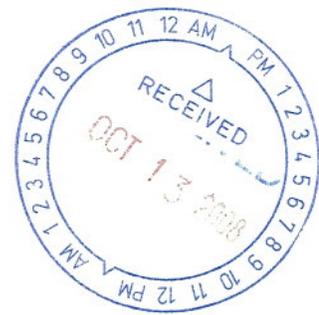


UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY



IN THE MATTER OF) DOCKET NO. 08-70-LNG
FREEPORT LNG DEVELOPMENT, L.P.)

MOTION TO INTERVENE
OF BG LNG SERVICES, LLC

Pursuant to 10 C.F.R. § 590.303, BG LNG Services, LLC (“BGLS”) hereby moves to intervene in this proceeding concerning an application filed by Freeport LNG Development, L.P. (“Freeport LNG”) on August 1, 2008. In support of this request, BGLS respectfully states the following:

I.
COMMUNICATIONS

The names and addresses of the persons to whom service is to be made and to whom communications are to be addressed in this proceeding are:

Chris Migura
Commercial Counsel
BG North America, LLC
5444 Westheimer, Suite 1200
Houston, TX 77056
Tel: 713.599.3926
Fax: 713.599.4250
Chris.migura@bg-group.com

Mary J. Doyle
Regulation Director
BG North America, LLC
2311 Connecticut Ave, NW #406
Washington, DC 20008
Tel: 202.363.1582
Fax: 202.363.1582
mary.doyle@bg-group.com

Steve Hill
VP LNG Supply & Optimisation
BG North America, LLC
5444 Westheimer, Suite 1200
Houston, TX 77056
Tel: 713.599.3825
Fax: 832.553.1858
Steve.hill@bg-group.com

**II.
IDENTIFICATION OF MOVANT**

The exact legal name of the movant is BG LNG Services, LLC. BGLS is organized under the laws of the state of Delaware and has its principal place of business at 5444 Westheimer, Houston, Texas 77056. BGLS imports LNG that is delivered at the Lake Charles and the Elba Island Terminals under authorizations granted by the Department of Energy (“DOE”).

**III.
FREEPORT LNG’S APPLICATION**

On August 1, 2008, Freeport LNG filed an application pursuant to Section 3 of the Natural Gas Act, 15 U.S.C. § 717b, and Part 590 of the U.S. Department of Energy’s regulations, 10 C.F.R. Part 590 (2008). In the instant application, Freeport LNG is seeking blanket authorization to export LNG over a two-year period, on a short-term or spot market basis, in an amount up to the equivalent of 24 Bcf of natural gas that has been imported into the United States. Freeport LNG is seeking this authorization so that it may sell in non-U.S. markets any imported LNG that is not required for the operation of its facilities should U.S. market prices not support the sale of such imported LNG domestically.

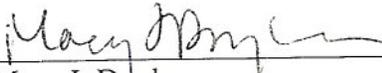
**IV.
INTERVENTION**

As an importer of LNG, BGLS has a direct and substantial interest in matters raised by Freeport LNG’s application in this docket. This interest cannot be adequately represented by any other party. The intervention of BGLS in this docket is therefore in the public interest.

V.
CONCLUSION

BGLS respectfully requests that it be granted leave to intervene in the above-captioned proceeding, with full rights as a party thereto.

Respectfully submitted,



Mary J. Doyle
Regulation Director
2311 Connecticut Ave., NW #406
Washington, DC 20008
Phone: 202.363.1582
Email: mary.doyle@bg-group.com

October 7, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the forgoing on the parties listed below:

Lisa M. Tonery
Fulbright & Jaworski L.L.P.
666 Fifth Avenue
New York, NY 10103

John Tobola
Freeport LNG Development, L.P.
333 Clay Street, Suite 5050
Houston, TX 77002

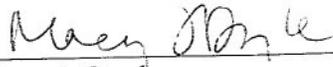
William Henry
Freeport LNG Development, L.P.
333 Clay Street, Suite 5050
Houston, TX 77002

Charles H. Shoneman
Bracewell & Giuliani LLP
2000 K Street, N.W.
Washington, DC 20006

R. J. Pautsch
Shell NA LNG, LLC
910 Louisiana, 41st Floor
Houston, TX 70002

Michael Cathey
Shell NA LNG, LLC
910 Louisiana, 41st Floor
Houston, TX 70002

Dated at Washington, DC this October 7, 2008.



Mary J. Doyle
Regulation Director
BG North America, LLC