



500 Eighth Street, NW
Washington, DC 20004
www.dlapiper.com

Andrea J. Grant
Andrea.Grant@dlapiper.com
T 202.799.4306
F 202.799.5306

March 9, 2023

Ms. Beverly Howard
Office of Fossil Energy and Carbon Management
Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Request for Amendment to Long-Term Natural Gas License – Order 3765-D

Dear Ms. Howard:

On December 31, 2015, the Office of Fossil Energy (FE) of the Department of Energy (DOE) issued DOE/FE Order No. 3765 under Section 3 of the Natural Gas Act.¹ That Order granted Irving Oil Commercial GP, a Canadian entity, and its sister U.S. entity, Irving Oil Terminals Operations LLC, (collectively “Irving Oil”) long-term authority to import and export natural gas from and to Canada. On October 27, 2017, DOE/FE issued DOE/FE Order No. 3765-A which amended DOE/FE Order No. 3765 to reflect a corporate name change. On February 28, 2018, DOE/FE issued DOE/FE Order No. 3765-B increasing the volumes of Irving Oil’s authorization to import and export natural gas from and to Canada. On March 11, 2019, DOE/FE issued DOE/FE Order No. 3765-C. That Order authorized an additional increase in the import and export volumes of the prior Orders and extended the term of the authorization. On August 25, 2022, DOE/FECM issued Order No. 3765-D that amended the authorization to import and export natural gas from and to Canada and reflected a corporate reorganization. Accordingly, Irving Oil is currently permitted to import into the United States up to 22 billion cubic feet (Bcf) of natural gas per year from Canada and to export from the United States up to 34 Bcf per year of natural gas to Canada. This authorization is valid through October 31, 2041.

I. Internal Reorganization and Requested Amendment

Irving Oil is now engaged in another internal reorganization to promote corporate efficiencies and reduce the number of entities the company must manage. Effective May 1, 2023, Irving Oil Terminals Operations Inc. will be merged into Irving Oil Terminals Inc., a subsidiary of Irving Oil Limited of Saint John, New Brunswick, Canada

¹ 15 USC Section 717b.



Ms. Beverly Howard
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Page 2

(the parent company). All of the business (e.g. all assets, liabilities, contracts and related matters) of Irving Oil Terminal Operations Inc. will be assumed by Irving Oil Terminals Inc. There will be no change in control, and the internal corporate reorganization will have no impact on the company's external operations.

Accordingly, Irving Oil requests that the Office of Fossil Energy and Carbon Management amend DOE/FEMC Order 3765-D and transfer the import and export authorizations previously granted to Irving Oil Terminals Operations LLC and Irving Oil Limited to Irving Oil Terminals Inc. and Irving Oil Limited.

II. Natural Gas Act – Standard of Public Interest

Under Section 3(c) of the Natural Gas Act, as amended by the Energy Policy Act, the import and export of natural gas from and to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas are deemed to be consistent with the public interest. The United States and Canada have such a free trade agreement. Therefore, Irving Oil believes that its request meets the Section 3(c) criterion and is consistent with the public interest.

III. Administrative Compliance

A hard copy of this letter and a check for the \$50 processing fee have been sent by overnight courier to the Office of Fossil Energy and Carbon Management.

Irving Oil would be pleased to respond to any questions you may have regarding this request to amend DOE/FECM Order No. 3765-D. Please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Andrea Grant'.

Andrea Grant
Martin Schaefermeier
Counsel for
Irving Oil Terminals Operations LLC
Irving Oil Terminals Inc., and
Irving Oil Limited

DLA Piper LLP (US)

6225 SMITH AVENUE, BALTIMORE, MD 21209

CHECK NO.:

2286098

INVOICE	DATE	AMOUNT	COMMENTS
022823	02-28-23	50.00	DELIVER TO - WASHINGTON DC - BRIDGET MONROE
			VENDOR ID: 106871

THIS CHECK HAS A BLUE BACKGROUND, VOID PANTOGRAPH, MICROPRINTED LINES AND AN ARTIFICIAL WATERMARK.

DLA Piper LLP (US)

6225 SMITH AVENUE
BALTIMORE, MD 21209-3600

Wells Fargo Disbursement Acct 11-24/1210

Date: 02/28/2023

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Pay Exactly FIFTY AND 00/100 Dollars

Amount
\$50.00

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ORDER
OF

TREASURER OF THE UNITED STATES



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