Energy Information Administration
U.S. Department of Energy
Condensate Workshop
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Processed Condensate Exports
Regulatory Framework and Paths Forward

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Discussion Agenda

- Approach: Focus on the Law
- Basic Legal Principles and Processes
- BIS Definition of “Crude Oil”
- Allowed Exports of Processed Condensate Under *Enterprise* and *Pioneer* Rulings
- Reactions and Open Issues
- Possible Regulatory Paths Forward

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Power
Renewables
Transportation Fuels
Nuclear
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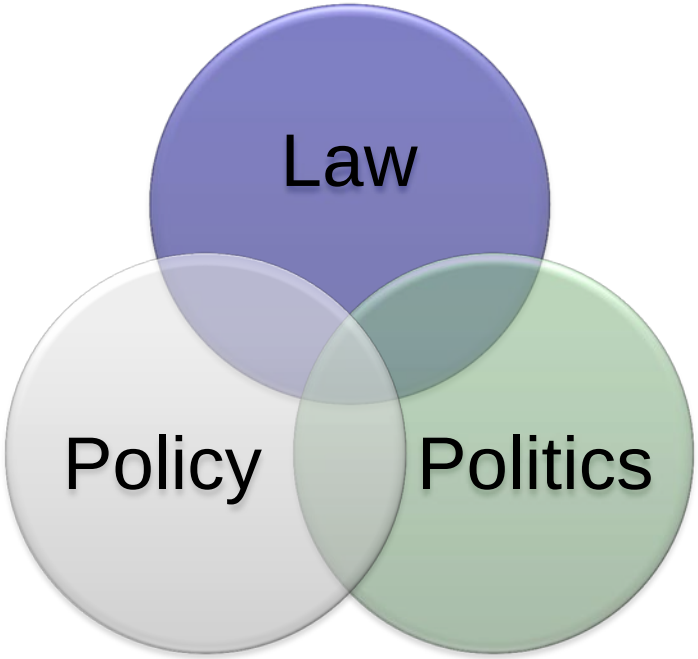
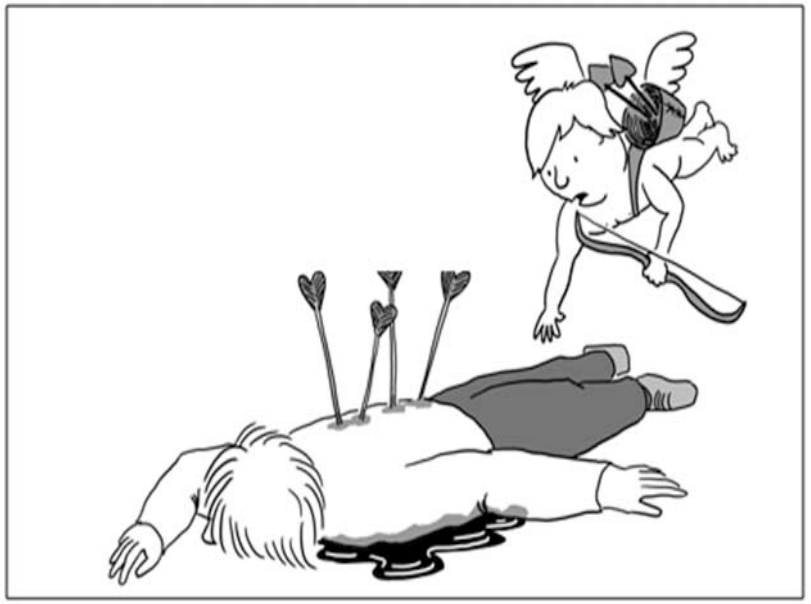
Focus on Crude Oil Export *Law*

- Our approach analyzes the statute (EPCA) and the regulations (EAR), which dictate the powers and processes of the agency (BIS), and BIS determinations
  - Text
  - Procedures
  - Original intent
  - Reasonable interpretations
- Crude export policy arguments are instructive only to the extent they rely on reasonable interpretations of existing law
- Politics are disregarded in this analysis



Existing Export Law Governs Regardless of Anomalies or Consequences

- *"40-year old crude export ban was never intended to apply to today's light oil glut"*
  - **But it does**
- *"Condensate is not what we think of as crude oil anyway"*
  - **But it's included**
- *"Does it make sense to define 'crude oil' based on whether it was not processed through a distillation tower?"*
  - **But that's the law**



Changes to the Crude Export Law Don't Count Until They Happen

Possible New Legislation in 114th Congress

Possible Executive Orders Allowing More Exports

Possible BIS Rulemaking to Redefine "Crude Oil"

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Energy Policy and Conservation Act of 1975

ENERGY POLICY AND CONSERVATION ACT

Public Law 94–163, as Amended

[As Amended Through P.L. 113–67, Enacted December 26, 2013]

AN ACT To increase domestic energy supplies and availability; to restrain energy demand; to prepare for energy emergencies; and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the ''Energy Policy and Conservation Act''.

- "The President shall . . . promulgate a rule prohibiting the export of crude oil . . . except that the President may . . . exempt from such prohibition such crude oil . . . which he determines to be consistent with the national interests and the purposes of this Act."
- While the term "crude oil" is not defined in the EPCA, the Secretary of Commerce is empowered to "implement any rule" imposing any "restriction" on the export of crude oil.
- EPCA authorizes possible exports pursuant to swaps or exchanges and recognizes the special relationship with Canada and Mexico.

President Calls the Crude Export Shots Under EPCA

to →

to →

- Crude exports prohibited unless President allows them in the "national interest" – determination effectively not reviewable by courts
- EPCA also empowers President to impose export controls on petroleum products – authority never exercised
- Executive Orders permit crude exports of (under specified conditions):
  - US crude to Canada (Reagan 1985)
  - Exports from Alaska's Cook Inlet (Reagan 1985)
  - 50,000 barrels per day of TAPS to Canada (Reagan 1988)
  - 25,000 barrels per day of California heavy (Bush 1992)
  - Unlimited TAPS crude (Clinton 1996)

Permissible Categories of Oil Exports From US

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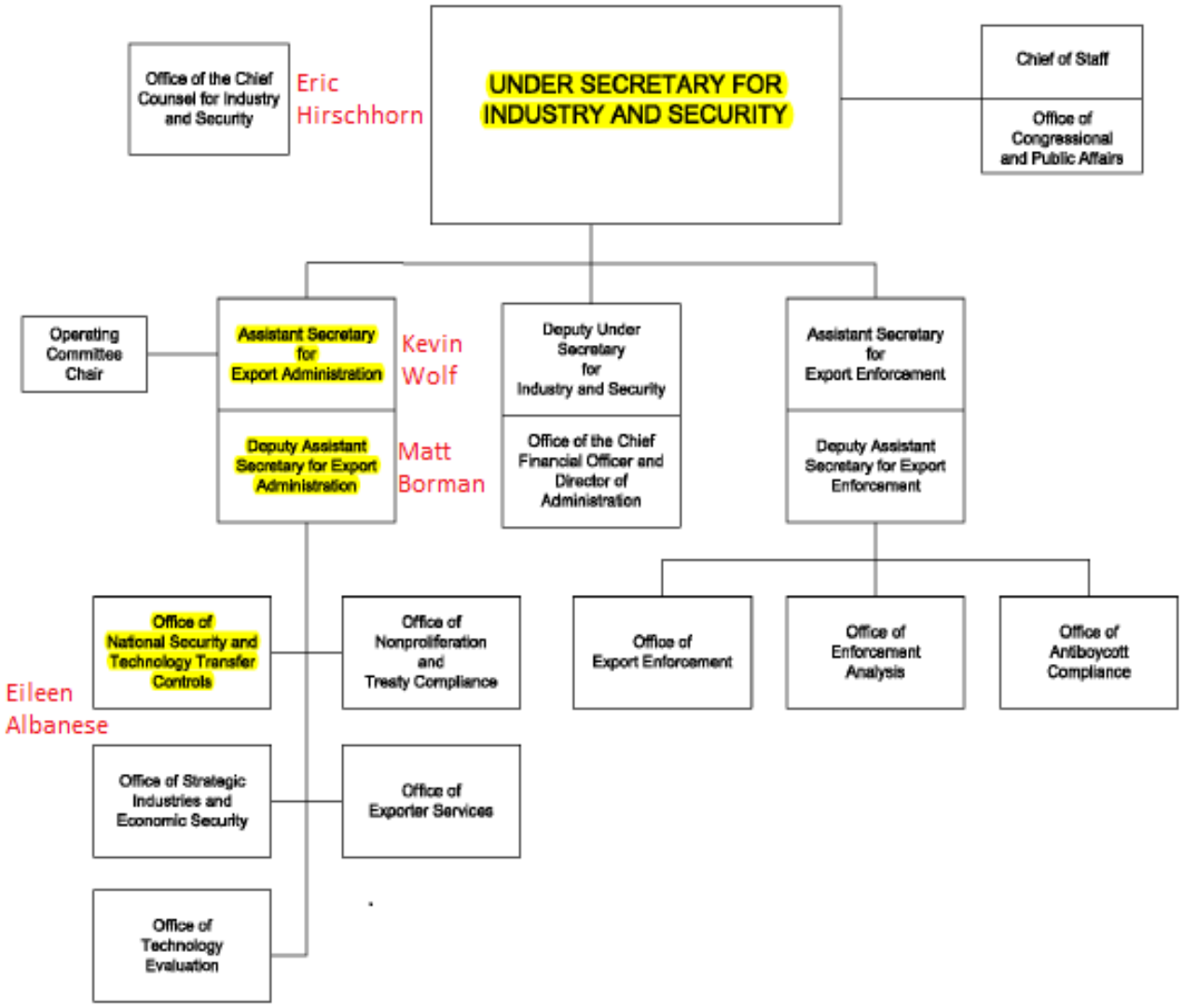
BIS Responsible for Administering Export Controls Part of U.S. Department of Commerce



Secretary of Commerce Penny Pritzker

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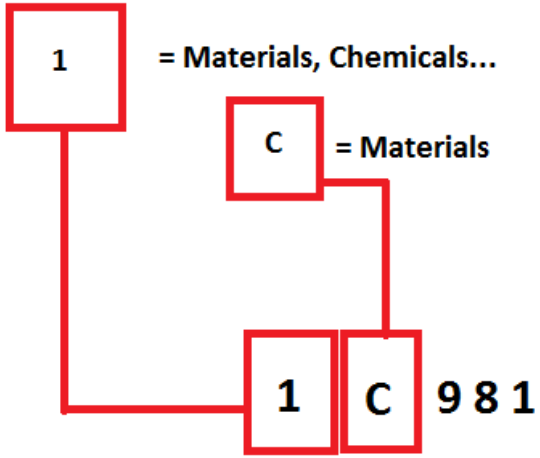
Basic Tools for Applying and Interpreting the Law: Classification Ruling and Export License

How do you seek a classification ruling or an export license?

Ruling:
Crude oil or product?



License required or issued?

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Law Requires Strict Confidentiality at BIS to Protect National Security

APPLICATION

COMMUNICATIONS

MEETINGS

LICENSE/CLASSIFICATION
GRANT OR DENIAL

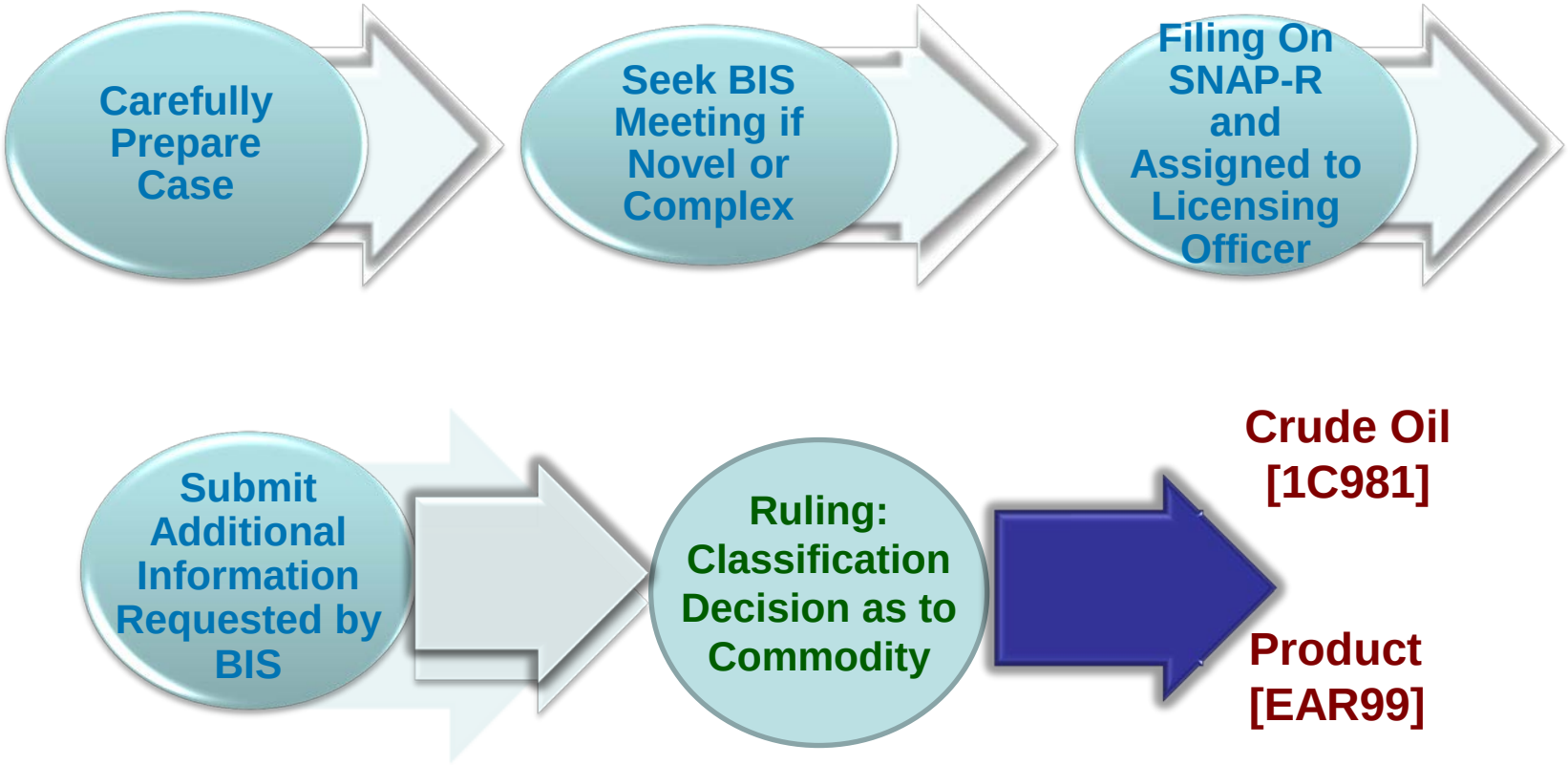
Commerce Control List Categories

0 = Nuclear materials, facilities and equipment (and miscellaneous items)
1 = Materials, Chemicals, Microorganisms and Toxins
2 = Materials Processing
3 = Electronics
4 = Computers
5 = Telecommunications and Information Security
6 = Sensors and Lasers
7 = Navigation and Avionics
8 = Marine
9 = Propulsion Systems, Space Vehicles, and Related Equipment

Commodity Classification Ruling Requests

- Exporters may ask BIS to issue a determination that a commodity is described by an Export Control Classification Number (ECCN) and if no ECCN applies, the commodity is an “EAR99” item.
- A ruling request must describe the commodity in sufficient technical detail to enable classification by BIS.
- If BIS assigns a commodity an ECCN, it likely has restrictions on its export; for example, it may require a license for export
  - Crude oil has the ECCN 1C981 and its export is prohibited, except for limited circumstances when a license is required
- If BIS designates your commodity as an EAR99 item, it generally is freely exportable without a license
  - Pursuant to the *Enterprise* and *Pioneer* rulings, processed condensate is classified an EAR99 item

BIS Classification Ruling Request Process



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Export License Application

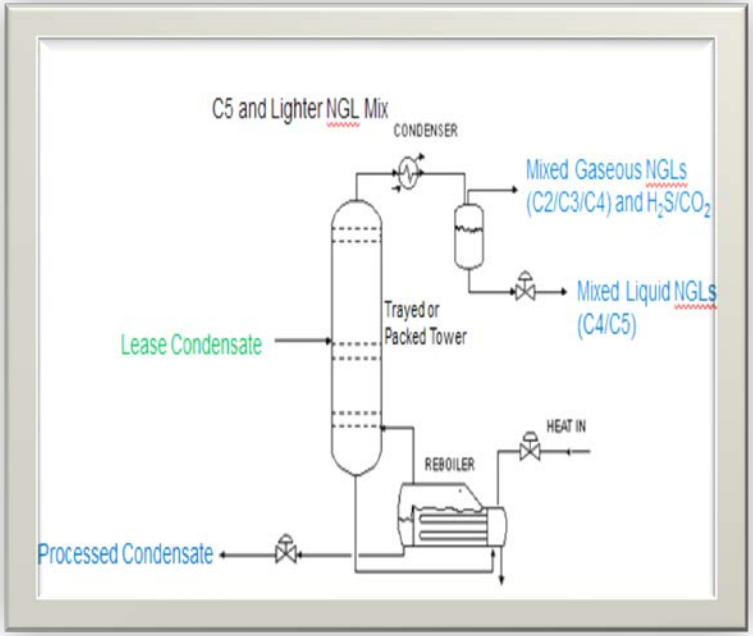
- A license is required for the export of crude oil (ECCN 1C981) to any allowed destination, including Canada (except for ANS crude)
- “The [license] applicant must be the exporter, who is the U.S. principal party in interest with the authority to determine and control the sending of items out of the United States.”
- The crude oil export license application must name all counterparties to a transaction, namely intermediate purchasers and end-user refiners of the crude oil
- A license is granted for 1 year and only the applicant can export crude oil under the license

Effects and Use of Ruling
Effects and Use of License

Example:
License to Export Canadian Crude Oil

License runs with the exporter (non transferable)

Example:
Processed Condensate Ruling



Ruling runs with the product (applies to all)

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BIS Definition of “Crude Oil”

“Crude oil” is defined as a mixture of hydrocarbons that

- *[i] existed in liquid phase in underground reservoirs and*
- *[ii] remains liquid at atmospheric pressure after passing through surface separating facilities and*
- *[iii] which has not been processed through a crude oil distillation tower.*

Included are reconstituted crude petroleum, and lease condensate and liquid hydrocarbons produced from tar sands, gilsonite, and oil shale. Drip gases are also included, but topped crude oil, residual oil, and other finished and unfinished oils are excluded.”

"Crude Oil" Definition Borrowed from and Served Objectives of Oil Price Controls Program of the 1970s

- Domestic "old" crude oil was subject to price controls (*e.g.*, $2/bbl), while "new" and imported oils were not (*e.g.*, $12/bbl)
  - Generally majors had a huge feedstock price advantage by controlling the "old" oil, while smaller, independent refiners had to pay a higher price for crude not subject to price controls
- "Entitlements Program" adopted to distribute the financial benefits of price controlled "old" oil among all US refiners, so each month the DOE (FEA):
  - Calculated the national ratio of old to total crude oil processed by all US refiners (*e.g.,* 50%)
  - Issued each refiner "entitlements" equal to its crude "runs to stills" times national ratio (an "entitlement" was the right to process 1 barrel of old oil)
  - Ordered each refiner that processed old oil in excess of its issued entitlements to purchase entitlements from refiners that ran less old oil than the national average
  - Set the monthly price of an entitlement (*e.g.,* $5/bbl)
  - Example: Refiner M runs 100 bbls made up of 80 old and 20 new, while Refiner S runs 80 bbls of which only 10 are old. Refiner M is issued 50 entitlements (100 x 50%) and is ordered to purchase 30 more (80-50). Refiner S is issued 40 (80 x 50%), of which he can sell 30 (40-10). Refiner M purchases 30 entitlements from Refiner S at a cost of $150 (30x$5)

Text of Crude Oil Definition Designed to Meet Price Controls Objectives – Not Exports – But It's the Law

- Crude oil definition captures as a refiner's "runs to stills" every type of feedstock that could possibly be processed to prevent evasion of price controls
  - "*Included are reconstituted crude petroleum, and lease condensate and liquid hydrocarbons produced from tar sands, gilsonite, and oil shale. Drip gases are also included*"
  - If you processed it – you must count it
- But definition also excludes all feedstock that has previously been processed in any way, this time to avoid creating bogus entitlements by double counting barrels
  - *"Crude oil" is defined as a mixture of hydrocarbons . . . which has not been processed through a crude oil distillation tower*"
  - *"topped crude oil, residual oil, and other finished and unfinished oils are excluded*"

Contrast: EIA Definition Where Lease Condensate Is Not Counted as "Crude Oil" (Unless Mixed in Crude Stream)

Crude oil: A mixture of hydrocarbons that exists in liquid phase in natural underground reservoirs and remains liquid at atmospheric pressure after passing through surface separating facilities. Depending upon the characteristics of the crude stream, it may also include 1. Small amounts of hydrocarbons that exist in gaseous phase in natural underground reservoirs but are liquid at atmospheric pressure after being recovered from oil well (casing head) gas in lease separators and are subsequently comingled with the crude stream without being separately measured. Lease condensate recovered as a liquid from natural gas wells in lease or field separation facilities and later mixed into the crude stream is also included; 2. Small amounts of nonhydrocarbons produced with the oil, such as sulfur and various metals; 3. Drip gases, and liquid hydrocarbons produced from tar sands, oil sands, gilsonite, and oil shale.

- EIA definition includes hydrocarbons that existed "in liquid phase in natural underground reservoirs," thus excluding lease condensate which is found in gaseous phase underground
- EIA definition does not address degree of processing that would remove the hydrocarbons from the scope of the definition; EIA has separate definitions for numerous petroleum products
- EIA definition includes lease condensate only to extent it is "later mixed with the crude oil stream"

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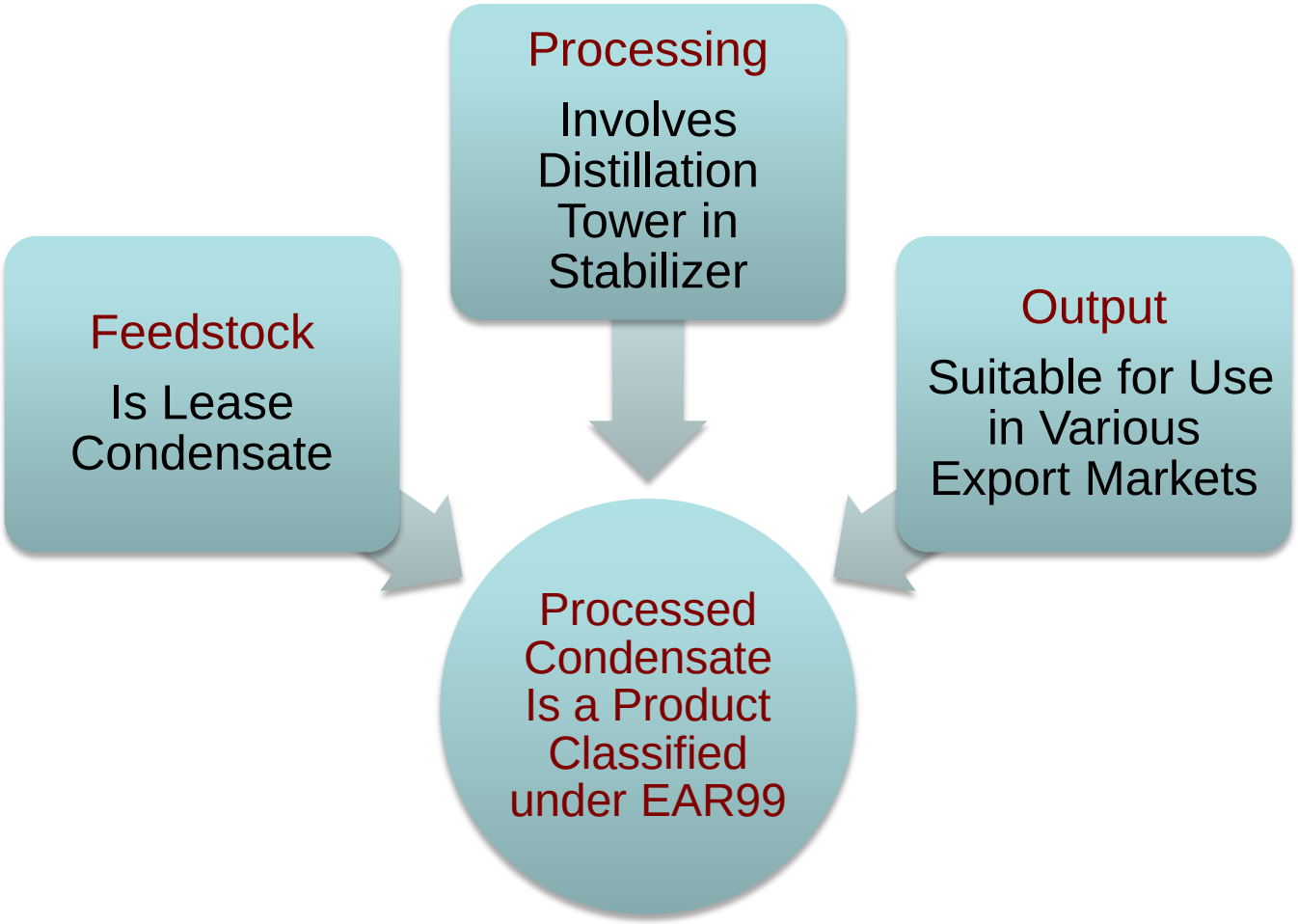
The Basics of the Rulings



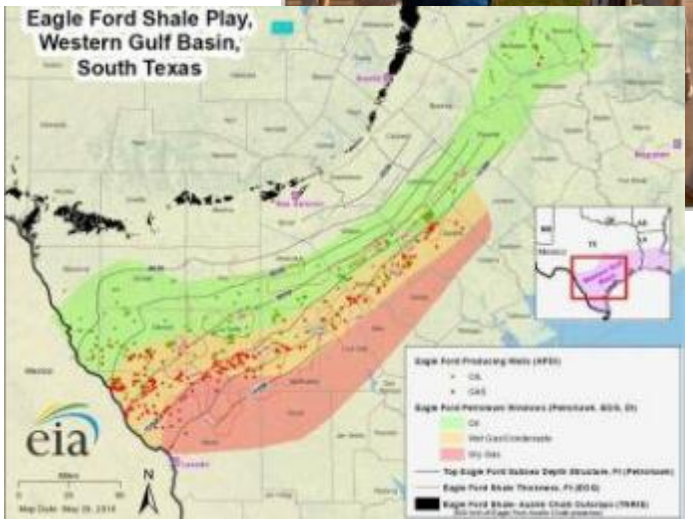
Explanation of Rulings by US Department of Commerce (June 24, 2014 Press Release)

"There has been no change in policy on crude oil exports. Existing statutes provide both specific restrictions and allowances regarding crude oil exports, which are administered and enforced by the Department of Commerce's Bureau of Industry and Security. Consistent with the regulatory definition, crude oil that has been processed through a distillation tower which results in the crude becoming a petroleum product is no longer defined as crude oil. Petroleum product can be exported without a license, except in very limited circumstances."

[emphasis added]

Rulings Cover Lease Condensate Feedstock

- Condensate is a mixture of light liquid hydrocarbons recovered from natural gas and condensate wells, commonly in gaseous state in underground reservoirs
- Eagle Ford unprocessed condensate has an API gravity ranging from 50 to 80
- Current production nationally at 1.2M bpd; projected 1.8M bpd by 2020



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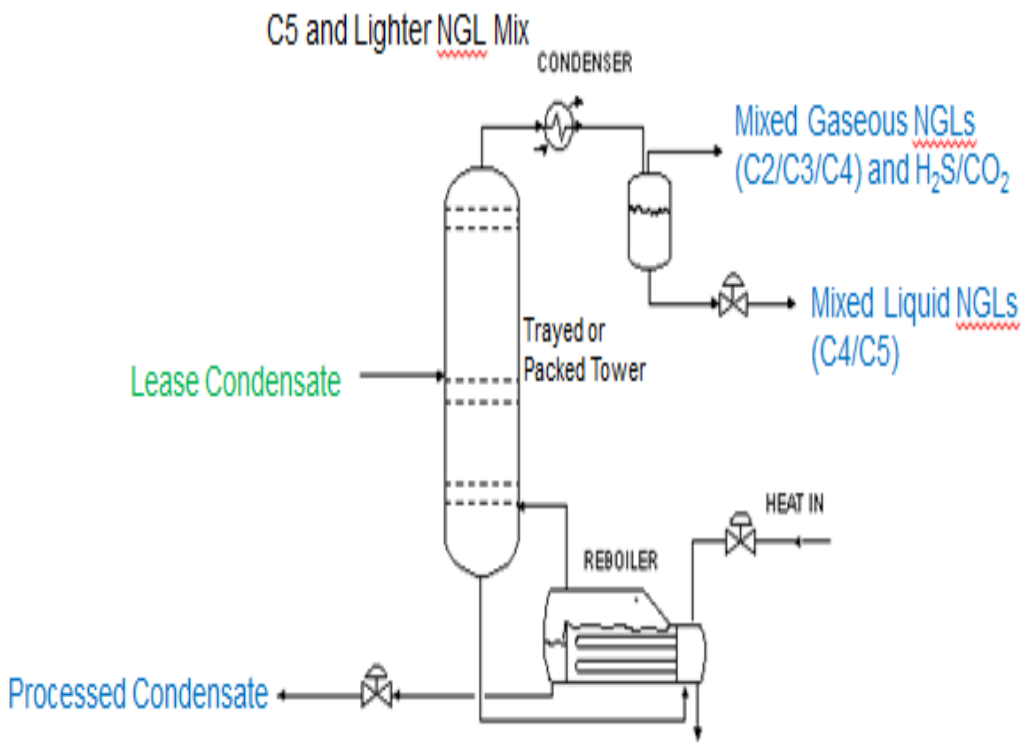
Rulings Cover Processing in a Distillation Tower at Stabilizer, Splitter or other Condensate Distillation Facility



Distillation of Significant Hydrocarbon Fractions:

- Methane (Natural Gas)
- Gaseous NGLs (Ethane, Propane, Butanes – C2, C3 and C4)
- Mixed Liquid NGLs (Butanes and Pentanes – C4 and C5)
- Processed Condensate

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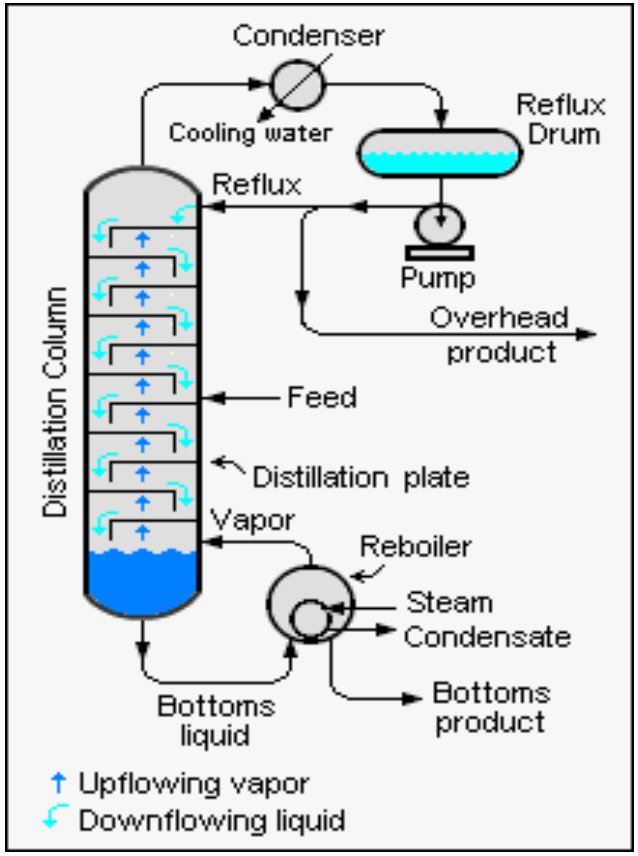
Processing in a Distillation Tower

- Distillation in the hydrocarbon context refers to the process of using heat, evaporation and condensation in a vessel that at minimum contains a reboiler and multiple surfaces (engineered trays or packing) that allow for fractionation to take place.
- EIA's definition of "distillation unit" is consistent, requiring a process of continuous vaporization and condensation:
  - *Distillation unit (atmospheric): The primary distillation unit that processes crude oil (including mixtures of other hydrocarbons) at approximately atmospheric conditions. It includes a pipe still for vaporizing the crude oil and a fractionation tower for separating the vaporized hydrocarbon components in the crude oil into fractions with different boiling ranges. This is done by continuously vaporizing and condensing the components to separate higher boiling point material. The selected boiling ranges are set by the processing scheme, the properties of the crude oil, and the product specifications.*
- The distillation process is typically performed in vertical vessels known as distillation "towers." The term tower is not a technical term that refers to a specified size or technology. Other terms in the industry used interchangeably with tower are "column," "still," "unit" and "vessel."

Distillation Tower and Process Is Essentially the Same in Stabilizer, Splitter or Refinery CDU

- Stabilizer
  - Temperature gradients [*e.g.*, 200-350]
  - Two or three product draws
  - Trays and/or packing
- Splitter
  - Temperature gradients [*e.g.*, 250 – 650]
  - Several product draws
  - Trays and/or packing
- Refinery CDU
  - Temperature gradients [*e.g.*, 300 - 1000]
  - Multiple product draws
  - Trays and/or packing



Source: Wikipedia

Rulings Cover Stabilizers that Employ Distillation Towers

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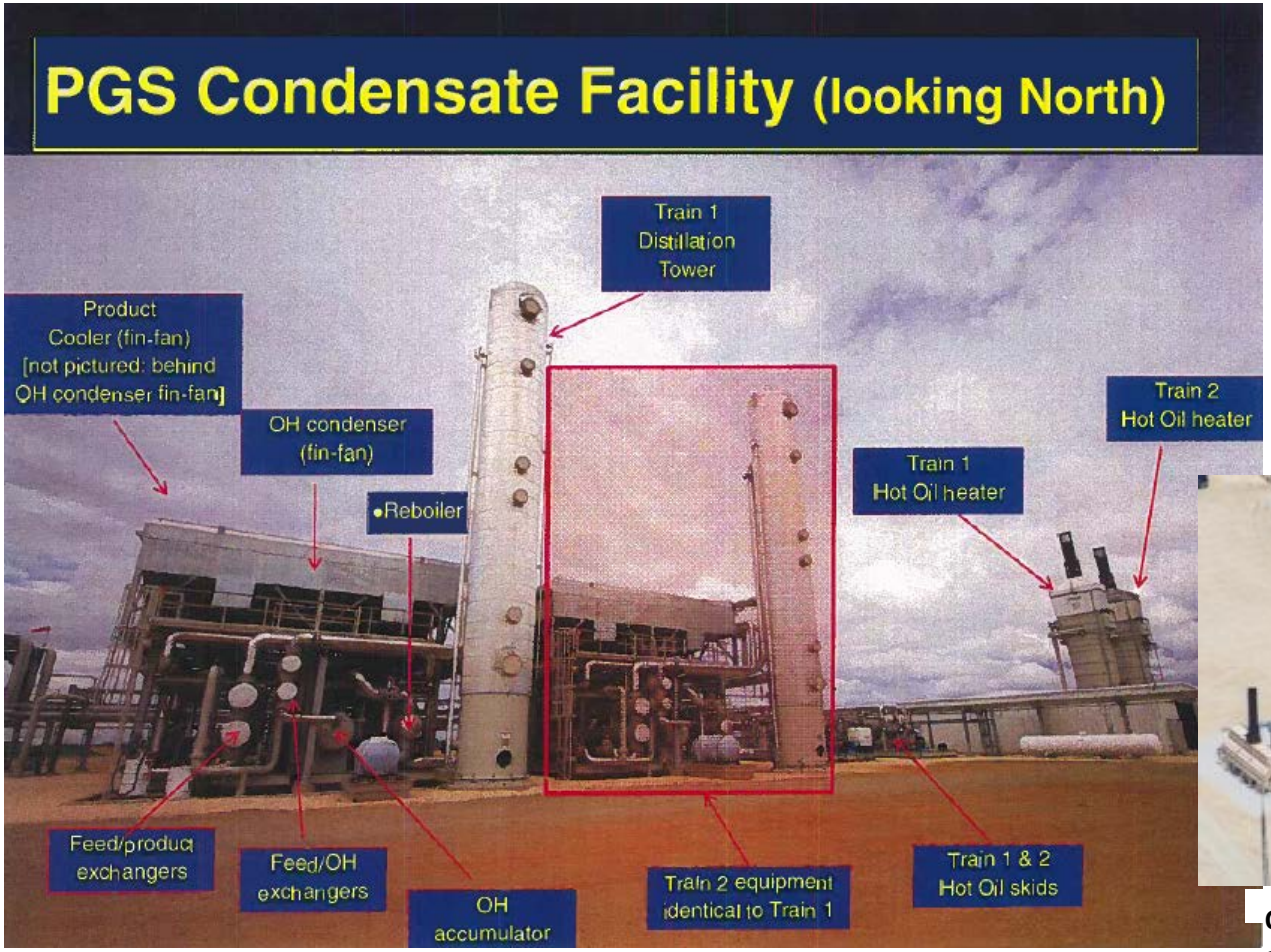
Rulings Cover Stabilizers that Employ Distillation Towers Regardless of their Size or Location



Plains All American Gardendale facility 80,000 bpd Capacity

One of Pioneer's Stabilizer Towers

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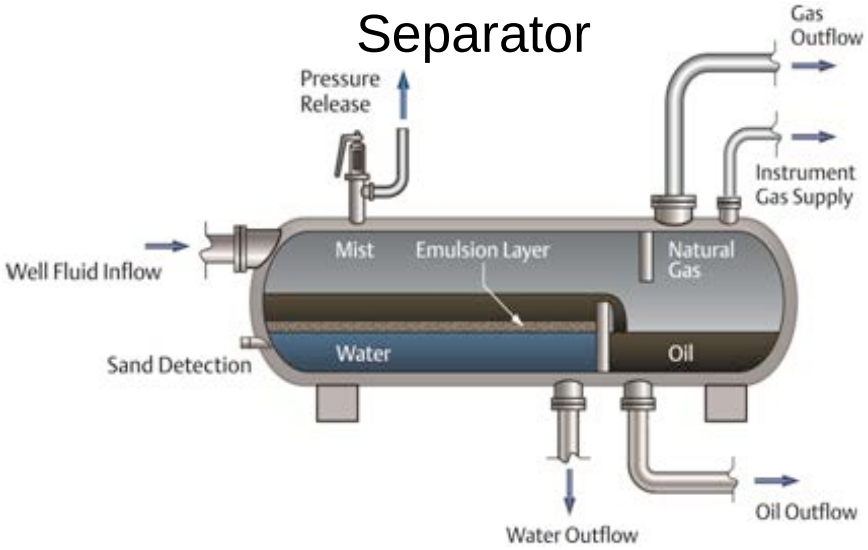
Rulings Do Not Cover Separation of Hydrocarbons in Equipment Not Using a Distillation Tower

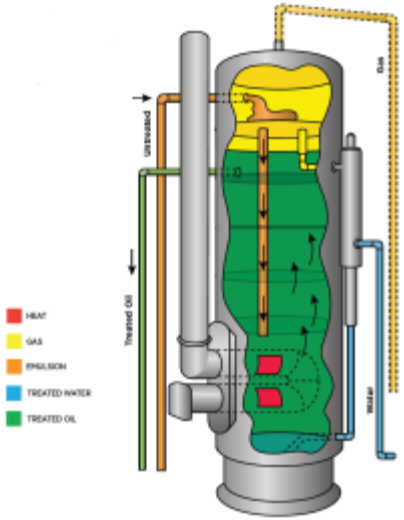
Separator



Flash Tank

High Pressure Separator

Heater Treater



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Another Example of Separation Technology Not Using a Distillation Tower

Valerus Solution

Controlled, multi-stage flash of condensate is most commonly performed using heat and a trayed or packed distillation tower. In order to overcome problems with erecting and operating these towers in a production environment, Valerus employs a two-stage or three-stage flash system using series-operated, conventional oilfield separators instead of a distillation tower. This system, combined with discrete heating and cooling stages, results in a modular, high-performing, easy-to-operate stabilizer system that offers flexibility for a wide range of inlet conditions.

Rulings Cover Processed Condensate Suitable for Use in Various Export Markets

Eagle Ford

Condensate Distillation Facilities

Segregated Transport and Storage

Diluent Market

Petrochemical feedstock

Fuel for Power Generation

Splitter and Refinery Feedstock

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Rulings Involve Processed Condensate That Is Similar to and Competes with Other Exportable Products

Market	Crude Oil	Refinery Naphtha	Pentanes Plus (Plant Condensate)	Processed Condensate	*Other Products in Market*
Petchem Feedstock	No	Yes	Yes	Yes	Ethane, LPG
Diluent for Heavy Oil	No	Yes	Yes	Yes	None
Gasoline Blending	No	Yes	Yes	Yes	Various Petroleum Blending Components
Power Gen Fuel	No	Yes	No	Yes	Fuel Oil, Natural Gas
Condensate Splitter	No	No	No	Yes	Lease Condensate
Refinery Feedstock	Yes	No	No	Yes	Crude oil

Processed Condensate is Classified as a Product under Schedule B and the HTSUS (Heading 2710)

SUPPLEMENT NO. 1 TO PART 754 - CRUDE PETROLEUM AND PETROLEUM PRODUCTS

This Supplement provides relevant Schedule B numbers and a commodity description of the items controlled by ECCNs 1C980, 1C981, 1C982, 1C983, and 1C984. The 10-digit Harmonized System-based Schedule B commodity numbers and descriptions below are drawn from *Chapter 27 of the Schedule B 2014* found at and the *AES 2014 Export Concordance* (December 30, 2013) http://www.census.gov/foreign-trade/aes/documentlibrary/expaes.txt. If there are any discrepancies between the information in this supplement and the information in the most current Schedule B, use the most current Schedule B commodity number on your Electronic Export Information filing on the Automated Export System.

Schedule B No	Commodity description
	CRUDE OIL
2709001000	Petroleum oils and oils obtained from bituminous minerals, crude
2709002010	Petroleum oils and oils obtained from bituminous minerals, testing 25 degrees API or more, condensate derived wholly from natural gas, crude
2709002090	Petroleum oils and oils obtained from bituminous minerals, testing 25 degrees API or more, crude, NESOI
2714100000	Bituminous or oil shale and tar sands
	PETROLEUM PRODUCTS
2707999010	Carbon black feedstock
2710121510	Leaded gasoline
2710121514	Unleaded gasoline, reformulated
2710121519	Unleaded gasoline, NESOI
2710121520	Jet fuel, naphtha-type
2710121550	Motor fuels, NESOI
2710121805	Motor fuel blending stock, Reformulated Blendstock for Oxygenate Blending (RBOB)
2710121890	Motor fuel blending stock, except Reformulated Blendstock for Oxygenate Blending (RBOB)
2710122500	Naphthas, except motor fuel or motor fuel blending stock

Harmonized Tariff Schedule of the United States (2014) (Rev. 1)
Annotated for Statistical Reporting Purposes

CHAPTER 27

MINERAL FUELS, MINERAL OILS AND PRODUCTS OF THEIR DISTILLATION; BITUMINOUS SUBSTANCES; MINERAL WAXES

V
27-1

Notes

1. This chapter does not cover:
   (a) Separate chemically defined organic compounds, other than pure methane and propane which are to be classified in heading 2711;
   (b) Medicaments of heading 3003 or 3004; or
   (c) Mixed unsaturated hydrocarbons of heading 3301, 3302 or 3805.
2. References in heading 2710 to "petroleum oils and oils obtained from bituminous minerals" include not only petroleum oils and oils obtained from bituminous minerals, but also similar oils, as well as those consisting mainly of mixed unsaturated hydrocarbons, obtained by any process, provided that the weight of the nonaromatic constituents exceeds that of the aromatic constituents.

   However, the references do not include liquid synthetic polyolefins of which less than 60 percent by volume distills at 300°C, after conversion to 1,013 millibars when a reduced-pressure distillation method is used (chapter 39).
3. For the purposes of heading 2710, "waste oils" means waste containing mainly petroleum oils and oils obtained from bituminous minerals (as described in note 2 to this chapter), whether or not mixed with water. These include:
   (a) Such oils no longer fit for use as primary products (for example, used lubricating oils, used hydraulic oils and used transformer oils);
   (b) Sludge oils from the storage tanks of petroleum oils, mainly containing such oils and a high concentration of additives (for example, chemicals) used in the manufacture of the primary products; and
   (c) Such oils in the form of emulsions in water or mixtures with water, sach as those resulting from oil spills, storage tank washings, or from the use of cutting oils for machining operations.

Subheading Notes

1. For the purposes of subheading 2701.11, "anthracite" means coal having a volatile matter limit (on a dry, mineral-matter-free basis) not exceeding 14 percent.
2. For the purposes of subheading 2701.12, "bituminous coal" means coal having a volatile matter limit (on a dry, mineral-matter-free basis) exceeding 14 percent and a calorific value limit (on a moist, mineral-matter-free basis) equal to or greater than 5,833 kcal/kg.
3. For the purposes of subheadings 2707.10, 2707.20, 2707.30, 2707.40, the terms "benzol (benzene)", "toluol (toluene)", "xylol" (xylenes)" and "naphthalene" apply to products which contain more than 50 percent by weight of benzene, toluene, xylenes or naphthalene, respectively.
4. For the purposes of subheading 2710.12, "light oils and preparations" are those of which 90 percent or more by volume (including losses) distill at 210°C (ASTM D 86 method).
5. For the purposes of the subheadings of heading 2710, the term "biodiesel" means mono-alkyl esters of fatty acids of a kind used as a fuel, derived from animal or vegetable fats and oils whether or not used.

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General Reactions to Rulings

- Rulings unexpected by Government and industry alike
  - Early confusion regarding the scope and application of Rulings
  - Media exaggerations and disinformation added to uncertainty
- Rulings considered as change in policy v. application of existing law
  - Rulings arguably required under existing regulations
  - But exports allowed under Rulings do have policy implications
- Today, Rulings are accepted part of legal and market landscape
  - Government embraces exports of processed condensate
  - Industry engaged in such exports with positive effects for condensate producers and no negative price consequences to the domestic market
- Companies may self-classify their processed condensate for export (more about this later)

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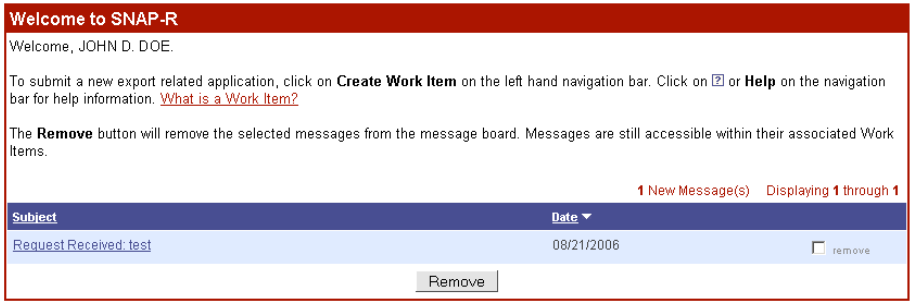
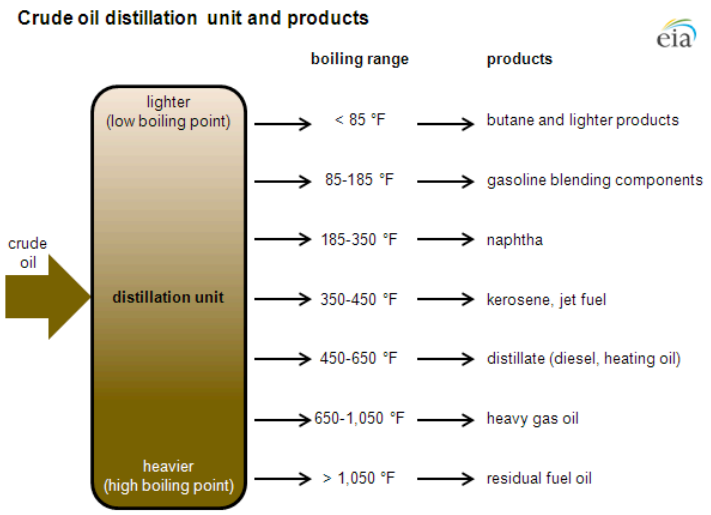
Companies Seeking Their Own BIS Rulings

- Confidentiality of Rulings has led a significant number of companies to seek their own rulings from BIS
  - Most applicants likely seeking *Enterprise* and *Pioneer* look-alike rulings
- BIS has issued identical questions to each applicant, setting out the information that should be provided to the BIS to support ruling
  - BIS seeking to have complete and similar record in each case
  - BIS seeking to ensure uniform application of criteria governing the export of processed condensate
- BIS should be poised to issue look-alike rulings any day . . .



The “Distillation” Issue

- Generally, this issue does not apply to the processing of lease condensate in a distillation tower at a stabilizer, splitter or similar tower facility
  - *Enterprise* and *Pioneer* Rulings settled this
- Under regulation “lease condensate” is treated identically to “crude oil,” raising questions of the distillation required to process crude oil into exportable products
- Area is ripe for further BIS determinations



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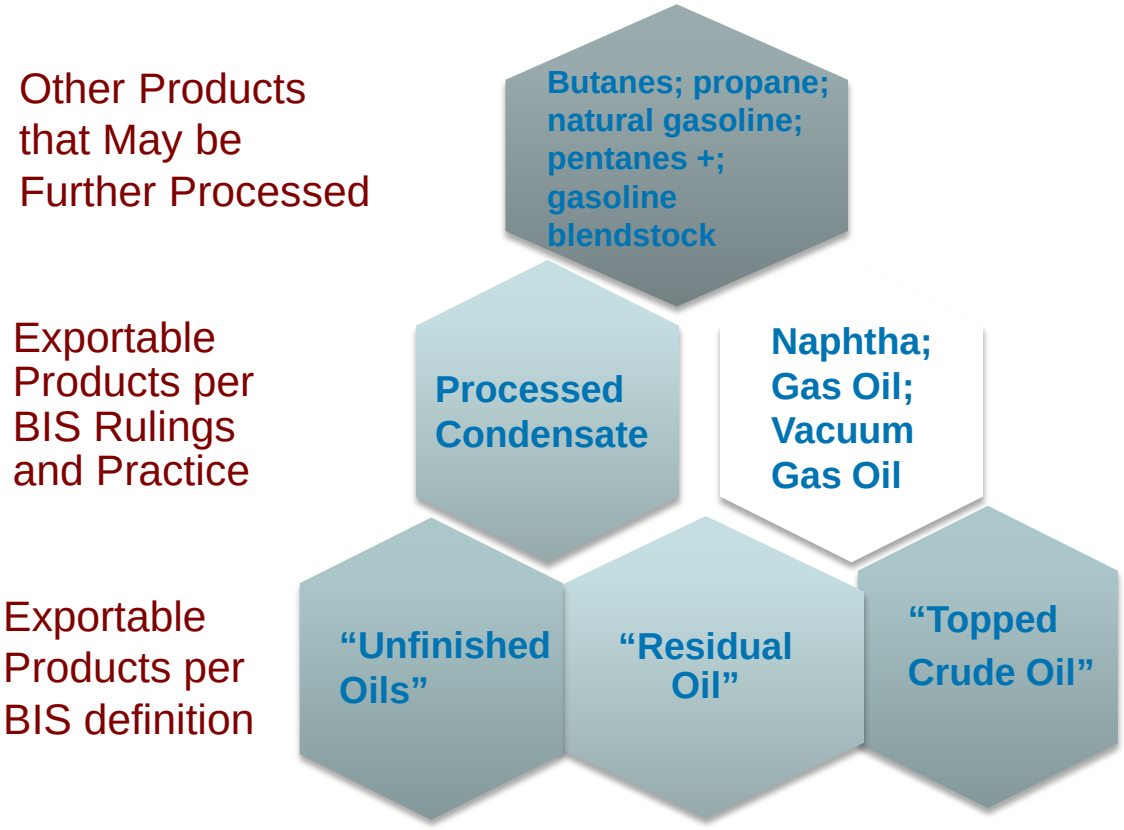
What Is a "Product" Under BIS Regulations? Product May be Unfinished and Require Further Processing

- By definition, a product is "mixture of hydrocarbons . . . which has … been processed through a crude oil distillation tower."



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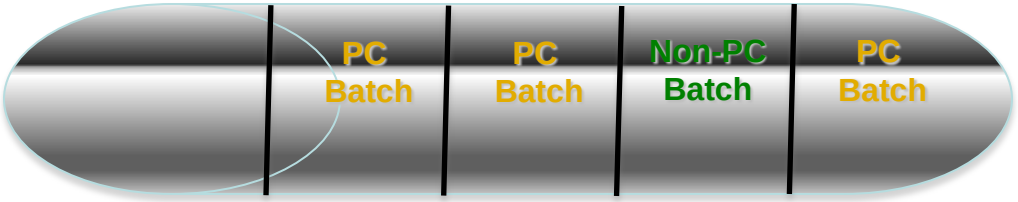
Segregation Requirement

- Processed condensate must be segregated from distillation facility to export vessel
  - Segregation requirements are part of compliance to allow the export of crude oil
- Confirmation of segregation should be obtained from each party taking custody of processed condensate (*e.g.,* pipeline, terminal)
- BIS established segregation criteria for the export of Canadian crude oil from United States



Managing Segregation in Batched Pipeline Transport

Managing Segregation in Terminal Storage (Addressing Tank Bottoms)

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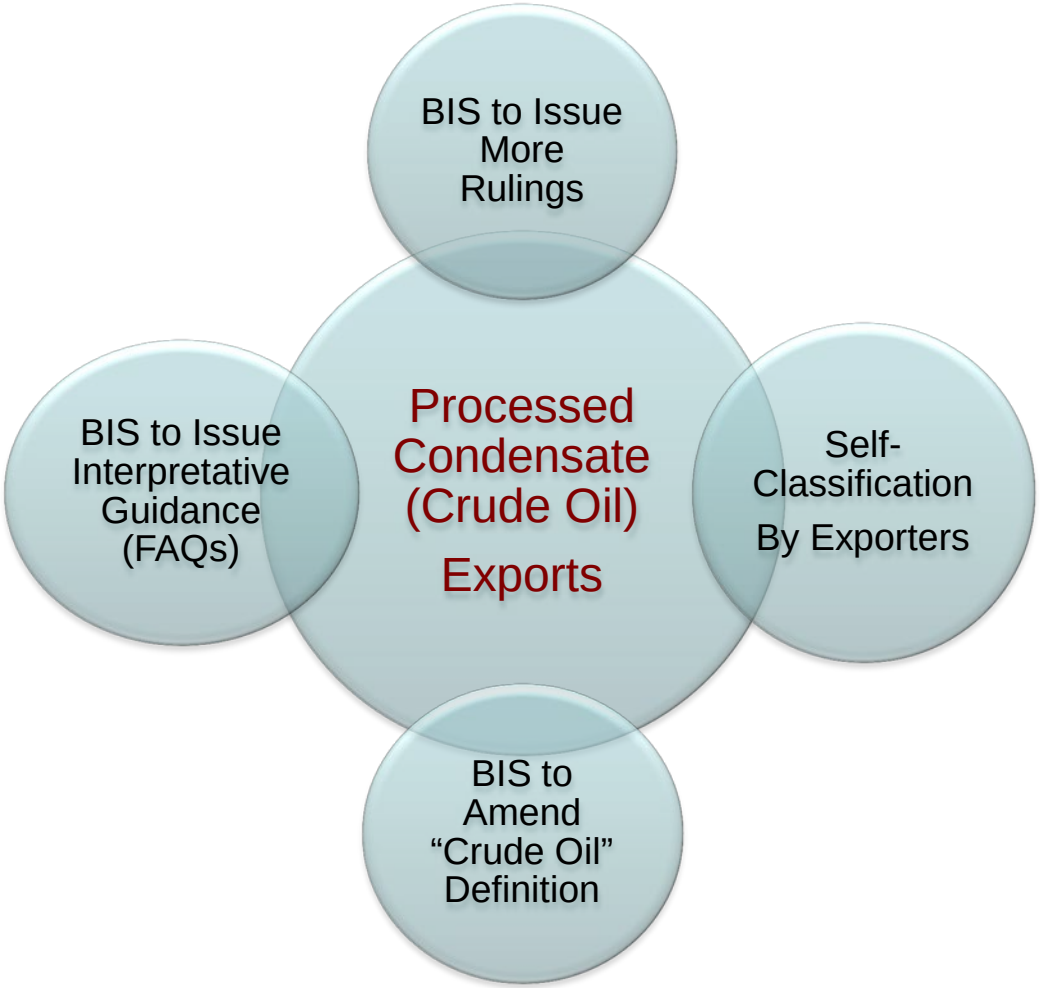
Discussion Agenda

- Approach: Focus on the Law
- Basic Legal Principles and Processes
- BIS Definition of “Crude Oil”
- Allowed Exports of Processed Condensate Under *Enterprise* and *Pioneer* Rulings
- Reactions and Open Issues
- **Possible Regulatory Paths Forward**

Objective: Provide Greater Clarity for Industry . . . Soon



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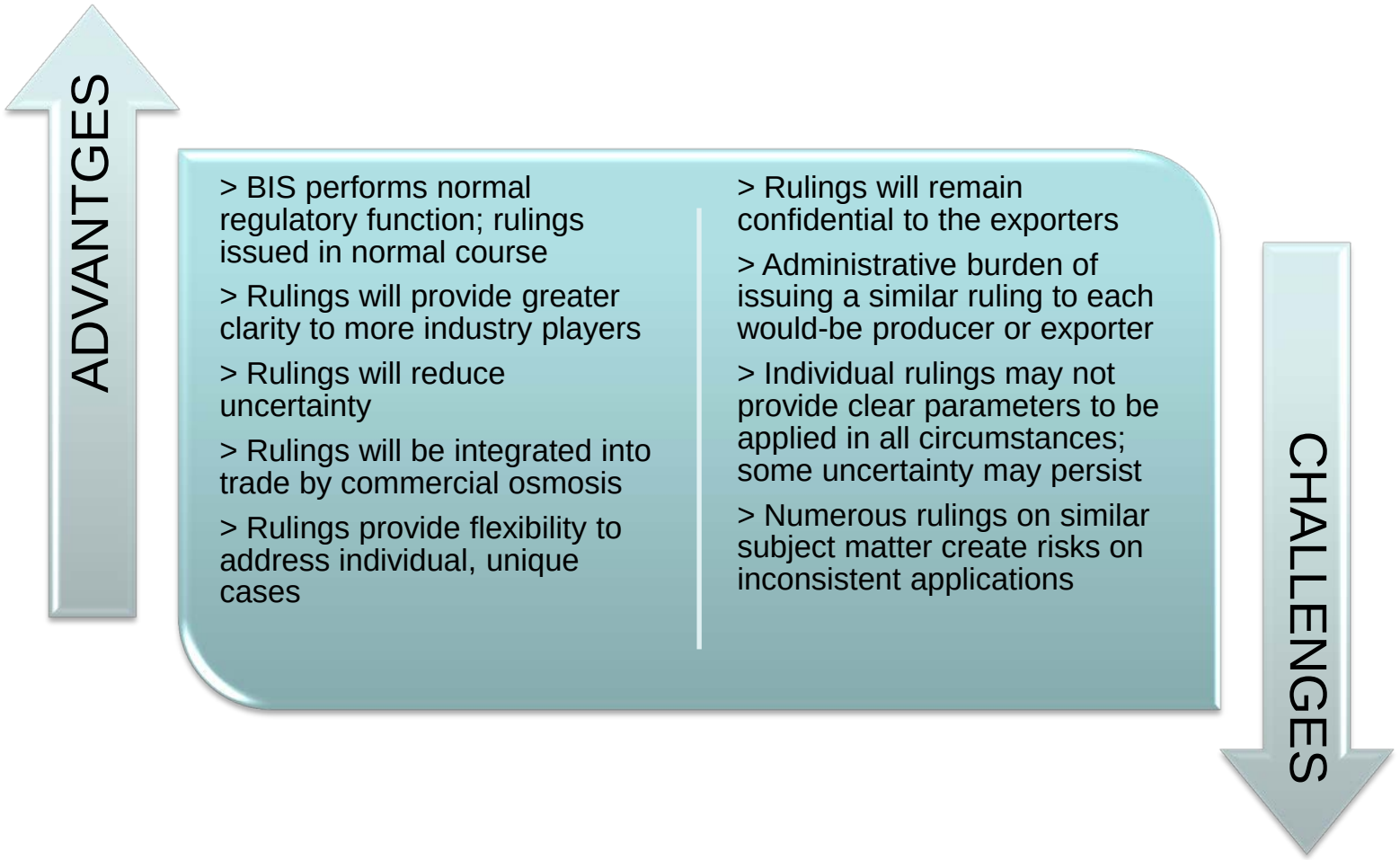
Pathway: BIS to Issue More Rulings



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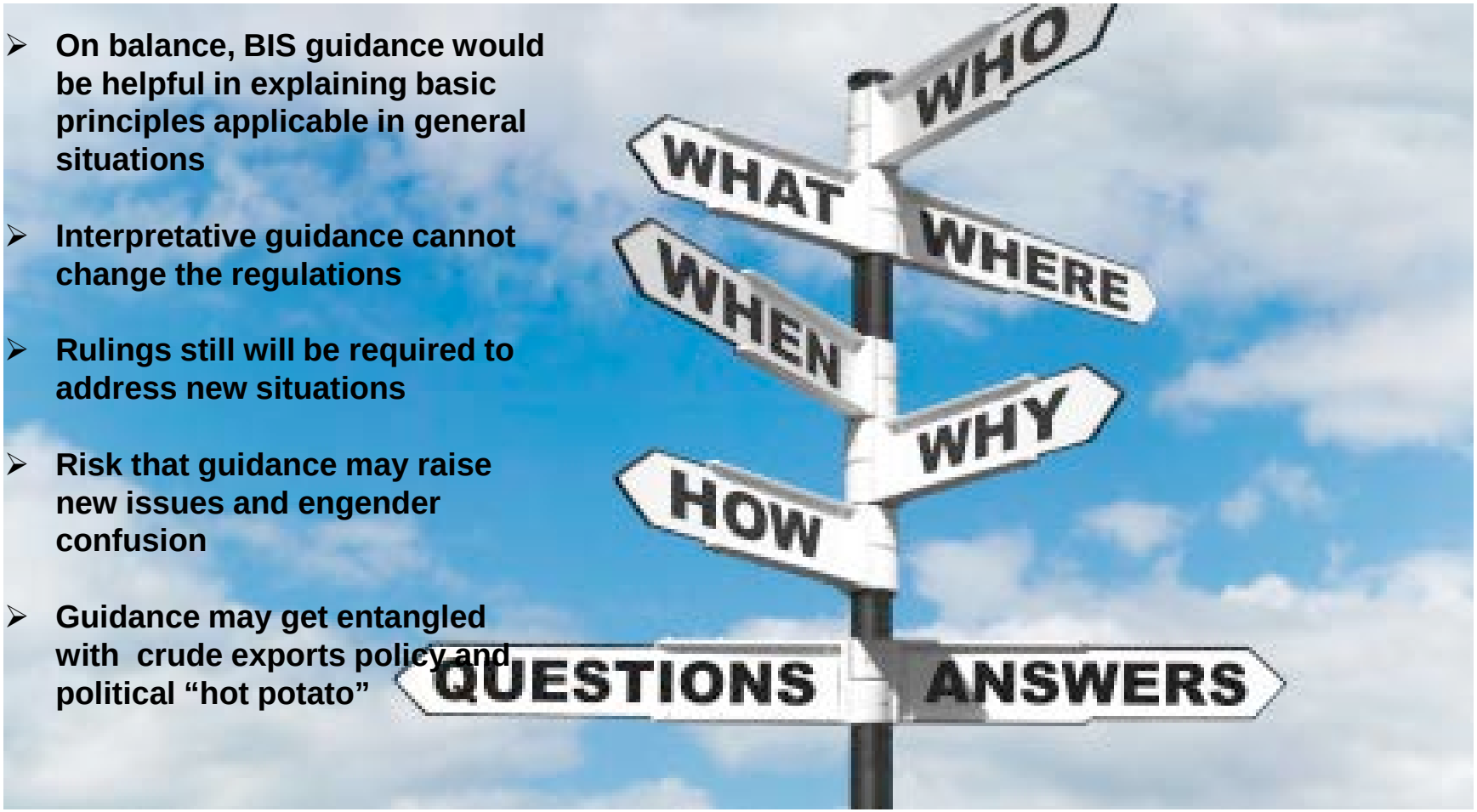
Pathway: BIS to Issue Interpretative Guidance (FAQs)

- **On balance, BIS guidance would be helpful in explaining basic principles applicable in general situations**
- **Interpretative guidance cannot change the regulations**
- **Rulings still will be required to address new situations**
- **Risk that guidance may raise new issues and engender confusion**
- **Guidance may get entangled with crude exports policy and political "hot potato"**



Pathway: BIS Amends "Crude Oil" Definition

"Crude oil" is defined as a mixture of hydrocarbons measuring under 50 degrees API gravity at the surface that

- *[i] existed in liquid phase in underground reservoirs and*
- *[ii] remains liquid at atmospheric pressure after passing through surface separating facilities and*
- *[iii] which has not been processed through a crude oil distillation tower.*

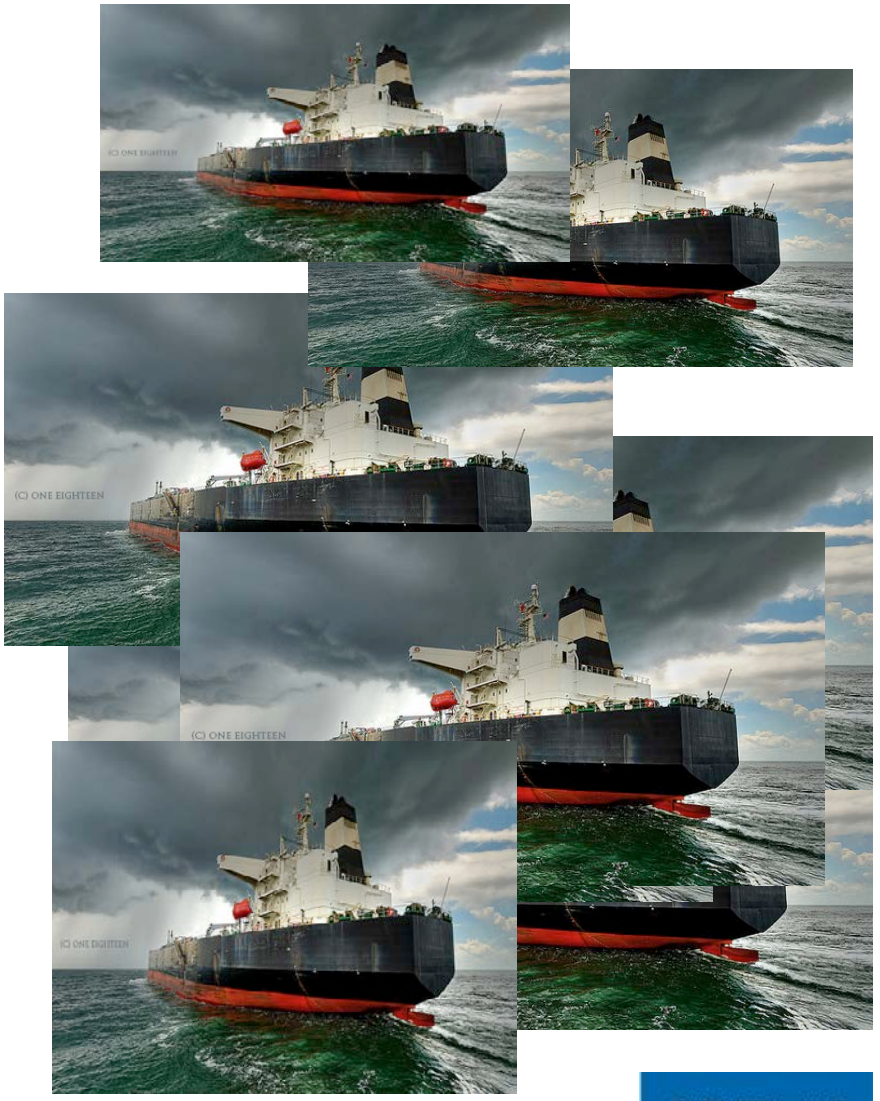
Included are reconstituted crude petroleum, and lease condensate and liquid hydrocarbons produced from tar sands, gilsonite, and oil shale. Drip gases are also included, but topped crude oil, residual oil, and other finished and unfinished oils are excluded."

Pathway: Industry Self-Classification

- Classification of commodities by exporters is a basic principle of compliance with export law
  - Exporters self-classify millions of commodities every year
  - Companies self-classify 4.5M barrels of oil exports each day
  - None of these require a ruling

- Industry has a good understanding of the parameters and conditions of the Rulings (even though they remain confidential)
  - Jacob Dweck described the nature of the *Enterprise* Ruling at the EIA 2014 Annual Conference (see materials at http://www.eia.gov/conference/2014/)
  - Industry has been adapting to Rulings through numerous commercial dealings

- Exporter must engage in strict due diligence to ensure compliance with Rulings (same as when exporter obtains its own ruling)
  - Feedstock
  - Distillation process and products
  - Segregation all the way to export vessel



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It's a Good Thing to Let Our Processed Condensate Go . . . And It's Correct Under the Law . . .

Sutherland Presenter Jacob Dweck

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Jacob ("Jake") Dweck's diverse energy law practice, spanning four decades, has focused on seeking practical solutions at the intersection of regulation and business. Jake has counseled the who's who in the industry in LNG, crude oil and liquids, pipeline regulation, Dodd Frank, trade and customs, incident response, and government investigations.

In the crude oil exports arena, Jake has led the legal team that guided the development of regulatory criteria for the export of Canadian crude oil from the United States. He also represented *Enterprise* in obtaining the seminal BIS ruling authorizing the export of processed condensate. Jake is presently assisting clients in connection with infrastructure projects affected by the export rules, exports of crude oil as part of an exchange or swap, and various other oil export transactions and opportunities.

Jake is a participant in the *Brookings Institution Crude Oil Exports Task Force* and a contributor to the Brookings' study *Changing Markets Economic Opportunities from Lifting the U.S. Ban on Crude Oil Exports.* He is a frequent speaker on oil export matters, including recently at the *EIA 2014 Annual Conference*, and is quoted extensively in the media. He served on the Board and as Treasurer of the Canadian American Business Council (CABC) (2008-2014).

Jake is a graduate of the City University of New York (summa cum laude, 1972) and Georgetown University Law School (international law review, 1975) and a member of *Phi Beta Kappa*.

Thank you

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Sutherland Presenter Shelley Wong

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Shelley Wong is a member of Sutherland's Energy Group, counseling clients on regulatory matters including customs and trade, EPA's Renewable Fuel Standard (RFS) program and risk management and liability arising from the transportation and storage of petroleum.

Shelley's recent practice has focused heavily on oil export controls. She has assisted many clients with BIS classification ruling requests and export licenses. Shelley was part of the legal team involved in obtaining the *Enterprise* ruling regarding the export of processed condensate. She also was involved in developing the regulatory criteria for the export of Canadian crude oil from U.S. ports.

Shelley is a member of the *Brookings Institution Crude Oil Task Force* and contributed to the Brookings Institution report *Changing Markets: Economic Opportunities from Lifting the U.S. Ban on Crude Oil Exports*." She presented on BIS export processes at the 2014 *RBN Turner Mason Annual Conference.*

Shelley is an honors graduate of Rice University and Vanderbilt Law School.

Thank you

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