



**RECEIVED**

By Docket Room at 8:28 am, Apr 16, 2024

Devon Energy  
333 West Sheridan Avenue  
Oklahoma City, OK 73102-5015

405 235 3611 Phone  
www.devonenergy.com

April 15, 2024

**VIA EMAIL TO: [fergas@hq.doe.gov](mailto:fergas@hq.doe.gov)**

Office of Fossil Energy and Carbon Management  
U.S. Department of Energy (FE-34)  
3E-056, Forrestal Building  
1000 Independence Ave. SW  
Washington, DC 20585

RE: **Docket No. 13-147-LNG**  
**Delfin LNG LLC**  
Comments in Support of Request of Delfin LNG LLC dated March 1, 2024

Ladies and Gentlemen:

Pursuant to the Administrative Procedures with respect to the Import and Export of Natural Gas, 10 C.F.R Part 590, and the Notice of Request for Supplemental Order Granting Conditional Extension of Time for Long-Term Authorization To Export Liquefied Natural Gas issued by the Office of Fossil Energy and Carbon Management (“DOE/FECM”) on March 29, 2024,<sup>1</sup> Devon Energy Corporation (“Devon”) hereby submits these comments in support of the request of Delfin LNG LLC (“Delfin”) filed in the above-captioned proceedings on March 1, 2024 (the “Request”). In its Request, Delfin asks DOE/FECM to issue a supplemental order that would modify its existing natural gas export authorizations<sup>2</sup> to provide Delfin a five-year extension of time to commence liquefied natural gas (“LNG”) export operations from its Deepwater Project from June 1, 2024, to

---

<sup>1</sup> 89 Fed. Reg. 22137 (Mar. 29, 2024).

<sup>2</sup> *Delfin LNG LLC*, DOE/FE Order No. 3393, Docket No. 13-129-LNG (Feb. 20, 2014) (FTA authorization) *amended* by Order No. 3393-A (Dec. 10, 2020) (extension of term through 2050), *further amended* by Order No. 3393-B (May 18, 2021) (correcting the precise location of the FLNGVs); and DOE/FE Order No. 4028, Docket No. 13-147-LNG (June 1, 2017) (non-FTA authorization), *reh’g denied* by Order No. 4028-A (Apr. 3, 2018), *amended* by Order No. 4028-B (Dec. 10, 2020) (extension of term through 2050), *further amended* by Order No. 4028-C (May 18, 2021) (correcting the precise location of the FLNGVs).

June 1, 2029. Devon respectfully urges DOE/FECM to grant Delfin's Request. In support of this filing, Devon states as follows:

Devon is a leading independent oil and natural gas exploration and production company headquartered in Oklahoma City. Devon is a publicly-traded company with its common shares traded on the New York Stock Exchange under the ticker symbol DVN. Devon's operations are focused onshore in the United States, with a premier multi-basin portfolio headlined by a world-class acreage position in the Delaware Basin in Texas and New Mexico, and operations in four other major producing basins. Devon's net production in the fourth quarter of 2023 was 662 MBoe/d (thousand barrels oil equivalent per day), including 1,061 MMcf/d (million cubic feet per day) of natural gas and 169 MBbls/d (thousand barrels per day) of natural gas liquids.

Devon believes that exports of abundant and clean-burning natural gas from the United States are consistent with the U.S. public interest. LNG exports create American jobs and benefit the U.S. economy while providing energy security to allies and trading partners around the world. The U.S. regulatory process should be supportive of LNG export projects like Delfin's, particularly in light of the increased geopolitical importance of the U.S. supplying American allies following the Russian invasion of Ukraine and the resulting energy crisis.

In September 2022, Devon announced that it had entered into a Heads of Agreement with Delfin providing for Devon to contract for long-term liquefaction services from Delfin. As Delfin stated in its Request, Devon has not yet finalized an offtake agreement with Delfin but expects to be a customer of Delfin utilizing its Deepwater Port facility to export domestic natural gas to overseas markets.

As detailed in its Request, Delfin is a unique LNG export project based on floating liquefaction vessels and structured as a Deepwater Port subject to the approval process of the

Maritime Administration. Delfin's project will utilize existing, already constructed offshore natural gas pipelines to access abundant American natural gas supplies and transport it to Delfin's floating LNG facilities that will be moored in federal waters offshore Louisiana. The Delfin project has been delayed by the circumstances detailed in the Request, but we understand that Delfin's LNG export project is ready to move forward if the Request is granted.

The Request is consistent with the Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries issued by DOE on April 26, 2023, and the proposed extension of time is consistent with the public interest.<sup>3</sup>

For all these reasons, Devon respectfully urges DOE/FECM to grant Delfin's Request and issue an order modifying Delfin's existing export authorizations to allow Delfin to commence export operations from the Delfin Deepwater Port by June 1, 2029.

Respectfully submitted,

DEVON ENERGY CORPORATION

A handwritten signature in blue ink that reads "Gregory Horne". The signature is written in a cursive, flowing style.

Gregory S. Horne  
Vice President

---

<sup>3</sup> See Request at 31-43.