



Undersigned counsel asked the applicant's counsel if Venture Global LNG had existing authority to export the LNG to CNOOC referred to in Exhibit 2, and he responded that they did:

Mr. Twist, Venture Global Calcasieu Pass LLC has existing export authorization from the Department of Energy issued in DOE Order Nos. 3345, 3520, 3662 and 4346. Venture Global Plaquemines LNG, LLC has existing export authorizations from the Department of Energy issued in DOE Order Nos. 3866 and 4446. These orders provide the authorizations for the export of LNG to CNOOC pursuant to the referenced agreements. Exhibit 3

Undersigned counsel then asked if Venture Global LNG had existing authority to export 80 million metric tons of LNG to Sinopec in the PRC over twenty years. Counsel for Venture Global LNG did not answer the question and responded as follows:

**The answers to your questions are all matters of public record.  
At the instruction of my client, I will not respond further.  
Exhibit 4<sup>1</sup>**

COMMENT:

If Venture Global LNG did not have DOE authority to enter into a Sales and Purchase Agreement to sell 80 million metric tons of LNG over twenty years to Sinopec, then the application in Docket No. 22-131-LNG should be rejected and the applicant should be required to notify Sinopec that they did not have the approval of the United States Department of Energy to export the contracted LNG.

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<sup>1</sup> The question only required a yes or a no answer. Why was there a refusal to answer such an important question? What does that say about how the company acts in the community?

The applicant should file a new request for authorization after Sinopec has been notified and it is clear that no Sales and Purchase Agreement is in place related to the authorization sought.

The public policy behind this comment is clear. The United States Department of Energy is not a rubber stamp. Companies should not be permitted to give the impression that just because they have entered into a contract that the DOE is obligated to issue an Order that permits it. The press releases in Exhibits 1 and 2 give this false impression. A person does not build a house and then seek a building permit when it is finished. Accordingly, applicants should file for export authority before they enter into contracts if they lack existing authorization to perform. Among other important things, this protects buyers like Sinopec. Buyers entering into a contract expect that a seller has the authority to perform. The Department of Energy protects buyers of LNG by requiring that sellers have authorization to export LNG before contracts are entered into.

Investors reading a News and Press Release should know that a company has existing authority to perform under a contract. Financial institutions also need this assurance. Investors and Financial institutions are putting their money at risk.

Because the News and Press releases speak in terms of metric tons and the Docket No. 22-131-LNG speaks in terms of cubic feet, Venture Global LNG should be required to certify through counsel that it has existing authority to perform under the contracts mentioned in the two News and Press Releases. Exhibits 1 and 2, and it should provide DOE authorization Order numbers as part of its response.

Respectfully Submitted,

          /s/ C. Russell Twist

C. Russell Twist

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Exhibit 1

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## NEWS & PRESS RELEASES

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# Venture Global and Sinopec Announce Historic LNG Sales and Purchase Agreements

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NOVEMBER  
4, 2021  
 PRESS  
RELEASE

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For Immediate Release

November 4, 2021

### Venture Global and Sinopec Announce Historic LNG Sales and Purchase Agreements

*Venture Global set to become America's  
top LNG exporter to China*

**ARLINGTON, VA**– Today, Venture Global LNG and China Petroleum & Chemical Corp. (Sinopec) announced the signing of two 20-year Sales and Purchase Agreements (SPA) for the

supply of a total of 4 million tonnes per annum (MTPA) of LNG from Venture Global's Plaquemines LNG export facility, in Plaquemines Parish Louisiana. In addition, UNIPPEC, a Sinopec subsidiary has agreed to purchase 3.5 million tonnes (MT) of LNG from Venture Global's Calcasieu Pass LNG facility for a shorter duration. This represents the largest single LNG supply deal ever signed by a US company and will double imports of US LNG to China.



“Venture Global is proud to enter into this new and exciting long-term partnership with Sinopec, and soon become the largest US LNG exporter to China,” said **Mike Sabel, Chief Executive Officer of Venture Global LNG**. “Today’s announcement will accelerate our combined efforts to lower carbon emissions and provide a low-cost, reliable and secure energy supply to China. From day one, Venture Global has been on a mission to drive fuel switching around the world from coal to natural gas, and we are thrilled to equip Sinopec with a



large supply of US LNG to do that and assist China in its energy transition.”

“Sinopec has been pursuing low-carbon, green, safe, responsible and sustainable development, seeking high quality growth of its natural gas business.” **said Ma Yongsheng, President of Sinopec Corp.** “We are committed to building capacity in providing clean energy and meeting peoples aspiration for better life. The signing of this LNG SPA reflects the shared mission of Sinopec and Venture Global in promoting the global energy transition and is of significance in achieving carbon emission peak and neutrality goals.”

[CLICK HERE](#) to view a video of speech and signing ceremony.

### *About Venture Global LNG*

Venture Global is a long-term, low-cost provider of U.S. LNG to be sourced from resource rich North American natural gas basins. Venture Global is currently constructing or developing multiple export facilities in Louisiana to provide clean, affordable energy to the world.

### *About Sinopec*

China Petroleum & Chemical Corporation (hereinafter referred to as “Sinopec Corp.”) is a listed company on Chinese and international stock exchanges with integrated upstream, midstream and downstream operations along the oil and gas

business value chain. Its controlling shareholder, China Petrochemical Corporation (“Sinopec Group”) is the world’s largest oil refiner and second largest chemical company and has been among the top 5 the Fortune 500 Company over the past years. Through its 30,000 gas stations, Sinopec reaches to 20 million customers every day.

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Venture Global media contact:

Shaylyn Hynes

D: +1 202 920-0964 [shynes@vglng.com](mailto:shynes@vglng.com)



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No Thanks

Exhibit 2

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## NEWS & PRESS RELEASES

[< PREV](#)

# Venture Global LNG and CNOOC Gas & Power Announce LNG Sales and Purchase Agreements

DECEMBER

21, 2021

 PRESS  
RELEASE

**Arlington, VA**– Today, Venture Global LNG and CNOOC Gas & Power Group Co., Ltd., a wholly owned subsidiary of China National Offshore Oil Corporation (CNOOC), announced the execution of a 20-year Sales and Purchase Agreement (SPA). This marks the first LNG supply agreement signed by a US exporter with CNOOC, China's largest importer of LNG. Under the deal, Venture Global will supply 2 million tonnes per annum (MTPA) of LNG on a free on board (FOB) basis from its Plaquemines LNG export facility, in Plaquemines Parish, Louisiana. In addition, CNOOC Gas & Power will purchase 1.5 million tonnes (MT) of LNG from Venture Global's

Calcasieu Pass LNG facility for a shorter duration.

“Venture Global is pleased to announce the expansion of our footprint in Asia through two new deals to supply the Chinese market with clean, low-cost US LNG,” said **Mike Sabel, Chief Executive Officer of Venture Global LNG**. “China is critical to global climate efforts, and LNG supplied by Venture Global will serve as an important addition to their low carbon energy mix for decades. This new long-term partnership with CNOOC builds on our company’s continued momentum in a very active 2021.”

“As China’s largest LNG importer, CNOOC is committed deeply not only to the mission of securing China’s gas supply, but also to the climate goals of building a carbon-neutral China by 2060,” said **Shi Chenggang, Chairman of CNOOC Gas & Power**. “We are pleased to announce our long-term LNG cooperation with Venture Global. By signing the SPAs with Venture Global, CNOOC will be able to further improve its ability to meet China’s increasing gas demand, whilst provide solid support for China’s energy transition pathway to build a more “beautiful China”.

### About Venture Global LNG

Venture Global is a long-term, low-cost provider of U.S. LNG sourced from resource rich North American natural gas basins. Venture Global is currently constructing or developing 70 MTPA of production capacity in Louisiana to provide clean,

affordable energy to the world. The company is developing Carbon Capture and Sequestration (CCS) projects at each of its LNG facilities.

### About CNOOC

CNOOC is China's largest LNG importer, and has imported more than 200 million tons of LNG since 2006. So far, CNOOC has made great contributions to providing a secured gas supply for China and supporting its green and low-carbon development goals. In the future, CNOOC will continue to seek reliable, flexible, competitive and diversified LNG supplies globally.

### **Venture Global investor contact:**

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### **Venture Global media contact:**

Shaylyn Hynes

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Ok

No Thanks



These orders provide the authorizations for the export of LNG to CNOOC pursuant to the referenced agreements.

Regards,

**J. Patrick Nevins**

**LATHAM & WATKINS** LLP

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-----Original Message-----

From: Charles TWIST <[charlesrussell.twist@verizon.net](mailto:charlesrussell.twist@verizon.net)>

Sent: Tuesday, February 08, 2022 1:42 PM

To: Nevins, Patrick (DC) <[Patrick.Nevins@lw.com](mailto:Patrick.Nevins@lw.com)>

Cc: Amy Sweeney <[amy.sweeney@hq.doe.gov](mailto:amy.sweeney@hq.doe.gov)>

Subject: Docket No. 22-131-LNG

Dear Mr. Nevins. I am considering submitting comments in DOE Docket No. 22-131-LNG. As part of my preparation, I have a question for you as counsel of record in this proceeding.

In a Venture Global LNG news and press release dated December 21, 2021, the release announced a 20 -year Sales and Purchase agreement with CNOOC. "Under the deal, Venture Global will supply 2 million tonnes per annum (MTPA) of LNG on a free on board (FOB) basis from its Plaquemines LNG export facility ---. In addition CNOOC Gas & Power will purchase 1.5 million tonnes (MT) of LNG from Venture Global's Calcasieu Pass LNG facility for a shorter duration."

Does Venture Global LNG have existing authority from the United States Department of Energy to export the LNG referred to in this press release. If yes, please provide the DOE authorization number(s). Thank you.

Russell Twist

Sent from my iPad

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**From:** Charles TWIST charlesrussell.twist@verizon.net  
**Subject:** Re: Docket No. 22-131-LNG  
**Date:** February 8, 2022 at 4:24 PM  
**To:** patrick.nevins@lw.com  
**Cc:** amy.sweeney@hq.doe.gov



Thank you Mr. Nevins. That is helpful.

My next question concerns the Venture Global LNG announced contract with Sinopec for 80 million metric tonnes over twenty years.

Does Venture Global LNG have existing authority to export 80 million metric tonnes of LNG to the PRC over twenty years? Thank you for making sure that I have my facts correct.

Russell Twist

Sent from my iPad

On Feb 8, 2022, at 3:52 PM, patrick.nevins@lw.com wrote:

Mr. Twist,

Venture Global Calcasieu Pass, LLC has existing export authorizations from the Department of Energy issued in DOE Order Nos. 3345, 3520, 3662, and 4346.

Venture Global Plaquemines LNG, LLC has existing export authorizations from the Department of Energy issued in DOE Order Nos. 3866 and 4446.

Those orders provide the authorizations for the export of LNG to CNOOC pursuant to the referenced agreements.

Regards,

**J. Patrick Nevins**

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**From:** Patrick.Nevins@lw.com  
**Subject:** RE: Docket No. 22-131-LNG  
**Date:** February 10, 2022 at 9:55 AM  
**To:** charlesrussell.twist@verizon.net  
**Cc:** amy.sweeney@hq.doe.gov

The answers to your questions are all matters of public record.  
At the instructions of my client, I will not be responding further.

**J. Patrick Nevins**

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**From:** Charles TWIST <charlesrussell.twist@verizon.net>  
**Sent:** Tuesday, February 08, 2022 4:25 PM  
**To:** Nevins, Patrick (DC) <Patrick.Nevins@lw.com>  
**Cc:** amy.sweeney@hq.doe.gov  
**Subject:** Re: Docket No. 22-131-LNG

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