

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY



IN THE MATTER OF  
CHENIERE MARKETING, INC.

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DOCKET NO. 08-77-LNG

MOTION TO INTERVENE OUT-OF-TIME  
OF BG LNG SERVICES, LLC

Pursuant to 10 C.F.R. § 590.303, BG LNG Services, LLC (“BGLS”) hereby moves to intervene out-of-time in this proceeding concerning an application filed by Cheniere Marketing, Inc. (“CMI”) on August 15, 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:

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**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.**  
**CMI’S APPLICATION**

On August 15, 2008, CMI 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, CMI is seeking blanket authorization to export LNG that has been imported into the United States over a two-year period, on a short-term or spot market basis, in an amount up to the equivalent of 64 Bcf of natural gas. CMI 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**

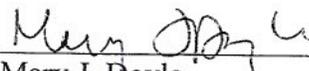
Motions to intervene in this proceeding were due October 10, 2008. Due to an administrative error, BGLS sent its original intervention to an incorrect address and, as a result, its intervention was not received on the directed due date. No harm will result to any party as a result of BGLS’s late intervention as the proceeding is in its early stages. Furthermore, BGLS agrees to accept the record as it stands. In these circumstances, BGLS submits that good cause exists to grant it leave to intervene herein.

As an importer of LNG, BGLS has a direct and substantial interest in matters raised by CMI'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 out-of-time in the above-captioned proceeding, with full rights as a party thereto.

Respectfully submitted,

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

October 27, 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  
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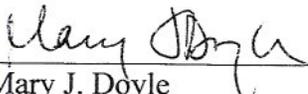
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Dated at Washington, DC this October 27, 2008.

  
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Mary J. Doyle  
Regulation Director  
BG North America, LLC