letter order finding that Freeport LNG's proposed BOG Liquefaction Project is exempt from the Commission's otherwise mandatory pre-filing procedures. 20081209-4002 20081209-3012 and/or 20081209-3004 – Not Docketed
<table>
<thead>
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<td>11/19/2008</td>
<td>CP03-75-003</td>
<td>Application of Freeport LNG Development, LP for Limited Amendment to</td>
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<td>CP05-361-001</td>
<td>authorization re EXPORT granted by the Commission on 6/18/06 under CP03-75 et al.</td>
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<td>Freeport LNG Development, LP’s CD containing an application for a limited</td>
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<td>amendment to the authorization re BOIL-OFF granted on 6/18/06 under CP03-75 et al.</td>
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<td>Environmental Assessment re Freeport LNG Export Project and Bog/Truck</td>
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<td>Order amending Section 3 Authorizations to construct and operate a</td>
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<td>liquefied natural gas (LNG) import terminal on Quintana Island et al</td>
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Cameron LNG Import & re-Export - CP10-496-000

On August 10, 2010, Cameron LNG filed a request for a determination by the Director of the Commission’s Office of Energy Projects that Cameron LNG’s proposal to engage in export activities at the Terminal would not be subject to the pre-filing procedures set forth in Section 157.21 of the Commission’s regulations. Cameron LNG supplemented that request on August 20, 2010. 20100810-5121 & 20100820-5093 – Not Docketed

The Director issued a letter order on August 30, 2010, which finds that Cameron LNG’s export proposal is exempt from the pre-filing procedures. 20100830-3004 – Not Docketed

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<td>09/03/2010</td>
<td>CP10-496-000</td>
<td>Cameron LNG, LLC Application to Amend Section 3 Authorizations under CP10-496</td>
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<td>12/07/2010</td>
<td>CP10-496-000</td>
<td>Environmental Assessment Report re Cameron LNG, LLC’s Section 3(a) Amendment to export LNG under CP10-496</td>
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Order amending section 3 authorizations re Cameron LNG, LLC under CP10-496.

Letter order granting Cameron LNG, LLC's 2/28/11 request to commence liquefied natural gas re-export operations from the LNG import terminal in Cameron Parish, Louisiana under CP10-496.

Dominion Cove Point – No Docket

See request for a determination by the Director of the Commission's Office of Energy Projects that proposal would not be subject to the pre-filing procedures (and supplements). 20110708-5129, 20110722-5178, 20110804-0002 & 20110801-3003

Request for Exemption from Pre-Filing for Re-Export of Dominion Cove Point LNG, LP
Application/Petition/Request / Certificate of Public Convenience and Necessity
Availability: Public

Supplemental Info on Pre-filing Exemption Request of Dominion Cove Point LNG, LP
Applicant Correspondence / Supplemental/Additional Information
Availability: Public

United States Coast Guard submits comments re the proposal to use the existing terminal at Cove Point LNG as a re-export facility.
Other Submittal / Government Agency Submittal Comments/Protest / Comment on Filing
Availability: Public

Letter to Dominion Cove Point LNG re their determination of applicability of the pre-filing process.
FERC Correspondence With Applicant / General Correspondence
Availability: Public