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DEPARTMENT OF ENERGY

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_____)	FE DOCKET NO. 12-183-LNG
MAGNOLIA LNG, LLC)	FE DOCKET NO. 13-131-LNG
_____)	FE DOCKET NO. 13-132-LNG

CONSOLIDATED APPLICATION TO AMEND PENDING AMENDMENT AND AMEND
EXISTING AUTHORIZATIONS IN ORDER TO INCREASE AUTHORIZED EXPORT
TERM THROUGH DECEMBER 31, 2050

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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
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MAGNOLIA LNG, LLC)	FE DOCKET NO. 12-183-LNG
)	FE DOCKET NO. 13-131-LNG
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CONSOLIDATED APPLICATION TO AMEND PENDING AMENDMENT AND AMEND
EXISTING AUTHORIZATIONS IN ORDER TO INCREASE AUTHORIZED EXPORT
TERM THROUGH DECEMBER 31, 2050

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the Department of Energy’s (“DOE”) regulations,² Magnolia LNG, LLC (“MLNG”) hereby requests to (1) amend the pending Application for Amendment to Long-Term Authorizations to Export Liquefied Natural Gas to Non-Free Trade Agreement and Free Trade Agreement Nations (“Amendment Application”) submitted to the DOE Office of Fossil Energy (“DOE/FE”) on December 31, 2018, under FE Docket No. 13-132-LNG³; and (2) amend the existing authorizations under FE Docket Nos. 12-183-LNG and 13-131-LNG.⁴ With the instant submission, MLNG requests to extend its current 20-year export term to Non-FTA nations and 25-year export terms to FTA nations to December 31, 2050. The following supplement provides the information that DOE/FE’s Policy Statement Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries

¹ 15 U.S.C. § 717b.

² 10 C.F.R. Part 590.

³ DOE/FE previously approved MLNG’s long-term, multi-contract authorization to export up to 394.2 billion cubic feet per year (“Bcf/yr”) of natural gas in the form of liquefied natural gas (“LNG”) to nations which do not have a free trade agreement with the United States requiring national treatment for trade in natural gas (“Non-FTA nations”).

⁴ DOE/FE originally approved MLNG’s long-term, multi-contract authorization to export LNG to nations with which the United States has a free trade agreement requiring national treatment for trade in natural gas (“FTA nations”) in DOE/FE Order Nos. 3245 and 3406. On March 21, 2019, the agency modified these orders at MLNG’s request, authorizing up to 224.5 Bcf/yr in each order, for a total of 449 Bcf/yr of exports to FTA nations. *See* DOE/FE Order Nos. 3245-A and 3406-A.

Through the Year 2050 (the “Policy Statement”) requires to extend the term of Non-FTA and FTA export authorizations.⁵

In support of this supplement to its Amendment Application and in compliance with the Policy Statement, MLNG states the following:

Section I

1. The relevant DOE/FE docket number associated with MLNG’s Non-FTA LNG exports is 13-132-LNG. The relevant DOE/FE docket numbers associated with MLNG’s FTA LNG exports are 12-183-LNG and 13-131-LNG.
2. Magnolia LNG, LLC is the authorization holder under DOE/FE Orders 3245 and including 3245-A, 3406 and 3406-A, and 3909.
3. MLNG has authorization to export LNG by vessel from the planned Magnolia LNG Project (“MLNG Project”), a natural gas liquefaction and LNG export terminal to be located in Lake Charles, Louisiana.
4. DOE/FE issued Order 3909 in DOE/FE Docket No. 13-132-LNG on November 30, 2016.
 - Order 3909 refers to LNG exports to Non-FTA nations only. The order authorizes the export of 1.08 billion cubic feet per day to Non-FTA nations.
 - MLNG submitted the Amendment Application to DOE/FE on December 31, 2018, and this Amendment Application is pending before the agency.⁶ The Amendment Application proposes to increase this authorized export volume to 1.23 billion cubic feet per day to Non-FTA nations.

⁵ Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050, 85 Fed. Reg. 52,237 (Aug. 25, 2020).

⁶ The Amendment Application seeks to amend the authorized non-FTA export volume under DOE/FE Order 3909 for the MLNG Project from 1.08 billion cubic feet per day to 1.23 billion cubic feet per day consistent with the final design of the MLNG Project.

- MLNG’s Amendment Application also seeks to align MLNG’s authorized LNG volumes across MLNG’s existing authorizations for LNG exports to Non-FTA and FTA nations.
 - The FTA orders referenced above, as modified on March 21, 2019, are each for 0.615 Bcf/day, or 1.23 Bcf/day in total. As noted above, MLNG’s request to increase exports to Non-FTA nations to 1.23 billion cubic feet per day is pending before DOE/FE.
5. The Federal Energy Regulatory Commission (“FERC”) has authorized MLNG to site, construct, and operate the MLNG Project pursuant to the following orders:
- *Magnolia LNG, LLC*, 155 FERC ¶ 61,033 (April 15, 2016), authorizing the MLNG Project;⁷
 - *Magnolia LNG, LLC*, 171 FERC ¶ 61,231 (June 18, 2020), revising the maximum liquefaction capacity of the Magnolia LNG Project to 8.8 million tonnes per annum (“mtpa”), or 1.23 Bcf/day, consistent with the export volumes requested under the Amendment Application pending before DOE/FE.
6. Consistent with the Policy Statement, MLNG requests that the existing 20-year export term as set forth in Ordering Paragraph A of DOE/FE Order 3909 be amended to extend through and including December 31, 2050. While the Policy Statement on its face does not apply to FTA exports, MLNG requests that the existing 25-year export terms as set forth in Ordering Paragraphs A of DOE/FE Order Nos. 3245 and 3406, as modified in Order Nos.

⁷ See also *Magnolia LNG, LLC*, 157 FERC ¶ 61,149 (Nov. 23, 2016) (denying a request for rehearing).

3245-A and 3406-A, be amended to extend through December 31, 2050, so that the FTA export terms align with the Non-FTA terms.

Section II:

1. As more fully described on pages 9-10 of the Amendment Application, DOE/FE should grant MLNG's Amendment Application, as supplemented herein, because it is in the public interest. Furthermore, 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 2020-2050.⁸ 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.⁹

The MLNG Project is fully permitted and construction ready. FERC has authorized MLNG to proceed with the initial site preparation work at the MLNG Project.¹⁰ The MLNG Project's minimum expected operational life is thirty years,¹¹ which would extend past 2050.

Granting the term extension sought by MLNG with this supplement to its Amendment Application will increase the volume of LNG that the MLNG 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

⁸ Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050, 85 Fed. Reg. at 52,240.

⁹ *Id.* at 52,240.

¹⁰ *Magnolia LNG, LLC*, Notice to Proceed with Initial Site Preparation, FERC Docket No. CP14-347-000 (May 4, 2017).

¹¹ *Magnolia LNG, LLC*, Final Environmental Impact Statement at 4-91, FERC Docket No. CP14-347-000 (Nov. 13, 2015).

Magnolia LNG Project and, thereby, assisting MLNG in marketing its liquefaction and export capacity on a long-term basis, and facilitating a final investment decision and ultimate construction and operation of the Magnolia LNG Project. Completing construction and commencing operations will allow the many benefits of the MLNG Project to accrue to the United States. Therefore, and for all the reasons detailed in the Policy Statement, the requested term extension is consistent with the public interest and should be granted.

2. FERC issued a final environmental impact statement (“Final EIS”) for the MLNG Project on November 13, 2015, under FERC docket CP14-347. As noted above, FERC subsequently approved the Magnolia LNG Project on April 15, 2016, and issued an Order Denying Rehearing on November 23, 2016.¹²

On November 18, 2018, MLNG submitted an application to FERC for Limited Amendment to Authorization Granted Under Section 3 of the Natural Gas Act to increase the Magnolia LNG Project LNG production capacity from 8.0 to 8.8 million tonnes per annum. On June 7, 2019, FERC issued Notice of Intent to prepare a Supplemental Environmental Impact Statement (“Supplemental EIS”) for the proposed Magnolia LNG Project production capacity amendment under FERC Docket CP19-19.¹³ On January 24, 2020, FERC issued the Supplemental EIS for the Magnolia LNG Project production capacity amendment.¹⁴ As noted above, FERC subsequently authorized the capacity amendment for Magnolia LNG on June 18, 2020.

¹² *Magnolia LNG, LLC*, 157 FERC ¶ 61,149 (Nov. 23, 2016).

¹³ *Magnolia LNG, LLC*, Notice of Intent to Prepare a Supplemental Environmental Impact Statement, FERC Docket No. CP19-19-000 (June 7, 2019).

¹⁴ *Magnolia LNG, LLC*, Final Supplemental Environmental Impact Statement, FERC Docket No. CP19-19-000 (Jan. 24, 2020).

There are no operational changes or new construction to the MLNG Project associated with the term extension to December 31, 2050. All revisions to the facility design allowing the increased LNG production capacity are described and considered in detail in FERC's review of the capacity increase proceeding under FERC Docket No. CP19-19-000.

As FERC reviewed and approved, the production capacity increase will be completed by increasing the capacity and pressures of the refrigerant system and a number of other design modifications to achieve the production uprate of the MLNG Project. The design of the MLNG Project will remain in the same footprint within the MLNG Project site. However, none of these proposed design changes are necessary to support operations of the fully permitted MLNG Project and therefore are not necessary to catalogue in this supplement to the Amendment Application.

Conclusion

For the foregoing reasons, MLNG respectfully requests that DOE/FE (1) accept this supplement to the Amendment Application and grant such Amendment Application, including extension of the Non-FTA term through December 31, 2050, on an expedited basis; and (2) extend the term of Magnolia LNG's FTA authorizations through December 31, 2050, in order to synchronize all LNG export authorizations for the facility.

Respectfully submitted,

/s/ David L. Wochner

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Date: October 1, 2020

October 1, 2020

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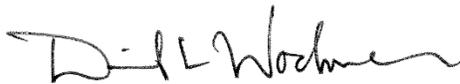
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**Re: Magnolia LNG LLC
FE Docket Nos.: 12-183-LNG; 13-131-LNG; 13-132-LNG
Consolidated Application to Amend Pending Amendment and Amend Existing
Authorizations in order to Increase Authorized Export Term Through December
31, 2050**

Dear Ms. Sweeney:

This opinion of counsel is provided in accordance with the requirements of Section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202(c). I have reviewed the corporate documents of Magnolia LNG LLC as relevant and necessary and have concluded that the proposed extension of the term of Magnolia LNG LLC's existing long-term authorizations to export domestically produced natural gas as liquefied natural gas, as described in the above referenced submission, is within Magnolia LNG LLC's corporate powers.

Very truly yours,



David L. Wochner
Counsel to Magnolia LNG LLC



Magnolia LNG -- DOE Verification 09-28-2020_USE_Active01_307951724_1.pdf

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E-Signature Summary

E-Signature 1: John Gram Baguley (JGB)

October 01, 2020 10:45:29 -8:00 [19E9FE365E9A] [99.172.37.186]
 john.baguley@magnolialng.com (Principal) (ID Verified)

E-Signature Notary: Debra Gay Kinney (dkg)

October 01, 2020 10:45:29 -8:00 [22516C6BEE84] [165.225.34.227]
 Debra.kinney@klgates.com

I, Debra Gay Kinney, did witness the participants named above electronically sign this document.



VERIFICATION

John Baguley, being first duly sworn on his oath deposes and says: that he is the Chief Operating Officer for Magnolia LNG LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the content 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.

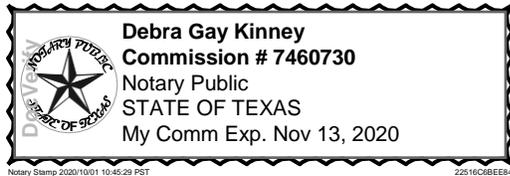
John Gram Baguley
Signed on 2020/10/01 10:45:29 -8:00

John Baguley, Chief Operating Officer
Magnolia LNG, LLC

Date: October 1, 2020

STATE OF TEXAS)
)
COUNTY OF HARRIS)

SUBSCRIBED and SWORN TO before me this 1st day of October, 2020.



Debra Gay Kinney
Signed on 2020/10/01 10:45:29 -8:00
Notary Public

My commission expires: November 13, 2020

Notary Registration Number 7460730



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