

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

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DELFIN LNG LLC  
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DOCKET NO. 13-129-LNG  
DOCKET NO. 13-147-LNG

ORDER AMENDING PROJECT DESCRIPTION IN LONG-TERM AUTHORIZATIONS  
TO EXPORT LIQUEFIED NATURAL GAS  
TO FREE TRADE AGREEMENT AND NON-FREE TRADE AGREEMENT COUNTRIES

DOE/FECM ORDER NO. 3393-D  
DOE/FECM ORDER NO. 4028-E

NOVEMBER 25, 2025

## I. INTRODUCTION AND BACKGROUND

On May 2, 2025, Delfin LNG LLC (Delfin) filed with the Department of Energy’s (DOE) Office of Fossil Energy and Carbon Management (FECM)<sup>1</sup> a “Request for Amendment of Long-Term Authorizations to Export Liquefied Natural Gas and for Additional Extension of Time to Commence Exports” (Request)<sup>2</sup> under section 3 of the Natural Gas Act (NGA).<sup>3</sup> In this Order, we address the portion of the Request asking DOE to amend Delfin’s existing long-term authorizations to export domestically produced liquefied natural gas (LNG) in Docket Nos. 13-129-LNG and 13-147-LNG to reflect refinements in the design of its floating LNG (or FLNG) project (Project).<sup>4</sup> Concurrently with this Order, we are issuing a separate order addressing the portion of the Request seeking an extension to Delfin’s export commencement deadline in Docket No. 13-147-LNG, as well as granting a Make-Up Period for Delfin’s long-term authorizations in Docket Nos. 13-129-LNG and 13-147-LNG, described below.<sup>5</sup>

Delfin is authorized to export LNG by vessel from the Project, to be located in the Gulf of America<sup>6</sup> off of Cameron Parish, Louisiana, under the following two orders:

- DOE/FE Order No. 3393, as amended (Docket No. 13-129-LNG),<sup>7</sup> authorizing

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<sup>1</sup> The Office of Fossil Energy (FE) changed its name to the Office of Fossil Energy and Carbon Management (FECM) on July 4, 2021.

<sup>2</sup> Delfin LNG LLC, Request for Amendment of Long-Term Authorizations to Export Liquefied Natural Gas and for Additional Extension of Time to Commence Exports, Docket Nos. 13-129-LNG and 13-147-LNG (May 2, 2025) [hereinafter Request].

<sup>3</sup> 15 U.S.C. § 717b. The authority to regulate the imports and exports of natural gas, including liquefied natural gas, under section 3 of the NGA (15 U.S.C. § 717b) has been delegated to the Assistant Secretary for FECM in Redelegation Order No. S4- DEL-FE1-2023, issued on April 10, 2023.

<sup>4</sup> Request at 2.

<sup>5</sup> See *Delfin LNG LLC*, DOE/FECM Order Nos. 3393-E and 4028-F, Docket Nos. 13-129-LNG and 13-147-LNG, Order Amending Long-Term Authorizations to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Countries (Nov. 25, 2025).

<sup>6</sup> Exec. Order No. 14172 of Jan. 20, 2025, *Restoring Names That Honor American Greatness*, 90 Fed. Reg. 8629 (Jan. 31, 2025) (directing the renaming, as the Gulf of America, of “the area formerly known as the Gulf of Mexico”); see also Sec’y of the Interior, Order No. 3423 (Feb. 7, 2025) (implementing section 4 of E.O. 14172).

<sup>7</sup> *Delfin LNG LLC*, DOE/FE Order No. 3393, Docket No. 13-129-LNG, Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from a Proposed Floating Liquefaction Project and Deepwater Port 30 Miles Offshore of Louisiana to Free Trade Agreement Nations (Feb. 20, 2014), *amended by* DOE/FE Order No. 3393-A (Dec. 10, 2020) (extending export term through 2050); DOE/FE Order No. 3393-B

exports of LNG in a volume equivalent to 657.5 billion cubic feet per year (Bcf/yr) of natural gas to any country with which the United States has entered into a free trade agreement (FTA) requiring national treatment for trade in natural gas (FTA countries), pursuant to NGA section 3(c);<sup>8</sup> and

- DOE/FE Order No. 4028, as amended (Docket No. 13-147-LNG),<sup>9</sup> authorizing exports in a volume equivalent to 657.5 Bcf/yr of natural gas to any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries), pursuant to NGA section 3(a).<sup>10</sup>

Under these authorizations, the FTA and non-FTA volumes are not additive.<sup>11</sup>

Delfin's proposed Project includes a "deepwater port" within the meaning of the Deepwater Port Act of 1974, as amended (DWPA),<sup>12</sup> and consequently requires a deepwater port license from the U.S. Department of Transportation's Maritime Administration (MARAD). According to Delfin, MARAD issued a DWPA license to Delfin on March 21, 2025 (DWPA License), and the DWPA License is based on the updated design of the Project described below.<sup>13</sup> 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 [DWPA License]."<sup>14</sup>

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(May 18, 2021) (correcting the precise location of the export facilities); and DOE/FECM Order No. 3393-C (Mar. 10, 2025) (modifying term to begin on the date of first export).

<sup>8</sup> 15 U.S.C. § 717b(c). The United States currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. FTAs with Israel and Costa Rica do not require national treatment for trade in natural gas.

<sup>9</sup> *Delfin LNG LLC*, DOE/FE Order No. 4028, Docket No. 13-147-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from a Proposed Floating Liquefaction Project and Deepwater Port 30 Miles Offshore of Louisiana to Non-Free Trade Agreement Nations (June 1, 2017), *reh'g denied*, DOE/FE Order No. 4028-A (Apr. 3, 2018), *amended by* DOE/FE Order No. 4028-B (Dec. 10, 2020) (extending export term through 2050); DOE/FE Order No. 4028-C (May 18, 2021) (correcting the precise location of the facilities); and DOE/FECM Order No. 4028-D (Mar. 10, 2025) (granting request to extend deadline to commence exports to June 1, 2029).

<sup>10</sup> 15 U.S.C. § 717b(a).

<sup>11</sup> *See Delfin LNG LLC*, DOE/FE Order No. 4028, at 173 (Ordering Para. E).

<sup>12</sup> 33 U.S.C. § 1501 *et seq.* The term "deepwater port" includes offshore LNG import and export terminals. *See id.* § 1502(9).

<sup>13</sup> *See* Request at 2 & n.6 (citing MARAD Press Release, "The Maritime Administration Issues the License for the Delfin LNG, LLC Deepwater Port Application" (Mar. 21, 2025), <https://www.maritime.dot.gov/newsroom/maritime-administration-issues-license-delfin-lng-llc-deepwater-port-application>).

<sup>14</sup> *Id.* at 2.

On June 6, 2025, DOE published a Notice of Delfin’s Request in the *Federal Register*, as it pertains to Delfin’s non-FTA authorization (Order No. 4028, as amended).<sup>15</sup> DOE invited the public to submit protests, motions to intervene, notices of intervention (as applicable), and written comments in response to the Request by July 7, 2025.<sup>16</sup> In response to the Notice, DOE received a timely-filed “Motion to Intervene and Protest” from the Center for Biological Diversity and Sierra Club (together, Environmental Advocates)<sup>17</sup> and five comments submitted by individuals—none of which address the amendment at issue in this Order.<sup>18</sup> On July 18, 2025, Delfin submitted an Answer to the Environmental Advocates’ Protest.<sup>19</sup> As Delfin did not oppose the Environmental Advocates’ motion to intervene, the motion is deemed granted.<sup>20</sup>

Below, DOE grants Delfin’s request for an amendment to its FTA and non-FTA authorizations to reflect the updated Project design, pursuant to NGA sections 3(c) and 3(a), respectively. Additionally, DOE’s procedures implementing the National Environmental Policy Act of 1969 (NEPA)<sup>21</sup> provide for a categorical exclusion if neither an environmental assessment nor an environmental impact statement is required—specifically, categorical exclusion B5.7, *Export of natural gas and associated transportation by marine vessel*.<sup>22</sup> On November 24, 2025,

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<sup>15</sup> U.S. Dep’t of Energy, Delfin LNG LLC; Request for Amendment of Long-Term Authorizations to Export Liquefied Natural Gas and for Additional Extension of Time to Commence Exports, 90 Fed. Reg. 24,111 (June 6, 2025). DOE finds that the requirement for public notice of applications in 10 C.F.R. Part 590 is applicable only to non-FTA applications under NGA section 3(a).

<sup>16</sup> *See id.*

<sup>17</sup> Center for Biological Diversity & Sierra Club, Motion to Intervene and Protest, Docket Nos. 13-129-LNG and 13-147-LNG (July 3, 2025).

<sup>18</sup> *See generally* Docket No. 13-147-LNG (docket entries #80-83, 85). In the separate order addressing Delfin’s requested commencement extension (*see supra* note 5), DOE summarizes and evaluates the Environmental Advocates’ protest, the comments received, and Delfin’s answer responding to the protest.

<sup>19</sup> Delfin LNG LLC, Answer to Protest of Requested Extension of Time, Docket Nos. 13-129-LNG and 13-147-LNG (July 18, 2025).

<sup>20</sup> 10 C.F.R. § 590.303(g); *see also infra* § IV (Ordering Para. B).

<sup>21</sup> 42 U.S.C. § 4321 *et seq.*

<sup>22</sup> *See* 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

DOE issued a categorical exclusion determination under this provision for the requested amendment to Delfin’s non-FTA authorization (Order No. 4028, as amended).<sup>23</sup>

## II. REQUESTED AMENDMENT TO PROJECT DESCRIPTION

In Delfin’s non-FTA authorization issued in 2017, DOE summarized Delfin’s application in stating that the proposed Project would be comprised of “four floating liquefied natural gas vessels (FLNGVs),” and that each FLNGV “would produce 3.3 million metric tons per annum (mtpa) of LNG for export, or 13.3 mtpa for the entire Facility, which is equivalent to 657.5 Bcf/yr of natural gas for export.”<sup>24</sup> As noted above, DOE authorized Delfin to export LNG in a volume equivalent to 657.5 Bcf/yr of natural gas under both its FTA and non-FTA authorizations on a non-additive basis.

In the portion of the Request at issue here, Delfin states that the FLNGV industry has continued to progress and evolve since Delfin obtained its export authorizations from DOE, thus allowing Delfin to adopt a variety of refinements to its Project.<sup>25</sup> These refinements include, for example: (i) refinements in engineering that reduce air emissions (by incorporating waste heat recovery); (ii) modifications to the mooring systems to reduce construction impacts and seabed disturbances; and (iii) the implementation of “novel technologies” to optimize the physical design of Delfin’s FLNGVs, allowing Delfin to increase the LNG production capacity of each FLNGV.<sup>26</sup> Delfin states that, as a result of these refinements, Delfin modified its Project as presented to MARAD in its DWPA License proceeding to “include only three, rather than four,

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<sup>23</sup> U.S. Dep’t of Energy, Categorical Exclusion Determination (CX-270869), Delfin LNG LLC, Docket No. 13-147-LNG (Nov. 24, 2025); *see infra* at 7.

<sup>24</sup> *Delfin LNG LLC*, DOE/FE Order No. 4028, at 2; *see also id.* at 14-16 (“Proposed Liquefaction Facility”). In Delfin’s FTA authorization issued in 2014, DOE similarly described the proposed Project. *See Delfin LNG LLC*, DOE/FE Order No. 3393, at 5-6 (“Liquefaction Project”); *see also* Request at 10 (Delfin stating that “[t]he background descriptions in Delfin’s export authorizations . . . refer to the Project as including four FLNGVs.”).

<sup>25</sup> *See* Request at 8.

<sup>26</sup> *Id.* at 8-9.

new-build FLNGVs that would each process in the nominal design case of approximately 4.0 MTPA.”<sup>27</sup>

Delfin states that, in this optimized design scenario, “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.”<sup>28</sup> Delfin further states that “[t]his 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.”<sup>29</sup>

Delfin states that it is not requesting any change in its authorized export volume, which “remains consistent with its current Project design.”<sup>30</sup> Delfin further maintains that “[the] Project refinements do not require or warrant change in any of the Ordering Paragraphs or terms or conditions of the export authorizations.”<sup>31</sup>

In sum, to ensure that Delfin’s authorizations “properly reflect the current Project design (as detailed to MARAD prior to DWPA License issuance),” Delfin asks DOE to amend the authorizations “to reflect that the Project now includes *three* FLNGVs, with no change in the currently authorized export volumes.”<sup>32</sup>

### **III. DISCUSSION AND CONCLUSIONS FOR PROJECT DESIGN AMENDMENT**

Under 10 C.F.R. § 590.407, DOE requires any authorization holder to provide “written notification, as soon as practicable, of any prospective or actual changes to the information

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<sup>27</sup> *Id.* at 9 (emphasis added).

<sup>28</sup> *Id.*

<sup>29</sup> *Id.* In support of this description, Delfin provides a chart from the public version of its updated Environmental Impact Assessment (EIA) submitted to MARAD, which summarizes “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.” *Id.* at 5 (referencing Attachment 1 to Request); *see also id.* at 14.

<sup>30</sup> *Id.* at 10.

<sup>31</sup> Request at 10.

<sup>32</sup> *Id.* at 10-11 (emphasis in original).

submitted during the application process upon which the authorization was based.”<sup>33</sup> DOE finds that Delfin’s amendment to its FTA and non-FTA authorizations to reflect its Project refinements falls within this requirement.

**FTA Authorization.** Under NGA section 3(c), DOE is charged with granting the requested amendment to the Project description in Delfin’s FTA authorization (Order No. 3393, as amended) “without modification or delay.”<sup>34</sup>

**Non-FTA Authorization.** Upon review of the Request, DOE finds that it is necessary and appropriate to grant the amendment to the Project description in Delfin’s non-FTA authorization (Order No. 4028, as amended), pursuant to NGA sections 3(a) and 16.<sup>35</sup> As set forth above, DOE has issued a categorical exclusion determination for this amendment.<sup>36</sup>

We emphasize that this updated Project description continues to be part of the body of both the FTA and non-FTA authorizations, as amended herein, and that DOE is not modifying the Ordering Paragraphs of either authorization (or the Terms and Conditions of Order No. 4028, as amended).

#### **IV. ORDER**

Pursuant to sections 3 and 16 of the Natural Gas Act, DOE hereby orders as follows:

A. Delfin’s long-term authorizations, Order Nos. 3393 and 4028, both as amended, are further amended to reflect the current design of Delfin’s Project in accordance with the license recently granted to Delfin by MARAD under the DWPA, effective immediately; and

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<sup>33</sup> 10 C.F.R. § 590.407.

<sup>34</sup> 15 U.S.C. § 717b(c).

<sup>35</sup> *Id.* §§ 717b(a), 717o.

<sup>36</sup> *See supra* note 23 (categorical exclusion issued to Delfin).

B. The motion to intervene filed jointly by the Center for Biological Diversity and Sierra Club is granted by operation of law.<sup>37</sup>

Issued in Washington, D.C., on November 25, 2025.

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Amy Sweeney  
Director, Office of Regulation, Analysis, and Engagement  
Office of Resource Sustainability

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<sup>37</sup> 10 C.F.R. § 590.303(g).