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Ms. Beverly Howard
Division of Natural Gas Regulation
Office of Fossil Energy
Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

15-165-NG

Re: Revised Request to Amend Long-Term Natural Gas License – Order 3765-A

Dear Ms. Howard:

On January 16, 2018, Irving Oil Commercial GP, a Canadian entity, and its sister U.S. entity, Irving Oil Terminals Operations LLC (collectively “Irving”) requested that the Office of Fossil Energy (“FE”) of the Department of Energy (“DOE”) amend Order 3765-A and provide two effective dates for the various authorizations sought – (1) one for imports and exports of natural gas from and to Canada from December 1, 2017 through October 31, 2017; and (2) one for imports and exports of natural gas from and to Canada for a term of 15 years beginning November 1, 2018. However, following our most recent discussion, Irving understands that such a request is not consistent with the protocol used by FE – one effective date for each order.¹ Accordingly, on behalf of Irving, we hereby withdraw that request and submit the following Request for Amendment in its place --

1. Retain the current effective date of November 1, 2017 in the Order;
2. Increase the authorization for imports of natural gas from Canada from up to 10 Billion cubic feet (“Bcf”) per year to 14 Bcf;

¹ In addition to the Request for Amendment filed on January 16, 2018, Irving also provided Notice to FE on two matters addressed in the Order. First, Irving had anticipated that both import and export transactions (referred to as Transaction 1 and Transaction 2 in its application and in the Order) would commence on November 1, 2017. However, the imports and exports under Transaction 1 did not begin until December 1, 2017, and the exports described in Transaction 2 have been delayed until November 1, 2018. By this letter, Irving is withdrawing its January 16, 2018 Request for Amendment, but is once again providing FE with notification about the effective dates of Transactions 1 and 2.

3. Increase the authorization for exports of natural gas to Canada from up to 22 Bcf per year to 26 Bcf; and

4. Make the Order effective for a term of 16 years so that it would expire on October 31, 2033.

Irving believes that adoption of these requested amended provisions of the Order will be consistent with FE's protocol – one effective date in each order – and reflect the commercial modifications in the transactions to be undertaken by Irving.

Irving would be pleased to respond to any questions you may have regarding this Request for Amendment to Order 3765-A.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrea Grant". The signature is fluid and cursive, with the first name "Andrea" written in a larger, more prominent script than the last name "Grant".

Andrea Grant
Martin Schaefermeier
Counsel for
Irving Oil Commercial GP and
Irving Oil Terminals Operations LLC