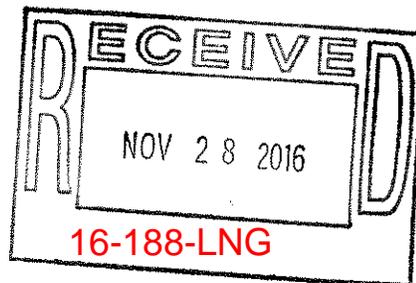




**OKRA
ENERGY**

November 21, 2016

Mr. John Anderson
Office of Fuels Programs, Fossil Energy
U.S. Department of Energy
Docket Room 3F - 056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, D.C. 20585



Re: **Okra Energy, LLC, Docket No. 16 - 188 - LNG**

**Application for Blanket Authorization to Export
Liquefied Natural Gas To Free Trade Agreement (FTA) Countries
in the Caribbean and Latin America.**

Dear Mr. Anderson:

Pursuant to Section 3 of the Natural Gas Act, 15 U.S.C. § 717B, and Part 590 of the regulations of the Department of Energy, 10 C.F.R. Part 590 (2016), Okra Energy, LLC hereby files an original and three (3) copies of its Application for Blanket Authorization to Export Liquefied Natural Gas to Free Trade Agreement (FTA) countries in the Caribbean and Latin America. A check in the amount of \$50 is being provided under separate cover as the filing fee stipulated by 10 C.F.R. § 590.207 (2016). I have enclosed one (1) extra copy of the application to be date-time stamped and returned via the enclosed postage paid envelope.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact the undersigned at (240) 224-4324.

Respectfully submitted,


Andrea Ravenet
for Okra Energy, LLC

Enclosures



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

In the Matter of:

)
OKRA ENERGY, LLC) DOCKET NO. 16 - ____ - LNG
)

**APPLICATION OF OKRA ENERGY, LLC
FOR BLANKET AUTHORIZATION TO EXPORT
LIQUEFIED NATURAL GAS
TO FREE TRADE AGREEMENT (FTA) COUNTRIES
IN THE CARIBBEAN AND LATIN AMERICA.**

Pursuant to Section 3 of the Natural Gas Act ("NGA"), 15 U.S.C. Section 717b and Part 590 of the Regulations of the Department of Energy ("DOE"), Okra Energy, LLC ("Okra Energy") hereby submits to the Office of Fossil Energy ("FE") the instant application for blanket authorization to export liquefied natural gas ("LNG") via intermodal containers to the Caribbean and other FTA countries in Latin America. In support of this application, Okra Energy respectfully offers the following:

I.

GENERAL

Correspondence and communications regarding this application should be addressed to the following:

Andrea Ravenet
Okra Energy, LLC
27 W. 20th Street
Suite 701
New York, NY 10011
(240) 240-4324



II.

BACKGROUND

Okra Energy is a limited liability company organized under the laws of the State of Delaware, with its principal place of business at 27 W. 20th Street, Suite 701, New York, NY 10011. Okra Energy is owned by Fresnel Holdings, LLC, with its principal place of business in New York, New York. Okra Energy is engaged in the business of purchasing natural gas from US gas producers, converting the gas to liquefied natural gas ("LNG"), and selling that LNG to entities located in the Caribbean and other FTA nations of Latin America.

Okra Energy shall own and operate a small-scale LNG plant, located in close proximity to its source of natural gas in southern Alabama. There, it will process natural gas into liquefied natural gas (LNG), fill intermodal containers with LNG for transport via truck to the primary export port, the Port of Alabama, where containers will be loaded onto barges or ships destined for the Caribbean and/or Latin America.

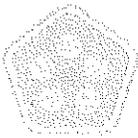
III.

AUTHORIZATION REQUESTED

By this application, Okra Energy requests that its export authorization begin on the earlier of either: the first date of export; or, eighteen months from the date authorization is issued.

Okra Energy requests authorization to export to FTA countries a combined total of up to 20 Bcf of natural gas over a two-year term. The requested authorization will enable Okra Energy to participate in short-term or spot-market transactions with its customers. Since a transaction arranged by Okra Energy may be structured with Okra Energy either purchasing, taking title to the gas, liquefying the gas, and/or acting as its agent for US sellers, Okra Energy requests authorization to export LNG for its own account as well as for the account of its U.S. suppliers and its FTA purchasers.

Okra Energy's negotiations with prospective customers in FTA nations are of a continuing nature. Therefore, Okra Energy requests that such authority for export of LNG via intermodal containers be granted on a blanket basis at all existing points of export from the U.S. to provide Okra Energy with the flexibility necessary to respond quickly to these marketing opportunities. Okra Energy cannot be competitive with other sellers if it must apply for export authorization for



each transaction. The subject application is similar to other blanket export arrangements approved by DOE.

IV.

PUBLIC INTEREST

Section 3(c) of the NGA provides that the importation and exportation of natural gas from or to a nation with which there is in effect a free trade agreement shall be deemed to be within the public interest, and that applications for such exportation shall be granted without modification or delay. Because Okra Energy's initial application is for the exportation of liquefied natural gas via intermodal containers to FTA nations in the Caribbean and Latin America, Okra Energy submits that its application is within the public interest.

V.

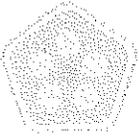
ENVIRONMENTAL IMPACT

Because the issuance of authorization for export to FTA nations is a statutory requirement, DOE/FE is not required to consider the impact of FTA authorization on the environment under the National Environmental Policy Act. Okra Energy seeks the necessary permits from and consultations with federal, state and local agencies having jurisdiction over its small-scale liquefaction facility(ies) and the transport of LNG via intermodal containers, to the extent applicable. The permits and consultations Okra Energy seeks in connection with the Project are from PHMSA, the Department of Transportation and the applicable state Public Service Commission(s). Okra Energy is engaged in working with all such agencies to meet these requirements.

VI.

REPORTING REQUIREMENTS

With respect to all imports and exports made pursuant to the authorization requested herein, Okra Energy will undertake to file with the DOE/FE in the month following the close of each calendar month, reports indicating by month whether imports or exports have occurred, and if so, the details of each transaction, including the total volumes of imports and exports in Mcf and the average price for the imports and exports per MMBtu at the international border. The reports



shall include the name of the seller, the name of the purchaser, the estimated or actual duration of the agreements, the name of the U.S. transporter(s), the point of entry or point of exit, whether the sales are made on an interruptible or firm basis, and, if applicable, the per unit (MMBtu) demand/commodity/reservation charge breakdown of the contract price. Okra Energy will notify the DOE/FE in writing of the date of the first delivery of natural gas imported or exported under the requested authorization within two weeks of such delivery.

VII.

CONCLUSION

WHEREFORE, for the foregoing reasons Okra Energy respectfully requests that the DOE/FE expeditiously consider the instant application and, pursuant to section 3 of the NGA and Part 590 of the DOE's regulations, grant its request for blanket export authorization. Okra Energy submits that a grant of such authorization would not be inconsistent with the public interest. Okra Energy requests immediate DOE/FE action on this application, in order to assure that Okra Energy is able to take advantage of business opportunities that Okra Energy expects to materialize in the upcoming months.

Respectfully submitted,

Andrea Ravenet

for **OKRA ENERGY, LLC**

Andrea Ravenet
27 W. 20th Street
Suite 701
New York, NY 10011

Dated: November 21, 2016



APPENDIX A

Verification



VERIFICATION

STATE OF NEW YORK)
) SS:
CITY AND COUNTY OF NEW YORK)

BEFORE ME, the undersigned authority, on this day personally appeared Andrea Ravenet, who, having been by me first duly sworn, on oath says that she is the Chief Operating Officer of Okra Energy, LLC; that she is familiar with the contents of the foregoing application; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

Andrea Ravenet
Andrea Ravenet

Sworn to and subscribed before me, a Notary Public, this 21 day of NOV 2016.

(NOTARIAL SEAL)

Neil Schneider
Notary Public

My Commission Expires:

NEIL SCHNEIDER
Notary Public, State of New York
Registration #01SC6065135
Qualified In Manhattan County
Commission Expires Oct. 9, 2017



APPENDIX B

**Opinion of Counsel, attached
(Ballard Spahr, 2 pages)**

1909 K Street, NW
12th Floor
Washington, DC 20006-1157
TEL 202.661.2200
FAX 202.661.2299
www.ballardspahr.com

September 28, 2016

Larine A. Moore
U.S. Department of Energy
FE-34
P.O. Box 44375
Washington DC 20026-4375

Re: Okra Energy, LLC DOE Export License Application

Ladies and Gentlemen:

We have acted as counsel to Okra Energy, LLC, a Delaware limited liability company (the **“Applicant”**). In doing so, we have examined executed copies of the following documents provided to us (the Organizational Documents and DOE Documents collectively referred to herein as the **“Documents”**):

- 1) The following organizational documents (the **“Organizational Documents”**)
 - a) Certificate of Formation of SanSailTEC, LLC, executed on November 7, 2015, and filed with the Delaware Secretary of State on November 12, 2015, as amended by that Certificate of Amendment executed August 30, 2016 and filed with the Delaware Secretary of State on September 2, 2016, changing SanSailTEC, LLC’s name to Okra Energy, LLC;
 - b) Limited Liability Company Agreement of Okra Energy, LLC (formerly known as SanSailTEC, LLC), a Delaware limited liability company, executed by Fresnel Holdings, LLC, its sole member, on August 30, 2016, replacing that Limited Liability Company Agreement of SanSailTEC, LLC, a Delaware limited liability company, executed on November 7, 2015;
 - c) Certificate of Formation of Fresnel Holdings LLC, executed on November 9, 2015, as amended by that Certificate of Amendment adding new managing member, Vanitas Holding Company, LLC, executed and filed with the Delaware Secretary of State on December 16, 2015;

DMEAST #26708959 v2

September 28, 2016

Page 2

- d) Limited Liability Company Agreement of Vanitas Holding Company, LLC, dated as of April, 2005, as amended by that First Amendment dated as of September 8, 2015;
 - e) Limited Liability Company Agreement of Gramercy West LLC, a Delaware limited liability company, executed by Le Chen, its manager and sole member, on May 19, 2015;
 - f) Limited Liability Company Resolution of Louis Ravenet, Manager and Sole Member, Vanitas Holding Company, LLC, as Managing Member of Fresnel Holdings, LLC, as Sole Member of Okra Energy, LLC, dated as of August 30, 2016.
- 2) The following Department of Energy documents (the "DOE Documents")
- a) Application for Short-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries (the "Application");

This letter is submitted pursuant to 10 C.F.R. § 590.202(c), of the Department of Energy administrative procedures (*Part 590, Administrative Procedures with Respect to the Import and Export of Natural Gas, Subpart B, Applications for Authorization to Import or Export Natural Gas*).

Based solely on our review of the Applicant's Organizational Documents, it is our opinion that the Applicant's proposed export of natural gas, as described in the Application, is within the organizational power and authority of the Company.

In rendering the opinions contained herein, we have assumed, without inquiry or investigation: (i) The legal capacity and competence of natural persons and the genuineness of all signatures; (ii) the conformity to authentic original documents of all documents submitted to us as copies and the authenticity of all documents submitted to us as originals; and (iii) the due authorization, execution and delivery of the Organizational Documents by each of the parties thereto.

We express no opinion as to the law of any jurisdiction other than the Delaware Limited Liability Company Act. We express no opinion as to the application or requirements of state securities, patent, trademark, copyright, antitrust and unfair competition, pension or employee benefit, labor, environmental health and safety or tax laws.

This opinion letter is limited to the matters expressly stated herein. No implied opinion may be inferred to extend this opinion letter beyond the matters expressly stated herein. We do not undertake to advise you or anyone else of any changes in the opinions expressed herein resulting from changes in law, changes in facts or any other matters that hereafter might occur or be brought to our attention.

Very truly yours,



OKRA
ENERGY

November 21, 2016

Mr. John Anderson
Office of Fuels Programs, Fossil Energy
U.S. Department of Energy
Docket Room 3F - 056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Okra Energy, LLC, Docket No. 16 - _____ - LNG

Payment of \$50 in support of:

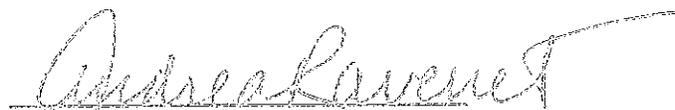
Application for Blanket Authorization to Export
Liquefied Natural Gas To Free Trade Agreement (FTA) Countries
in the Caribbean and Latin America.

Dear Mr. Anderson:

Enclosed please find our check in the amount of \$50 as the filing fee stipulated by 10 C.F.R. § 590.207 (2016) associated with our Application, as cited, above.

Thank you for your kind assistance in this matter. Please let me know should any other funds be needed. If you have any questions regarding this filing, please contact the undersigned at (240) 224-4324.

Respectfully submitted,



Andrea Ravenet
for Okra Energy, LLC