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UNITED STATES OF AMERICA BEFORE THE DEPARTMENT OF ENERGY OFFICE OF FOSSIL ENERGY

In the matter of:		
Venture Global LNG, LLC)))	FE Docket No. 14-88-LNG

MOTION TO INTERVENE OF THE AMERICAN PETROLEUM INSTITUTE

Pursuant to 10 C.F.R. 590.303, the American Petroleum Institute ("API") files this motion to intervene in the above-captioned docket. In support, API states as follows.

I. COMMUNICATIONS

Any communications regarding this pleading should be addressed to:

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II. BACKGROUND

On May 13, 2014, Venture Global LNG, LLC¹ filed an application with the Department of Energy's Office of Fossil Energy ("DOE/FE") seeking a long-term multi-contract authorization to export domestically produced liquefied natural gas ("LNG") up to the equivalent

¹ On September 22, 2014, Venture Global LNG, LLC filed an application to modify its pending LNG export applications to reflect a corporate reorganization. *Application to Transfer FTA Export Authorization, and To Modify Pending Applications*, DOE/FE Docket No. 14-88-LNG (Sept. 22, 2014), *available at* http://energy.gov/sites/prod/files/2014/10/f18/14 006 CIC.pdf (last visited Jan. 7, 2015). Under the corporate structure described in that pleading, the applicant in this proceeding is Venture Global Calcasieu Pass, LLC. For the purposes of this Motion to Intervene, "Venture Global" refers to Venture Global LNG, LLC and Venture Global Calcasieu Pass, LLC.

of 0.67 billion cubic feet ("Bcf") of natural gas per day to non-Free Trade Agreement ("non-FTA") countries. The authorization is sought for Venture Global on its own behalf and as agent for others for a 25-year period, commencing on the earlier of the date of first export or seven years from the date the authorization is issued. Venture Global proposes to export LNG from its project site presently under development along the Calcasieu Ship Channel in Cameron Parish, Louisiana, to any nation that currently has or develops the capacity to import LNG, with which the United States does not have a FTA requiring national treatment for trade in natural gas or LNG and with which trade is not prohibited by U.S. law or policy. The deadline to intervene in the above-captioned proceeding is January 9, 2015.²

III. INTERVENTION

API is a national trade association representing more than 600 member companies involved in all aspects of the oil and natural gas industry in the United States. Our members include owners and operators of LNG import and export facilities in the United States and around the world, as well as owners and operators of LNG vessels, global LNG traders, and manufacturers of essential technology and equipment used all along the LNG value chain. Our members also have extensive experience with the drilling and completion techniques used in shale gas development and in producing America's natural gas resources in a safe and environmentally responsible manner. API thus has a direct and immediate interest in this docket which cannot be adequately protected by any other party. Accordingly, API should be permitted to intervene in this docket with full rights as a party.

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² 79 Fed. Reg. 66,707.

IV. CONCLUSION

For the reasons stated above, API respectfully requests that DOE/FE grant this timely motion to intervene and that API be accorded fully party status in any proceedings held by DOE/FE in this docket.

Respectfully submitted,

/s/ David L. Wochner
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Counsel for American Petroleum Institute

Dated: January 9, 2015

CERTIFICATE OF SERVICE

I certify that I have this 9th day of January, 2015, serviced copies of the foregoing

document filed with the DOE/FE on the designated representatives of all of the parties to this

proceeding, in accordance with 10 C.F.R. § 590.107(a).

Dated: January 9, 2015

/s/ Michael L. O'Neill

Michael L. O'Neill

Counsel for American Petroleum Institute