January 23, 2025

*Sent via email*

The Hon. Ingrid Kolb
Acting Secretary
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

**Re: DOE Policy Recommendations on behalf of AXPC**

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Dear Acting Secretary Kolb:

I am writing on behalf of the American Exploration & Production Council (AXPC) to present our key priorities and actionable recommendations for the Department of Energy (DOE). These recommendations aim to support responsible energy production in the United States that support DOE's mission of ensuring America's security and prosperity by addressing energy challenges through transformative science and technology solutions.

The AXPC is a national trade association which represents the nation's leading independent oil and gas producers, who collectively contribute more than 50% of America's oil and natural gas production annually. Over the past two decades, our member companies have led the American Energy Revolution, fundamentally reshaping global energy markets and establishing the United States as the world leader in both oil and natural gas production, while simultaneously achieving significant emission reductions.

From powering domestic energy demand growth from Artificial Intelligence (AI) to addressing energy poverty around the globe, American energy dominance—underpinned by durable, innovative energy policy—is key to a stronger, more secure

future. We urge the administration to continue to pursue this mission by implementing research and regulatory frameworks that enhance U.S. energy production while upholding high environmental standards. Our recommendations focus on policy priorities that we believe strike this critical balance and help drive innovations in technology and science that are necessary to promote domestic energy development in the United States.

**Recommendations Policy Actions for the DOE**

1. **Resume Timely Approval of Liquefied Natural Gas (LNG) Export Approvals.** U.S. LNG plays a critical role in geopolitical stability and supporting global emission reductions — a fact that has been confirmed numerous times over the past decade. As the world's largest natural gas producer, the U.S. is well positioned to meet the dual challenge of supplying the world with affordable, clean, and reliable energy-all while reducing global emissions. This misguided permitting pause should be lifted immediately, and DOE should ensure that any public interest study uses well-reasoned assumptions.

2. **Promote U.S. Energy Exports.** American energy is a powerful source for good in the world and can be a lifeline for countries that do not have their own energy resources—especially in the developing world. Unfortunately, the Biden Administration took several steps to discourage or impede financing for U.S. fossil fuel export projects. These actions run counter to promoting energy security and lowering emissions globally. The 2025 Administration should revoke policy and guidance documents discouraging the use of international fossil fuel financing. The government should consider designating U.S. natural gas as a "low-carbon fuel" and critical for realizing a low-carbon future.

3. **Create Fair Access to Export Authorizations and Avoid Unnecessary Delays.** Currently, no federal authorization is needed to export crude oil. The new administration should consider if LNG should be afforded equal treatment by removing the export permitting requirement. Absent such reforms, standards should be set for FERC and DOE to provide more transparent and reliable rules of the road, including by providing that it is the policy of the United States that LNG exports are in the public interest unless a limited set of exceptions applies.

4. **Provide Greater Certainty for Critical Energy and Infrastructure.** American Energy Dominance is not achievable without meaningful permit reform. A critical

piece of the puzzle is the build out of infrastructure needed to keep up with growing energy demands in ever-cleaner ways, but the federal permitting process for these critical projects is too complicated, too unpredictable, take too long, and allows for endless lawsuits. DOE should leverage its pivotal role influencing U.S. energy policy to spur new innovations and efficiencies that can streamline and modernize federal permitting programs.

5. **Enhance Energy Reliability with Advanced Natural Gas Storage:** Energy reliability and grid concerns have grown due to increasing demand, extreme weather events, and a rapid growth in non-dispatchable sources of power. To ensure a more stable and secure energy supply, DOE should promote natural gas storage to ensure a consistent supply of energy during periods of peak demand, mitigating disruptions and addressing the growing need for a dependable energy system.

6. **Promote Carbon Storage and Emissions Reduction to Secure Energy Leadership**: The oil and gas industry continues its progress in lowering emissions from operations including through the development of new emissions technologies and carbon sequestration projects. DOE should continue supporting these advancements through targeted research, development, and grant programs, ensuring America remains at the forefront of innovative energy solutions. These initiatives will not only reduce emissions but also support the economic strength of traditional energy sectors, reinforcing the United States as a global leader in energy and emissions reduction.

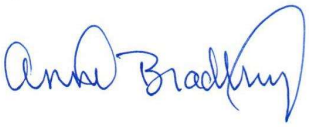
7. **Support Research to Advance the Treatment and Reuse of Produced Water:** DOE has been a key supporter of research into the treatment and reuse of produced water, which may someday prove to be a vital resource in water-scarce, energy-producing regions. Continued focus on this issue is critical for basins with abundant produced water but limited or narrowing disposal options, especially in water-stressed regions. DOE can help advance the development of technologies that can reduce disposal needs, improve resource sustainability, and continue supporting long-term energy production.

We urge the DOE to consider these policy actions and recommendations to ensure that the U.S. pursues innovations in technology and science that are necessary to promote domestic energy development in the U.S. While these recommendations represent our primary concerns, we acknowledge there are numerous other policies and regulatory measures that impact U.S. energy production. We encourage

consideration of input from our partner associations representing other industry stakeholders for a comprehensive understanding of these interconnected issues.

AXPC remains committed to working collaboratively with your team to advance policies that promote responsible energy development while supporting our nation's economic and environmental objectives. Should you have any questions about these recommendations or if we can be of assistance, please do not hesitate to contact my senior policy staff Wendy Kirchoff at wendy.kirchoff@axpc.org. We appreciate your consideration of these priorities and look forward to engaging with DOE to achieve our shared goals.

Sincerely,



Anne Bradbury
CEO
American Exploration & Production Council (AXPC)

Cc: Energy Secretary Nominee Chris Wright
Energy Deputy Secretary Nominee James Danly