

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT

Delfin LNG LLC

Docket No. 13–147–LNG

**Motion to Intervene and Protest of Public Citizen, Inc.**

Public Citizen protests Delfin LNG’s request for an extension of time to export natural gas. The April 2023 *Policy Statement on Export Commencement Deadlines in Authorizations To Export Natural Gas to Non-Free Trade Agreement Countries* states that the U.S. Department of Energy “will not consider an application for an extension” unless the applicant demonstrates that “its inability to comply with the existing export commencement deadline is the result of extenuating circumstances outside of its control.”<sup>1</sup> While the applicant claims a number of generic excuses as to why it has failed to make adequate progress (problems with its floating LNG technology; China; the COVID-19 epidemic; and licensing challenges<sup>2</sup>) these simply mask that it appears Delfin LNG’s ownership was unprepared and inexperienced in developing such a complex project. Indeed, the Department of Energy granted authorization to Golden Pass LNG to export natural gas in 2017—the same year as Delfin LNG—and Golden Pass quickly went to work despite COVID, upheaval with China relations, and other challenges and yet is on track to begin exporting LNG next year. Delfin LNG, meanwhile, appears to have not taken its authorization to export LNG seriously until 2022—five years after obtaining authorization from DOE.

Delfin LNG proposes a floating LNG export terminal located 50 miles off the coast of Louisiana in deepwater Gulf of Mexico. Delfin LNG is essentially controlled by two individuals: New Zealand national Frederick Jones, and Jason Kalisman, grandson of the late billionaire Alfred Taubman. The lack of experience of Delfin’s owners in constructing floating LNG export terminals, combined with their financing challenges and overextended obligations with other projects like Cedar LNG, appear to be the

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<sup>1</sup> [www.energy.gov/sites/default/files/2023-06/Policy%20Statement%20on%20Export%20Commencement%20Deadlines%20in%20Authorizations%20to%20Export%20Natural%20Gas%20to%20Non-Free%20Trade%20Agreement%20Countries.pdf](https://www.energy.gov/sites/default/files/2023-06/Policy%20Statement%20on%20Export%20Commencement%20Deadlines%20in%20Authorizations%20to%20Export%20Natural%20Gas%20to%20Non-Free%20Trade%20Agreement%20Countries.pdf)

<sup>2</sup> *Application*, at pages 3-4, [www.energy.gov/sites/default/files/2024-03/Delfin%20DOE%20Extension%20request%20%28030124%20FINAL%29.pdf](https://www.energy.gov/sites/default/files/2024-03/Delfin%20DOE%20Extension%20request%20%28030124%20FINAL%29.pdf)

primary reasons for their inability to meet the original Department of Energy deadline. Therefore, the request fails the *Policy Statement* test and must be denied.

One of Delfin LNG's financing vehicles is a shell company *theglobe.com* which is listed on the over-the-counter penny stock market and currently trades for about 20 cents a share. The lack of market interest in this capital financing structure is one indication that the ownership and financing structure of Delfin LNG is the problem.

### **Motion to Intervene**

Public Citizen, Inc. moves to intervene in this proceeding. Established in 1971, Public Citizen, Inc. is a national, not-for-profit, non-partisan, research and advocacy organization representing the interests of household consumers. We have over 500,000 members and supporters across the United States. Public Citizen is active before the Federal Energy Regulatory Commission promoting just and reasonable rates. We frequently intervene in U.S. Department of Energy proceedings involving the export of electricity and natural gas. Our Energy Program Director, Tyson Slocum, is an expert on energy market regulatory matters, serving as a witness on the Department of Energy public interest standard in testimony before the U.S. Congress in February 2023.<sup>3</sup> Slocum also serves on two federal advisory committees of the U.S. Commodity Futures Trading Commission (the Energy and Environmental Markets and Market Risk advisory committees). Financial details about our organization are on our web site.<sup>4</sup>

Respectfully submitted,

*Tyson Slocum*

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<sup>3</sup> [www.citizen.org/article/house-testimony-energy-legislation/](http://www.citizen.org/article/house-testimony-energy-legislation/)

<sup>4</sup> [www.citizen.org/about/annual-report/](http://www.citizen.org/about/annual-report/)

## VERIFICATION

Pursuant to 10 CFR § 590.103(b), I, Tyson Slocum, declare that I am Energy Program Director for Public Citizen, Inc. and am authorized to make this verification; that I have authored and read the foregoing filing 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 that the foregoing is true and correct. Executed on April 29, 2024.

*Tyson Slocum*  
Tyson Slocum  
Energy Program Director  
Public Citizen, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the applicant and intervenors for this docketed proceeding in accordance with 10 CFR § 590.107(b).  
Dated at Washington, DC this 29<sup>th</sup> day of April 2024.

Signed,

*Tyson Slocum*

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