

February 25, 2025

Eric Beightel
Executive Director
Permitting Council
1800 M Street, NW, Suite 6006
Washington, DC 20036
FAST-41@permitting.gov

Brandon Cherry
Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street NE
Washington, DC 20426
Brandon.Cherry@ferc.gov

Re: Alaska Gasline Development Corporation FAST-41 Re-Initiation Notice

Dear Mr. Beightel and Mr. Cherry:

Pursuant to Title 41 of Fixing America's Surface Transportation Act 42 U.S.C. § 4370m (2016) ("FAST-41"), Alaska Gasline Development Corporation ("AGDC") hereby submits this FAST-41 Initiation Notice (FIN) for its Alaska LNG Project (the "Project") to continue to be a "covered project" within the meaning of FAST-41. The Project was determined to be a covered project and an original FIN was approved by the Federal Permitting Improvement Steering Council and the Federal Energy Regulatory Commission (FERC) on August 17, 2017.

Under the FAST-41 program, the Project received major permits and approvals in 2020. In addition, DOE completed a Supplemental Environmental Impact Statement (EIS) in 2022 and issued an updated order for export of LNG to non-free trade agreement countries.

In response to a challenge by the Sierra Club and Center for Biological Diversity, the U.S. Fish and Wildlife Service and National Marine Fisheries Service plan to update their Biological Opinions in 2025. In addition, several permits and approvals need to be renewed, as identified in this application. For these reasons, AGDC requests re-activation of the FAST-41 process for the updated Biological Opinions and permit renewals.

In accordance with Section 41003 of FAST-41, 42 U.S.C. § 4370m-2, AGDC submits the following information.

1. Project Information:

Title:	Alaska LNG Project
Sector:	Pipeline
Type:	Liquefied Natural Gas Terminal Facilities (Onshore or in State Water) and Associated Natural Gas Pipeline
Location:	Alaska

2. Project Sponsor Name and Contact Information: Alaska Gasline Development Corporation

Frank Richards
President
Alaska Gasline Development Corporation
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Lisa Haas
Environment, Regulatory, and Lands Manager
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3. Statement of Purposes and Objectives of Project:

The purpose of the Alaska LNG Project is to commercialize and bring to market the vast natural gas resources on Alaska's North Slope which have been stranded since the discovery of these resources almost 50 years ago. By constructing the infrastructure needed to treat and transport gas from the North Slope and liquefy the gas for export, the Project will unlock these valuable resources; meet the demand for natural gas globally and within parts of Alaska; increase revenues for federal, state and local governments, businesses and residents; create tens of thousands of jobs; improve the nation's trade balance with foreign countries; and increase the energy security of the United States and our allies.

4. Concise Description:

The Alaska LNG Project is comprised of the following integrated and interdependent facilities: a liquefaction facility in Southcentral Alaska designed to produce up to 20 million metric tons per annum of LNG, an approximately 807-mile, 42-inch diameter gas pipeline, compressor and heater stations, a gas treatment plant ("GTP") within the Prudhoe Bay Unit ("PBU") on the North Slope; an approximately 1-mile, 60-inch diameter gas transmission line connecting the GTP to the PBU gas production facility, and an approximately 63-mile, 32-inch diameter gas transmission line connecting the GTP to the Point Thomson gas production facility.

The mainline of the Alaska LNG Project will traverse over 800 miles from the GTP on the North Slope of Alaska through several boroughs before it crosses Cook Inlet and connects with the liquefaction facility and marine terminal in Nikiski, Alaska. FERC completed a comprehensive EIS and issued a FERC Section 3 authorization for the Project in 2020 (FERC Docket No. CP17-78-000).

5. Statement Regarding Technical and Financial Ability of Project Sponsor

AGDC is a stand-alone public corporation of the State of Alaska whose organization, administration and powers are governed by Alaska Statutes Title 31, Chapter 25. This statute empowers AGDC to advance an Alaska liquefied natural gas project by developing infrastructure and providing services relating to transportation, liquefaction, a marine terminal, marketing and commercial support. The statute also established a project fund consisting of money appropriated to AGDC by the state legislature, and money continues to be appropriated for AGDC operations, as needed, each year. AGDC has a highly experienced project management team that manages a network of world class contractors experienced in developing liquefaction, pipeline and gas processing facilities that supported the design and permitting phases of the project. All major

permits have been obtained, along with 94.5% of the construction right-of-way. AGDC is now working with potential private investors to lead the project through the next phases including Front-End Engineering Design (FEED), Final Investment Decision and construction.

6. Statement of Federal Financing, Environmental Reviews and Required Authorizations

FERC completed extensive review of environmental and engineering information included in AGDC's application for authorization to construct and operate the Alaska LNG Project filed on April 17, 2017 in FERC Docket No. CP17-78-000. FERC's application review followed more than 2 years of environmental review in FERC's pre-filing process in Docket No. PF14-21. In addition, a substantial amount of environmental review had previously been performed by FERC and other agencies on similar Alaska natural gas infrastructure projects that included major components of the Alaska LNG Project located along the same right-of-way or at adjacent locations.

In 2020, FERC and other federal agencies issued required permits and authorizations, including the Pipeline Hazardous Materials Safety Administration, U.S. Army Corps of Engineers, U.S. Coast Guard, U.S. Environmental Protection Agency, U.S. Department of the Interior Bureau of Land Management, and the U.S. Fish and Wildlife Service, as well as several Alaska state agencies. The FAST-41 dashboard (<https://www.permits.performance.gov/permitting-project/fast-41-covered-projects/alaska-lng-project>) identifies completed authorizations.

The Alaska LNG Project is a large infrastructure development, estimated to cost in the range of \$44 billion. The Alaska Natural Gas Transportation Act of 2004 made the Alaska LNG Project eligible for a federal loan guarantee for a portion of the cost.

When FERC and other permits were received in 2020, AGDC's focus was to obtain private investors to fund construction and operations. Significant challenges in that process included the global pandemic, Russia's invasion of Ukraine that pulled investment to other parts of the U.S. and world, and overall size of the project.

A lead investor has now been identified for the Alaska LNG Project, and definitive agreements are being negotiated. Plans are being developed to move forward with FEED once the agreements are complete. However, several permits need to be renewed, and Biological Opinions are being updated. Coordination of the updates and permit renewals is requested through the FAST-41 process.

7. Why the Alaska LNG Project is a Covered Project under FAST-41

The Alaska LNG Project was determined to be a FAST-41 Covered Project on August 17, 2017, and continued coverage is requested. FAST-41 defines a Covered Project under 42 U.S.C. § 4370m(6)(A) as:

any activity in the United States that requires authorization or environmental review by a [f]ederal agency involving construction of infrastructure for renewable or conventional energy production, electricity transmission, surface transportation, aviation, ports and waterways, water resource projects, broadband, pipelines, manufacturing, semiconductors, artificial intelligence and

machine learning, high-performance computing and advanced computer hardware and software, quantum information science and technology, data storage and data management, cybersecurity, carbon capture, energy storage, or any other sector as determined by a majority vote of a Council that—

- (i)
 - (I) is subject to NEPA;
 - (II) is likely to require a total investment of more than \$200,000,000; and
 - (III) does not qualify for abbreviated authorization or environmental review processes under any applicable law;
- (ii) is covered by a programmatic plan or environmental review developed for the primary purpose of facilitating development of carbon dioxide pipelines;
- (iii) is –
 - (I) subject to NEPA;
 - (II) sponsored by an Indian Tribe (as defined in section 5304 of title 25), an Alaska Native Corporation, a Native Hawaiian organization (as defined in section 7517 of title 20), the Department of Hawaiian Home Lands, or the Office of Hawaiian Affairs; and
 - (III) located on land owned or under the jurisdiction of the entity that sponsors the activity under subclause (II); or
- (iv) is subject to NEPA and the size and complexity of which, in the opinion of the Council, make the project likely to benefit from enhanced oversight and coordination, including a project likely to require -
 - (I) authorization from or environmental review involving more than 2 federal agencies; or
 - (II) the preparation of an environmental impact statement under NEPA.

The Alaska LNG Project meets the definition of a Covered Project under both alternative subparts (i) and (iv). With respect to subsection (i), the Project is subject to NEPA, has an estimated cost of \$40 to \$45 billion and does not qualify for abbreviated authorization or environmental review processes under any applicable law. In addition, given its size and complexity, the Project will likely benefit from enhanced oversight and coordination and otherwise meets the criteria of subsection (iv) above.

Consequently, AGDC respectfully requests that the Alaska LNG Project continue to be a Covered Project and continue to be treated as such within the meaning of FAST-41.

Alaska Gasline Development Corporation

February 25, 2025

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Please contact Lisa Haas via phone at 907.947.9353 or via email at lhaas@agdc.us if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "F. T. Richards".

Frank T. Richards

President

cc:

James Martin, FERC

Craig Litteken, Permitting Council

Lisa Haas, AGDC