

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

Delfin LNG LLC

)
) **Docket Nos. 13-129-LNG**
) **and 13-147-LNG**
)

**REQUEST OF DELFIN LNG LLC FOR AMENDMENT OF
LONG-TERM AUTHORIZATIONS TO EXPORT LIQUEFIED NATURAL GAS
AND FOR ADDITIONAL EXTENSION OF TIME TO COMMENCE EXPORTS**

Pursuant to Section 3(a) of the Natural Gas Act (“NGA”) ¹ and Part 590 of the regulations of the Department of Energy (“DOE”),² Delfin LNG LLC (“Delfin”) submits to the Office of Fossil Energy and Carbon Management of the DOE (“DOE/FECM”) this request (“Request”) to amend its existing long-term, multi-contract authority to export domestically produced liquefied natural gas (“LNG”) from Delfin’s floating LNG (or “FLNG”) project to any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the U.S. either (1) has a Free Trade Agreement (“FTA”) requiring national treatment for trade in natural gas or (2) does not have such a FTA but with which trade is not prohibited by U.S. law or policy (“non-FTA” nations).³ Specifically, Delfin requests that

¹ 15 U.S.C. § 717b(a) (2018). The authority to regulate the imports and exports of natural gas, including liquefied natural gas, under section 3 of the NGA has been delegated to the Assistant Secretary for Fossil Energy and Carbon Management in Redelegation Order No. S4-DEL-FE1-2022, issued on June 13, 2022.

² 10 C.F.R. § 590 (2025).

³ *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), *further amended by* Order No. 3393-C (March 10, 2025)(modifying term to begin on the date of first export); *Delfin LNG LLC*, 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), *further amended by* Order No. 4028-D (March 10, 2025)(granting request to extend deadline to commence exports). In addition, Delfin’s export authorizations were amended, along with many others, by DOE/FE Order No. 4641 in Docket No. 10-85-LNG, *et al.* to include short-term (less than two year) exports (including for commissioning volumes) as part of a long-term authorization.

its non-FTA export authorization be amended to allow it to commence commercial non-FTA exports of LNG by June 1, 2031, providing an additional two-year extension of time beyond that recently granted by DOE,⁴ based on updated facts about the Project and consistent with DOE's newly adopted approach to term extensions providing for "the removal of additional regulatory barriers standing in the way of unleashing U.S. liquefied natural gas (LNG) exports."⁵ In addition, Delfin requests that both its non-FTA and FTA authorizations be amended as necessary to reflect the current design of its Project in accordance with the license recently granted to Delfin by the Maritime Administration ("MARAD") under the Deepwater Port Act ("DWPA").⁶ Amending the export authorizations to reflect the refinements of Delfin's Project over time will not require any change in the authorized volumes nor in any of the other Ordering Paragraphs of the authorizations.

DOE/FECM's policy provides that requests for extensions of time to commence exports should be filed at least 90 days prior to the existing commencement deadline in a non-FTA order in order to allow the agency sufficient time to provide public notice of the request and to evaluate the application and any filed comments on it.⁷ Although Delfin's current commencement deadline is just over four years away, it respectfully requests that DOE act on

⁴ *Delfin LNG*, DOE/FECM Order No. 4028-D; *see also* DOE Press Release, DOE Issues Extension to Delfin LNG Project (Mar. 10, 2025), available at: <https://www.energy.gov/articles/doe-issues-extension-delfin-lng-project>.

⁵ DOE Press Release, ENERGY DEPARTMENT TAKES ACTION TO REMOVE BARRIERS FOR REQUESTS TO LNG EXPORT COMMENCEMENT DATE EXTENSIONS (Apr. 1, 2025), available at: <https://www.energy.gov/articles/energy-department-takes-action-remove-barriers-requests-lng-export-commencement-date>; Rescission of Policy Statement on Export Commencement Deadlines in Authorizations To Export Natural Gas to Non-Free Trade Agreement Countries, 90 Fed. Reg. 14411 (Apr. 2, 2025) ("Recission of Policy").

⁶ *See* MARAD Press Release, "The Maritime Administration Issues the License for the Delfin LNG, LLC Deepwater Port Application" (March 21, 2025), available at: <https://www.maritime.dot.gov/newsroom/maritime-administration-issues-license-delfin-lng-llc-deepwater-port-application>.

⁷ *See* DOE/FECM, Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries, 88 Fed. Reg. 25272, 25277 (April 26, 2023) (the "2023 Extension Policy"). This timing requirement was maintained in the Recission of Policy, *supra*. note 5.

this Request within that same 90-day time period, i.e., by the end of July 2025.⁸ This timing is necessary to remove potential regulatory uncertainty as Delfin progresses toward a positive Final Investment Decision (“FID”) on its first FLNG vessel (or “FLNGV”) in the third quarter of this year and hopefully as soon as August.

I. CORRESPONDENCE AND COMMUNICATIONS

All correspondence and communications concerning this Request should be addressed to the following persons:⁹

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II. REGULATORY DEVELOPMENTS SINCE MARCH 2024 REQUEST

On March 1, 2024, Delfin filed with DOE/FECM in these proceedings its request for an extension of its non-FTA export commencement date. Delfin’s “March 2024 Request” provided

⁸ Because this Request relates to an existing export authorization and is included within the already authorized level of LNG exports, DOE/FECM action on it is *not* affected by its ongoing consideration of the 2024 LNG Export Study. See *Delfin LNG*, Order No. 4028-D at 23; *Golden Pass LNG Terminal LLC*, Order No. 3147-F/3978-G at 16 (March 5, 2025). Relatedly, the “Pause” in new authorizations established in connection with the preparation of that Study issued by the prior Administration did not apply to term extension requests. See DOE/FECM posting “The Temporary Pause on Review of Pending Applications to Export Liquefied Natural Gas” at n. 1 (undated, but stating that it is “current as of February 2024”), available at: https://www.energy.gov/sites/default/files/2024-02/The%20Temporary%20Pause%20on%20Review%20of%20Pending%20Applications%20to%20Export%20Liquefied%20Natural%20Gas_0.pdf

⁹ To the extent necessary, Delfin respectfully requests waiver of Section 590.202(a) of DOE’s regulations to include three individuals on the official service list related to this Request. 10 C.F.R. § 590.202(a).

extensive background and explanation regarding Delfin’s Project, its unique status as a FLNG project, the technical development and evolution of the Project over time, and its significant commercial success including binding, long-term LNG sale and purchase agreements (“SPAs”) for 3.3 million metric tonnes per annum (“MTPA”).¹⁰

To satisfy the stringent requirement under the since-rescinded 2023 Extension Policy that the authorization holder’s inability to comply with the non-FTA commencement deadline be the result of “extenuating circumstances outside its control,” Delfin explained in its March 2024 Request that its Project has been delayed by a series of such extenuating circumstances including: the continuing evolution of FLNGV technology requiring a series of refinements of the Project, complications related to trade with China affected its plans in 2018-19, the impacts of the COVID-19 epidemic, the related slowdown in market demand for LNG, the need to secure very limited shipyard slots for the FLNGV construction, and significant and protracted challenges with the MARAD licensing process.¹¹

Delfin emphasized the regulatory delays in the MARAD DWPA license process, which are not applicable to land-based LNG export projects, and detailed its extensive efforts from April 2022 forward seeking to obtain final license issuance.¹² Delfin concluded this explanation in its March 2024 Request as follows:

In summary, for much of the past year, Delfin has been hoping and expecting its final license to be issued by MARAD, and has done everything it can devise to further that goal. Unfortunately, MARAD’s final license issuance process – uniquely applicable to

¹⁰ In accordance with the terms of its export authorizations, Delfin has submitted to DOE a full and non-redacted copy of all its executed long-term SPAs, along with public summary of the material terms of each agreement. Those filings are publicly available at: <https://www.energy.gov/fecm/articles/delfin-lng-llc>.

¹¹ See March 2024 Request at 11-29.

¹² See *id.* at 22-27. In support of that explanation, Delfin included as attachments to its March 2024 Request the following submissions previously made to MARAD: June 2022 letter detailing engineering refinements (Attachment 1); April 2023 Environmental Assessment addressing changes to the Project (Attachment 2); and June 2023 analysis of Greenhouse Gas issues (Attachment 3).

Delfin among all LNG export projects with non-FTA authorization – is clearly outside of Delfin’s control. Delfin still expects MARAD to issue its final license soon.¹³

That timing expectation proved incorrectly optimistic and DOE/FECM emphasized setbacks in Delfin’s MARAD licensing process when it issued at the end of May 2024 its notice tolling Delfin’s export commencement deadline while it continued to consider the March 2024 Request.¹⁴ MARAD had still not acted on Delfin’s request for its DWPA license by the end of the Biden Administration.

The Executive Order entitled *Unleashing American Energy* issued on January 20, 2025, in its Section 8(b) – (d) established a process for moving forward consistent with applicable law for “any proposed deepwater port for the export of liquefied natural gas (project) for which a favorable record of decision (ROD) has previously been issued pursuant to the Deepwater Port Act of 1974 (DWPA).”¹⁵ Delfin is such a project.

On January 27, 2025, Delfin submitted to MARAD an update to facilitate its review of the Project, including a description of all the refinements to the Project and their probable environmental impacts as detailed in a revised and updated Environmental Impact Assessment (“EIA”), consistent with the ROD. MARAD publicly announced on March 21, 2025, that it has issued a license authorizing Delfin to own, construct, operate, and eventually decommission its deepwater port Project, recognizing that it will be the first offshore LNG export project.¹⁶ With respect to timing, the DWPA License provides only that Delfin must *begin* construction of the

¹³ March 2024 Request at 26.

¹⁴ Notice Tolling Expiration of Non-FTA Authorization Pending DOE Action, Docket No. 13-147-LNG at 4-5 (May 31, 2024)(“Notice Tolling Expiration”).

¹⁵ Exec. Order No. 14,154 of January 20, 2025, *Unleashing American Energy*, Section 8(b) – (d), 90 Fed. Reg. 8353, 8357-58 (Jan. 29, 2025), available at: <https://www.govinfo.gov/content/pkg/FR-2025-01-29/pdf/2025-01956.pdf>.

¹⁶ See MARAD Press Release, *supra* note 6.

deepwater port no later than five years after the effective date of the license, except that the deadline may be extended for delays in necessary construction permits, delays due to time-of-year construction limitations beyond Delfin’s direct control, or additional periods as MARAD may permit for good cause.¹⁷

Shortly before MARAD granted Delfin its DWPA license, DOE granted Delfin’s request for a five-year extension of its non-FTA commencement deadline until June 1, 2029. DOE concluded that “The substantial body of evidence presented by Delfin demonstrates that Delfin is continuing to do all it can—within its control—to complete the Project and commence export operations.”¹⁸ With respect to the first prerequisite under the 2023 Extension Policy of having commenced construction, DOE recognized that Delfin’s “Project is unique” as the only FLNG project with a non-FTA export authorization and that the existing pipelines connecting the FLNGVs to shore have already been constructed.¹⁹ With respect to the second prerequisite of extenuating circumstances, DOE emphasized both the MARAD process and the need for Delfin to secure the necessary yard slot with the FLNGV shipbuilder.²⁰

Regarding the latter point, Delfin explained in the March 2024 Request that there are only a few shipyards in the world capable of constructing Delfin’s FLNGVs and they all have limited slots allocated for ship construction and require binding commitments to proceed.²¹ Delfin further explained that it “has negotiated and agreed upon major terms of a near-ready-for-execution Engineering, Procurement, Construction and Integration (“EPCI”)

¹⁷ Delfin DWPA License, Article 5. The License does not mandate any timing deadline for completion of the Project.

¹⁸ DOE/FECM Order No. 4028-D at 21.

¹⁹ *Id.* at 20.

²⁰ *Id.* at 19-21.

²¹ *See* March 2024 Request at 4, 7-8, and 27-28.

Agreement with Samsung Heavy Industries (“SHI”) of South Korea, the leading shipyard in the world for FLNG construction, supported by Black & Veatch (“B&V”) of Kansas for the topside liquefaction technology, for a new-build FLNGV[;]”²² but that “finalization and execution of [the EPCI] has been held up by [regulatory] uncertainty about the timing of Delfin’s FID.”²³ As DOE/FECM recognized when granting Delfin’s extension of time:

Although Delfin began working with Korean shipbuilder SHI in 2019, it could not obtain a space on SHI’s construction schedule due to uncertainties over the timing of its financing while it pursued its final DWP license issuance. Delfin was essentially at the mercy of the shipbuilder, and the construction schedule was not within its control.²⁴

DOE/FECM recognized that the extension of time it granted until June 1, 2029 was less than the five-years requested by Delfin given the passage of time between the request and its action, but found it to be “a necessary and reasonable period of time based on the evidence presented.”²⁵ In that regard, DOE observed that Delfin had stated that it “can arrange for completion of its first FLNGV in just under five years.”²⁶ That timing, however, was premised on the expectation that Delfin would receive the necessary regulatory authorizations and accordingly contractually commit with SHI to the necessary timing for FLNGV construction essentially in the middle of *last year*.²⁷ Of course, that did not happen given the continuing regulatory uncertainty resulting from both MARAD delay and DOE’s deferral of a decision on

²² *Id.* at 4.

²³ *Id.* at 28.

²⁴ DOE/FECM Order No. 4028-D at 21.

²⁵ *Id.* at 22-23.

²⁶ *Id.* at 21 & n. 133 (citing March 2024 Request at 27-28).

²⁷ *See* March 2024 Request at 27-28.

the term extension.²⁸ Furthermore, the length of the extension requested in the March 2024 Request was limited to the absolute minimum necessary in light of the emphasis in the 2023 Extension Policy on the need for authorization holders to develop their projects as quickly as possible, its limitation on extensions to the delay caused by extenuating circumstances, and its apparent general predisposition not to grant extensions of time.

DOE, of course, has now rescinded the 2023 Extension Policy, concluding that it does not align with the *Unleashing America Energy* Executive Order and posed an undue burden on natural gas project development and LNG export authorization holders.²⁹ Both the change in DOE policy and updated facts regarding the current status of Delfin’s Project as it continues to do all it can to complete the Project following the very recent elimination of the previous regulatory hurdles support the additional extension of time addressed further below.

III. INCORPORATION OF PROJECT REFINEMENTS IN AUTHORIZATIONS

As Delfin refined its Project over time it utilized the “best available technology” required under the DWPA and the ROD previously issued by MARAD as the FLNGV industry continued to progress and evolve.³⁰ For instance, Delfin adopted engineering refinements that reduce air emissions (by incorporating waste heat recovery, which effectively results in a combined-cycle power generation on the FLNGV) and a change in its mooring systems to reduce construction impacts and seabed disturbances. In addition, Delfin implemented novel technologies to optimize the physical design of its FLNGVs that enable Delfin to (1) enhance the robustness and

²⁸ The Notice Tolling Expiration at 3 emphasized that until DOE issued another order on the March 2024 Request “Delfin has no reliance interest on this non-FTA authorization [and] [a]ny actions taken by Delfin prior to the issuance of DOE’s order on the Request are at its own risk.”

²⁹ See Recission of Policy and related DOE Press Release, *supra*. note 5.

³⁰ For a background on FLNG developments in recent years, *see* March 2024 Request at 7-12. Delfin also explained in that request “the need for Delfin to refine its project repeatedly to reflect advances being made in the FLNG industry, to comply with the ‘best technology’ requirements of the DWPA, market demand and expectation, and the desire to improve efficiency and environmental performance.” *Id.* at 35.

reliability of its liquefaction process and design for varying feed gas compositions, (2) reduce specific fuel consumption substantially and, thereby, reduce air emissions per ton of LNG produced and (3) materially increase the LNG production capacity of each vessel. As a result of these refinements, Delfin modified its Project as presented to MARAD to include only three, rather than four, new-build FLNGVs that would each process in the nominal design case of approximately 4.0 MTPA. In the optimized design scenario (reflecting an annual average based on seasonal fluctuations in ambient temperature, partial contractor margins, and an estimated production unit availability of 99 percent), each of the three FLNGVs would produce 4.4 MTPA of LNG for export, for a total Project output for the three FLNGVs of 13.2 MTPA. This is essentially the same LNG production capacity previously proposed and authorized for the Project, but produced using three FLNGVs rather than four smaller ones producing 3.3 MTPA each.

As previously noted, Delfin submitted to MARAD on January 27, 2025, a description of all the refinements to the Project and their probable environmental impacts as detailed in a revised and updated EIA, including the change to three FLNGVs. For DOE/FECM's reference, Delfin provides as Attachment 1 to this Request a chart from the public version of the EIA summarizing the design refinements and the related conclusion (detailed in the rest of the EIA) that the refinements overall reduced impacts and there were no significant new circumstances or adverse environmental consequences that substantially differ from those originally evaluated in the previously completed Final Environmental Impact Statement for the Project.³¹ This environmental conclusion, recently evaluated by MARAD as part of the DWPA License

³¹ The first item in the chart focuses on the reduction from 4 to 3 in the number of FLNGV mooring locations, rather than FLNGVs themselves, because the FLNGVs are not considered part of the MARAD-jurisdictional deepwater port.

issuance, need not be considered by DOE in connection with this Request for an extension of time.³²

The background descriptions in Delfin's export authorizations, however, refer to the Project as including four FLNGVs. More specifically, the FTA export authorization described Delfin's original plan of two converted FLNGVs with approximately 2.5 MTPA output each followed by two new-build FLNGVs of approximately 4.0 MTPA, for total capacity of approximately 13 MTPA.³³ The later non-FTA export authorization referred to the subsequent design (as reflected in the MARAD ROD) of four FLNGVs producing 3.3 MTPA each.³⁴

For both FTA and non-FTA nations, Delfin is currently authorized to export LNG in a volume equivalent to 657.5 Bcf/year.³⁵ Delfin does not request any change in this authorized export volume, which remains consistent with its current Project design.³⁶ More broadly, its Project refinements do not require or warrant change in any of the Ordering Paragraphs or terms or conditions of the export authorizations. To ensure that the export authorizations properly reflect the current Project design (as detailed to MARAD prior to DWPA License issuance),

³² Granting an extension of time does not substantively change the underlying proposed action nor constitute new approval of a project: thus, the extension is an administrative action, not a major Federal action significantly affecting the quality of the human environment. Therefore, the extension of time does not require additional NEPA review.

³³ See DOE/FE Order No. 3393 at 5-6.

³⁴ See DOE/FE Order No. 4028 at 2.

³⁵ See DOE/FE Order No. 4028, Ordering Paragraph (A.); DOE/FE Order No. 3393, Ordering Paragraph (A). Consistent with DOE practice, the authorized export volumes in the Ordering Paragraphs are stated in natural gas measurement (the 657.5 Bcf/yr) without reference to an LNG equivalent in MTPA. The Ordering Paragraphs also do not specify the number of FLNGVs, but rather refer simply to Delfin's Project. In DOE/FE Order No. 3393-B/4028-C, Ordering Paragraph (A) in both orders was amended simply to better reflect the location of the Project.

³⁶ The minor difference between the 13.3 MTPA LNG equivalent referenced in Order No. 4028 at 2 (though oddly after stating that the four FLNGVs each have output of 3.3 MTPA) and Delfin's current optimized design scenario of 13.2 MTPA may be reconciled, if necessary, with a slightly different conversion to LNG of the operative limit of 857 Bcf/yr of natural gas, or could potentially allow for slightly improved output by the FLNGVs. Notably, Delfin's FTA order authorized the same natural gas export quantity while referencing the LNG output as 13.0 MTPA. See DOE/FE Order No. 3393 at 5-6.

however, Delfin requests that DOE/FECM amend its orders to reflect that the Project now includes *three* FLNGVs, with no change in the currently authorized export volumes.

IV. REQUEST FOR ADDITIONAL TWO-YEAR EXTENSION OF TIME

With the Recission of Policy, DOE/FECM has reverted to its pre-existing “good cause” standard for requests to extend the deadline to commence LNG exports.³⁷ Using that approach, DOE historically has considered on a case-by-case basis the timing required by the agency approving the siting, construction, and operation of the LNG export facilities, as well as the authorization holder’s progress with its project, and the additional time necessary to commence exports.³⁸ In applying that standard going forward, DOE/FECM also should take into consideration the goals of the *Unleashing Energy* Executive Order of avoiding agency actions that unduly burden the use of domestic natural gas, just as it did in the Recission of Policy.

“Good cause” warrants an additional two-year extension of the deadline for Delfin’s non-FTA exports based on these standards. DOE/FECM just issued an extension of time for Delfin under the more stringent standards of the 2023 Extension Policy, and its conclusions in so doing remain fully applicable, with the only new issue presented being the appropriate length of the extension. The requested extension of time is fully consistent with MARAD’s recent issuance of the DWPA license requiring construction to start within five years. Furthermore, as DOE/FE has recognized, “Delfin is continuing to do all it can – within its control – to complete the Project and commence export operations.”³⁹

³⁷ 90 Fed. Reg. 14411.

³⁸ See 2003 Term Extension Policy, 88 Fed. Reg. at 25275-6 (discussing and citing prior orders granting extensions of export commencement deadlines).

³⁹ DOE/FECM Order No. 4028-D at 21.

Obtaining at long last the DWPA license from MARAD, as well as the extension of time from DOE/FECM, significantly advanced the Project. Moreover, that regulatory success, reinforced by market developments supporting additional world-wide demand for U.S. LNG, have provided additional commercial impetus to the Project. For instance, on March 25, 2025, Delfin signed a “heads of agreement” with the German state-owned company Securing Energy For Europe GmbH (“SEFE”) for long-term supply of 1.5 mtpa of LNG by Delfin for at least 15 years.⁴⁰ Delfin also is in active negotiation with potential customers for additional LNG offtake agreements, focusing on its second and third FLNGVs.

While the regulatory approvals were the only true impediments to the FID of Delfin’s first FLNGV, other tasks remain that will take some time. As Delfin explained in its March 2024 Request,

In addition to receiving the final regulatory authorizations needed to proceed with its first FLNGV (*i.e.*, MARAD final license issuance and the requested conditional extension of time from DOE), Delfin needs to complete two major tasks, along with a few minor ones: (1) finalize and execute the Lump-Sum Turn-Key EPCI contract with SHI to construct the FLNGV and (2) finalizing financing. All of these tasks are on course and have essentially been on-hold while Delfin pursued the final DWP license issuance.⁴¹

Delfin could not proceed meaningfully with these necessary tasks until it obtained the DWPA license, which just occurred on March 21 this year. Delfin has now launched its financing efforts in earnest and is on track for FID of its first FLNNGV in the third quarter of this year. Delfin is also actively engaged with SHI to refresh the pricing for its EPCI contract,

⁴⁰ See SEFE Press Release, “Delfin to supply SEFE with 1.5 million tonnes of US LNG per year,” (March 25 2025), available at: https://www.sefe.eu/en/newsroom/press-releases/delfin-to-supply-sefe-with-1.5-million-tonnes-of-us-lng-per-year?utm_source=substack&utm_medium=email

⁴¹ March 2024 Request at 27; *see also id.* at 27-31 (Section “IV. Remaining Steps Needed For Delfin’s FID”).

finalize and execute it, and secure the necessary yard-slot that is available with activities commencing late this year.

When recently granting Delfin an extension of time, DOE/FECM correctly recognized, that under its negotiated EPCI contract with SHI Delfin can reach commercial exports in slightly less than five years;⁴² but that timeline commences only when the EPCI contract is executed.⁴³ Thus, on its current timeline after the recent resolution of regulatory delays, Delfin now expects to commence commercial operations in the second half of 2030. To provide some additional buffer in the event of potential unexpected delays, and to provide comfort for financing parties regarding the elimination of any need for a future extension, Delfin respectfully requests that its commencement deadline now be extended to June 1, 2031. This extension is necessary to support the construction and operation by Delfin of the nation's first FLNGV export facility, furthering the public interest well-recognized by DOE in exports of abundant domestic natural gas.

Other than this further extension of the commencement deadline (and the minor refinement in the Project description previously explained), Delfin does not propose any change in the nature of its existing export authorizations or of its Project. Therefore, the additional extension does not alter DOE's public interest determination when previously authorizing non-FTA exports by Delfin under NGA Section 3(a), just as with its previous extension of time.⁴⁴ Thus, good cause exists to grant the requested extension of time which is a reasonable and

⁴² DOE/FECM Order No. 4028-D at 21 & n. 133 (citing March 2024 Request at 27-28).

⁴³ See March 2024 Request at 27-28; "ANSWER OF DELFIN LNG LLC TO INTERVENTIONS, COMMENTS AND PROTESTS OF ITS REQUESTED EXTENSION OF TIME," filed in this proceeding on May 14, 2024 at 10 ("The only uncertainty regarding this construction timeline is when Delfin can commit to the EPCI agreement, which is being held up not by any commercial impediments but instead by regulatory issues.")

⁴⁴ See DOE/FECM Order No. 4028-D at 23.

appropriate duration in the circumstances, as updated here, and because LNG exports by Delfin remain in the public interest.

V. ATTACHMENTS

As previously noted, Delfin is including as part of this Request as Attachment 1 the excerpt from January 27, 2025 revised and updated EIA provided to MARAD: “Table 7-1 Summary of Anticipated Impacts of the Primary Design Modifications for Port Delfin: 2016-2024, Port Delfin LNG Project.” In accordance with DOE regulations, Delfin has also attached to this Request a Verification and a Certificate of Service.

If DOE/FECM would like copies of any other material mentioned in this Request, or has any questions regarding the Request, Delfin will promptly respond to any requests for information.

VI. CONCLUSION

WHEREFORE, for all the foregoing reasons, Delfin respectfully requests that DOE/FE issue an order (1) amending its existing export authorizations to reflect the current Project design with three FLNGVs and (2) amending the non-FTA export authorization to allow Delfin to commence export operations from the Delfin Deepwater Port by no later than June 1, 2031, with no other changes in the existing authorizations, as more fully described in this Request.

Respectfully submitted,

/s/ J. Patrick Nevins

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Dated: May 2, 2025

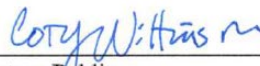
Verification

State of Florida)
)
City of Pensacola) SS:

William H. Daughdrill, being first duly sworn on his oath deposes and says: that he is the Chief Operating Officer of Delfin LNG LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contests thereof; that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief; and that he is authorized to execute and file the same with the U.S. Department of Energy.

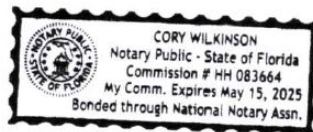

William H. Daughdrill
Chief Operating Officer
Delfin LNG LLC

Sworn to and subscribed before me this 2ND day of May, 2025



Notary Public
In and For said City.

My Commission Expires:



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document upon each person designated on the official service list compiled for this proceeding.

Dated at Washington, D.C., this 2nd day of May, 2025.

/s/ J. Patrick Nevins

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