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U.S Department of Energy
Office of Regulation, Analysis, and Engagement Office of Fossil Energy and Carbon Management
Forrestal Building, Room 3E-056
1000 Independence Avenue SW
Washington, DC 20585

Re: Docket Nos. 13-129-LNG; 13-147-LNG

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Chesapeake Energy Corporation (Chesapeake) appreciates this opportunity to comment in support of the application filed by Delfin LNG LLC (Delfin) on March 1, 2024. Delfin requests a supplemental order modifying its authorization to export domestically produced liquefied natural gas (LNG) to non-free trade agreement countries set forth in DOE/FE Order No. 4028, as amended, to allow Delfin to commence export operations from the proposed Delfin Deepwater Port by no later than June 1, 2029. Importantly, Delfin is simply requesting more time and is not proposing material changes to the nature of the project or export authorizations.

Chesapeake is one of the largest natural gas producers in the U.S with operations in Louisiana and Pennsylvania, currently operating approximately 2,500 wells, with a gross average daily gas production of approximately 6.3 billion cubic feet/day of affordable and reliable lower carbon domestically and abroad. 100% of the company's gas production is now dual-certified by MiQ and EO 100. Chesapeake has a 2035 net-zero commitment to reduce Scope 1 & 2 methane and greenhouse gas intensity. In pursuit of these goals, Chesapeake has invested more than \$30 million on ESG-related initiatives that include operating over 2,000 methane monitoring devices, retrofitting approximately 19,000 pneumatic devices, and conducting aerial Gas Mapping LiDAR scans to detect emissions across all assets. These efforts have resulted in an enterprise-wide methane intensity of 0.02% which is an order of magnitude below the 0.2% methane intensity that this congress set the methane fee at in the Inflation Reduction Act, 2022.


Chesapeake recently announced a "Sales and Purchase Agreement ("SPA") utilizing the proposed Delfin facility to purchase approximately 0.5 million tonnes ("mtpa") of LNG per annum from Delfin. The LNG from the Delfin facility will be shipped to allies of the United States in both Europe and Asia, supplying them with U.S.-produced, affordable low-carbon energy at a time when our allies are relying on U.S. LNG for their national and energy security.

The first floating LNG (FLNG) in the U.S, the innovative Delfin project will be located nearly 45 miles offshore and utilizes existing pipeline infrastructure. The new FLNG project infrastructure can also be relocated or deployed elsewhere as needed mitigating concerns related to long term stranded assets. The benefits of the Delfin floating LNG facility will also be realized locally, as natural gas royalty owners in the U.S continue to see income from the production of natural gas contracted to this facility and, local communities will continue to see tax and local investments at a time of all time low-natural gas prices. The opportunity to access international markets will continue to support local jobs in the industry.

The U.S.-produced natural gas that will be shipped through the Delfin facility will provide some of the cleanest natural gas in the world to our allies as evidenced by recently-conducted studies from the Appalachian Methane Initiative and the Berkley Research Group (BRG)¹.

While the world's need for energy has never been greater and U.S. energy producers are looked upon to provide more low-carbon energy both domestically and abroad, the domestic price of natural gas remains near all-time low levels despite record high volumes of LNG export enabling both residential and industrial consumers to have access to needed critical energy supply, at record low prices².

Sincerely,



Usha-Maria Turner

¹ [BRG USLNG-Competitive-GHG-Footprint-Analysis_2024-4.16.24.pdf \(thinkbrg.com\)](#)

² [Natural Gas Futures Contract 1 \(Dollars per Million Btu\) \(eia.gov\)](#); [U.S. Natural Gas Exports \(Million Cubic Feet\) \(eia.gov\)](#)