

February 27, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.W.
Room 1A, East
Washington, D.C. 20426

**Re: Sabine Pass Liquefaction, LLC, Sabine Pass Liquefaction Expansion, LLC,
Sabine Pass LNG, L.P. and Cheniere Creole Trail Pipeline, L.P.
Docket No. PF13-___-000
Request to Initiate Pre-Filing Review Process
Liquefaction Expansion Project and Pipeline Extension and Expansion**

Dear Ms. Bose:

Pursuant to the requirements of 18 C.F.R. § 157.21 (2013), Sabine Pass Liquefaction, LLC, Sabine Pass Liquefaction Expansion, LLC and Sabine Pass LNG, L.P. (together, “Sabine Pass”) and Cheniere Creole Trail Pipeline, L.P. (“CCTPL”) (Sabine Pass and CCTPL together, the “Applicants”) hereby request that the Federal Energy Regulatory Commission (“Commission” or “FERC”) initiate the Commission’s pre-filing review of a proposed expansion of the Liquefaction Project (“Liquefaction Expansion Project”) at the existing Sabine Pass LNG Terminal in Cameron Parish, Louisiana¹ and an extension and expansion of the existing Cheniere Creole Trail Pipeline system (“CCTPL Expansion”).² The Liquefaction Expansion Project, which will comprise Stage 3 of the Liquefaction Project currently under construction at the Sabine Pass LNG site, consists of two liquefaction trains (Trains 5 and 6) totaling approximately

¹ Sabine Pass Liquefaction, LLC (“SPL”) and Sabine Pass Liquefaction Expansion, LLC are affiliates of Sabine Pass LNG, L.P. (“Sabine Pass LNG”). The Commission has authorized Sabine Pass LNG to site, construct and operate an LNG import, storage and vaporization terminal in Cameron Parish, Louisiana with a total send-out capacity of 4 billion cubic feet per day (“Bcf/d”). See *Sabine Pass LNG, L.P., Order Granting Authority Under Section 3 of the Natural Gas Act and Issuing Certificates*, 109 FERC ¶ 61,324 (2004) (Phase I); *Sabine Pass LNG, L.P., Order Granting Authority Under Section 3 of the Natural Gas Act*, 115 FERC ¶ 61,330 (2006) (Phase II). Most recently, the Commission authorized the construction and operation of the Liquefaction Project, consisting of Trains 1 and 2 (Stage 1) and Trains 3 and 4 (Stage 2) at the existing terminal site. See *Sabine Pass Liquefaction, LLC*, 139 FERC ¶ 61,039 (2012), *reh’g denied*, 140 FERC ¶ 61,076 (2012) (“Liquefaction Project”).

² CCTPL was issued a certificate of public convenience and necessity for the CCTPL pipeline on June 15, 2006 in Docket No. CP05-357-000, as amended. The CCTPL pipeline currently connects the Sabine Pass LNG terminal to Gillis, Louisiana (approximately 93.8 miles). Most recently, the Commission authorized CCTPL to make certain system modifications to enable bidirectional gas flow for the delivery of feed gas to the Liquefaction Project. See *Cheniere Creole Trail Pipeline, L.P.*, 142 FERC ¶ 61,137 (2013).

1.3 billion cubic feet per day (“Bcf/d”) of natural gas liquefaction capacity.³ In order to deliver feed gas to the Liquefaction Expansion Project, CCTPL proposes both to extend and to loop a portion of its existing pipeline system. Participation in the pre-filing review process will assist the Applicants in the early identification and resolution of any potential issues of concern to stakeholders and should allow for the expeditious review and approval by the Commission of the application that will be filed by the Applicants at the conclusion of the pre-filing process.

In compliance with the Commission’s pre-filing procedures, the Applicants submit the following:

1. *Project Schedule*⁴

The Applicants anticipate filing their formal application pursuant to Sections 3 and 7 of the NGA, respectively, no later than October 2013 and will respectfully request that the Commission issue an Order authorizing the siting, construction and operation of the Liquefaction Expansion Project and the CCTPL Expansion no later than October 2014. The Applicants anticipate filing their Project Implementation Plan no later than October 2014 and requesting authorization to commence construction by November 2014 for the Liquefaction Expansion Project and by 2015 for the CCTPL Expansion. Sabine Pass anticipates a construction schedule of approximately 50 months for the completion and startup of Trains 5 and 6. CCTPL anticipates a construction schedule of approximately 12 months to construct and place in-service the CCTPL Expansion. A more detailed schedule is provided below.

Key Milestone Activities	Anticipated Schedule
Submit Request to Initiate Pre-filing Review Process	February 27, 2013
File NGA Section 3 Application	October 2013
Issuance of Environmental Assessment (“EA”) or Draft Environmental Impact Statement	March 2014

³ SPL is concurrently filing an application pursuant to Section 3 of the Natural Gas Act (“NGA”) with the Department of Energy, Office of Fossil Energy (“DOE/FE”) for authorization to export domestic natural gas as liquefied natural gas (“LNG”) pursuant to an LNG Sale and Purchase Agreement with a 20-year term commencing on the date of first commercial delivery from Train 5. DOE/FE previously has granted SPL long-term authorization to export LNG from the Liquefaction Project. *See Sabine Pass Liquefaction, LLC, Opinion and Order Conditionally Granting Long-Term Authorization to Export Liquefied Natural Gas From Sabine Pass LNG Terminal to Non-Free Trade Agreement Nations*, DOE/FE Order No. 2961, (May 20, 2011); *Sabine Pass Liquefaction, LLC, Final Opinion and Order*, DOE/FE Order No. No. 2961-A (Aug. 7, 2012); *see also Sabine Pass Liquefaction, LLC, Order Granting Long-Term Authorization to Export Liquefied Natural Gas From Sabine Pass LNG Terminal to Free Trade Agreement Nations*, DOE/FE Order No. 2833 (Sept. 7, 2010).

⁴ 18 C.F.R. § 157.21(d)(1) (2012).

(“DEIS”)	
Issuance of Final Environmental Impact Statement (“FEIS”) (if required)	July 2014
Issuance of Authorization	October 2014 ⁵
File Initial Implementation Plan	October 2014
Commencement of Construction	November 2014 – Liquefaction Expansion 2015 – CCTPL Expansion
CCTPL Expansion In-Service	2016
Liquefaction Expansion Project In-Service	2018

2. *Zoning and Availability*⁶

The proposed Liquefaction Expansion Project will be located on approximately 156 acres of the Sabine Pass LNG site in Cameron Parish, Louisiana, on the eastern shore of the Sabine Pass Channel and east of the town of Sabine Pass, Texas. Sabine Pass LNG has acquired the land through a long-term lease. The Sabine Pass LNG site is located in an industrial-zoned area. The Liquefaction Expansion Project will utilize the existing Sabine Pass LNG marine facilities.

3. *Liquefaction Expansion Project Description*⁷

Attachment 1a illustrates the Liquefaction Expansion Project location and preliminary site configuration and plot plan. The Liquefaction Expansion Project will be designed to process on average approximately 1.3 Bcf/d of pipeline quality natural gas delivered to the Liquefaction Expansion Project through an interconnecting pipeline. Similar to the Liquefaction Project, natural gas will be liquefied and stored as LNG in Sabine Pass LNG’s five (5) existing metal, double-wall, single containment storage tanks with secondary impoundment. LNG will be exported from the terminal via LNG carriers that will arrive at the Sabine Pass LNG terminal via

⁵ It is anticipated that this date will be expedited if the Commission staff prepares an EA rather than a DEIS/FEIS.

⁶ 18 C.F.R. § 157.21(d)(2).

⁷ *Id.* § 157.21(d)(4).

marine transit through the Sabine Pass Channel. The Liquefaction Expansion Project will not result in an increase in the number of ship transits.⁸

The main component of the Liquefaction Expansion Project consists of two (2) Phillips Optimized Cascade LNG trains (Trains 5 and 6), each capable of processing up to 0.65 Bcf/d of natural gas.⁹

Each LNG Train contains the following equipment:

- Gas treatment facilities to remove and dispose of solids, CO₂, sulfur, heavy hydrocarbons, water, and mercury;
- Six LM2500+G4 gas turbine-driven refrigerant compressors;
- Waste heat recovery systems for regenerating the gas driers and amine system;
- Approximately 200 Induced draft air coolers for cooling the refrigerants and other process streams;
- Storage tank for amine make up;
- Associated fire and gas and safety systems;
- Associated control systems and electrical infrastructure;
- Utility connections and distribution systems as required;
- Soil improvement, piling and paving; and
- Piping, piperacks, foundations and structures within the LNG train battery limits.

In addition, the Liquefaction Expansion Project will require the following new facilities or modification to existing facilities:

- Expansion of and remodeled buildings to accommodate increased equipment, new utilities and support infrastructure, and modifications to existing facilities built for the Sabine Pass LNG terminal as determined to be required, including the following:¹⁰
 - Modifications to control building to add systems for the liquefaction trains and other new facilities, and to move some functions to the new O&M building;

⁸ The Sabine Pass LNG terminal is capable of loading/unloading approximately 400 ships per year, or an average of just over 1 ship every day.

⁹ The nameplate rating will be determined during the pre-filing process after further study of expected feed gas composition, site conditions, equipment selections, expected maintenance schedules, and other factors.

¹⁰ Modifications and additions to existing facilities will be determined through engineering design development to take place during the pre-filing process.

- Expansion of the existing warehouse to store spare parts and consumables for both the liquefaction and regasification facilities;
- Expansion of the existing storage building for chemicals, lubricants, and other hazardous substances;
- Expansion of the existing O&M building for lockers, canteen, offices, etc.;
- Remote I/O buildings and substations, as required;
- Storage tanks for propane and ethylene refrigerants;
- New wet and dry flares protecting LNG Trains 5 and 6;
- Impoundments for the liquefaction trains;
- Five (5) recycle boil-off gas compressors, each rated approximately 1.1 MW;
- Two (2) instrument air compressor packages, each capable of providing approximately 5.35 mmscf/d;
- Two (2) LM2500+ DLE gas turbine driven electric power generators, each rated approximately 27 MW;
- Two new standby generators;
- New plant roads to service new facilities;
- Expansions of security and perimeter control systems;
- Expansions of telecom, IT, CCTV, and other systems;
- New storage tanks for condensate, liquid nitrogen, diesel, and gasoline (if required);
- Two demineralized water units, each capable of treating up to 2,750 gpm of freshwater;
- One demineralized water tank (approximately 1,530,000 gallons);
- New pipeline interconnects for the receipt of natural gas, including meter station and filter separator; and
- Modification of the electric generation facilities, including gas-turbine generators, transformers, and other electrical accessories to supplement existing onsite power generation.

4. CCTPL Expansion Project Description

Attachment 1b illustrates the proposed expansion and extension of the existing CCTPL system. The proposed CCTPL Expansion Project consists of the following new facilities:

- 45 miles of 42-inch-pipeline extending from the terminus of the existing CCTPL system and terminating at facilities operated by the Pine Prairie Energy Center natural gas storage facility (“PPEC”). This extension of the CCTPL system will parallel existing right of way (“ROW”) for nearly 70 percent of the route, consisting primarily of agriculture land and some timber acreage. Preliminary analysis of the route showed no major pipe construction issues or ROW concerns.
 - A new 53,000-Horsepower compressor station, the Mamou Compressor Station, located at the end of the pipeline extension.
 - Three 36-inch diameter lateral pipelines: (i) an approximately 1,000-foot long lateral connecting to PPEC; (ii) an approximately 1.5-mile long lateral connecting to the pipeline systems of ANR Pipeline Company (“ANR”); and (iii) an approximately 16.5-mile long lateral connecting to Columbia Gulf Transmission Company (“Columbia Gulf”) and Texas Gas Transmission, LLC (“Texas Gas”). These lateral lines will parallel existing pipeline ROW for over 90 percent of the route.
 - Four new Measuring and Recording (“M&R”) stations designed to receive gas from PPEC, ANR, Texas Gas and Columbia Gulf. The PPEC and ANR M&Rs will be co-located with the Mamou Station.
 - New or modified (re-wheeled) compressors at the existing Gillis Compressor Station.
 - Looping of the existing Zone 1 pipeline facilities with a parallel 42-inch line in two locations. The first loop will extend 25 miles south from the Gillis Compressor Station to existing Main Line Valve 5. The second loop will extend 14 miles from the existing meter facilities at Johnson Bayou to a new meter to be installed by SPL to serve Trains 5 and 6. By adding these loops, CCTPL Zone 1 capacity will increase to 3.0 Bcf/d, with maximum capacity through the Gillis Compressor Station of 2.25 Bcf/d.
5. *List of Relevant Federal and State Agencies in the Liquefaction Project Area with Relevant Permitting Requirements, and Statement Indicating Agency Awareness of Applicants’ Intention to Use Pre-Filing Process (including contact names, phone numbers, and whether agencies agree to participate in this process).*¹¹

Table 1, which is included as an attachment to this letter, identifies the federal and state agencies that have some form of review and/or permitting authority over the Liquefaction Expansion Project and the CCTPL Expansion and further reflects the timeframe within which the Applicants propose to file with such agencies for permits or other authorization, as applicable. For the most part, the Applicants intend to pursue such authorizations concurrent with the instant Commission process and expect to submit to the relevant agencies all applications for federal

¹¹ 18 C.F.R. § 157.21(d)(5).

authorizations no later than October 2013. The Applicants anticipate that the relevant agencies will issue their respective federal authorizations for the Liquefaction Expansion Project and the CCTPL Expansion in accordance with the schedule set by the Commission pursuant to Section 157.9 of the Commission's regulations.¹² Table 1 also provides a listing of those agencies that the Applicants have informed about this pre-filing review request (contact information provided), including the project schedule, and whether those agencies have agreed to participate in the pre-filing review process. The Louisiana Department of Natural Resources has been designated as the lead state agency by the Governor of Louisiana to consult with the Commission regarding state and local safety considerations.

6. *List and Description of the Interest of Other Persons/Organizations Contacted about the Liquefaction Expansion Project*¹³

The Applicants initiated their public outreach program for the Liquefaction Expansion Project and the CCTPL Expansion in January 2013. Since that time, the Applicants have had discussions with numerous agencies (federal, state and local), individuals, groups and organizations regarding the Liquefaction Expansion Project's and CCTPL Expansion's potential effects on the environment, relationship with the community during construction and operation, and public safety issues.

The Applicants will continue to meet with various groups and individuals regarding the Liquefaction Expansion Project and the CCTPL Expansion as outlined in the Public Outreach Plan discussed below.

7. *Project Work Already Done*¹⁴

- **Agency Consultations:** See Item No. 5 above, and Table 1 for a list of agency consultations.
- **Engineering:** Sabine Pass currently is preparing engineering and design plans for all components of the Liquefaction Expansion Project. CCTPL is engaged in ROW and engineering design for the CCTPL Expansion.
- **Environmental and Engineering Contractor Engagement:** To date, Sabine Pass and CCTPL have engaged the following contractors and subcontractors to help develop the proposed facilities.
 - Bechtel Corporation
 - ConocoPhillips Company
 - PCS
 - TRC
 - GexCon US Inc.
 - Trinity Consultants
 - SWCA

¹² *Id.* § 157.9.

¹³ *Id.* § 157.21(d)(6).

¹⁴ *Id.* § 157.21(d)(7).

- ***Environmental Studies:*** All Liquefaction Expansion Project facilities will be located within the previously-authorized footprint of the existing Sabine Pass LNG terminal. Additional environmental impacts will be limited to those areas already reviewed and permitted by the Commission and the applicable state and federal permitting agencies. As reflected above, the proposed extension of the CCTPL system will parallel existing ROW for nearly 70 percent of the route, consisting of primarily agriculture land and some timber acreage. CCTPL's proposed line looping will parallel its existing ROW. Preliminary analysis of the route showed no major pipe construction issues or ROW concerns.
- ***Public Outreach and Open House Meetings:*** See Item Nos. 6 and 10, and Table 1 and Table 2 for a list of stakeholder communications. Open House Meetings are being scheduled for locations in the vicinity of the Liquefaction Expansion Project and the CCTPL Expansion. The Applicant's Public Outreach Program also has been implemented (see below).

8. *Third Party Consultant Proposals*¹⁵

The Applicants sent out a Request for Proposals for Third-Party Contractors in early February 2013 to several potential environmental contractors and are concurrently providing responses from potential contractors to the Commission Staff under separate cover.

9. *Acknowledgement: Complete Environmental Report and Complete Application Required at the Time of Filing*¹⁶

The Applicants acknowledge that a complete Environmental Report and complete applications under Sections 3(a) and 7(c) of the NGA, respectively, will be submitted to the FERC at the time of filing.

10. *Public Participation Plan Details*¹⁷

As part of its public outreach plan, the Applicants have conducted or will conduct the following activities:

1. Made a formal announcement of the Liquefaction Expansion Project and the CCTPL Expansion to local, state, and federal elected officials, and also have notified key special interest groups;
2. Held follow-up meetings with local, state and federal regulatory agencies previously contacted to identify other stakeholders and to initiate pre-filing activities with each agency;

¹⁵ *Id.* § 157.21(d)(8). The Applicants request waiver of the requirement to submit three prospective third party contractors.

¹⁶ *Id.* § 157.21(d)(10).

¹⁷ *Id.* § 157.21(d)(11).

3. Will continue to identify other governmental organizations to inform them about the Liquefaction Expansion Project and the CCTPL Expansion and address any issues that are raised by the parties represented by these organizations;
4. Will continue to identify and meet with key audiences and stakeholder groups, local associations, neighborhood groups and other non-government organizations to inform them about the Liquefaction Expansion Project and the CCTPL Expansion and address any issues that may be raised;
5. Will hold technical workshops/open houses in order to provide information about LNG to all of the interested state and federal agencies, adjacent tenants, as well as the public;
6. Will provide all required support needed for FERC to conduct public scoping meetings;
7. Pertinent information regarding the status of the Liquefaction Expansion Project and the CCTPL Expansion will be posted on the publicly available website of Cheniere Energy Partners, L.P. The website address is (www.cheniere.com) and will be populated with the information listed below:
 - o A list of public repositories where all project related information, including project maps, will be available for inspection;
 - o Frequently asked questions, with responses (FAQs);
 - o A list of questions and issues raised at open houses and the Applicants' responses to each;
 - o Newsletter contents;
 - o Applications filed with the FERC;
 - o Any data requests, and the Applicants' response to each;
 - o Environmental documents issued by FERC; and
 - o Other appropriate project related information.

A single point of contact has been established for the Liquefaction Expansion Project and the CCTPL Expansion. The contact will be:

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Through the pre-filing process the Applicants will endeavor to identify and resolve all of the stakeholders' potential issues and concerns, thereby providing the Commission with an application that can be moved expeditiously through the NEPA process. The Commission's early assistance in facilitating the NEPA process is greatly appreciated.

Kimberly D. Bose
February 27, 2013
Page 10 of 10

11. *Submittal to U.S. Coast Guard of Section 33 CFR § 127.007 Letter of Intent and Preliminary Waterway Suitability Assessment*¹⁸

As reflected in the February 19, 2013 letter from G.J. Paitl, Captain, U.S. Coast Guard, Captain of the Port, Port Arthur, Texas (Attachment 2), construction and operation of the Liquefaction Expansion Project will not require submission of a new Letter of Intent or revision to the existing Waterway Suitability Assessment.

The Applicants respectfully request that the Commission grant this request to initiate the pre-filing review process by March 8, 2013. Should you have any questions about this request, please feel free to contact the undersigned at (212) 318-3009.

Respectfully submitted,

/s/ Lisa M. Toney
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Enclosures

cc: Mr. Jeff Wright
Ms. Lauren O'Donnell
Mr. Terry Turpin

¹⁸ *Id.* § 157.21(d)(12).

List of Enclosures

Attachment 1a – Liquefaction Expansion Project Location and Preliminary Site Configuration

Attachment 1b – CCTPL Pipeline Expansion Route

Attachment 2 – Letter from G.J. Paitl, Captain, U.S. Coast Guard, Captain of the Port, Port Arthur, Texas dated February 19, 2013

Table 1 – Agency Correspondence

Table 2 – List of Stakeholder Communications