

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

ALASKA LNG PROJECT LLC

)

FE Docket No. 14-96-LNG

**MOTION FOR LEAVE TO INTERVENE OF
CONOCOPHILLIPS ALASKA, INC.**

This Motion for Leave to Intervene is filed by ConocoPhillips Alaska, Inc. (“ConocoPhillips Alaska”) pursuant to Section 590.303 of the Department of Energy’s (“DOE”) Administrative Procedures With Respect to the Import and Export of Natural Gas, 10 C.F.R. § 590.303 (2014), and the Notice published in the *Federal Register* on September 17, 2014.¹ ConocoPhillips Alaska requests that this Motion be granted for the reasons set forth below.

I. COMMUNICATIONS

Communications and correspondence regarding this Motion should be addressed to the following:

Barbara Fullmer
Vice President and General Counsel
CONOCOPHILLIPS ALASKA, INC.
700 G Street
P.O. Box 100360
Anchorage, AK 99510-0360
Phone: (907) 265-1341
Email: Barbara.F.Fullmer@conocophillips.com

Douglas F. John
Elizabeth A. Zembruski
JOHN & HENGERER
Suite 600
1730 Rhode Island Avenue, N.W.
Washington, D.C. 20036-3116
Phone: (202) 429-8800
Email: djohn@jhenergy.com
ezembruski@jhenergy.com

II. DESCRIPTION OF MOVANT

The exact legal name of Movant is ConocoPhillips Alaska, Inc. ConocoPhillips Alaska is a Delaware corporation with its principal place of business in Anchorage, Alaska. ConocoPhillips Alaska is a wholly-owned subsidiary of ConocoPhillips Company, a publicly-

¹ *Alaska LNG Project LLC; Application for Long-Term Authorization to Export Liquefied Natural Gas Produced From Domestic Natural Gas Resources to Non-Free Trade Agreement Countries for a 30-Year Period*, 79 Fed. Reg. 55764 (Sept. 17, 2014).

traded Delaware corporation. ConocoPhillips Alaska is authorized to do business in the State of Alaska, among other states, and is engaged in the exploration and production of oil and natural gas in Alaska.

III. BACKGROUND

On July 18, 2014, Alaska LNG Project LLC (“Alaska LNG”) filed an application with DOE’s Office of Fossil Energy (“FE”) pursuant to Section 3 of the Natural Gas Act (“NGA”), 15 U.S.C. § 717b, and Part 590 of DOE’s regulations, 10 C.F.R. § 590 (2014). In this application, Alaska LNG is seeking long-term authorization to export 20 million metric tons per annum of liquefied natural gas (“LNG”) produced from Alaska sources in a volume equivalent to approximately 929 billion cubic feet (“Bcf”) per year of natural gas or approximately 2.55 Bcf per day. This LNG will be exported by vessel from a proposed Liquefaction Facility to be constructed in the Nikiski area of the Kenai Peninsula in southcentral Alaska to: (1) any country with which the United States currently has, or in the future may enter into, a free trade agreement (“FTA”) requiring national treatment for trade in natural gas (“FTA countries”); 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 countries”). Alaska LNG is requesting this authorization for a 30-year term, to commence on the earlier of the date of first export or 12 years from the date the requested authorization is granted. Alaska LNG asks for authorization to export the LNG on its own behalf and as agent for other parties who hold title to the LNG at the time of export.

IV. MOTION TO INTERVENE

ConocoPhillips Alaska submits that good cause exists to grant it leave to intervene in this proceeding. As discussed in the subject application, Alaska LNG is currently comprised of three members: (1) ExxonMobil Alaska LNG LLC, (2) BP Alaska LNG LLC, and (3) ConocoPhillips

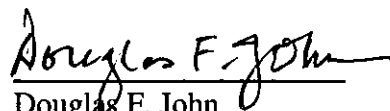
Alaska LNG Company, an affiliate of ConocoPhillips Alaska. Affiliates of the members, including ConocoPhillips Alaska, currently hold oil and gas leasehold interests in Alaska which will provide natural gas for the project. Under these circumstances, ConocoPhillips Alaska will be directly affected by the outcome of this proceeding, and its interests cannot be adequately represented by any other party hereto.

ConocoPhillips Alaska supports Alaska LNG's application for long-term authorization to export LNG to both FTA and non-FTA countries. Alaska LNG's requested authorization is not inconsistent with the public interest and should be granted by DOE/FE. The Alaska LNG project will provide significant economic benefits to Alaskans for many years to come, including state revenues, new job opportunities, and access to decades of domestically produced natural gas for in-state use in Alaska.

V. CONCLUSION

WHEREFORE, for the reasons set forth above, ConocoPhillips Alaska requests that it be permitted to intervene in the captioned docket and be made a party for all purposes.

Respectfully submitted,



Douglas F. John
Elizabeth A. Zembruski
JOHN & HENGERER
1730 Rhode Island Avenue, N.W.
Suite 600
Washington, D.C. 20036-3116

Barbara Fullmer
Vice President and General Counsel
CONOCOPHILLIPS ALASKA, INC.
700 G Street, P.O. Box 100360
Anchorage, AK 99510-0360

Counsel for ConocoPhillips Alaska, Inc.

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

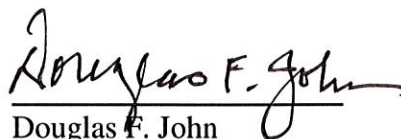
ALASKA LNG PROJECT LLC

)

FE Docket No. 14-96-LNG

CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2014), I, Douglas F. John, hereby certify that I am a duly authorized representative of ConocoPhillips Alaska, Inc., and that I am authorized to sign and file with the Department of Energy's Office of Fossil Energy, on behalf of ConocoPhillips Alaska, Inc., the foregoing document in the above-referenced proceeding.



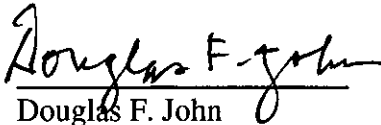
Douglas F. John
JOHN & HENGERER
1730 Rhode Island Avenue, N.W.
Suite 600
Washington, D.C. 20036-3116
Phone: (202) 429-8800
Email: djohn@jhenergy.com

Counsel for ConocoPhillips Alaska, Inc.

Dated at Washington D.C.: November 17, 2014.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on the applicant and the Department of Energy's Office of Fossil Energy in accordance with the requirements of 10 C.F.R. § 590.107(b) (2014).


Douglas F. John

Dated at Washington D.C.: November 17, 2014.