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

**Carib Energy (USA) LLC**

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**FE Docket No. 16-98-LNG**

**MOTION TO INTERVENE  
OF  
FLORIDIAN NATURAL GAS STORAGE COMPANY, LLC**

Pursuant to 10 C.F.R. § 590.303, Floridian Natural Gas Storage Company, LLC (Floridian) files this motion to intervene in the above-captioned proceeding. Floridian states as follows:

**COMMUNICATIONS**

Any communications regarding this pleading should be addressed to:

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**CARIB APPLICATION**

On March 25, 2016, Carib Energy (USA) LLC (Carib) filed an application to the U.S. Department of Energy Office of Fossil Energy (DOE/FE) requesting long-term, multi-contract authorization under Section 3 of the Natural Gas Act (NGA) to export over a twenty-year term

domestically produced liquefied natural gas (LNG) up to the equivalent of 1.3 billion cubic feet (Bcf) of natural gas per year to non-Free Trade Agreement (FTA) nations in Central America, South America and the Caribbean. Carib states that the LNG will be purchased from existing facilities owned and operated by Pivotal LNG, Inc. or its affiliates, transported over highways in ISO containers and exported from ports in the southeastern United States capable of accommodating LNG exports by ISO containers on ocean-going carriers.

### **FLORIDIAN INTERVENTION**

Floridian is developing a new natural gas liquefaction, storage, vaporization and truck loading facility near Indiantown in Martin County, Florida. Floridian holds a certificate of public convenience and necessity issued by the Federal Energy Regulatory Commission (FERC) under NGA Section 7(c) of the Natural Gas Act authorizing the new facility (the Floridian Facility).<sup>1</sup> In addition, Floridian holds long-term, multi-contract authorization granted by DOE/FE under NGA Section 3 to export over a twenty-year term to non-FTA nations LNG produced at the Floridian Facility up to the equivalent of 14.6 Bcf of natural gas per year (the maximum annual send-out capacity of natural gas in its liquefied state via the truck loading station at the Floridian Facility), less the portion of that volume that may be under firm contract directly or indirectly to Carib (due to DOE/FE's having previously authorized Carib to export LNG from the Floridian Facility at the equivalent such maximum annual send-out capacity<sup>2</sup>). Floridian thus has a direct and unique interest in this proceeding that cannot be adequately represented by any other party. Accordingly there is good cause to grant Floridian intervention.

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<sup>1</sup> On August 29, 2008, FERC issued an order in Docket No. CP08-13-000 authorizing Floridian to construct and operate a new liquefaction, storage, vaporization and truck loading facility and associated pipeline facilities in Martin County, Florida. On August 31, 2012 and July 16, 2015, FERC issued orders in Docket No. CP12-100-000 and Docket No. CP13-541-000, respectively, amending the FGS authorization.

<sup>2</sup> *Carib Energy (USA) LLC*, DOE/FE Order No. 3487, FE Docket No. 11-141-LNG (Sept. 10, 2014).

## CONCLUSION

For the reasons stated, Floridian respectfully requests that DOE/FE grant this timely motion to intervene and that Floridian be accorded full party status in this proceeding.

Dated: October 17, 2016

Respectfully submitted,

/s/ Beth L. Webb

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Attorneys for Floridian Natural  
Gas Storage Company, LLC

**CERTIFICATE OF SERVICE**

I certify that I have this 17<sup>th</sup> day of October, 2016, caused service of a copy of the foregoing Motion to Intervene of Floridian Natural Gas Storage Company, LLC on the designated representatives of Carib Energy (USA) LLC, the applicant in this proceeding, in compliance with 10 C.F.R. § 590.107(b).

/s/ Joan M. Darby