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May 29, 2025

Ms. Amy Sweeney
Director, Office of Regulation, Analysis, and Engagement (FE-34)
Office of Resource Sustainability
Office of Fossil Energy and Carbon Management
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585
via email Fergas@hq.doe.gov

**Re: Louisiana LNG Infrastructure LLC
FE Docket No. 16-144-LNG
Request for Extension of Export Commencement Deadline**

Dear Ms. Sweeney:

Pursuant to the Non-FTA Authorization¹ issued by the U.S. Department of Energy's ("DOE") Office of Fossil Energy and Carbon Management ("DOE/FECM") in the above-captioned docket, Louisiana LNG Infrastructure LLC ("Louisiana LNG") is currently authorized to export liquefied natural gas ("LNG") in an amount up to 1,415.3 billion cubic feet per year to non-free trade agreement ("Non-FTA") nations for a term extending through December 31, 2050, from its liquefaction and export facility located near the city of Carlyss in Calcasieu Parish, Louisiana (the "Woodside Louisiana LNG Project" or "Project"). Under Louisiana LNG's Non-FTA Authorization, Louisiana LNG "must commence export operations ... no later than seven years from the date of issuance of [Order No. 4373]",² or by May 2, 2026. For good cause shown, Louisiana LNG hereby respectfully requests an approximately 44-month extension of the export commencement deadline under its Non-

¹ *Driftwood LNG LLC*, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FE Order No. 4373, FE Docket No. 16-144-LNG (May 2, 2019) ("*Order No. 4373*") & *Driftwood LNG LLC*, Order Extending Export Term for Authorization to Non-Free Trade Agreement Nations Through December 31, 2050, DOE/FE Order No. 4373-A, FE Docket No. 16-144-LNG (Dec. 10, 2020) (together with Order No. 4373, "*Non-FTA Authorization*"), as modified, *Louisiana LNG Infrastructure LLC*, Order Granting Request to Amend Authorizations to Export Liquefied Natural Gas to Reflect Corporate Name Change, DOE/FECM Order Nos. 3968-B & 4373-B, Docket No. 16-144-LNG (Feb. 26, 2025) (changing the name of the authorization holder of the Non-FTA Authorization). In light of the authorization holder's corporate name change from Driftwood LNG LLC to Louisiana LNG Infrastructure LLC, and DOE/FECM's approval of such, this filing references the Non-FTA Authorization as having been issued in the name of Louisiana LNG Infrastructure LLC.

² See *Order No. 4373*, at Ordering Para. (D).



FTA Authorization,³ until December 31, 2029. This requested extension is consistent with the request pending before the Federal Energy Regulatory Commission (“FERC” or “Commission”), filed by Louisiana LNG and Driftwood Pipeline LLC on May 13, 2025.⁴ The requested extension to FERC, which has been submitted in parallel with this requested extension, seeks an additional eight-month period, until December 31, 2029, to place the Project in service to align the in-service date approved by FERC with the updated schedule milestones under Louisiana LNG’s Engineering, Procurement and Construction contract with Bechtel Energy Inc. (“Bechtel”).

Louisiana LNG has made substantial progress toward the development of the Project since issuance of the Non-FTA Authorization, and there is significant evidence demonstrating good cause for the extension of time. On August 16, 2024, Woodside Energy Group Ltd (“Woodside Energy”) notified DOE/FECM of a planned transaction to acquire Tellurian Inc. (“Tellurian”) and its affiliated assets, including Driftwood LNG LLC (now Louisiana LNG). DOE/FECM approved the change in control on September 26, 2024.⁵ Following the close of the transaction,⁶ Woodside Energy further requested that DOE/FECM modify, among other things, the Non-FTA Authorization to update the name of the authorization holder to reflect a corporate name change and the new name of the Project.⁷ On April 29, 2025, less than seven months after closing the transaction to acquire the Project, Woodside Energy announced that it had made a positive final investment decision (“FID”) for the foundation development of the Project, which includes the first three liquefaction trains and common infrastructure.⁸ The \$17.5 billion investment in the Project represents the largest single foreign direct investment in the State of Louisiana’s history, and is the first greenfield U.S. LNG project to make FID since 2023.⁹ This demonstrates not only the economic viability of the Project,¹⁰ but that Louisiana LNG has achieved a major milestone in the development of the Project since the issuance

³ Louisiana LNG is not requesting any modification with respect to the term of its authorization to export LNG to free trade agreement nations, which commenced on February 28, 2024. *See Driftwood LNG LLC*, Order granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas By Vessel From the Proposed Driftwood LNG Facility in Calcasieu Parish, Louisiana, to Free Trade Agreement Nations, DOE/FE Order No. 3968, FE Docket No. 16-144-LNG, at Ordering Para. (A) (Feb. 28, 2017).

⁴ *See Louisiana LNG Infrastructure LLC & Driftwood Pipeline LLC*, Request for Extension of Time, Docket Nos. CP17-117-003, *et al.* (May 13, 2025); *see also Louisiana LNG Infrastructure LLC & Driftwood Pipeline LLC*, Notice of Request for Extension of Time, Docket Nos. CP17-117-003, *et al.* (May 15, 2025).

⁵ *Driftwood LNG LLC*, Statement of Change in Control, FE Docket No. 16-144-LNG (Aug. 16, 2024).

⁶ Louisiana LNG provided notice to DOE/FECM that the transaction closed on October 8, 2024. *See Driftwood LNG LLC*, Notification of Close, FE Docket No. 16-144-LNG (Oct. 21, 2024).

⁷ *Driftwood LNG LLC*, Notification of Entity and Project Name Change and Request to Update Service List, FE Docket No. 16-144-LNG (Dec. 10, 2024). On February 26, 2025, DOE/FECM issued an order granting the request. *See supra* n.1.

⁸ Press Release, *Woodside Approves Louisiana LNG Development*, WOODSIDE ENERGY (Apr. 29, 2025), https://www.woodside.com/docs/default-source/asx-announcements/2025/028-woodside-approves-louisiana-lng-development.pdf?sfvrsn=461ba43c_3.

⁹ Woodside Energy, *Woodside Approves Louisiana LNG Development* (Apr. 30, 2025), <https://www.woodside.com/media-centre/news-stories/story/woodside-approves-louisiana-lng-development>.

¹⁰ *See Sierra Club v. FERC*, 97 F.4th 16, 29 (D.C. Cir. 2024) (discussing the significance of FID in the context of extension of time requests from FERC).



of the Non-FTA Authorization. Louisiana LNG continues to work to attract partners for both offtake agreements as well as equity sell-downs for the Project.

Additionally, the Project has been actively under construction since April 4, 2022 when Bechtel first commenced site preparation activities.¹¹ Over the past three years, construction and development of the Woodside Louisiana LNG Project has progressed continuously.¹² As noted in its semi-annual reports, continued construction activities to date have included site preparation, vegetation clearing and burning, excavation and backfill, mud mat installation, pile driving, stormwater management, installation of the material offloading facility tie-back wall, construction of water wells, concrete foundation pouring, and rebar/formwork in the first liquefaction train and LNG storage tanks.¹³ Approximately 400 personnel currently report daily to the Woodside Louisiana LNG Project site including Louisiana LNG staff, inspectors and contractors, and the Bechtel team and their subcontractors, with that number expected to increase significantly as a result of reaching FID. The Project will support over 15,000 national jobs during the construction phase, and over 4,000 national jobs during operations.¹⁴ Further, Louisiana LNG has received and is maintaining all required permits and authorizations necessary for the Project. To date, Louisiana LNG has made a significant capital investment in the Project, of over \$2 billion.¹⁵

Despite significant progress, Louisiana LNG encountered unforeseen circumstances in the years that followed the issuance of its Non-FTA Authorization that prevent it from meeting the export commencement deadline therein. Global upheaval stemming from the COVID-19 pandemic caused cascading market and logistical impacts on workforce, safety, supply chain, and investment in infrastructure projects. Moreover, a legal challenge to Louisiana LNG's U.S. Army Corps of Engineers ("USACE") permit also created headwinds with respect to Louisiana LNG's ability to secure final commercial and financial commitments for the Project. These circumstances caused unforeseeable difficulties for development of the Project and made securing long-term LNG commercial commitments difficult for several years. However, the U.S. Court of Appeals for the

¹¹ *Driftwood LNG LLC*, Semi-Annual Report (October 1, 2021 – March 31, 2022), FE Docket No. 16-144-LNG (Mar. 31, 2022).

¹² *See id.* through *Louisiana LNG Infrastructure LLC*, Semi-Annual Report (October 1, 2024 through March 31, 2025), FE Docket No. 16-144-LNG (Apr. 1, 2025).

¹³ *See Driftwood LNG LLC & Driftwood Pipeline LLC*, Request for Extension of Time, Docket Nos. CP17-117-001 & CP17-118-001 (Oct. 4, 2023) (summarizing construction activities occurring through October 2023) & *Louisiana LNG Infrastructure LLC*, Monthly Construction Status Report – March 2025, Docket No. CP17-117-000 (Apr. 17, 2025).

¹⁴ Press Release, *Woodside Approves Louisiana LNG Development*, WOODSIDE ENERGY (Apr. 29, 2025), https://www.woodside.com/docs/default-source/asx-announcements/2025/028-woodside-approves-louisiana-lng-development.pdf?sfvrsn=461ba43c_3; *see also id.* at 19 (noting that the national jobs figure includes direct labor on the construction site and all labor used to make materials purchased for construction (e.g. pipe fabricators)).

¹⁵ *See also* Woodside Energy, *First Quarter Report for Period Ended 31 March 2025* (Apr. 23, 2025), available at https://www.woodside.com/docs/default-source/investor-documents/quarterly-and-half-yearly-pdfs-and-data-tables/2025/027-first-quarter-2025-report.pdf?sfvrsn=42036c5e_3at.



Fifth Circuit ultimately upheld Louisiana LNG's USACE permit,¹⁶ the pandemic has since subsided,¹⁷ global energy markets have rebounded, and geopolitical tensions have increased demand for LNG deliveries from the United States to European markets. In this regard, Louisiana LNG recently executed a long-term LNG sale and purchase agreement with Uniper Global Commodities SE for up to 1 million tonnes per annum of LNG from the Project,¹⁸ and continues to actively engage with potential LNG offtakers for sales of LNG from the Project.

In light of these circumstances, Louisiana LNG requested and received a three-year extension of time from FERC to complete construction and place the Project and its associated pipeline in-service.¹⁹ In the 2024 FERC Extension Order, the Commission found that Louisiana LNG had "made a good faith effort to meet the deadline in its authorization and that good cause exists for an extension."²⁰ In finding the requisite good cause, FERC recognized that the "COVID-19 pandemic's unprecedented upheaval of global supply chains and energy markets began within months after the authorization for the projects was issued," and noted that Louisiana LNG had nevertheless "still taken steps to advance the projects as proposed."²¹ Although Louisiana LNG has worked diligently to develop and execute the timely construction of the Project, making good faith efforts to meet the service commencement deadline stipulated in the FERC 2024 Extension Order, Louisiana LNG, through extensive discussion with Bechtel, determined that a minor additional extension of time is required to meet certain schedule milestones, which were revised to more accurately reflect the status of Project construction after Woodside Energy's acquisition of Tellurian. In this regard, as noted above, Louisiana LNG submitted a second extension of time request to FERC on May 13, 2025, seeking approximately eight additional months, until December 31, 2029, to complete construction and place the Project in service. This requested extension to DOE, which is submitted in parallel to the extension request to FERC, proposes to align Louisiana LNG's Natural Gas Act ("NGA") authorizations from both agencies in terms of approved timeframes.

Section 3(a) of the NGA authorizes the exportation of natural gas from the United States unless DOE determines that doing so "will not be consistent with the public interest."²² NGA Section 3(a) also authorizes DOE, "after opportunity for hearing, and for good cause shown, to issue a

¹⁶ *Healthy Gulf v. U.S. Army Corps of Eng'rs*, 81 F.4th 510 (5th Cir. 2023)

¹⁷ United Nations, *WHO chief declares end to COVID-19 as a global health emergency*, UN NEWS (May 5, 2023), <https://news.un.org/en/story/2023/05/1136367>.

¹⁸ See *Louisiana LNG Infrastructure LLC*, Long-Term LNG Sale and Purchase Agreement, FE Docket No. 16-144-LNG (May 9, 2025); see also Press Release, *Woodside Signs LNG Supply Agreements with Uniper*, WOODSIDE ENERGY (Apr. 17, 2025), https://www.woodside.com/docs/default-source/asx-announcements/2025/026-woodside-signs-lng-supply-agreements-with-uniper.pdf?sfvrsn=fe994405_3.

¹⁹ See *Driftwood LNG LLC & Driftwood Pipeline LLC*, Order Granting Extension of Time Request, 186 FERC ¶ 61,112 (2024) ("2024 FERC Extension Order").

²⁰ 2024 FERC Extension Order, at P 11.

²¹ *Id.*

²² 15 U.S.C. § 717b(a).



supplemental order as it may find necessary or appropriate.”²³ Although DOE recently issued a Policy Statement whereby it changed the standards by which it has traditionally reviewed requests for extensions of time,²⁴ the Policy Statement has since been rescinded.²⁵ DOE has stated that it will consider requests for extensions “on a case-by-case basis consistent with DOE’s practice prior to issuance of the Policy Statement.”²⁶

As noted above, in April 2025, Woodside Energy announced that it reached FID for the foundation development of the Woodside Louisiana LNG Project, which, as DOE/FECM has previously recognized, is an important milestone that supports the assertion that a project sponsor “has worked diligently to develop” a project and “requires the extension to complete the construction and place the export facilities into service.”²⁷ Additionally, Louisiana LNG has already received an extension of its FERC NGA authorization for a substantial portion of the time requested herein.²⁸ Although DOE/FECM “has the responsibility to independently evaluate any application to extend the deadline by which export must commence” including the “discretion to establish different deadlines than FERC[,]”²⁹ Louisiana LNG’s potential equity investors and offtake customers require regulatory certainty that the time permitted under the Non-FTA Authorization to begin commercial exports will align with other Project milestones, including, but not limited to, the deadline for completion of construction and placing the Project in-service.³⁰ Therefore, consistent with prior DOE/FECM precedent, Louisiana LNG requests an export commencement deadline under its Non-FTA Authorization that is consistent with the requested FERC in-service deadline.

Louisiana LNG notes that the extension requested herein changes only the timing, not the nature, of the Project. As such, Louisiana LNG is not proposing any modifications or additions to the Project in connection with the instant request for an extension of time. Therefore, there are no changes to DOE/FECM’s public interest determinations nor any of its conclusions underlying the

²³ *Delfin LNG LLC*, Order Amending Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries, and Granting Request to Extend Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries, DOE/FECM Order Nos. 3393-C & 4028-D, Docket Nos. 13-129-LNG & 13-147-LNG, at 7-8 (Mar. 10, 2025) (“*Delfin LNG*”) (cleaned up).

²⁴ U.S. Dep’t of Energy, Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries, 88 Fed. Reg. 25,272 (Apr. 26, 2023) (“Policy Statement”).

²⁵ U.S. Dep’t of Energy, Recission of Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries, 90 Fed. Reg. 14,411 (Apr. 2, 2025).

²⁶ *Id.*

²⁷ *See Port Arthur LNG, LLC*, Order Granting Application to Extend Term to Begin Exports of Liquefied Natural Gas to Free Trade Agreement Countries and to Extend Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries, DOE/FECM Order Nos. 3698-C & 4372-B, FE Docket Nos. 15-53-LNG, *et al.*, at 12-13 (Apr. 21, 2023) (“*Port Arthur LNG*”).

²⁸ *See generally* 2024 FERC Extension Order (authorizing a three-year extension of time to complete construction and make the Project available for service by April 18, 2029).

²⁹ *Port Arthur LNG*, at 12.

³⁰ *See Cameron LNG, LLC*, Order Granting Application for Extension of Commencement Deadlines, DOE/FE Order Nos. 3680-A & 3846-A, FE Docket Nos. 15-36-LNG, *et al.*, at 5 (Nov. 2, 2020) (“*Cameron LNG*”) (finding good cause to grant an extension on similar grounds).



Non-FTA Authorization. Additionally, DOE/FECM has granted similar requests for extensions by LNG companies for similar or longer periods of time than requested here.³¹

Moreover, granting the instant request for an extension of the export commencement deadline will assist with the orderly development of the Project, and result in LNG exports that DOE/FECM has already found to be consistent with the public interest. As DOE recently concluded in its Response to Comments³² on the 2024 LNG Export Study, increased U.S. LNG exports will “enhance national and energy security for the United States as well as U.S. allies and trading partners[,]” which is “an important part of DOE’s public interest review....”³³ Additionally, the 2024 LNG Export Study found that increasing U.S. LNG exports increases gross domestic product, results in beneficial impacts on the U.S. trade balance, and provides increased levels of employment and economic support in communities where natural gas infrastructure is located.³⁴ Thus, granting the extension requested herein will help the United States realize these benefits and is, therefore, consistent with the public interest.

Louisiana LNG has demonstrated that good cause exists to grant the requested extension because (1) Louisiana LNG made good faith efforts to meet the export commence deadline in the Non-FTA Authorization, maintaining all permits and significantly progressing the Project, and is fully committed to moving the Project forward as demonstrated by ongoing construction, as well as the recent FID announcement and subsequent formal issuance of Notices to Proceed to Bechtel for additional scopes of work, (2) Louisiana LNG encountered entirely unforeseeable circumstances that inhibited progress in commercializing the Project, which have now abated, (3) the public interest findings underlying the Non-FTA Authorization remain valid, and (4) Louisiana LNG’s request is consistent with DOE/FECM precedent granting similar requests for extensions of time to LNG companies. Moreover, Louisiana LNG’s request is consistent with the public interest, which is served by facilitating the delivery of much-needed LNG to our global allies and trading partners, and current U.S. policy to “unleash America’s affordable and reliable energy and natural resources.”³⁵

Given the foregoing, Louisiana LNG hereby requests that DOE/FECM grant an approximately 44-month extension of time of the export commencement deadline in its Non-FTA Authorization so that it may commence exports from the Project by December 31, 2029. Louisiana LNG respectfully requests that DOE/FECM grant this request for extension by **June 30, 2025**³⁶ so as to help expedite

³¹ See, e.g., *Delfin LNG* (granting five-year extension of Non-FTA export commencement deadline); see also *Cameron LNG* (granting 34-month extension of Non-FTA export commencement deadline).

³² See U.S. Dept. of Energy, Office of Fossil Energy and Carbon Management, *Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments* (May 19, 2025) (“Response to Comments”); see also U.S. Dept. of Energy, *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports*, 89 Fed. Reg. 104,132 (Dec. 20, 2024) (“2024 LNG Export Study”).

³³ *Response to Comments*, at 48.

³⁴ *Id.* at 47-49.

³⁵ See Exec. Order No. 14,154, *Unleashing American Energy*, 90 Fed. Reg. 8,353 (Jan. 20, 2025).

³⁶ Louisiana LNG requested FERC issue an order on its request for an extension of time by no later than June 13, 2025. See *Louisiana LNG Infrastructure LLC & Driftwood Pipeline LLC*, Request for Extension of Time, Docket Nos. CP17-117-003, *et al.*, at p. 5 (May 13, 2025).

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the timely conclusion of ongoing commercial and financial discussions between the Project and certain potential partners.

Should you have any questions about the instant filing, please feel free to contact the undersigned at (212) 506-3710.

Respectfully submitted,


/s/ Lisa M. Tonery
Lisa M. Tonery
Jacob I. Cunningham
Attorneys for
Louisiana LNG Infrastructure LLC

VERIFICATION

State of Texas

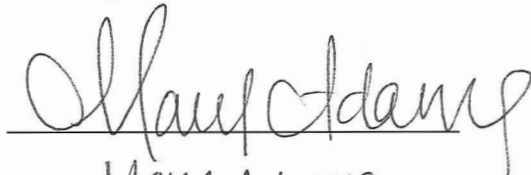
County of Harris

BEFORE ME, the undersigned authority, on this day personally appeared Daniel Kalms, who, having been by me first duly sworn, on oath says that he is the President for Louisiana LNG Infrastructure LLC and is duly authorized to make this Verification; that he has read the foregoing filing and that the facts therein stated are true and correct to the best of his knowledge, information and belief.



Daniel Kalms
President

SWORN TO AND SUBSCRIBED before me on the 28th day of May, 2025.

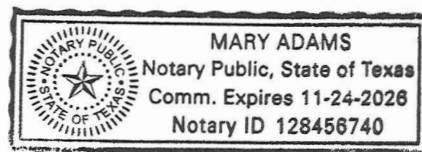


Name: Mary Adams

Title: Notary Public

My Commission expires:

24 November 2026



Certificate of Service

I hereby certify that I have this day served the foregoing document upon each person designated on the service list in this proceeding.

Dated at New York, NY this 29th day of May, 2025.

/s/Dionne McCallum-George

Dionne McCallum-George

Executive Assistant on behalf of

Louisiana LNG Infrastructure LLC