

April 26, 2024

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

**Re: Delfin LNG LLC, DOE/FECM Docket No. 13-147-LNG**

Dear Ms. Sweeney:

On June 1, 2017, the U.S. Department of Energy, Office of Fossil Energy and Carbon Management (“DOE/FECM”) issued to Delfin LNG LLC (“Delfin”) an authorization to export domestically produced LNG by vessel from the proposed Delfin Liquefaction Project to any country with which the United States has not entered into a Free Trade Agreement that provides for national treatment of natural gas (“Non-FTA Authorization”).<sup>1</sup> The Non-FTA Authorization requires that Delfin commence commercial exports of LNG by June 1, 2024. On March 1, 2024, Delfin submitted a request for a conditional extension of the deadline to commence LNG exports, consistent with DOE/FECM’s *Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries*.<sup>2</sup> Mitsui O.S.K. Lines, Ltd. (“MOL”) submits these comments in support of Delfin’s extension request.<sup>3</sup>

MOL is the one of the largest shipping companies in the world. Headquartered in Tokyo, Japan, MOL’s fleet includes over 100 LNG carriers and Floating LNG Storage and Regasification Units, as well as about 700 other ships, such as dry cargo ships, car carriers, oil tankers, container ships, Floating Oil Production and Offloading vessels, and other specialized vessels. MOL is also an industry leader in sustainability initiatives, with our “Blue Action MOL,” which utilizes the knowledge we have gained through shipping to expand the field to social infrastructure and sustainable growth for societies.<sup>4</sup> MOL is working to reduce its emissions to net zero by 2050.

MOL respectfully requests that DOE/FECM issue the extension of Delfin’s Non-FTA Authorization. MOL entered into an Investment Agreement with Delfin Midstream Inc., the parent company of Delfin, on May 23, 2023. Pursuant to that agreement, MOL has joined the Board of Directors of Delfin Midstream. As an investor and board member of Delfin Midstream, we are confident and fully support the Delfin Liquefaction Project. MOL is further considering making material investments, to be agreed and subject to certain conditions, into the Delfin Liquefaction Project to support the construction of each floating liquefaction (“FLNG”) vessel. We understand that offtake capacity for the first FLNG vessel is already fully contracted, and gas supply is fully sourced. Additionally, the Project’s onshore components have already received authorization, and a construction deadline extension, from the Federal Energy Regulatory Commission. The Delfin Liquefaction Project continues to have advanced discussions with Samsung Heavy Industries on the construction of at least one FLNG unit. The combination of these serious ongoing conversation regarding the vessel construction with the

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<sup>1</sup> DOE/FE Order No. 4028, Docket No. 13-147-LNG (June 1, 2017), *reh’g denied*, Order No. 4028-A (Apr. 3, 2018); Order No. 4028-B (Dec. 10, 2020); Order No. 4028-C (May 18, 2021).

<sup>2</sup> 88 Fed. Reg. 25272 (Apr. 26, 2023).

<sup>3</sup> The names, titles, and mailing addresses for the official service list are attached hereto.

<sup>4</sup> See: <https://www.mol.co.jp/en/bam/>

firm contractual commitments from LNG offtakers creates a very robust financing package that will support debt and equity funding, including potential equity from MOL.

Natural gas is an essential transition fuel in the move to net zero, and securing LNG from the U.S. is vital to this transition and to global energy security generally. LNG is also vital to DOE's *America's Strategy to Secure the Supply Chain for a Robust Clean Energy Transition*,<sup>5</sup> as projects such as Delfin's create an immense incentive for global businesses, such as MOL, to invest in American industry. These incentives are government enabled and private sector led and provide broad benefits to the American public.

The Delfin Liquefaction Project will be an important source of the transition fuel that is necessary to meet rising global energy demand. The secure supply of LNG is especially important for U.S. allies such as Japan and countries in Europe, with the benefit of incentivizing continued demand and investment in American energy and technology. Given the importance of U.S. LNG supply and the continued support for Delfin from investors and LNG purchasers, MOL respectfully requests that DOE/FECM promptly approve Delfin's extension request.

Respectfully submitted,



Suryan Wirya-Simunovic  
Executive Director  
Mitsui O.S.K. Lines, Ltd.

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<sup>5</sup> Available at <https://www.energy.gov/policy/articles/americas-strategy-secure-supply-chain-robust-clean-energy-transition>