

RECEIVED

By Docket Room at 8:14 am, Mar 22, 2024



Howard L. Nelson
Tel 202.331.3163
Fax 202.261.4762
nelsonh@gtlaw.com

March 21, 2024

Mrs. Amy Sweeney
U.S. Department of Energy
Natural Gas Regulation
FE-34 - Room 3E-056
1000 Independence Avenue, S.W.
Washington DC 20585

**RE: GULFSTREAM LNG DEVELOPMENT, LLC, FECM Docket No. 23-34-LNG
Amendment to Application for Long-Term Authorization to Export Liquefied Natural Gas**

Dear Ms. Sweeney:

Pursuant to 10 C.F.R. § 590.204, GULFSTREAM LNG DEVELOPMENT, LLC (“Gulfstream LNG”) hereby amends its application for long-term authorization to export liquefied natural gas (“LNG”) as described in its March 10, 2023 Application (“Application”). As explained in the attached amendment, the purpose of the amendment is to substitute a new site on which the Project will be constructed.

Gulfstream LNG attests that a copy of same, including a copy of the updated Exhibit A, filed under seal, was sent via US Mail to the U.S. Department of Energy on March 21, 2024.

Should you have any questions about the foregoing, please feel free to contact the undersigned.

Sincerely,

Howard L. Nelson

Greenberg Traurig, LLP
2101 L. Street, NW
Suite 1000
Washington, DC 20037
Phone: (202) 331-3163
Email: nelsonh@gtlaw.com

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

GULFSTREAM LNG DEVELOPMENT, LLC) FECM DOCKET NO. 23-34-LNG

**AMENDMENT TO APPLICATION OF GULFSTREAM LNG DEVELOPMENT, LLC
FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS
TO FREE TRADE AND NON-FREE TRADE AGREEMENT NATIONS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”), 15 U.S.C. § 717b, and Section 204 of the Department of Energy’s (“DOE”) regulations, 10 C.F.R. § 590.204, GULFSTREAM LNG DEVELOPMENT, LLC (“Gulfstream LNG”) hereby amends its application submitted to the DOE’s Office of Fossil Energy and Carbon Management (“DOE/FECM”) on March 10, 2023, to grant for a term ending on December 31, 2050, multi-contract authorization to export, on its own behalf and as an agent for others, up to 237.5 Bcf/year, which is equivalent to approximately 650 MMcf/d of natural gas converted to LNG (“Application”).

Gulfstream LNG sought authorization in the Application to export LNG from its proposed LNG export project (the “Project”), to be located in Plaquemines Parish, Louisiana to (1) any country with which the United States currently has, or in the future may enter into, a free trade agreement requiring national treatment for trade in natural gas (“FTA Nations”); and (2) any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas with which trade is not prohibited by United States law or policy (“Non-FTA Nations”). On June 26, 2023, DOE/FECM granted Gulfstream LNG’s request to export LNG to FTA Nations.¹ The request to export LNG to Non-FTA Nations is pending.

¹ *Gulfstream LNG Development, LLC*, DOE/FECM Order No. 5014, Docket No. 23-34-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations (Jun. 26, 2023).

In support of this Amendment, Gulfstream LNG states as follows:

Section 204(a) of DOE's regulations, 10 USC § 590.204(a), states as follows:

The applicant may amend or supplement the application at any time prior to issuance of the Assistant Secretary's final opinion and order resolving the application, and shall amend or supplement the application whenever there are changes in material facts or conditions upon which the proposal is based.

Pursuant to this regulation, Gulfstream LNG amends its Application to change the site upon which the Project will be constructed. In its Application, Gulfstream stated that the Project will be constructed on an approximately 500-acre parcel of land being developed by Louisiana 23 Development Company and Plaquemines Port, Harbor & Terminal District on a site south of the town of Belle Chasse, Plaquemines Parish, Louisiana. Upon being informed that the developer was unable to secure the property, Gulfstream LNG has secured another site.

The new site is on an approximate 418-acre parcel of land located south of the town of Belle Chasse, Plaquemines Parish, Louisiana just three miles downstream on the same side of river from the original site. Gulfstream LNG has executed a Ground Lease for the new Project site with the owner of the site, Magnolia Terminal, LLC, which is attached as Exhibit A. An amended map and site plan is included as Exhibit B. The new site does not necessitate any other changes to the Project as originally described in the Application (*e.g.*, supply of gas, size of facility, environmental impacts, connections to existing natural gas pipeline systems). Therefore, this Amendment does not affect any other part of Gulfstream LNG's original Application.

Dated: March 21, 2024

Respectfully submitted,

Howard L. Nelson

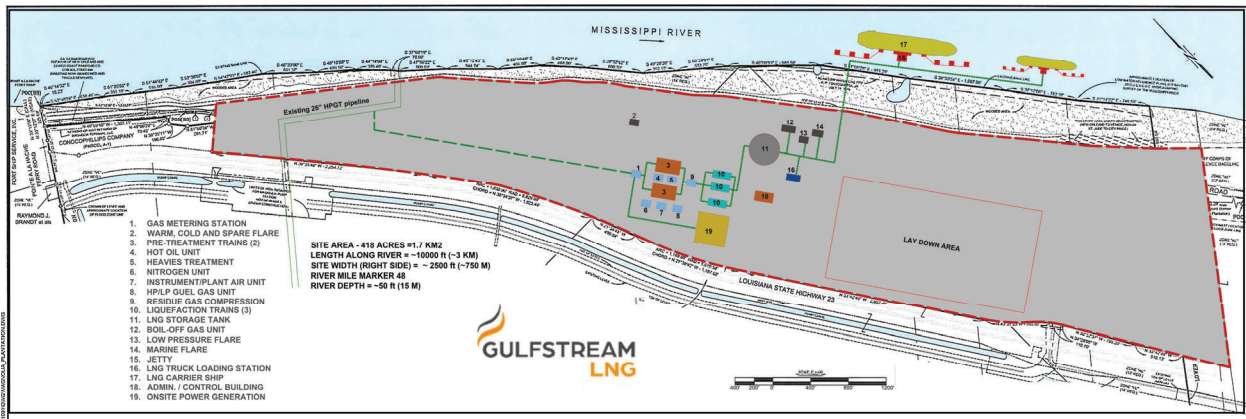
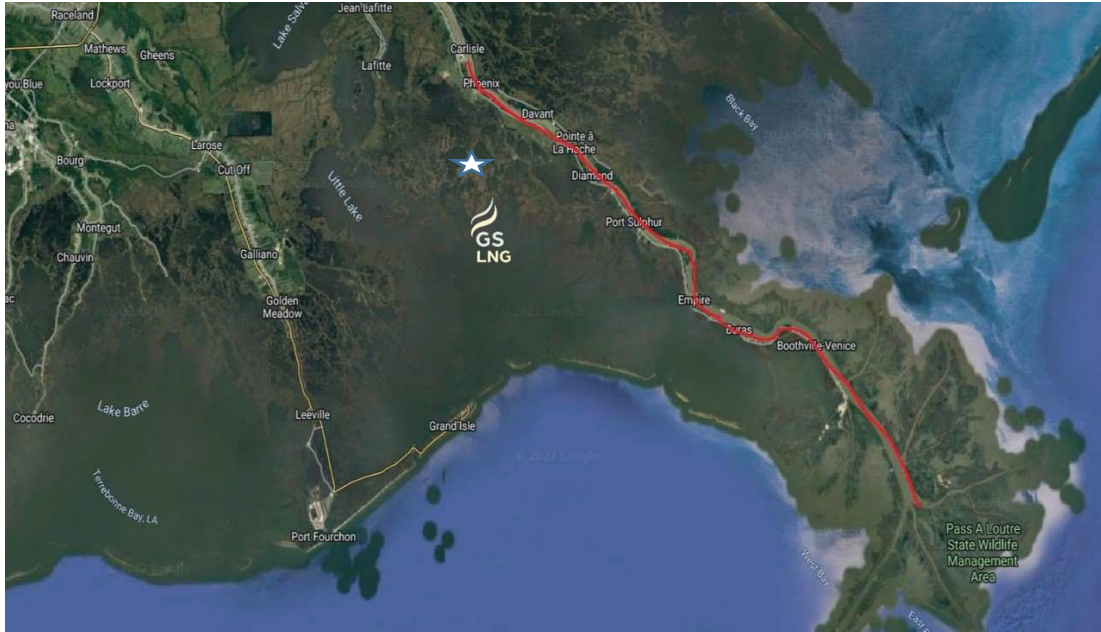
Howard L. Nelson
Kenneth M. Minesinger
William Garner
Ernesto Danache
Greenberg Traurig, LLP
2101 L. Street, NW
Suite 1000
Washington, DC 20037
Phone: (202) 331-3163
Email: nelsonh@gtlaw.com

EXHIBIT A
GROUND LEASE AND JOINT DEVELOPMENT AGREEMENT

Filed Under Seal

EXHIBIT B

MAP AND SITE PLAN



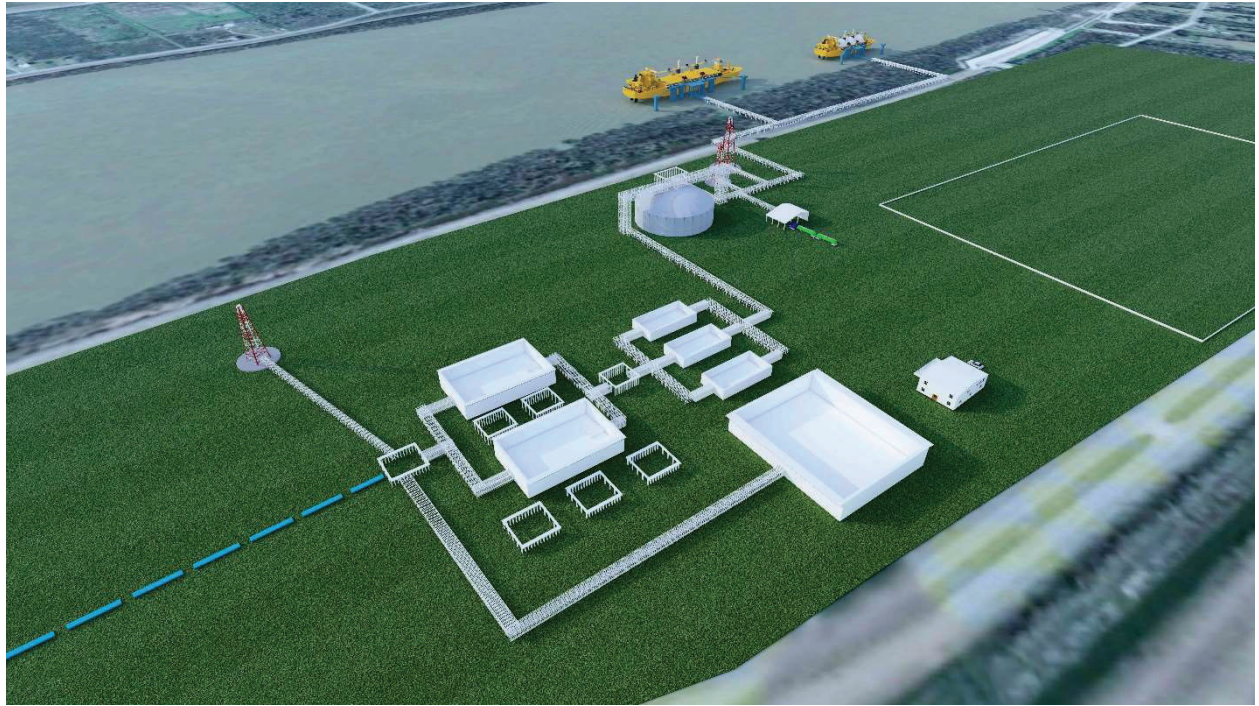


EXHIBIT C

OPINION OF COUNSEL

March 21, 2024

U.S. Department of Energy
Natural Gas Regulation
FECM-34 - Room 3E-056
1000 Independence Avenue, S.W.
Washington DC 20585

RE: GULFSTREAM LNG DEVELOPMENT, LLC, FECM Docket No. 23-34-LNG

Application for Long-Term Authorization to Export Liquefied Natural Gas

Dear Sir/Madam:

This opinion of counsel is provided in accordance with the requirements of Section 590.202(c) of the US Department of Energy's regulations, 10 CFR 590.202(c) (2023). I have examined the organizational and governance documents of GULFSTREAM LNG DEVELOPMENT, LLC ("Gulfstream LNG"), a Delaware limited liability company, and other documents and authorities as necessary for purposes of this opinion. On the basis of the foregoing, it is my opinion that the proposed long-term, multi-contract export of liquefied natural gas by Gulfstream LNG, as described in the above-referenced application, is within the limited liability company powers of Gulfstream LNG.

Respectfully submitted,

William Garner

William Garner
Greenberg Traurig, LLP
1000 Louisiana Street
Suite 6700
Houston, TX 77002
Tel: +1 713 374 3500
Fax: +1 713 374 3505
garnerw@gtlaw.com

EXHIBIT D

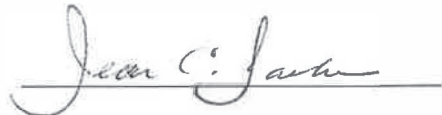
VERIFICATION

I, Howard L. Nelson, being sworn, do hereby affirm that I am counsel to GULFSTREAM LNG DEVELOPMENT, LLC and that I am familiar with the contents of this application; and that the matters set forth therein are true and correct to the best of my knowledge, information and belief.

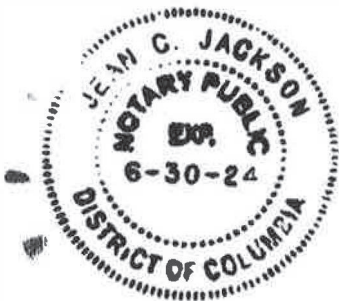


Howard L. Nelson

SWORN TO AND SUBSCRIBED before me, a Notary Public, in and for
the District of Columbia this 21st day of March, 2024.



Name: Jean C. Jackson



JEAN C. JACKSON
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires June 30, 2024

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 in this proceeding.

Dated this 21st day of March, 2024.

Michael C. Van Norden

Michael C. Van Norden
Greenberg Traurig, LLP
2101 L Street, N.W.
Suite 1000
Washington, DC 20036
(202) 530-8527
vannordenm@gtlaw.com