

February 9, 2015

Larine A. Moore U.S. Department of Energy FE-34 P.O. Box 44375 Washington DC 20026-4375

## RECEIVED By Docket Room at 12:35 pm, Feb 10, 2015 3 Waterway Avenue, Suite 400

The Woodlands, TX 77380 USA 713.574.1880

## RE: Request to Vacate DOE/FE Order No. 3327 in FE Docket No. 12-174-LNG, Withdraw Application in FE Docket No. 12-184-LNG, and Vacate DOE/FE Notice in FE Docket No. 12-184-LNG

Dear Ms. Moore:

This letter is being submitted by Pangea LNG (North America) Holdings, LLC ("Pangea") to request that the Office of Fossil Energy of the Department of Energy ("DOE/FE") (1) vacate DOE/FE's January 30, 2013 order authorizing Pangea to export liquefied natural gas ("LNG") to countries with which the U.S. has a Free Trade Agreement requiring the national treatment for trade in natural gas ("FTA"), (2) withdraw Pangea's December 19, 2012 application, as amended, to export LNG to countries with which the U.S. does not have a FTA, and (3) vacate the DOE/FE's December 3, 2014 notice in the above referenced dockets, all as further described below. The undersigned is an officer of Pangea authorized to make such requests.

On January 30, 2013, the DOE/FE issued Order No. 3227 in FE Docket No. 12-174-LNG authorizing Pangea to export up to 398.5 billion cubic feet per year ("Bcf/y") of natural gas in the form of LNG for a 25-year term to FTA nations. No LNG has ever been exported under such authorization, and Pangea is no longer pursuing further efforts to export LNG under this authorization.

On December 19, 2012, Pangea filed in FE Docket No. 12-184-LNG an application to export up to 398.5 Bcf/y of natural gas in the form of LNG for a 25-year term to non-FTA nations, and an amendment thereto on March 31, 2014. Pangea no longer wishes the DOE/FE to continue processing this application, as subsequently amended (per below), and does not intend to pursue further efforts to export LNG as specifically contemplated by such application as amended.

On December 3, 2014, the DOE/FE issued its Notice of Corporate Reorganization or Change in Control and Amendment of Pending Application to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries in FE Docket No. 12-184-LNG.<sup>1</sup> Pangea has not taken, and no longer intends to take, the actions described in such notice and its underlying March 31, 2014 Amendment of Application in such docket. Most importantly, the control of Pangea was

<sup>&</sup>lt;sup>1</sup> The application that is the subject of this Notice was filed by Pangea in FE Docket No. 12-184-LNG, but was subsequently docketed by the DOE/FE as FE Docket No. 14-002-CIC. The docket set forth in the Notice is FE Docket No. 12-184-LNG.



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never transferred to NextDecade Partners, LLC and is no longer being contemplated. Further, Pangea has not taken, and no longer intends to take, these same actions for the purposes set forth in its March 31, 2014 Application to Amend Authorization in FE Docket No. 12-174-LNG.<sup>2</sup>

We appreciate the efforts expended to date by the DOE/FE with respect to these matters and hope this filing will assist the DOE/FE's efforts to timely and accurately estimate likely future LNG exports from the U.S. in accordance with its statutory responsibilities. Please direct any question you have about this matter to Pangea's energy regulatory counsel:

> Erik J.A. Swenson Norton Rose Fulbright US LLP<sup>3</sup> 801 Pennsylvania Ave. NW Washington, DC. 20004 (202) 662-4555 erik.j.a.swenson@nortonrosefulbright.com

We respectfully request the effectiveness of any DOE/FE action granting this request to be the date on which such action is taken.

Thank you for your attention to these matters.

Respectfully Submitted.

Kathleen Eisbrenner Chief Executive Officer of Pangea LNG (North America) Holdings, LLC

<sup>&</sup>lt;sup>2</sup> Such Application to Amend Authorization was filed by Pangea in FE Docket No. 12-174 LNG, but was subsequently docketed by the DOE/FE as FE Docket No. 14-003-CIC.

<sup>&</sup>lt;sup>3</sup> Fulbright & Jaworski LLP changed its legal name to Norton Rose Fulbright US LLP on January 21, 2015.

## **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 Secretary in this proceeding.

Dated at Washington, D.C. this 10<sup>th</sup> day of February, 2015.

/s/ Maguette Fame\_\_\_\_\_

Maguette Fame Paralegal on behalf of Pangea LNG (North America) Holding, LLC