



DLA Piper LLP (US)  
500 Eighth Street, NW  
Washington, DC 20004  
www.dlapiper.com

Andrea J. Grant  
andrea.grant@dlapiper.com  
T 202.799.4306  
F 202.799.5306

**RECEIVED**

***By Docket Room at 2:11 pm, Jul 31, 2015***

July 31, 2015

Office of Natural Gas Regulatory Activities  
U.S. Department of Energy  
Attn: Larine Moore, Docket Manager  
Forrestal Building, Docket Room 3E-042 (FE34)  
P.O. 44375  
1000 Independence Avenue S.W.  
Washington, D.C. 20026-4375

Re: Supplemental Submission to Application of Irving Oil Terminals Inc. for  
Authorization to Import Natural Gas from Canada and Application of Irving  
Oil Commercial GP to Export Natural Gas to Canada, Case No. 15-111-NG

Ms. Moore:

Attached please find a supplemental submission to the Irving Oil Applications  
referenced above in response to questions posed by DOE.

Thank you for your assistance. If you have any questions, please contact the  
undersigned.

Respectfully submitted

A handwritten signature in black ink that reads 'Andrea Grant'.

Andrea Grant  
Counsel to Irving Oil Terminals  
Operations Inc. and  
Irving Oil Commercial GP



DLA Piper LLP (US)  
500 Eighth Street, NW  
Washington, DC 20004  
www.dlapiper.com

Andrea J. Grant  
andrea.grant@dlapiper.com  
T 202.799.4306  
F 202.799.5306

July 31, 2015

Benjamin Nussdorf, Esquire  
Office of Fossil Energy  
Office of Oil and Gas Global Security and Supply  
U.S. Department of Energy  
Forrestal Building, Docket Room 3E-042 (FE34)  
P.O. Box 44375  
1000 Independence Avenue, S.W.  
Washington, D.C. 20026-4375

Re: Supplemental Submission to Application of Irving Oil Terminals Operations Inc.  
Seeking Authority to Import Natural Gas from Canada to the United States and  
Application of Irving Oil Commercial GP (with Irving Oil Terminals Operations Inc.  
acting as its agent in the U.S.) Seeking Authority to Export Natural Gas from the  
United States to Canada, Case No. 15-111-NG

Dear Mr. Nussdorf:

As we have discussed, Irving Oil Commercial GP of Saint John, New Brunswick, Canada applied for a long-term license authorizing the export of approximately 26 billion cubic feet (Bcf) of natural gas from the United States to Canada. Its sister entity, Irving Oil Terminals Operations Inc. of Portsmouth, New Hampshire, acted as its U.S. agent, pursuant to the "Notice of Procedure," adopted earlier this year. See 80 Fed. Reg. 11664 (March 4, 2015). In addition, Irving Oil Terminals Operations Inc. (a U.S. entity) applied for a long-term license authorizing the import of approximately 9.83 Bcf from Canada into the United States.

In the course of review, the Department of Energy has posed several questions, and this supplemental submission provides the requested information.

1. Irving Oil Commercial GP is a general partnership that is established/registered in New Brunswick, Canada and has its principal place of business in Saint John, New Brunswick, Canada.
2. Irving Oil Limited is a corporation incorporated in New Brunswick, Canada and has its principal place of business in Saint John, New Brunswick, Canada.



3. Irving Oil Terminals Operations Inc. is a corporation incorporated in the State of Delaware and has its principal place of business at 190 Commerce Way, Portsmouth, New Hampshire, 03801.
4. Pursuant to the "Notice of Procedure" adopted in March 2015, Irving Oil Terminals Operations Inc. (a U.S. entity) is acting as agent for service of process and related matters for its Canadian sister entity, Irving Oil Commercial GP, in the license application requesting authority to export approximately 26 Bcf of natural gas from the U.S. to Canada. Irving Oil Commercial GP is the principal entity seeking the authority. The partnership neither resides nor has a principal place of business or other corporate presence in the United States.

We hope this letter fully responds to the questions posed and clarifies Irving Oil Terminal Operations Inc.'s limited role in the license application to export natural gas to Canada.

If you have any additional questions, Irving Oil Commercial GP and Irving Oil Terminal Operations Inc. would be please to respond. Please contact the undersigned.

Thank you for your assistance with this matter.

Respectfully submitted,

A handwritten signature in black ink that reads 'Andrea Grant'.

Andrea Grant  
Counsel for Irving Oil Terminals  
Operations Inc. and  
Irving Oil Commercial GP