

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

Pieridae Energy (USA) Ltd.

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FE Docket No. 14-179-LNG

**MOTION TO INTERVENE OF
SAINT JOHN GAS MARKETING COMPANY**

Pursuant to the Department of Energy's ("DOE") Administrative Procedures With Respect to the Import and Export of Natural Gas, 10 C.F.R. §§ 590.302, 590.303 (2014) and the notice published in the Federal Register on December 10, 2014,¹ Saint John Gas Marketing Company ("SJGM") hereby moves to intervene in FE Docket No. 14-179-LNG, which concerns the application of Pieridae Energy (USA) Ltd. ("Pieridae") to export natural gas to Canada for subsequent liquefaction and export to Free Trade Agreement ("FTA") countries and non-FTA countries.

I. COMMUNICATIONS

Communications concerning this motion should be addressed as follows, and the following should be included on the official service list in this proceeding:

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¹ *Pieridae Energy (USA) Ltd.; Application for Long-term Authorization to Export Domestically Produced Natural Gas Through Canada to Non-Free Trade Agreement Countries After Liquefaction to Liquefied Natural Gas for a 20-Year Period*, 79 Fed. Reg. 73285 (Dec. 10, 2014).

II. BACKGROUND

On October 24, 2014, Pieridae filed an application with DOE seeking long-term (20-year), multi-contract authorization to export to Canada up to 292 Bcf per year of natural gas. Pieridae indicated that the point of export will be near Baileyville, Maine on the Maritimes & Northeast US Pipeline. The natural gas Pieridae proposes to export to Canada will be either (1) converted to liquefied natural gas (“LNG”) in Canada and exported to one or more countries with which the U.S. has a Free Trade Agreement; (2) converted to LNG in Canada and exported to one or more countries with which the U.S. does not have an FTA; or (3) consumed within Canada as a source of energy in the production of electricity that may be used to operate Pieridae’s proposed liquefaction facilities.²

Pieridae and its affiliates intend to construct two liquefaction production trains, LNG storage and marine loading facilities, and ancillary facilities necessary to liquefy natural gas and to store and deliver LNG.³ The foregoing facilities are proposed to be located in Guysborough County, Nova Scotia, Canada. Pieridae’s liquefaction and export project, the Goldboro LNG project, will be capable of producing approximately 10 million metric tons per annum (“mpta”), which is roughly equivalent to 487 Bcf/year (1.33 Bcf/day).⁴

Pieridae states that it will not construct, expand, or modify any pipeline facilities in the U.S. in conjunction with its proposed exports, and Pieridae states that it has not entered into any agreement with any third party in relation to any proposal to construct, expand, or modify any pipeline system in the U.S.⁵ Nonetheless, Pieridae explains that it may take capacity on new

² Application at 3-4.

³ *Id.* at 10.

⁴ *Id.*

⁵ *Id.* at 8.

pipelines or expansions and that it may source natural gas from various U.S. basins. Pieridae also states that service to its Goldboro LNG project would not result in the impairment of service to other customers.⁶

Pieridae states that the natural gas exports and associated Goldboro LNG project will bring numerous benefits to the U.S. public through the purchase of U.S. equipment, engineering services, and technology for construction, operation, and maintenance of the Goldboro LNG project. Further, Pieridae states that purchasing of U.S.-sourced natural gas will stimulate the U.S. economy, generate additional tax revenues and U.S. jobs, and make a substantial contribution to the U.S. balance of payments. Pieridae claims that these benefits demonstrate that the proposed exports are not inconsistent with the public interest.⁷

III. INTERVENTION

Saint John Gas Marketing Company is a Delaware corporation with its principal place of business in The Woodlands, TX. SJGM is a wholly-owned subsidiary of Repsol St. John LNG, S.L. (“RSJLNG”). RSJLNG is a Spanish corporation with its principal place of business in Madrid, Spain.

Good cause exists to grant SJGM leave to intervene in this proceeding. Affiliates of SJGM are considering a natural gas liquefaction and LNG export project to be located at the existing Canaport LNG terminal in Saint John, New Brunswick, Canada.⁸ Like Pieridae, this project also is considering exporting natural gas by pipeline to Canada for subsequent export as LNG. DOE’s regulatory approach to adjudicating applications to export natural gas by pipeline to an adjacent country for subsequent export as LNG appears to be a case of first impression. As

⁶ *Id.* at 24.

⁷ *Id.* at 30-31.

⁸ SJGM may act the U.S.-marketing agent for procuring potential U.S.-sourced natural gas.

such, SJGM has a direct interest in both the public interest analysis to be conducted by DOE for Pieridae's application and in the outcome of this proceeding.⁹ Thus, SJGM has a direct, substantial, and vital interest in this proceeding and desires to intervene in order to protect that interest. SJGM is not now, and will not be, adequately represented by any other party in these proceedings, and may be affected by DOE's action on Pieridae's application.

WHEREFORE, in consideration of the foregoing, Saint John Gas Marketing Company respectfully requests that it be permitted to intervene in the captioned docket and be made a party for all purposes.

Respectfully submitted,

/s/ Kirstin E. Gibbs
Kirstin E. Gibbs
Tyler S. Johnson
Bracewell Giuliani LLP
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Attorneys for Saint John Gas Marketing Co.

February 9, 2015

⁹ The outcome of the proceeding could affect SJGM's economic interests. *See Cameron LNG, LLC*, DOE/FE Order No. 3391, *Order Conditionally Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel From the Cameron LNG Terminal in Cameron Parish, Louisiana, to Non-Free Trade Agreement Nations*, at 125-6 (Feb. 11, 2014) (stating "...the economic consequences of granting the Application could be far-reaching and could affect the interests of the movants and their members. This fact alone is good cause to permit their intervention.").

CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2014), I, Kirstin E. Gibbs, hereby certify that I am a duly authorized representative of Saint John Gas Marketing Company, and that I am authorized to sign and file with the Department of Energy's Office of Fossil Energy, on behalf Saint John Gas Marketing Company, the foregoing document in the above-reference proceeding.

/s/ Kirstin E. Gibbs
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Attorney for Saint John Gas Marketing Co.

Dated in Washington, D.C.: February 9, 2015

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

Pieridae Energy (USA) Ltd.

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FE Docket No. 14-179-LNG

VERIFICATION

SEATTLE

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WASHINGTON

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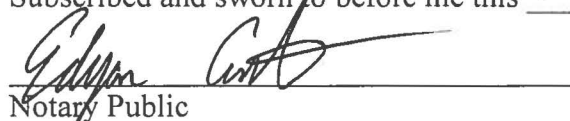
Pursuant to 10 C.F.R. § 590.103(b) (2014), Tyler S. Johnson, being duly sworn, affirms that he is authorized to execute this verification, that he has read the foregoing document, and that all facts stated herein are true and correct to the best of his knowledge, information, and belief.



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Attorney for Saint John Gas Marketing Co.

Subscribed and sworn to before me this 9th day of February, 2015.


Notary Public

My Commission Expires: 7/17/17



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).

/s/ Tyler S. Johnson
Tyler S. Johnson

February 9, 2015