



Enbridge Holdings (LNG) L.L.C.
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April 29, 2024

VIA EMAIL TO: fergas@hq.doe.gov

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

Dear Ms. Sweeney:

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, 2024,¹ Enbridge Holdings (LNG) L.L.C., a wholly owned subsidiary of Enbridge Inc (“Enbridge”) 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 to issue a supplemental order modifying its existing liquefied natural gas export (“LNG”) authorizations² to provide Delfin a five-year extension of time to commence LNG export operations from its Deepwater Project from June 1, 2024, to June 1, 2029. Enbridge respectfully urges DOE/FECM to grant Delfin’s Request. In support of this filing, Enbridge states as follows:

Enbridge is a leading North American energy infrastructure company with a core business focus in liquids pipelines, natural gas transmission, distribution, and storage, and renewable power generation. Enbridge and its affiliates transport approximately 30% of the crude oil produced in North American and nearly 20% of the natural gas consumed in the U.S., including 15% of the Gulf Coast’s LNG export capacity. Enbridge is headquartered in Houston, Texas and is a U.S. subsidiary of Enbridge Inc, a public company traded on the Toronto Stock Exchange and New York Stock Exchange under the symbol ENB. Enbridge has a 5.77% ownership stake in Delphin.

¹ 89 Fed. Reg. 22137 (Mar. 29, 2024).

² *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).

Enbridge believes that exports of abundant and clean-burning natural gas from the U.S. are consistent with the U.S. public interest. Natural gas produced from North American sources is both more affordable and contains lower emissions intensity than natural gas produced in other regions worldwide. Expanding access to U.S. sourced LNG through project's like Delfin's will help reduce the world's GHG emissions by displacing coal-fired and oil-fired power generation. Further, LNG exports create American jobs and benefit the U.S. economy while providing energy security to U.S. allies and trading partners around the globe. The geopolitical significance and importance of the U.S. supplying LNG to allies and trade partners has only increased in recent years following the Russian invasion of Ukraine and the resulting energy crisis. As such, the U.S. regulatory process should be supportive and incentive of Delfin's project and similar LNG export projects.

Delfin is a unique LNG export project, as detailed in the Request, based on floating liquefaction vessels, and structured as a Deepwater Port subject to the approval processes of the U.S. Maritime Administration. Delfin's project will utilize existing offshore natural gas pipelines to transport America's abundant natural gas supplies to the proposed floating LNG facilities that will be moored in federal waters offshore Louisiana. The circumstances culminating in the delays to the development of Delfin's project are detailed in the request.

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

For the foregoing reasons, Enbridge 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,

ENBRIDGE HOLDINGS (LNG) L.L.C.



Robert L. Huffman
President

³ See Request at 31-43.