

**RECEIVED**

*By Docket Room at 3:16 pm, Aug 12, 2020*

UNITED STATES OF AMERICA

DEPARTMENT OF ENERGY

OFFICE OF FOSSIL ENERGY

_____ )	FE DOCKET NO.	13-69-LNG
VENTURE GLOBAL CALCASIEU PASS, LLC )	FE DOCKET NO.	14-88-LNG
_____ )	FE DOCKET NO.	15-25-LNG

APPLICATION TO AMEND EXPORT TERM  
FOR EXISTING LONG-TERM AUTHORIZATIONS  
THROUGH DECEMBER 31, 2050

August 12, 2020

By Electronic Mail

Mrs. Amy Sweeney  
U.S. Department of Energy, Natural Gas Regulation  
FE-34 - ROOM 3E-056  
1000 Independence Avenue, S.W.  
Washington DC 20585  
FERGAS@HQ.DOE.GOV

Attention: Venture Global Calcasieu Pass, LLC  
FE Docket Nos. 13-69-LNG, 14-88-LNG, and 15-25-LNG  
Application to Amend Export Term For Existing Long-Term Authorizations  
Through December 31, 2050

Dear Mrs. Sweeney:

Venture Global Calcasieu Pass, LLC (“Calcasieu Pass”) has received four long-term authorizations from the Department of Energy, Office of Fossil Energy (“DOE/FE”) under section 3 of the Natural Gas Act (“NGA”) to export domestically produced liquefied natural gas (“LNG”). In accordance with the procedures set forth in 10 C.F.R. Part 590, Calcasieu Pass hereby submits to DOE/FE this Application to Amend Export Term For Existing Long-Term Authorizations Through December 31, 2050 (“Application”) pursuant to the final policy statement issued on July 29, 2020, entitled “Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050” (“Extension Policy Statement”).

In this Application, Calcasieu Pass requests extension of the existing 20-year term set forth in Order No. 4346 issued in FE Docket Nos. 13-69-LNG, 14-88-LNG, and 15-25-LNG on March 5, 2019, for its long-term, multi-contract authorization to export LNG to Non-Free Trade Agreement (“non-FTA”) nations. Calcasieu Pass also requests corresponding extensions to the existing 25-year terms in the prior orders in those dockets authorizing exports to Free Trade Agreement (“FTA”) nations.<sup>1</sup> In accordance with the Extension Policy Statement, Calcasieu Pass requests that the terms of each of these export authorizations be extended through December 31, 2050.

---

<sup>1</sup> Order No. 3345 issued in FE Docket No. 13-69-LNG on September 27, 2013; Order No. 3520 issued in FE Docket No. 14-88-LNG on October 10, 2014; and Order No. 3662 issued in FE Docket No. 15-25-LNG on June 17, 2015.

In support of this request, and consistent with the form specified in DOE/FE’s application template for term extensions for existing long-term authorizations (last updated July 29, 2020), Calcasieu Pass submits the following information.

**Section I:**

1. The relevant DOE/FE docket numbers are: 13-69-LNG (Order No. 3345), 14-88-LNG (Order No. 3520), and 15-25-LNG (Order No. 3662). Order No. 4346 was issued in all three docket numbers.
2. The authorization holder is Venture Global Calcasieu Pass, LLC.<sup>2</sup>
3. Calcasieu Pass has authorization to export LNG by vessel from the proposed Venture Global Calcasieu Pass Project (“Calcasieu Pass Project”), a natural gas liquefaction and LNG export terminal currently under construction and located in Cameron Parish, Louisiana.
4. Information on existing orders:

<b>Order No. (date)</b>	3345 (Sept. 27, 2013)	3520 (Oct. 10, 2014)	3662 (June 17, 2015)	4346 (Mar. 5, 2019)
<b>Amendment (date)</b>	Yes (Dec. 3, 2014)	Yes (Dec. 3, 2014)	None	Yes (Mar. 17, 2020)
<b>FTA/non-FTA</b>	FTA	FTA	FTA	Non-FTA
<b>Export Volume</b>	243.6 Bcf/yr	243.6 Bcf/yr	132.8 Bcf/yr	620 Bcf/yr

The cumulative authorized export volumes across all DOE/FE long-term orders are: 620 Bcf/yr (FTA) and 620 Bcf/yr (non-FTA).

5. The Federal Energy Regulatory Commission (“FERC”) issued its “Order Granting Authorizations Under Sections 3 and 7 of the Natural Gas Act” for the Calcasieu Pass Project, and the related TransCameron Pipeline project, on February 21, 2019. 166 FERC ¶ 61,144 (2019). No requests for rehearing were filed.
6. Calcasieu Pass requests that the term of each of its export authorizations be extended through December 31, 2050.

---

<sup>2</sup> The export authorizations issued in Order Nos. 3345 and 3520 were originally issued to Venture Global LNG, LLC, but Calcasieu Pass currently holds all the authorizations. See “Notice of Corporate Reorganization or Change in Control and Amendment of Authorizations to Export Liquefied Natural Gas to Free Trade Agreement Countries” issued in FE Docket Nos. 13-69-LNG and 14-88-LNG (Dec. 3, 2014).

## **Section II:**

1. DOE/FE should grant Calcasieu Pass's Application because it is in the public interest. As detailed in the Extension Policy Statement, extending the term of existing natural gas export authorizations is supported by DOE's 2018 LNG Export Study, which concluded that the United States will experience net economic benefits from LNG exports through the period 2020-2050.<sup>3</sup> As DOE/FE also noted in the Extension Policy Statement, to the extent U.S. exports can diversify global LNG supplies and increase the volumes of LNG available globally, these exports will improve energy security for many U.S. allies and trading partners.

The Calcasieu Pass Project is currently under construction and Calcasieu Pass anticipates that it will commence full operations of the Calcasieu Pass Project in late 2022, with a phased operational start-up expected to commence earlier as described in Calcasieu Pass's filings with FERC. The Calcasieu Pass Project will have an operational life that is expected to extend past 2050. Granting the term extensions sought by Calcasieu Pass in this Application will increase the volume of LNG that the Calcasieu Pass Project is able to export over the life of its authorizations. The requested extensions also will provide greater certainty about the long term regulatory support for LNG exports from the Calcasieu Pass Project and, thereby, assist the project in its commercial efforts to contract capacity on a very long-term basis. Therefore, and for all the reasons detailed in the Extension Policy Statement, the requested term extension is consistent with the public interest and should be granted.

2. In accordance with the National Environmental Policy Act of 1969 ("NEPA"), FERC issued a final environmental impact statement ("EIS") for the Calcasieu Pass Project on October 22, 2018.<sup>4</sup> After an independent review, DOE/FE adopted the final EIS on November 1, 2018 (DOE/EIS-0510),<sup>5</sup> and the U.S. Environmental Protection Agency published a notice of the adoption on November 9, 2018.<sup>6</sup> There are no operational or physical changes to the Calcasieu Pass Project associated with the requested extension of

---

<sup>3</sup> DOE/FE published the 2018 LNG Export Study on its website on June 7, 2018, and concurrently provided notice of the availability of the Study. *See* NERA Economic Consulting, *Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports* (June 7, 2018), *available at* <https://www.energy.gov/sites/prod/files/2018/06/f52/Macroeconomic%20LNG%20Export%20Study%202018.pdf>.

<sup>4</sup> Federal Energy Regulatory Commission, *Calcasieu Pass Project Final Environmental Impact Statement*, Docket Nos. CP15-550-000, CP15-551-000, and CP15-551-001 (Oct. 22, 2018) [hereinafter the "final EIS"].

<sup>5</sup> Letter from Amy Sweeney, DOE/FE, to Julie Roemele, U.S. Environmental Protection Agency (Nov. 1, 2018). *See also* Order No. 4346 at 62-68 (adopting the FERC EIS and discussing environmental issues).

<sup>6</sup> U.S. Environmental Protection Agency, *Environmental Impact Statements; Notice of Availability*, 83 Fed. Reg. 56,078 (Nov. 9, 2018).

the term of its export authorizations and no new construction is proposed. Accordingly, approval of this Application qualifies for a categorical exclusion under NEPA pursuant to the terms of 10 C.F.R. 1021.410, appendix B to subpart D of part 1021, Categorical Exclusion B5.7.

Pursuant to 18 C.F.R. § 590.103(c), Calcasieu Pass represents that, to the best of its knowledge, the same or a related matter is not being considered by any other part of the Department of Energy, including FERC, or any other Federal agency or department. Calcasieu Pass further represents that it is submitting the non-refundable filing fee of fifty dollars (\$ 50) required by 10 C.F.R. § 590.207 electronically and concurrently with this Application.

We hope this Application provides you with sufficient detail to grant the requested export term extensions in compliance with the Extension Policy Statement. Please feel free to contact the undersigned counsel for Calcasieu Pass if you have any questions or require additional information.

Sincerely,

/s/ J. Patrick Nevins

J. Patrick Nevins

Direct Dial: +1.202.637.3363

patrick.nevins@lw.com

Christopher M. Randall

Direct Dial: +1.202.637.2189

christopher.randall@lw.com

*Counsel to Venture Global Calcasieu Pass, LLC*

Appendix A

**Verification**

STATE OF VIRGINIA                    )  
  )  
CITY OF ARLINGTON                 )        SS:

Keith Larson, being first duly sworn on his oath deposes and says: that he is the General Counsel of Venture Global LNG, Inc., and an authorized representative of Venture Global Calcasieu Pass, LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contents thereof; that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief; and that he is authorized to execute and file the same with the U.S. Department of Energy.

*Keith D. Larson*

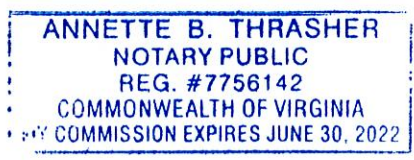
\_\_\_\_\_  
Keith Larson  
General Counsel

Sworn to and subscribed before me this 12<sup>th</sup> day of August, 2020.

*Annette B. Thrasher*  
\_\_\_\_\_  
Notary Public  
In and For said City



My Commission Expires:



Appendix B

**OPINION OF COUNSEL**



## Opinion of Counsel

This opinion is submitted pursuant to 10 C.F.R. 590.202(c) of the Department of Energy administrative procedures. The undersigned is General Counsel to Venture Global LNG, Inc. and an authorized representative of Venture Global Calcasieu Pass, LLC.

I have reviewed the organizational documents of Venture Global Calcasieu Pass, LLC, and it is my opinion that the proposed export of natural gas is within the company's limited liability company powers.

Respectfully submitted.



---

Keith Larson  
General Counsel  
Venture Global LNG, Inc.  
1001 19th Street North  
Suite 1500  
Arlington, VA 22209  
Telephone: (202) 759-6736  
[klarson@ventureglobalng.com](mailto:klarson@ventureglobalng.com)

Dated: August 12, 2020

**Certificate of Service**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service lists compiled by the Department of Energy, Office of Fossil Energy in these proceedings.

Dated at Washington, D.C. this 12th day of August, 2020.

*/s/ Christopher M. Randall*

---

Christopher M. Randall  
Latham & Watkins LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, DC 20004  
(202) 637-2200