MOTION TO INTERVENE OF FREEPORT LNG DEVELOPMENT, L.P.

Pursuant to 10 C.F.R. § 590.303 (2010), Freeport LNG Development, L.P. ("Freeport") hereby moves to intervene in the above-captioned proceeding. In support of its motion, Freeport states as follows:

The names and addresses of the persons upon whom all communications concerning this proceeding should be served are as follows:

John Tobola
Freeport LNG Development, L.P.
333 Clay St
Suite 5050
Houston, TX 77002-4173

Les Lo Baugh
BROWNSTEIN HYATT FARBER
SCHRECK, LLP
2029 Century Park East, 21st Floor
Los Angeles, California 90067

On September 7, 2010, Sabine Pass Liquefaction, LLC ("Sabine Pass") filed an "Application for Long-Term Authorization to Export Liquefied Natural Gas" ("Application"), wherein, it requested authority to export up to 16 mtpa of domestically produced liquefied natural gas ("LNG") from the Sabine Pass LNG Terminal to any country (1) with which the United States does not have a free-trade agreement, (2) which has the capacity to import LNG, and (3) with which trade is not prohibited by law or policy of the United States. Sabine Pass requested authorization for a twenty-year term, commencing on the earlier of the date of first export, or five years from the date of an order granting the Application.

Given that the Application is requesting broad authority to export LNG from the United States to nearly all other countries, worldwide, Freeport has a direct interest in this proceeding. Freeport and its affiliates operate an LNG terminal facility and holds various LNG import and export authorizations. The Application, if granted, could affect Freeport’s interests. Thus,
Freeport has a substantial interest in, and will be directly affected by, the outcome of this proceeding. Further, no other party can adequately represent Freeport’s interests. Freeport requests that it be permitted to intervene in this proceeding, and that it be granted full rights as a party to this proceeding.

Freeport is continuing to study the Application and, as a result, is unable to state a position on the Application at this time.

WHEREFORE, Freeport respectfully requests that is motion to intervene be granted.

Dated: December 13, 2010

Respectfully submitted,

By:

Les Lo Baugh
Brownstein Hyatt Farber Schreck LLP
2029 Century Park East, Suite 2100
Los Angeles, California 90067

Attorney for Freeport
UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY  

In the Matter of  
Sabine Pass Liquefaction, LLC  

) 

Docket No. 10-111-LNG  

VERIFICATION  

Pursuant to 10 C.F.R. § 590.103(b) (2010), Les Lo Baugh, being first duly sworn, affirms that he is authorized to execute this verification, that he has read the foregoing document, and that all facts stated herein are true and correct to the best of his knowledge, information, and belief.  

Les Lo Baugh  

Subscribed and sworn to before me this 13th day of December, 2010.  

Notary Public, California  

My Commission Expires: October 24, 2014
CERTIFICATE OF REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2010), I Les Lo Baugh, hereby certify that I am a duly authorized representative of Freeport LNG Development, L.P., and that I am authorized to sign and file with the Office of Fossil Energy, on behalf of Freeport LNG Development, L.P., the foregoing document.

Dated at Los Angeles, California, this 13th day of December, 2010.

Les Lo Baugh