

December 31, 2014

VIA HAND DELIVERY

Mr. John A. Anderson

Office of Fossil Energy

U.S. Department of Energy

Docket Room 3F-056, FE-50

Forrestal Building

1000 Independence Avenue, S.W.

Washington, DC 20585

RE: American LNG Marketing LLC, Docket No. H 209-LNG
Application for Long-Term Authorization to Export Liquefied Natural Gas

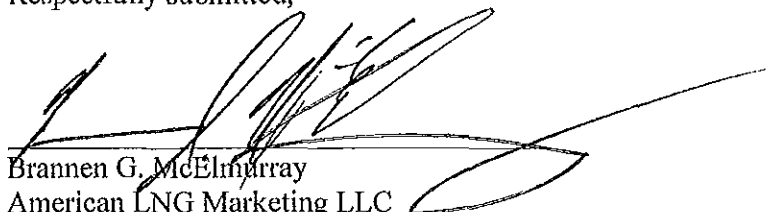
Dear Mr. Anderson:

American LNG Marketing LLC ("American LNG") seeks long-term, multi-contract authorization for itself or as agent for others under Section 3 of the Natural Gas Act to export up to 3.02 Bcf of natural gas per year (equivalent to approximately 60,000 metric tons of liquefied natural gas ("LNG") per year) from domestic resources for a term of 20 years beginning on the earlier of the date of first export or seven years from the date the requested authorization is granted. American LNG is seeking authority to export LNG (1) to any country with which the United States has, or in the future may enter into, a free trade agreement requiring national treatment for trade in natural gas ("FTA") and (2) to any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas, which currently has or in the future develops the capacity to import LNG and with which trade is not prohibited by United States law or policy.

American LNG's application is subject to a categorical exclusion from an environmental review. As such, American LNG requests that the Office of Fossil Energy promptly issue the requested authorizations pursuant to the revised procedures for processing export applications.

Enclosed is a check in the amount of \$50.00 in payment of the applicable filing fee pursuant to 10 C.F.R. § 590.207. Please contact the undersigned at (212) 515-4644 if you have any questions regarding this filing.

Respectfully submitted,



Brannen G. McElmurray
American LNG Marketing LLC
1345 Avenue of the Americas
New York, New York 10105

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

American LNG Marketing LLC

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Docket No. 14-209-LNG

APPLICATION OF AMERICAN LNG MARKETING LLC FOR
LONG-TERM, MULTI-CONTRACT AUTHORIZATION
TO EXPORT LIQUEFIED NATURAL GAS TO
FREE TRADE AGREEMENT AND
NON-FREE TRADE AGREEMENT NATIONS

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
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American LNG Marketing LLC

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Docket No. 14 - 207 - LNG

APPLICATION OF AMERICAN LNG MARKETING LLC
FOR LONG-TERM, MULTI-CONTRACT AUTHORIZATION
TO EXPORT LIQUEFIED NATURAL GAS TO
FREE TRADE AGREEMENT AND
NON-FREE TRADE AGREEMENT NATIONS

Pursuant to Section 3 of the Natural Gas Act ("NGA"), 15 U.S.C. § 717b, and Part 590 of the regulations of the Department of Energy ("DOE"), 10 C.F.R. § 590, American LNG Marketing LLC ("American LNG") submits this application ("Application") to the DOE Office of Fossil Energy ("DOE/FE") for long-term, multi-contract authorization for American LNG to export up to 3.02 Bcf of natural gas per year (equivalent to approximately 60,000 metric tons of liquefied natural gas ("LNG") per year ("TPA")) produced from domestic sources for a 20-year period, commencing on the date of first export or seven years from the date the requested authorization is granted.

American LNG seeks authorization to export LNG from a proposed natural gas liquefaction project under construction on the northern portion of the Hialeah Railyard in Medley, Florida ("Hialeah Facility") (1) to any country with which the United States has, or in the future may enter into, a free trade agreement ("FTA") requiring national treatment for trade in natural gas and (2) to any country with which the United States does not have an FTA requiring national treatment for trade in natural gas, which currently has or in the future develops the capacity to import LNG and with which trade is not prohibited by United States law or policy.

In support of this application, American LNG respectfully submits the following:

I. DESCRIPTION OF APPLICANT AND EXPORT FACILITY

The exact legal name of the applicant is American LNG Marketing LLC, which is a limited liability company formed under the laws of Delaware with its principal place of business at 1345 Avenue of the Americas, New York, New York, 10105. American LNG is in the business of marketing liquefied natural gas in and outside the United States. American LNG is controlled by Fortress Equity Partners (A) LP, which is a limited partnership formed under the laws of Delaware ("FEP") and sponsored by entities related to Fortress Investment Group LLC ("Fortress"). Fortress (NYSE: "FIG") is a leading, highly diversified global investment management firm with approximately \$66.0 billion of assets under management as of September 30, 2014. Fortress's primary business is to sponsor the formation of, and provide investment management services for, various investment funds and companies, including related managed accounts.

An affiliate of American LNG, LNG Holdings (Florida) LLC ("LNG Holdings"), has secured an approximately 13 acre site ("Site") from Florida East Coast Industries, LLC ("FECI"), which is one of Florida's oldest and largest full-service commercial real estate, transportation and infrastructure companies.¹ LNG Holdings is a limited liability company formed under the laws of Delaware with its principal place of business at 1345 Avenue of the Americas, New York, New York, 10105. LNG Holdings is a special purpose entity whose primary business is to construct, own, and operate the Hialeah Facility. LNG Holdings is controlled by FEP.

The Site is part of an approximately 242 acre parcel located in Medley, Florida referred to as the "Hialeah Rail Yard", which is leased primarily to The Florida East Coast Railway

¹ A Memorandum of Lease demonstrating control over the Site by LNG Holdings is attached as Appendix C.

("FECR"). FECR is a Florida-based freight railroad that operates a 351-mile freight rail system between Jacksonville and Miami with a fleet of over 50 mainline and local service locomotives. Construction of the Hialeah Facility is underway and is expected to be complete in September 2015. The location of the Hialeah Facility is depicted in Appendix D.

Once completed, the Hialeah Facility will have a total production capacity of 100,000 gallons of LNG per day, or 8.26 MMcf of natural gas per day. The Hialeah Facility will have a storage capacity of approximately 270,000 gallons. American LNG will purchase some or all of the output of the Hialeah Facility from LNG Holdings. American LNG intends primarily to sell LNG for use as a transportation fuel by both railroads and motor vehicles in the continental U.S., U.S. territories, and foreign countries in the Caribbean and Central America, and for use in electric generation facilities converted from fuel oil, primarily in the Caribbean and Central America. American LNG has executed a long-term off-take agreement with FECR for a significant percentage of the LNG production capacity of the Hialeah Facility. FECR will use the LNG to fuel a portion of its locomotive fleet as part of a fleet modernization program. The use of LNG to displace diesel fuel use will significantly lower FECR's operating costs, including reduced engine maintenance due to cleaner burning natural gas; significantly reduce FECR's emissions footprint and the associated risk of compliance costs due to future environmental regulation; and make its transportation services more attractive to shippers whose customers value environmentally friendly and energy efficient products. At the Hialeah Facility, LNG typically will be delivered into ISO containers (truck or rail mounted) for both domestic and export customers. ISO containers designated for delivery to export customers will then be loaded onto container ships or roll-on/roll-off ocean-going carriers for export at the nearby Port of Miami or other ports in Florida capable of handling such ISO containers without modification

(including Port Everglades, Port Canaveral, Port of Palm Beach, and Port of Jacksonville). The likely destination of such exports will be nations in the Caribbean and Central America, but American LNG is requesting that its export authorizations not be limited to such nations.

The Hialeah Facility will be connected to the domestic natural gas supply market through an interconnection constructed by Florida Gas Transmission ("FGT") near FGT compressor station number 22. Through FGT's upstream interconnections, American LNG will be able to source gas from a variety of suppliers in the domestic market.

II. COMMUNICATIONS

All communications and correspondence regarding this Application should be directed to the following persons:

Brannen G. McElmurray
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New York, New York 10105

Phone: 212-515-4644
Email: bmcelmurray@fortress.com

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Suite 500 West
Washington, DC 20037
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Email: jdecker@velaw.com

III. AUTHORIZATION REQUESTED

American LNG requests long-term, multi-contract authorization to export up to 3.02 Bcf of natural gas per year (equivalent to approximately 60,000 metric tons of LNG per year) (1) to any country with which the United States has, or in the future may enter into, a FTA requiring national treatment for trade in natural gas and (2) to any country with which the United States does not have a FTA requiring national treatment for trade in natural gas, which currently has or in the future develops the capacity to import LNG and with which trade is not prohibited by United States law or policy. American LNG requests this long-term authorization for a 20-year period commencing on the date of first export or seven years from the date the requested

authorization is granted, whichever is first. The quantities of the FTA authorization and non-FTA authorization will not be additive.

American LNG is requesting this authorization both on its behalf and as agent for other parties who themselves will hold title to the LNG at the time of export pursuant to long-term sale and purchase agreements with American LNG. American LNG will comply with all DOE/FE requirements for exports and agents, including the registration requirements. When acting as agent, American LNG will register with the DOE/FE each LNG title holder for which American LNG seeks to export LNG as agent. American LNG will provide the DOE/FE with registration materials that include an acknowledgement and agreement by the LNG title holder to supply information necessary to permit American LNG to register that person or entity with DOE/FE, including (i) the LNG title holder's agreement to comply with any order issued by DOE/FE pursuant to this Application and all applicable requirements of DOE's regulations at 10 C.F.R. Part 590, including but not limited to destination restrictions; (ii) the exact legal name of the LNG title holder, state/location of incorporation/registration, primary place of doing business, and the LNG title holder's ownership structure, including the ultimate parent entity if the registrant is a subsidiary or affiliate of another entity; (iii) the name, title, mailing address, e-mail address, and telephone number of a corporate officer or employee of the LNG title holder to whom inquiries may be directed; (iv) within 30 days of execution, a copy, filed with DOE/FE of any long-term contracts, not previously filed with DOE/FE, including both a non-redacted copy for filing under seal and either (x) a redacted version of the contract or (y) major provisions of the contract, for public posting.²

² See, e.g., *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331 (Sept. 11, 2013).

American LNG is not submitting long-term supply agreements and long-term export agreements with the instant Application and, therefore, requests that the DOE/FE make a similar finding to that in DOE/FE Order No. 2961 with regard to the transaction-specific information of the type identified in Section 590.202(b) of the DOE regulations.³ At the time of this Application, American LNG has not yet entered into such agreements given that a long-term export authorization is required to finalize arrangements with prospective customers. In accordance with the DOE/FE's state policy in Sabine Pass, DOE/FE Order No. 2961, American LNG will submit transaction-specific information when such contracts are executed.⁴

IV. FEEDSTOCK GAS SOURCES

American LNG seeks authorization to export natural gas available in the United States natural gas supply and transmission system. The sources of natural gas for the Hialeah Facility will include the vast supplies available from various producing regions in the eastern United States, including the Gulf Coast and Marcellus Shale. The Hialeah Facility has the potential to access the entire national gas pipeline grid through its interconnection with FGT.

V. PUBLIC INTEREST

American LNG's authorization as described herein is not inconsistent with the public interest and should be granted by DOE/FE under the individual statutory provisions that apply separately to exporting natural gas to FTA and non-FTA countries.

³ In the May 20, 2011 order granting Sabine Pass Liquefaction, LLC ("Sabine Pass") long-term export authorization to Non-FTA countries, the DOE/FE found that Sabine Pass was not required to submit with its application transaction-specific information pursuant to Section 590.202(b) of the DOE regulations. The DOE/FE found that given the state of development for the proposed Sabine Pass export project, it was appropriate for Sabine Pass to submit such transaction-specific information when the contracts reflecting such information are executed. *See Sabine Pass Liquefaction, LLC, Opinion and Order Conditionally Granting Long-Term Authorization to Export Liquefied Natural Gas from Sabine Pass LNG Termination to Non-Free Trade Agreement Nations*, FE Docket No. 10-111-LNG, DOE/FE Order No. 2961, at 41 (May 20, 2011).

⁴ The DOE/FE has previously held that the commitment to file contracts once they are executed complies with the requirement of 10 C.F.R. § 590.202(b) to supply transaction-specific information "to the extent practicable." *Id.*

A. FTA Countries

NGA Section 3(c), as amended by Section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486), provides that:

[T]he exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and applications for such importation or exportation shall be granted without modification or delay.⁵

Under this statutory presumption, that portion of this Application that seeks to export LNG to nations with which the United States currently has, or in the future may enter into, a FTA requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest and should be granted by DOE/FE without modification or delay. Indeed, DOE/FE promptly grants authorization for export to FTA nations as a matter of statutory requirement.

B. Non-FTA Countries

American LNG's authorization as described herein is not inconsistent with the public interest and should be granted by DOE/FE under the statutory provisions that apply to exporting natural gas to non-FTA countries. Section 3(a) of the NGA sets forth the general standard for review of export applications:

[N]o 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, [the Secretary] 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 in part, with

⁵ 15 U.S.C. § 717b(c) (2009).

such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.⁶

According to the DOE/FE, “[t]his provision creates a rebuttable presumption that a proposed export of natural gas is in the public interest” and “DOE/FE must grant such an application unless opponents of the application overcome that presumption by making an affirmative showing of inconsistency with the public interest.”⁷ To overcome this rebuttable presumption an opponent must affirmatively demonstrate that the proposal is inconsistent with the public interest.⁸

In evaluating the “public interest” the DOE/FE looks to a number of different factors, including “economic impacts, international impacts, security of natural gas supply, and environmental impacts, among others.”⁹ Consistent with its Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas, DOE/FE has stated its intention to “minimize federal control and involvement in energy markets and to promote a balanced and mixed energy resource system”.¹⁰

The market, not government, should determine the price and other contract terms of imported [or exported] gas. . . . The federal government’s primary responsibility in authorizing imports [or exports] should be to evaluate the need for the gas and whether the import [or export] arrangement will provide the gas on a

⁶ 15 U.S.C. § 717b(a) (2006) (emphasis added). This authority has been delegated to the Assistant Secretary for Fossil Energy pursuant to Redesignation Order No. 00-002.04D (Nov. 6, 2007).

⁷ *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 3357-B at 9 (“Order No. 3357-B”); *see also*, *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 3282-C at 9 (“Order No. 3282-C”); *Jordan Cove Energy Project, L.P.*, DOE/FE Order No. 3413 at 6 (“Order No. 3413”); *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, DOE/FE Order No. 3282 at 5-6 (“Order No. 3282”); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 28; *see also Panhandle Producers and Royalty Owners Assoc. v. ERA*, 822 F.2d 1105, 1111 (D.C. Cir. 1987) (“A presumption favoring import authorization, then, is completely consistent with, if not mandated by, the statutory directive.”).

⁸ Order No. 3357-B at 9; *see also Phillips Alaska Natural Gas Corp. and Marathon Oil Co.*, DOE/FE Order No. 1473 (April 2, 1999) (“Section 3 creates a statutory presumption in favor of approval of an export application and the Department must grant the requested export [application] unless it determines the presumption is overcome by evidence in the record of the proceeding that the proposed export will not be consistent with the public interest.”).

⁹ Order No. 3357-B at 9.

¹⁰ *Id.*

competitively priced basis for the duration of the contract while minimizing regulatory impediments to a freely operating market.¹¹

While the Policy Guidelines deal specifically with imports, the DOE/FE has found that the principles are applicable to exports.¹²

DOE/FE has also stated that its

review of export application has continued to focus on: (i) the domestic need for the natural gas proposed to be exported, (ii) whether the proposed exports pose a threat to the security of domestic natural gas supplies, (iii) whether the arrangement is consistent with DOE/FE's policy of promoting market competition, and (iv) any other factors bearing on the public interest¹³

DOE/FE looks to the evidence developed in the record of each application proceeding to make its determination.¹⁴ As demonstrated herein, American LNG's application is not inconsistent with the public interest.

C. Economic Impacts of the Proposed Exports

In Order No. 3282, DOE/FE restated its methodology for evaluating exports of natural gas and set forth a number of factors that it will consider when reviewing applications. The first factor for evaluation when reviewing an export application is economic impact. To study the economic impacts of natural gas exports, DOE/FE commissioned a two-part study of the cumulative impacts of proposed LNG exports ("2012 LNG Export Study").¹⁵ The first part of the study, conducted by the Energy Information Administration ("EIA"), looked at the potential impacts of natural gas exports on energy prices, production, and consumption under several

¹¹ *New Policy Guidelines and Delegations Order Relating to Regulation of Imported Natural Gas*, 49 Fed. Reg. 6684, 6685 (Feb. 22, 1984).

¹² Order No. 3357-B at 10; Order No. 3413 at 8; *Phillips Alaska Natural Gas Corp. and Marathon Oil Co.*, DOE/FE Order No. 1473 at 14; *see also*, Order No. 3282 at 7.

¹³ Order No. 3357-B.

¹⁴ Order No. 3282 at 7.

¹⁵ Although the study was prepared in the context of LNG exports, the compressed natural gas exports proposed by Emera will provide analogous benefits to the U.S. economy.

export scenarios (“2012 EIA Study”). The second part of the study, conducted by NERA Economic Consulting, assessed the macroeconomic impacts of natural gas exports using its proprietary model and the results of the 2012 EIA Study (“NERA Study”). Most importantly, the 2012 LNG Export Study concludes that “the United States will experience net economic benefits from issuance of authorizations to export domestically produced LNG.”¹⁶ The NERA Study found that the U.S. would experience net economic benefits from natural gas exports, with the level of benefits increasing as the quantity of exports increases.¹⁷ While exports would cause some increases in natural gas prices, price increases were limited based on conditions both within the U.S. and in the broader global market.¹⁸ After taking comments on the 2012 LNG Export Study, DOE/FE determined that the study is “fundamentally sound” and supports natural gas exports.¹⁹

DOE/FE recently requested that the EIA analyze the impacts of a higher level of natural gas exports – 12 to 20 Bcf per day – than was analyzed in the 2012 EIA Study. The resulting study, *Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets* (“2014 EIA Study”) further supports American LNG’s application.²⁰ The EIA concludes that “increasing LNG exports leads to higher economic output, as measured by real gross domestic product (GDP), as increased energy production spurs investment.”²¹ Consistent with the 2012 LNG Export Study and the 2014 EIA Study, American LNG’s proposed exports will provide economic benefits to Medley and the broader U.S. economy.

¹⁶ Order No. 3357-B at 94.

¹⁷ Nera Study at 40.

¹⁸ Order No. 3357-B at 41.

¹⁹ *Id.*

²⁰ U.S. Energy Information Administration, *Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets*, October 29, 2014, available at <http://www.eia.gov/analysis/requests/fe/>.

²¹ 2014 EIA Study at 12.

American LNG's proposed export level is *de minimis* compared to the quantities studied in the 2012 LNG Export Study and 2014 EIA Study, but these exports and the Hialeah Facility itself will still have a positive economic impact, consistent with the NERA Study's analysis. The quantity of natural gas to be exported is so minimal — approximately 0.0083 Bcf per day — as to have no practical impact on natural gas prices or supply in the U.S.²² In another proceeding involving small export quantities, DOE/FE concluded that 0.04 Bcf per day of exports, or more than four times that proposed by American LNG, was “unlikely to have a significant impact on domestic natural gas markets or on the domestic economy generally.”²³ American LNG's proposed exports will similarly have no impact on domestic natural gas markets.

American LNG's proposed exports will have a more significant effect on the regional level. DOE/FE has stated that it will consider regional impacts of natural gas exports on a case-by-case basis.²⁴ The operation of the Hialeah Facility will benefit the Medley economy in a number of ways. The Facility will enhance the value of existing pipeline infrastructure and add to the local property tax base with very few operating expenditures required from the city of Medley to support the Facility. In addition, the availability of infrastructure that can provide a reliable source of LNG will benefit high-horse power transportation users such as marine logistics companies, on-road trucking logistics companies, and railroad operators. The availability of a reliable supply of LNG will enable these types of companies to make long-term capital investment in the equipment, personnel, and operational changes that will allow them to take advantage of domestically produced natural gas (in the form of LNG). Conversion to LNG will allow these companies to lower their operating cost, have more environmentally friendly

²² *Id.* at 83 (noting 2012 domestic consumption of natural gas as 25.63 Tcf); *see also*, 2014 EIA Study, which considers exports of 12 to 20 Bcf per day.

²³ *Carib Energy (USA) LLC*, DOE/FE Order No. 3487 at 14 (Sep. 10, 2014) (“Order No. 3487”).

²⁴ Order No 3257 at 77.

operations, and provide a more attractive transportation and logistics service to environmentally conscious customers. These benefits will make area transportation and logistics companies more economically competitive and will also serve to attract other similar companies seeking to locate operations near advantaged infrastructure.

The availability of a reliable supply of LNG to customers outside of the United States who are currently burning diesel or fuel oil for power generation will encourage conversion to LNG capable power generation equipment. Companies in the United States would be well positioned to provide and support LNG capable power generation equipment, thus providing a secondary economic benefit from the exports proposed in this Application. The direct and indirect economic benefits associated with the Hialeah Facility would continue for the life of the operation (expected to be 30 years or longer), bringing stable, long-term economic value to the State of Florida and specifically the city of Medley.

D. International Impacts of the Proposed Exports

The second major factor DOE/FE considers when evaluating an export application is international impacts. The Hialeah Facility will foster good trade relations with and benefit development within the Caribbean, which is consistent with U.S. policy under the Caribbean Basin Initiative, and within Central America. These countries represent too small a market to be attractive to companies seeking to export LNG by tanker. Small-scale LNG exports, however, can be feasible due to the ease of transport using cargo ships and the lower costs of regasification units compared to large import terminals.

Exporting domestic LNG from the United States will also introduce an alternative fuel to the Caribbean and Central America that would support the conversion of existing power generating stations from heavy fuel oil to natural gas. Imports of LNG will have environmental

benefits of reducing air pollutants and greenhouse gases and attracting economic growth to the area. Although American LNG is primarily focused on exports to the Caribbean and Central America, American LNG is not proposing that its export authorization be limited to any specific area. American LNG requests that the DOE/FE authorize exports from the Hialeah Facility to any qualifying nation worldwide.

E. Supply Impacts of the Proposed Exports

The third factor DOE/FE considers in evaluating natural gas export applications is the security of natural gas supply. In non-FTA orders issued to date, DOE/FE has, in our view correctly, concluded that the U.S. has adequate gas supplies to meet the 5.74 Bcf per day of exports authorized in its final orders.²⁵ The quantity of exports proposed by American LNG — 0.0083 Bcf per day — represents only 0.14% of the quantity previously approved for export to non-FTA countries by the DOE/FE. As discussed above, American LNG proposes to export such a small quantity of natural gas as to have no detectable impact on natural gas prices in the U.S. or on the security of domestic supply.

F. Environmental Impacts of the Proposed Exports

The final factor DOE/FE stated it would consider when considering export applications is environmental impacts. American LNG's proposed exports to the Caribbean and Central America will allow energy consumers to switch from using heavy fuel oil and diesel to natural gas. Air emissions from burning natural gas are far less than for oil-fired generation. Based on figures published by the U.S. Environmental Protection Agency, natural-gas fired generation produces one third less carbon dioxide, 99.2 percent less sulfur dioxide, and 58 percent less

²⁵ Order No. 3352-B at 98.

nitrogen oxides per megawatt-hour when used for electric generation.²⁶ Exports of LNG to the Caribbean and Central America will have significant positive environmental effects through the reduction of emissions from displaced fuel oil and diesel. As discussed below, the Hialeah Facility is already under construction, will be constructed regardless of the outcome of this proceeding, and is subject to a categorical exclusion from an environmental assessment. Therefore, the environmental benefits of displacing heavy fuel oil and diesel outweigh the negative impacts of American LNG's proposal, which are zero.

VI. ENVIRONMENTAL IMPACT

The Hialeah Facility is subject to a categorical exclusion from the requirements of the National Environmental Protection Act ("NEPA") pursuant to exclusion B5.7 of DOE/FE's regulations.²⁷ Categorical exclusion B5.7 applies to import/export authorizations that involve minor operational changes but not new construction.²⁸ As discussed below, American LNG has determined that the Hialeah Facility is not subject to the jurisdiction of the Federal Energy Regulatory Commission ("FERC"). Construction of the Hialeah Facility is currently underway, and construction and operation of the Hialeah Facility will occur without regard to DOE/FE's decision on this application because American LNG has an obligation to supply LNG to FERC. American LNG is also actively marketing the Hialeah Facility's capacity to other domestic users based on an expected in-service date of September 2015. Maintaining the expected in-service date is important to enable prospective customers to commit the required capital investment to have LNG-capable equipment and operations given the significant lead times involved currently in the LNG supply chain. Moreover, the Hialeah Facility has secured agreements for the

²⁶ See <http://www.epa.gov/cleanenergy/energy-and-you/affect/natural-gas.html>.

²⁷ 10 C.F.R. Part 1021, Subpart D, Appendix B5.

²⁸ Order No. 3487 at 10.

financing necessary to construct and operate the Hialeah facility, and the financing agreements are not conditioned on DOE/FE's decision on this application. Finally, any exports from the Hialeah Facility will be through ports that do not require modification to accommodate the ISO containers. Therefore, the Hialeah Facility falls within the scope of exclusion B5.7, and no NEPA analysis is necessary.

A. No FERC Jurisdiction

The Hialeah Facility is not subject to FERC's Natural Gas Act jurisdiction. FERC recently issued two orders that narrowly interpret its jurisdiction over LNG import/export facilities and establish that FERC's jurisdiction pursuant to Section 3 would not include the Hialeah Facility. Section 3 gives FERC two types of jurisdiction over facilities: jurisdiction over the construction of new facilities at border crossings and over "LNG terminals". In its recent orders, FERC determined that its Section 3 jurisdiction over border facilities was limited to

(1) pipelines that transport natural gas to or from the United States' international borders; and (2) coastal LNG terminals that are accessible to ocean-going LNG tankers and connected to pipelines that deliver gas to or take gas away from the terminal.²⁹

The Hialeah Facility obviously is not a cross-border pipeline. It also is not a traditional LNG terminal located on the coast that is accessible to ocean-going LNG tankers and connected to take-away or delivery pipelines. The Hialeah Facility is located a significant distance inland and does not have any facilities capable of loading ocean-going LNG tankers. As discussed above, the Hialeah Facility will deliver LNG into ISO containers (truck or rail mounted), which, if destined for a customer outside of the United States and its territories, will be loaded onto container ships or roll-on/roll-off ocean-going carriers for export at the nearby Port of Miami or

²⁹ *Emera CNG, LLC*, 148 FERC ¶ 61,219, at P 13 (2014) ("*Emera*").

other ports in Florida (including Port Everglades, Port Canaveral, Port of Palm Beach, and Port of Jacksonville).

FERC's *Emera* order holds there is no jurisdiction over a facility similar to the Hialeah Facility. In *Emera*, FERC considered a facility to compress natural gas and load it onto trucks that would be driven onto a container ship at a nearby port for export. FERC concludes that it does not have jurisdiction over the facility because it does not meet either prong of the border-facility test.³⁰ FERC also states that it has "never issued authorization under section 3 to designate points of import or export for gas carried by truck, train, or waterborne vessel or authorized the site of, or construction and operation of, any complementary facility, such as a road, bridge, railway, or stand-alone pier, needed to import or export gas by a *non-pipeline mode of transportation*" as jurisdictional.³¹ In the case of the Hialeah Facility, the LNG facility will be located a significant distance from any point of export, and LNG produced by the facility will be carried to such point by truck, train, or waterborne vessel (typically loaded into ISO containers), and never by pipeline. Thus, the port where LNG transported by truck, train, or tanker is loaded onto a ship is not jurisdictional.³²

The Hialeah Facility's operations are nearly identical to those in *Emera* in that it will take natural gas and liquefy it for use as a vehicular fuel or other end uses, or for export via truck or cargo container. The only distinction between the Hialeah Facility and the facility in *Emera* with regard to exports is that the Hialeah Facility will liquefy the gas, rather than compress it. For purposes of FERC's Section 3 jurisdiction over border-crossing facilities, the difference between

³⁰ *Id.*

³¹ *Id.* at note 16 (*emphasis added*).

³² *Id.*; see also, *The Gas Company, LLC*, 142 FERC ¶ 61,036, at P 14 (2013) (finding no jurisdiction over existing port facilities used to unload LNG containers).

LNG and compressed natural gas is not a part of FERC's analysis. Thus, the Hialeah Facility is not within FERC's Section 3 jurisdiction.

The Hialeah Facility is also not an "LNG terminal" that would be subject to FERC jurisdiction.³³ The Hialeah Facility is similar in many ways to other facilities that FERC does not consider to be LNG terminals. In another recent decision, FERC determined that it did not have Section 3 jurisdiction over a facility that would unload Canadian LNG from ocean-going vessels and send it out by truck or rail, finding that such a facility was not an "LNG terminal" as defined in the Natural Gas Act. FERC distinguished that facility from traditional LNG terminals because it was not connected to the pipeline system.³⁴ The effect of the *Emera* and *Shell* decisions is that FERC is interpreting the definition of "LNG terminal" consistent with its jurisdiction over border-crossing facilities. That is, only coastal LNG facilities that service ocean-going LNG tankers and that are also interconnected to pipelines qualify as "LNG terminals" subject to FERC's jurisdiction. While the Hialeah Facility is connected to a natural gas supply pipeline, it is not a coastal facility and does not directly service ocean-going LNG tankers. Therefore, the Hialeah Facility is not an "LNG terminal" subject to FERC's jurisdiction.

Other facilities already in operation liquefy natural gas and export it via truck to Canada and Mexico outside of FERC's jurisdiction. Applied LNG Technologies USA, L.L.C exports LNG from a facility in Arizona to Mexico, and Encana Natural Gas Inc. and Prometheus Energy Group export LNG to Canada by truck. Xpress Natural Gas exports compressed natural gas via

³³ "'LNG terminal' includes natural gas facilities located onshore or in State waters that are used to receive, unload, load, store, transport, gasify, liquefy, or process natural gas that is imported to the United States from a foreign country, exported to a foreign country from the United States, or transported in interstate commerce by waterborne vessel." 15 U.S.C. 717a(11).

³⁴ *Shell US Gas & Power, LLC*, 148 FERC ¶ 61,163 (2014) ("*Shell*").

truck to Canada. None of these four companies has been subjected to FERC jurisdiction thus far all while engaging in acts substantially similar to what American LNG proposes. Consistent with both the *Emera* and *Shell* orders and FERC's failure to assert jurisdiction to other small-scale, truck-and-cargo-based liquefaction facilities, the Hialeah Facility is not subject to FERC jurisdiction under Section 3.

The Hialeah Facility is also not subject to FERC jurisdiction pursuant to Section 7. Section 7 applies to facilities for the transportation of natural gas in interstate commerce. FERC has consistently held that facilities that liquefy natural gas for sale to end users, including as a transportation fuel, are not subject to its jurisdiction under Section 7. The Hialeah Facility is exempt from Section 7 regulation under this reasoning, and many of the sales from the facility will be subject to a statutory exemption from FERC jurisdiction that applies to sales and transportation of natural gas as a vehicular fuel.

The Natural Gas Act includes an exemption for sales of natural gas as vehicular fuel. Sales of natural gas or LNG for use as a vehicular fuel are not subject to regulation, and a facility cannot become a "natural gas facility" subject to FERC's Section 7 jurisdiction (as well as certain other types of FERC regulation) as a result of sales of natural gas for use as a vehicular fuel.³⁵ While selling natural gas as a vehicular fuel does not exempt a facility from FERC jurisdiction if that facility engages in other jurisdictional activities, any vehicular fuel sales, or loading of LNG that will be used as a vehicular fuel, will not lead to FERC regulation. Trucks, rail cars, and ships using LNG as a fuel to power movement of the vessel would all qualify as exempt sales of vehicular fuel.

³⁵ 15 U.S.C. 717a(10).

The liquefaction of gas for sale to end users for use other than as a vehicular fuel can also be exempt from FERC jurisdiction. Where the liquefaction of natural gas “transform[s] it into what is, in effect, an end product” that will not re-enter a pipeline, the liquefaction and the facilities to do it are not subject to FERC’s Section 7 jurisdiction.³⁶ FERC’s concern with such facilities is that they not be used to circumvent its jurisdiction over pipeline transportation of natural gas.³⁷ As long as the facilities do not “facilitate the transportation of the gas [by pipeline]”, FERC’s jurisdiction does not extend to those facilities.³⁸ None of the LNG produced at the Hialeah Facility will re-enter a pipeline. Therefore, the Hialeah Facility is not subject to FERC jurisdiction pursuant to Section 7.

Because the Hialeah Facility is not subject to FERC jurisdiction under Section 3 or Section 7, FERC authorization is not required for the construction, ownership, or operation of the Hialeah Facility.

B. Categorical Exclusion

DOE/FE need not conduct an environmental review of the Hialeah Facility because it is subject to categorical exclusion B5.7 of DOE/FE’s regulations. Exclusion B5.7 applies to import/export authorizations that involve only minor operational changes but not new construction.³⁹ As discussed above, the Hialeah Facility typically will deliver LNG ISO containers (truck or rail mounted). These ISO containers will either be destined to domestic end-users who will use LNG as a vehicular fuel or loaded onto container ships or roll-on/roll-off ocean-going carriers for export. In either case, the operations and infrastructure at the Hialeah

³⁶ *Air Products and Chemicals, Inc.*, 58 FERC ¶ 61,199 (1992) (“*Air Products*”); *see also, Pivotal LNG, Inc.*, 148 FERC ¶ 61,164 at P 18 (2014) (“*Pivotal IP*”); *Pivotal LNG, Inc.*, 137 FERC ¶ 62,108 (2011).

³⁷ *Pivotal II* at 18.

³⁸ *Air Products* at 61,619.

³⁹ 10 C.F.R. Part 1021, Subpart D, Appendix B5.

Facility are identical and require no modification as a result of whether the end user is located in the United States, an FTA country, or a non-FTA country. In addition, the Hialeah Facility is under construction, has executed an agreement with a domestic customer for a material portion of its output, and has secured agreements from financing sources for the funds necessary to construct and operate the Hialeah Facility, which financing agreements are not conditioned on DOE/FE's decision.

Accordingly, DOE/FE should conclude that the exports proposed in this Application are subject to a categorical exclusion and an analysis pursuant to NEPA is not required. In Order No. 3487, DOE/FE determined that Carib's application qualified for a categorical exclusion because its LNG would be sourced from a facility to be constructed by Floridian Natural Gas Storage Company, LLC ("Floridian Facility"),⁴⁰ and such facility would require no modifications to enable Carib's exports.⁴¹ Accordingly, DOE/FE should conclude that the exports proposed in this Application are subject to a categorical exclusion and an analysis pursuant to NEPA is not required. Because no environmental review is required, American LNG's application is ripe for approval pursuant to DOE/FE's "Procedures for Liquefied Natural Gas Export Decisions."⁴²

VII. APPENDICES

The below listed Appendices are included with this application:

Appendix A Verification

Appendix B Opinion of Counsel

Appendix C Memorandum of Lease

⁴⁰ Order No. 3487 at 9-10. The Floridian Facility, though not constructed, has received FERC authorization as a Section 7 storage facility but such FERC authorization was not the basis for the request and subsequent approval of the categorical exclusion. The categorical exclusion was granted on the basis that the export activities authorized by DOE/FE would require only minor operational changes but not new construction relative to the planned operations and construction if no such DOE/FE authorization were granted.

⁴¹ *Id.*

⁴² 79 Fed. Reg. 48,132 (Aug. 15, 2014).

Appendix D Location of Hialeah Facility

VIII. CONCLUSION

WHEREFORE, for the reasons set forth above, American LNG respectfully requests that the DOE/FE issue an order granting American LNG long-term authorization to export up to 3.02 Bcf of natural gas per year (equivalent to approximately 60,000 metric tons of LNG per year) for a term of 20 years (1) to any country with which the United States currently has, or in the future may enter into, a FTA requiring national treatment for trade in natural gas and (2) to any country with which the United States does not have a FTA requiring national treatment for trade in natural gas, which currently has or in the future develops the capacity to import LNG and with which trade is not prohibited by United States law or policy. American LNG further requests that DOE/FE issue such an order promptly because no environmental review of this application is required.

As demonstrated herein, the authorization requested is not inconsistent with the public interest and, accordingly, should be granted pursuant to Section 3 of the NGA.

Respectfully submitted,



Brannen G. McElmurray
American LNG Marketing LLC

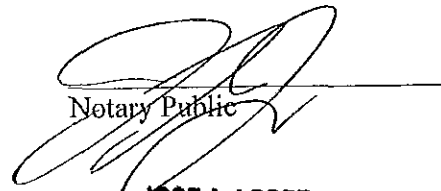
APPENDIX A
VERIFICATION

County of New York)
)
State of New York)

BEFORE ME, the undersigned authority, Brannen G. McElmurray, on this day personally appeared, who, having been by me first duly sworn, on oath says that he is duly authorized to make this Verification on behalf of American LNG Marketing LLC; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.



SWORN TO AND SUBSCRIBED before me on the 31 day of December, 2014.



Notary Public

JOSE A. LOPEZ, JR.
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01L06088680
Qualified in Nassau County
Certificate Filed in New York County
Commission Expires Jan. 14, 20__

May 17 2018

**APPENDIX B
OPINION OF COUNSEL**

December 31, 2014

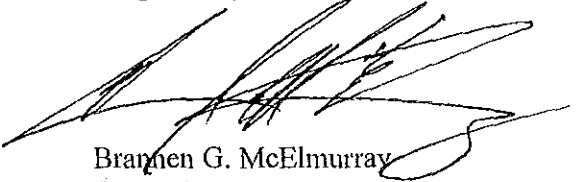
Mr. John A. Anderson
Office of Fossil Energy
U.S. Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: American LNG Marketing LLC
Application for Long-Term Authorization to Export Liquefied Natural Gas

Dear Mr. Anderson:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the U.S. Department of Energy, 10 C.F.R. § 590.202(c) (2014). The undersigned is counsel to American LNG Marketing LLC. I have reviewed the corporate documents of American LNG Marketing LLC and it is my opinion that the proposed export of natural gas as described in the application filed by American LNG Marketing LLC to which this Opinion of Counsel is attached as Appendix B, is within the limited liability company powers of American LNG Marketing LLC.

Respectfully submitted,



Branhen G. McElmurray
Counsel

APPENDIX C
MEMORANDUM OF LEASE

PREPARED BY, RECORD, AND RETURN TO:
Kolleen Cobb, Esq.
Flagler
2855 S. LeJeune Road, 4th Floor
Coral Gables, Florida 33143

MEMORANDUM OF LEASE

THIS MEMORANDUM OF LEASE (the "Memorandum") is made and entered into as of the 20th day of November, 2014, by and between FDG LR 7 LLC, a Delaware limited liability company, its successors and/or assigns ("Landlord"), an address of which is 2855 Le Jeune Road, 4th Floor, Coral Gables, Florida 33134, and LNG Holdings (Florida) LLC, a Delaware limited liability company, its successors and/or assigns ("Tenant"), an address of which is 1345 Avenue of the Americas, New York, New York 10105.

WITNESSETH:

1. Landlord is the fee simple owner of that certain real property described in Exhibit "A," attached to and made a part of this Memorandum (the "Land").

2. Landlord and Tenant have entered into a Ground Lease Agreement dated as of November 20th 2014 (the "Lease") whereby Landlord (i) leased to Tenant, and Tenant leased from Landlord, the Land, together with improvements located thereon and all rights, privileges and appurtenances thereto (the "Leased Premises") and (ii) granted to Tenant the option (the "Purchase Option") to purchase the Land, any of Landlord's improvements located thereon pursuant to the terms of the Lease.

3. The term of the Lease will commence as set forth in the Lease and will be for five (5) years following the Commencement Date (as defined in the Lease), unless earlier terminated in accordance with the terms of the Lease. The Lease also contain options for Tenant to extend the term for five (5) additional periods of five (5) years each, subject to the terms and conditions set forth in the Lease.

4. The Lease contains substantially the following language:

"Tenant will have no authority or power, express or implied, to create or allow any construction lien or mechanics' or materialmen's lien or claim of any kind against the Leased Premises or any portion thereof. Tenant will promptly cause any such liens or claims to be released by payment, bonding or otherwise within thirty (30) days after request by Landlord, and will indemnify Landlord against losses arising out of any such claim including, without limitation, legal fees and court costs. NOTICE IS HEREBY GIVEN THAT LANDLORD WILL NOT BE

LIABLE FOR ANY LABOR, SERVICES OR MATERIAL FURNISHED OR TO BE FURNISHED TO TENANT, OR TO ANYONE HOLDING THE LEASED PREMISES THROUGH OR UNDER TENANT, AND THAT NO MECHANICS' OR OTHER LIENS FOR ANY SUCH LABOR, SERVICES OR MATERIALS WILL ATTACH TO OR AFFECT THE INTEREST OF LANDLORD IN THE LEASED PREMISES. TENANT WILL DISCLOSE THE FOREGOING PROVISIONS TO ANY CONTRACTOR ENGAGED BY TENANT PROVIDING LABOR, SERVICES OR MATERIAL TO THE LEASED PREMISES."

5. Upon the expiration or sooner termination of the Lease in whole or in part, the parties shall execute, in recordable form, an instrument confirming that the Lease has been terminated in whole or in part (and that this Memorandum is likewise terminated).

6. This Memorandum does not set forth the entire Lease, and is solely intended to give notice thereof. If any conflict exists between the provisions of this Memorandum and the provisions of the Lease, the provisions of the Lease shall control.

IN WITNESS WHEREOF, Landlord and Tenant have executed this Memorandum as of the date first above written.

WITNESSES:

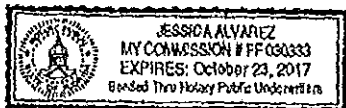
LANDLORD:

[Signature]
Name: Charles Cobb
[Signature]
Name: Jessica Alvarez

FDG LR 7 LLC, a Delaware limited liability company
By: [Signature]
Kolleen Cobb, Vice President

STATE OF FLORIDA)
)ss:
COUNTY OF MIAMI-DADE)

The foregoing instrument was acknowledged before me this 20th day of November, 2014, by Kolleen Cobb, as Vice President, of FDG LR 7 LLC, a Delaware limited liability company, on behalf of such limited liability company. He/She is personally known to me or produced as identification.



[Signature]
Notary Public State of Florida
Print Name: _____

My commission expires: _____

[signatures and acknowledgements continue on next page]

TENANT:

LNG Holdings (Florida) LLC, a Delaware limited liability company

MARILYN MATABEAR
Name: M. Matabear

[Signature]
Name: Michael T...

By: [Signature]
Name: John Morrissey CFO
Title: _____

STATE OF New York)
COUNTY OF New York)SS:

The foregoing instrument was acknowledged before me this this 21st day of November, 2014, by John Morrissey, as CFO of LNG Holdings (Florida) LLC, a Delaware limited liability company, on behalf of such limited liability company. He/She is personally known to me or ~~produced~~ as identification.

Notary Public State of New York
Print Name: Rosario Rutzy Lualhati

My commission expires: May 16, 2015

Rosario Rutzy Lualhati

ROSARIO RUTZY LUALHATI
NOTARY PUBLIC-STATE OF NEW YORK
No. 01LU6241290
Qualified in New York County
My Commission Expires May 16, 2015

EXHIBIT A
LEGAL DESCRIPTION OF LAND

LEGAL DESCRIPTION: (LAND LEASE PARCEL)

A PARCEL OF LAND BEING A PORTION OF LOTS 72, 75, 77 AND 88 AND CERTAIN RIGHTS-OF-WAY WITHIN THE "AMENDED PLAT OF E 1/2 OF SEC. 14 TWP. 53S RGE. 40E", ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLATBOOK 13, PAGE 63, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA, LYING WITHIN THE NORTHEAST 1/4 OF SECTION 14, TOWNSHIP 53 SOUTH, RANGE 40 EAST, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS;

COMMENCE AT THE NORTHEAST CORNER OF SAID NORTHEAST 1/4 OF SECTION 14; THENCE SOUTH 01°39'24" EAST ON THE EAST LINE OF SAID NORTHEAST 1/4 FOR 457.33 FEET TO THE POINT OF BEGINNING; THENCE CONTINUE SOUTH 01°39'24" EAST ON SAID EAST LINE 119.26 FEET; THENCE SOUTH 54°57'45" WEST 405.80 FEET TO THE BEGINNING OF A NON-TANGENT CURVE CONCAVE SOUTHEASTERLY, WHOSE RADIUS POINT BEARS SOUTH 33°36'34" EAST; THENCE SOUTHWESTERLY ON THE ARC OF SAID CURVE TO THE LEFT, HAVING A RADIUS OF 2,277.65 FEET, A CENTRAL ANGLE OF 11°13'26", AN ARC DISTANCE OF 446.17 FEET; A CHORD BEARING OF SOUTH 50°46'43" WEST AND A CHORD DISTANCE OF 445.46 FEET TO A POINT OF NON-TANGENCY; THENCE SOUTH 46°15'46" WEST 360.84 FEET; THENCE NORTH 14°12'49" WEST 70.74 FEET; THENCE NORTH 16°27'49" WEST 715.15 FEET; THENCE NORTH 22°25'39" WEST 113.14 FEET; THENCE NORTH 89°46'21" EAST 356.40 FEET; THENCE NORTH 78°46'03" EAST 219.56 FEET; THENCE SOUTH 84°08'08" EAST 326.53 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHERLY; THENCE EASTERLY ON THE ARC OF SAID CURVE TO THE LEFT, HAVING A RADIUS OF 600.00 FEET, A CENTRAL ANGLE OF 10°21'44", FOR AN ARC DISTANCE OF 108.51 FEET TO A POINT OF TANGENCY; THENCE NORTH 85°32'08" EAST 193.52 FEET TO THE POINT OF BEGINNING.

SAID LAND SITUATE, LYING AND BEING IN MIAMI-DADE COUNTY, FLORIDA, CONTAINING 545,521 SQUARE FEET (12.5234 ACRES), MORE OR LESS.

E-recording Report of Recorded Documents

Itemized Fee View

Prepared for: First American Title - Commercial Services Div. - Orlando

For the period: 11/26/2014

Account number: FLT3RB

Cost center: FAF02384 Orlando

Business unit ID: 02384

Report generated: 11/26/2014 08:54 AM

Documents Recorded

NAME	TYPE	PG	ENTRY	RECORD DATE	SF	AMT	TOTAL	PROCESSED
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Nov 26, 2014								
697075								
POL-Recording Package 02.MOL	LEASE	5	E.20140815258.B.29406.P.1092	11/26/2014 08:57 AM EST	Submission Fee	4.00	28.00	11/26/2014
					Page Fee	0.00	20.00	11/26/2014
						4.00	44.00	48.00
						4.00	44.00	48.00
Totals for Miami-Dade County, FL						4.00	44.00	48.00

Recording Fee Totals

COUNTY	RECORD DATE	SF	AMT
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Totals for Miami-Dade County, FL		4.00	44.00 48.00
Total of All Recording Fees		4.00	44.00 48.00

Document Count: 1

Questions Contact:

Simplifile Support 1-800-460-5657

4844 North 300 West, Suite 202

Provo, UT 84604

E-recording Report of Recorded Documents

Itemized Fee View

Prepared for: First American Title - Commercial Services Div. - Orlando

For the period: 11/26/2014

Account number: FLT3RB

Cost center: FAF02384 Orlando

Business unit ID: 02384

Report generated: 11/26/2014 08:54 AM

Documents Recorded

NAME	TYPE	PG	ENTRY	RECORD DATE	SF	AMT	TOTAL	PROCESSED
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697075								
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					Page Fee	0.00	80,000.00	80,000.00
					Intangible tax	0.00	140,000.00	140,000.00
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Recording Fee Totals

COUNTY	RECORD DATE	SF	AMT
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Totals for Miami-Dade County, FL		4.00	220,222.50
Total of All Recording Fees		4.00	220,222.50

Document Count: 1

Questions Contact:

Simplifile Support 1-800-460-5657

4844 North 300 West, Suite 202

Provo, UT 84604

APPENDIX D
LOCATION OF HIALEAH FACILITY

