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By Docket Room at Thursday, June 23, 2022 11:11 AM

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

June 16, 2022

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-C

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.<sup>1</sup> 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 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. 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 an internal reorganization to promote corporate efficiencies and reduce the number of entities the company must manage. Irving Oil Commercial GP is a wholly-owned subsidiary of Irving Oil Limited of Saint John, New Brunswick, Canada. It has been acting as a principal operating arm for the parent company. However, effective July 1, 2022, the company plans to dissolve Irving Oil Commercial GP and transfer its entire business (e.g. all assets, liabilities, contracts and related matters) to the parent company, Irving Oil Limited. There will be no change in

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<sup>1</sup> 15 USC Section 717b.



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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/FE Order 3765-C and transfer to Irving Oil Limited and Irving Oil Terminal Operations LLC the authorizations granted therein. Irving Oil will submit the dissolution document for Irving Oil Commercial GP as soon as it is received from the New Brunswick Corporate Registry, the Crown corporation responsible for such matters.

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/FE Order No. 3765-C. Please contact the undersigned.

Respectfully submitted,

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

Andrea Grant  
Martin Schaefermeier  
Counsel for  
Irving Oil Commercial GP  
Irving Oil Terminals Operations LLC  
Irving Oil Limited

ANDREA JILL GRANT

15101 SPRINGFIELD ROAD PH. 301-869-4788  
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Date June 16, 2022

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Irving Oil

Amendment to Order 3765-C

Andrea J. Grant RP

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