

**RECEIVED**

**By Docket Room at 11:30 am, Oct 01, 2025**

**SheppardMullin**

Sheppard, Mullin, Richter & Hampton LLP  
Four Embarcadero Center, 17<sup>th</sup> Floor  
San Francisco, California 94111-4109  
415.434.9100 main  
415.434.3947 fax  
www.sheppardmullin.com

October 1, 2025

**Via Email**

U.S. Department of Energy (FE-34)  
Office of Fossil Energy and Carbon Management  
Office of Oil and Natural Gas  
Division of Natural Gas Regulation  
Attn: Natural Gas Reports  
P.O. Box 44375  
Washington, D.C. 20026-4375  
fergas@hq.doe.gov

Re: Alaska LNG Project LLC  
Docket No. 14-96-LNG  
DOE/FECM Order Nos. 3554 and 3643-A  
Semi-Annual Report

To: Office of Oil and Gas Global Security and Supply, Division of Natural Gas Regulatory  
Activities

In accordance with Ordering Paragraph J of DOE/FE Order No. 3554 issued November 21, 2014 and Ordering Paragraph M of DOE/FECM Order No. 3643-A issued August 20, 2020, Alaska LNG Project LLC submits this semi-annual report describing the progress of the proposed Alaska LNG Project that has occurred since the last semi-annual report was filed on April 1, 2025. If you have any questions regarding this filing, please do not hesitate to contact me at jbrough@sheppardmullin.com. Thank you for your assistance.

Respectfully submitted,

/s/ Jennifer Brough  
Jennifer Brough  
*Counsel to Alaska LNG Project LLC*

Enclosure

**Alaska LNG Project LLC**  
**Docket No. 14-96-LNG**  
**DOE/FECM Order Nos. 3554 and 3643-A**  
**Semi-Annual Report**  
**October 1, 2025**

**Progress of the Project**

On September 5, 2014, Alaska LNG Project (“Project”) sponsors submitted a request to begin the mandatory Federal Energy Regulatory Commission (“FERC”) pre-filing review process for LNG terminal facilities. FERC accepted the request in a letter order dated September 12, 2014. The FERC docket number assigned to the Project during pre-filing was PF14-21.

On April 17, 2017, the Alaska Gasline Development Corporation (“AGDC”) filed the FERC application for the Project pursuant to Section 3 of the Natural Gas Act. The FERC docket number assigned to the Project is CP17-178. On March 6, 2020, FERC issued the Final Environmental Impact Statement for the Project.

On May 21, 2020, FERC issued an order granting authorization under NGA section 3.<sup>1</sup> On September 11, 2020, FERC issued an order addressing rehearing requests and sustaining the NGA section 3 authorization for the Project.<sup>2</sup>

On September 21, 2020, the Center for Biological Diversity and Sierra Club filed a petition for review of the FERC NGA section 3 authorization at the United States Court of Appeals for the District of Columbia Circuit (“D.C. Circuit”) (Case No. 20-1379). On December 17, 2020, Sierra Club filed a D.C. Circuit petition for review of the DOE/FECM Orders issued in this proceeding (Case No. 20-1503). In July 2021, the D.C. Circuit set a briefing schedule for Case No. 20-1379 and final briefing concluded in February 2022. On May 16, 2023, the D.C. Circuit issued an opinion in Case No. 20-1379 dismissing and denying the petition for review and sustaining the FERC NGA section 3 authorization for the Project.

On June 28, 2021, DOE/FECM issued a Notice of Intent to Prepare a Supplemental Environmental Impact Statement for the Alaska LNG Project. On June 30, 2021, the D.C. Circuit issued an order holding Case No. 20-1503 in abeyance pending DOE/FECM’s Supplemental Environmental Impact Statement. On August 24, 2021, DOE/FECM issued a Notice of Schedule for Supplemental Environmental Impact Statement setting December 14, 2022 as the date for the Final Order and NEPA Record of Decision. On February 25, 2022, DOE/FECM issued a Notice of Amended Schedule for Supplemental Environmental Impact Statement setting February 13, 2023 as the date for the Final Order and NEPA Record of Decision. On June 29, 2022, DOE/FECM issued a Notice of Availability for the Draft Supplemental Environmental Impact Statement with comments due August 15, 2022. On April 13, 2023, DOE/FECM issued Order No. 3643-C affirming and amending DOE/FECM Order No. 3643-A following a partial grant of rehearing. On June 14, 2023, DOE/FECM issued Order No. 3643-D denying the request for rehearing of Order No. 3643-C.

---

<sup>1</sup> *Alaska Gasline Dev. Corp.*, 171 FERC ¶ 61,134 (2020).

<sup>2</sup> *Alaska Gasline Dev. Corp.*, 172 FERC ¶ 61,214 (2020).

**Alaska LNG Project LLC**  
**Docket No. 14-96-LNG**  
**DOE/FECM Order Nos. 3554 and 3643-A**  
**Semi-Annual Report**  
**October 1, 2025**

On August 11, 2023, Sierra Club and Center for Biological Diversity filed a petition for review of DOE/FECM Order Nos. 3643-C and 3643-D in the D.C. Circuit (Case No. 23-1214). DOE/FECM moved to consolidate Case No. 23-1214 with the original petition for review (Case No. 20-1503). The consolidation motion was granted on October 3, 2023. Both Alaska LNG Project LLC and AGDC moved to intervene in support of DOE/FECM in the D.C. Circuit appeals. The D.C. Circuit set a briefing schedule that was subsequently modified, with final briefs filed on May 13, 2024. Oral argument was held before the D.C. Circuit on October 21, 2024 and the case remains pending.

On January 20, 2025, President Trump issued an Executive Order titled “Unleashing Alaska’s Extraordinary Resource Potential” that directs the heads of all executive departments and agencies to, among other things, “prioritize the development of Alaska’s LNG potential, including the permitting of all necessary pipeline and export infrastructure related to the Alaska LNG Project, giving due consideration to the economic and national security benefits associated with such development.”<sup>1</sup>

AGDC reports that is in the process of raising capital for the next phase of the Project, which will be Front End Engineering Design (FEED). Potential investors are performing due diligence on the Project to consider providing the funding needed for FEED. In March 2025, AGDC representatives visited Taiwan, Thailand, South Korea, and Japan to discuss the Project. On March 27, 2025, AGDC announced that it had signed definitive agreements with an affiliate of Glenfarne Group, LLC (Glenfarne) to become the lead developer on the Project.

In May 2025, Glenfarne announced that it selected Worley Limited to undertake additional engineering and prepare a final cost estimate for the Project in sufficient detail to achieve Final Investment Decision. In June 2025, Glenfarne announced that PTT Public Company Limited has signed a preliminary Cooperation Agreement for strategic participation in the Project, including for the procurement of 2 MTPA of LNG over a 20-year term. In September 2025, Glenfarne announced that it signed a non-binding Letter of Intent with JERA Co., Inc. to advance discussions about LNG offtake from the Project and also signed a preliminary agreement with POSCO International to form a strategic partnership to advance the Project.

### **Date Facility Is Expected To Be Operational**

Based on AGDC’s FERC filing and the Final Environmental Impact Statement issued by FERC, the Project could be operational six years following commencement of construction.

### **Status of Long-Term Contracts**

Alaska LNG Project LLC has not yet entered into any long-term contracts associated with the long-term export of LNG or any long-term supply contracts. Alaska LNG Project LLC will file, or cause others to file, all such contracts with DOE/FECM within 30 days of their execution, in accordance with Ordering Paragraph D of DOE/FECM Order No. 3554 and Ordering Paragraph G of DOE/FECM Order No. 3643-A.

---

<sup>1</sup> See *Unleashing Alaska’s Extraordinary Resource Potential*, 90 F.R. 8347 (2025).