

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY



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

MOTION OF SHELL NA LNG LLC TO INTERVENE

Pursuant to 10 C.F.R. § 590.303 Shell NA LNG LLC ("Shell LNG") hereby moves to intervene in this proceeding initiated by Freeport LNG Development, L.P.'s ("Freeport LNG") application filed in this docket on August 1, 2008. In support hereof, Shell LNG states as follows:

**I.
COMMUNICATIONS AND CORRESPONDENCE**

Communications and correspondence regarding this docket should be directed to the following representatives of Shell LNG:

R.J. Pautsch
Shell NA LNG LLC
910 Louisiana, 41st Floor
Houston, Texas 77002
(713) 241-3570
r.j.pautsch@shell.com

Michael Cathey
Shell NA LNG LLC
910 Louisiana, 41st Floor
Houston, Texas 77002
(713) 241-7777
michael.cathey@shell.com

Charles H. Shoneman
Bracewell & Giuliani LLP
2000 K Street, N.W., Suite 500
Washington, D.C. 20006
(202) 828-5860
charles.shoneman@bgllp.com

II.
IDENTITY AND INTEREST OF SHELL LNG

Shell LNG imports liquefied natural gas ("LNG") into the United States. Shell LNG is an affiliate of Shell Oil Company, which is involved in the domestic and international LNG business. Shell LNG holds firm capacity at the Cove Point LNG terminal and at the Elba Island LNG terminal. Shell LNG will also be the capacity holder at the Broadwater LNG terminal.

III.
FREEMPORT LNG'S FILING

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 (DOE") regulations, 10 C.F.R. Part 590 (2008). In its application, Freeport LNG requests that DOE's Office of Fossil Energy ("FE") issue an order granting Freeport LNG blanket authorization to engage in exports of LNG previously imported into the United States to international locations including Belgium, Spain, Japan, South Korea, India, China, Taiwan, France, Italy and the United Kingdom. Freeport LNG states that it proposes to engage in short-term, spot market exports of up to 24 Bcf. Freeport LNG further states that it will not export domestically-produced LNG or natural gas, nor will it export LNG to countries with which trade is prohibited by law. Freeport LNG requests that this blanket authorization be granted for a two-year period commencing on the date of authorization. Freeport LNG states that it proposes to export volumes of imported LNG on its own behalf or as agent for others.

IV.
INTERVENTION

As an importer of LNG, Shell LNG has immediate, direct and substantial legal and economic interests in matters raised by Freeport LNG's application in this docket. These interests cannot be

adequately represented by any other party. The intervention of Shell LNG in this docket is therefore in the public interest.

WHEREFORE, Shell LNG requests that it be permitted to intervene in this docket with full rights as a party.

Respectfully submitted,

By: 
Charles H. Shoneman
Bracewell & Giuliani LLP
2000 K Street, N.W.
Washington, D.C. 20006
(202) 828-5800

**Attorney for
SHELL NA LNG LLC**

September 11, 2008

CERTIFICATE OF SERVICE

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

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

Dated at Washington, D.C. this 11th day of September 2008.



Charles H. Shoneman