

Posting of Off-the-Record Communication

The attached document was sent to the Department of Energy in reference to this proceeding, Commonwealth LNG, LLC, Docket No. 19-134-LNG. This document is considered an “off-the-record communication” under 10 CFR 590.102 and 590.108 because (1) the person/entity who either made the communication or knowingly caused the communication to be made is an “interested person;” (2) the communication was directed to a “decisional employee;” and (3) the communication “is relevant to the merits of the proceeding.”

The comment period for this proceeding has closed. This communication is posted here in compliance with regulations. As provided in 10 CFR 590.108(a)(5), a request by a party wishing to rebut this communication, on the record, may be submitted in writing. As specified in this regulation, such requests will be granted “only for good cause.”

RECEIVED

By Docket Room at 01/16/2024 8:00 a.m.



COMMONWEALTH
LNG

January 11, 2024

The Honorable Joseph R. Biden
President of the United States
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

RE: Commonwealth LNG Non-Free Trade Agreement (NFTA) Authorization Application Status

Dear Mr. President,

We are writing to encourage your support for the U.S. Department of Energy's (DOE) expeditious approval of the Commonwealth LNG application to export liquefied natural gas (LNG) to Non-Free Trade Agreement (NFTA) countries. Commonwealth LNG is developing a mid-sized facility to produce and export LNG at a site located in Cameron Parish, Louisiana.

Commonwealth applied for authorization from the DOE to export LNG to Free Trade Agreement (FTA) and NFTA countries on October 16, 2019. We were granted FTA authorization on April 17, 2020, and received our Federal Energy Regulatory Commission (FERC) certificate of authorization by unanimous vote of the Commission on November 17, 2022. The NFTA approval is the only remaining permit required for our project.

Based on achieving these milestones and historical precedent for DOE granting NFTA authorizations for similar LNG export facilities we have advanced the remaining technical and commercial aspects of our project. To date, we have spent approximately \$130 million on the development of our project. We are now ready to implement the final steps toward financing and construction of the facility once the NFTA authorization is secured.

On April 21, 2023, DOE issued a new policy with respect to requests for extensions to existing NFTA authorizations. We saw this as a positive development in the clarifications it provided. Notably, the policy states that the DOE will continue to require that projects commence LNG exports within seven years of authorization **"to ensure that other entities that may seek similar authorizations are not frustrated in their efforts to obtain those authorizations by**

authorization holders that are not engaged in actual export [or re-export] operations.” Authorization of our pending original NFTA application is consistent with the intent of this policy. However, with 14 months now elapsed since our FERC authorization, we continue to find ourselves with limited feedback or visibility into the DOE’s NFTA deliberation process.

Our marketing activities have shown that demand for U.S.-sourced LNG remains strong, especially from European customers. We anticipate that at least half of our long-term contracted volumes will be with European customers with end-user positions. We commend this Administration’s commitment to support our European allies with their energy security needs through U.S. LNG and believe our project can help fulfill this strategic goal while these economies transition to lower carbon energy sources in line with critical climate goals. As you fittingly noted following Russia’s invasion of Ukraine, we must “make America a world leader [in] manufacturing and exporting clean energy technologies of the future to countries all around the world.” Action is needed to make that goal a reality.

Unleashing U.S. LNG offers the single largest green initiative on the planet by accelerating coal-to-gas switching, the benefits of which we have already experienced in the U.S. We support the commitments this Administration and key industry members made at COP28 to curb methane pollution which will further enhance the positive benefits of U.S.-sourced LNG. With our abundant gas supplies and rigorous environmental and safety standards, the U.S. is positioned to provide competitive LNG supplies to world markets in a responsible way during the next decades of the energy transition. If, however, the U.S. decides to take a back seat during this transition period, then other LNG-producing nations will fill the void – at the detriment of investment in this country, creation of good paying jobs, and growth in GDP.

We are proud to offer an engineering-focused approach to LNG that combines advanced technology for environmental controls, and operational safety and efficiency. Commonwealth recently announced an agreement in principle with OnStream CO2 LLC for a carbon capture and storage solution to safely sequester and store a portion of CO2 from our project. The captured CO2 will be permanently sequestered at the Cameron Parish CO2 Hub, complementing our goal of achieving best-in-class environmental standards through measures that also include a focus on responsibly sourced gas and the installation of the highest efficiency gas turbines.

We also look forward to the economic benefits our facility will bring to the U.S. balance of trade, the Louisiana economy, and especially Cameron Parish, an area devastated by hurricanes in 2020. We have received broad support for our project from community leaders and look forward to serving as a long-term partner to the parish.

Commonwealth LNG strives to achieve positive results for all stakeholders affected by our business. This includes safe and ethical operations, good corporate citizenship and respect for the culture and traditions of the people of Louisiana. We are committed to establishing a legacy as a company that provides clean and affordable energy to existing and emerging economies, protects the environment, and attracts and motivates the best people in the industry.

Should you or your staff have any questions about Commonwealth LNG's NFTA application, the status of our project, or any related concern, feel free to reach out directly to either of us via the phone numbers or email addresses listed directly beneath our signatures below.

Thank you for your time and your consideration of this request.

Sincerely,



Paul J. Varello

Founder and Executive Chairman

Ph: 346-352-4450

pvarello@teamcpl.com



Farhad Ahrabi

President and Chief Executive Officer

Ph: 346-352-4451

fahrabi@teamcpl.com

CC: Jennifer Granholm, *U.S. Secretary of Energy*
 Jeff Zients, *White House Chief of Staff*
 Lael Bainard, *Director of the National Economic Council*
 Jake Sullivan, *U.S. National Security Advisor*
 Gina Raimondo, *U.S. Secretary of Commerce*
 Chuck Schumer, *U.S. Senate Majority Leader*
 Mike Johnson, *Speaker of the U.S. House of Representatives*
 Joe Manchin, *Chairman of the U.S. Senate Energy and Natural Resources Committee*