

## **Posting of Off-the-Record Communication**

The attached document was sent to the Department of Energy in reference to this proceeding, Commonwealth LNG LLC, Docket No. 19-134-LNG. This document is considered an “off-the-record communication” under 10 CFR 590.102 and 590.108 because the person/entity who either made or knowingly caused the communication to be made is an “interested person,” the communication was directed to a “decisional employee,” and the communication “is relevant to the merits of the proceeding.”

The comment period for this proceeding has closed. This communication is posted here in compliance with regulations. As provided in 10 CFR 590.108(a)(5), a request by a party wishing to rebut this communication, on the record, may be submitted in writing. As specified in this regulation, such requests will be granted “only for good cause.”



**RECEIVED**

*By Docket Room at 07/21/2023 10:25 a.m.*

**COMMONWEALTH  
LNG**

July 20, 2023

Ms. Amy Sweeney  
Director, Division of Natural Gas Regulation  
Office of Fossil Energy and Carbon Management  
U.S. Department of Energy  
Docket Room 3F-056, FE-50  
Forrestal Buildingr1000 Independence Avenue, S.W.  
Washington, D.C. 20585

Re: Commonwealth LNG, LLC - FE Docket No. 19-134-LNG

Dear Ms. Sweeney:

On October 16, 2019, Commonwealth LNG, LLC (“Commonwealth”) filed an application with the Department of Energy (“DOE”) for long-term authorization to export liquefied natural gas to nations which have a Free Trade Agreement (“FTA”) with the United States as well as those nations which do not have a Free Trade Agreement (“Non-FTA”) with the United States. The application requested authorization to export domestically produced liquefied natural gas (“LNG”) in an amount up to 9.5 million metric tonnes per annum from Commonwealth’s proposed natural gas liquefaction and export facilities to be located in Cameron Parish, Louisiana (the “Project”). DOE granted Commonwealth’s request for authorization with respect to FTA nations on April 17, 2020.

On September 11, 2020, Commonwealth filed an application to amend the requested export term in its pending application through December 31, 2050, as it relates to exports to Non-FTA nations pursuant to the DOE policy statement “Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050”. This amended application is pending in FE Docket No. 19-134-LNG.

On November 17, 2022, the Federal Energy Regulatory Commission issued an order granting authorization under Section 3 of the Natural Gas Act for the construction of the Project.

Granting authorization to export to Non-FTA nations is a requirement for the successful marketing, funding and construction of any U.S. LNG export project. Given the criticality of the Non-FTA authorization to Commonwealth’s customers, investors and lenders, Commonwealth respectfully requests that DOE promptly grant Commonwealth’s authorization to export LNG to non-FTA nations.

Respectfully submitted,

Paul J. Varello  
Chairman  
Commonwealth LNG, LLC

**From:** [FERGAS](#)  
**To:** [mikemckenna63@gmail.com](mailto:mikemckenna63@gmail.com)  
**Cc:** [Wade, Jennifer L.](#); [Howard, Beverly](#); [FERGAS](#)  
**Subject:** RE: [EXTERNAL] Letter from Paul Varello  
**Date:** Friday, July 28, 2023 12:24:43 PM  
**Attachments:** [image001.png](#)  
[19-134-LNG DOE Letter 7-20-2023 07.21.2023.pdf](#)

---

Good afternoon,

Attached please find receipt of your submission. Pursuant to 10 CFR § 590.107, please ensure that all parties to the proceeding have been served with this submission and please supplement your submission with a certificate of service. Pursuant to 10 CFR § 590.103, please also supplement your submission with a verification statement for it to be considered a complete filing.

Division of Natural Gas Regulation  
Office of Resource Sustainability  
Office of Fossil Energy and Carbon Management  
U.S. Department of Energy  
1000 Independence Ave, SW  
Washington, DC 20585  
**Phone:** 202-586-9478  
**Email:** [fergas@hq.doe.gov](mailto:fergas@hq.doe.gov)  
**Website:** <https://www.energy.gov/fecm/regulation>



Engage and subscribe.



---

**From:** Michael McKenna <[mikemckenna63@gmail.com](mailto:mikemckenna63@gmail.com)>  
**Sent:** Friday, July 21, 2023 10:25 AM  
**To:** Sweeney, Amy <[amy.sweeney@hq.doe.gov](mailto:amy.sweeney@hq.doe.gov)>  
**Subject:** [EXTERNAL] Letter from Paul Varello

Ms. Sweeney —

Mr. Varello asked me to forward this letter to you.

Please don't hesitate to contact me with any questions.

Thank you.

MMcKenna

\*\*\*\*\*

This message does not originate from a known Department of Energy email system.  
Use caution if this message contains attachments, links or requests for information.

\*\*\*\*\*

**RECEIVED**

***By Docket Room at 07/31/2023 4:27 p.m.***

**CERTIFICATE OF SERVICE**

I certify that I have this 31st day of July, 2023, serviced copies of the foregoing document filed with DOE/FE on the designated representatives of all of the parties to this proceeding, in accordance with 10 C.F.R. § 590.107(a)

/s/ Timothy J. Furdyna  
Timothy J. Furdyna  
*Counsel for Commonwealth LNG, LLC*

**UNITED STATES OF AMERICA  
BEFORE THE DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT**

<b>In the Matter of</b>	)	
	)	<b>FE Docket No. 19-134-LNG</b>
<b>Commonwealth LNG, LLC</b>	)	

**VERIFICATION**

I, Thomas Smith, declare that I am General Counsel to Commonwealth LNG, LLC, and am duly authorized to make this Verification; that I have read the foregoing instrument and that the facts therein stated are true and correct to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Houston, Texas on July 31, 2023.

/s/ Thomas Smith  
Thomas Smith  
General Counsel  
Commonwealth LNG, LLC