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UNITED STATES OF AMERICA

DEPARTMENT OF ENERGY

OFFICE OF FOSSIL ENERGY

STROM, INC.

) DOCKET No. 14-56-LNG
) ORDER NO. 3537
)

BACKGROUND

On October 21, 2014, the DOE issued Order # 3537 (“Order”) which authorized Strom, Inc. “to export domestically produced LNG by ISO containers on vessels from the proposed Project, to be located in Crystal River, Florida. The volume authorized in this Order is equivalent to approximately 28.21 Bcf/yr of natural gas for a 25-year term, beginning on the earlier of the date of first export or five years from the date the authorization is issued (i.e., October 21, 2019). Strom, Inc. is authorized to export this LNG pursuant to one or more long-term contracts (a contract greater than two years).”

The Order further states that “This LNG may be exported to Australia, Bahrain, Canada- Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore, and any nation with which the United States subsequently enters into a FTA requiring national treatment for trade in natural gas, provided that the destination nation has the capacity to import LNG via ocean going vessels.

REQUEST:

Through this letter, Strom request that its Order No. 3537, Section A, line 4 be amended by granting Strom, Inc. ten years instead of “five years” as outlined in the Order. Further request that the new date shall be October 21, 2024. Strom further requests that the DOE/FE automatically grant this request pursuant to the NGA.

AUTHORITY

Pursuant to 40 C.F.R. Sec. 1508.4 (2015), Strom finds a categorical exclusion applies to this request as it does not involve any new or modified facilities and would result in no additional environmental impacts thus complies with the National Environmental Policy Act ("NEPA").

Further, Section 3(c) of the NGA was amended by section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486) to require that applications authorizing (a) the import and export of natural gas, including LNG, from and to a nation with which there is in effect a FTA requiring national treatment for trade in natural gas, and (b) the import of LNG from other international sources, be deemed consistent with the public interest and granted **without modification or delay**. This Application falls within section 3(c), as amended, and therefore, DOE/FE is charged with granting the requested authorization without modification or delay.

In light of DOE's statutory obligation to grant this amendment without modification or delay, there is no need for DOE/FE to review other arguments in support of this request for amendment.

Respectfully Submitted,

Dean M. Wallace,



President