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UNITED STATES OF AMERICA

DEPARTMENT OF ENERGY

OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT

In the Matter of:	)	
	)	
ST LNG, LLC	)	**FE Docket No._25-___-LNG**
	)	
	)	

APPLICATION OF ST LNG, LLC FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS TO FREE TRADE AGREEMENT NATIONS AND NON-FREE TRADE AGREEMENT NATIONS

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1.0 INTRODUCTION

Pursuant to Section 3 of the Natural Gas Act ("NGA"), and Part 590 of the regulations of the United States ("U.S.") Department of Energy ("DOE"), ST LNG, LLC (the "Applicant") hereby submits this application ("Application") to the DOE's Office of Fossil Energy and Carbon Management ("DOE/FECM"), requesting long-term, multi-contract authorization to export domestically-produced liquefied natural gas ("LNG") in an amount of up to approximately 460 billion cubic feet ("Bcf") of natural gas per year (equivalent to approximately 8.4 million metric tons per annum ("MTPA") LNG) from its proposed deepwater port ("DWP") export terminal Project to be located off the southeast coast of Matagorda, Texas, as further defined in Section 2.0 below.

Applicant requests authorization, on a non-additive basis, to export LNG to both (i) countries with which the U.S. has a free trade agreement ("FTA") requiring national treatment for trade in natural gas ("FTA Nations"), and (ii) any country that lacks an FTA with the U.S. requiring national treatment for trade in natural gas, with which trade is not prohibited by U.S. law or policy and that has, or in the future develops, the capacity to import LNG ("Non-FTA Nations").

Applicant seeks such authorization both on its own behalf and as agent for other entities who may hold title to the LNG at the point of export. Consistent with the DOE's Term Extension Policy Statement, Applicant requests such authorization for a term extending through December 31, 2050, and consistent with public interest under Section 3(a) of the NGA, as well as Executive Order 14154, *Unleashing American Energy*, 11, and DOE's past practice, to allow three (3) additional years for the Applicant to export the approved volume of LNG from the Project, as defined in Section 2.0 below, beyond December 31, 2050. This three-year period, known as the "Make-Up Period", will extend through December 31, 2053..

In support of this Application, the Applicant respectfully submits the following:

2.0 DESCRIPTION OF APPLICANT

The exact legal name of the Applicant is ST LNG, LLC ("ST LNG", or the "Applicant"), a limited

liability company organized under the laws of Florida, having registered office at 19575 Collins Ave., Unit 28, Sunny Isles, Florida, 33160. The Applicant's principal place of business and corporate headquarters is located at 9201 Corporate Blvd, Suite 420, Rockville, MD, 20850, USA. The Applicant is also registered to do business in the State of Texas. Tak Investment Inc. is the owner company of the Applicant, see organization chart below, Fig-1.

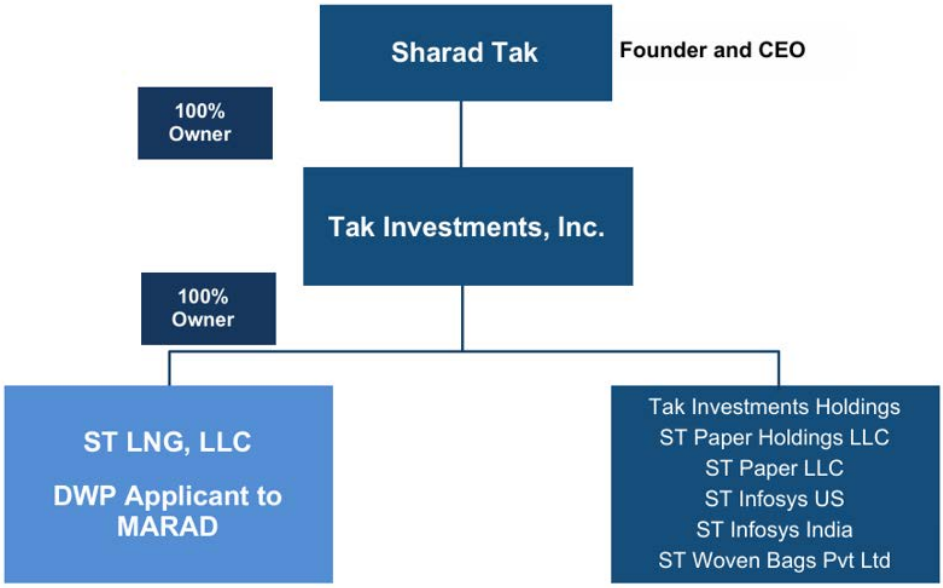


Fig-1 (Organization Chart)

The Applicant is proposing to construct, own, operate, and decommission the ST LNG DWP Development Project (the "Project") on the Outer Continental Shelf ("OCS") of the Gulf of America for the purpose of safely, efficiently, and reliably exporting approximately 8.4 MTPA of LNG, including exporting to FTA Nations and Non-FTA Nations.

The Applicant submits this Application to request authority and secure approvals from the DOE for the export of LNG to FTA Nations and Non-FTA Nations pursuant to the requirements set forth in Section 3 of the NGA and applicable laws and regulations.

3.0 COMMUNICATIONS AND CORRESPONDENCE

All communications and correspondence concerning the instant Application, including all service of pleadings and notices, should be directed to the following individuals[1]:

Andy Mukherjee P.E., Senior Vice President-LNG
Himkar Tak, Vice President
ST LNG, LLC
9201 Corporate Blvd, Suite 420
Rockville, MD, 20850, USA
Phone: +1.403.816.8204

[1] Applicant requests waiver of Section 590.202(a) of DOE's regulations, to the extent necessary to include each of the individuals listed here on the official service list in this proceeding. 10 C.F.R. § 590.202(a).

Email: andy.mukherjee@stenergyco.com
Phone: +1.301.404.8285
Email: hstak@stpaperllc.com

and

Cam Ellis
as legal counsel for ST LNG, LLC
9201 Corporate Blvd, Suite 420
Rockville, MD, 20850, USA
Phone: +1.281.841.7337
Email: cameron@elliscg.com

4.0 EXECUTIVE ORDERS

The Applicant cites following recent Executive Orders, as background information that supports quick approval of this Application.

4.1 Executive Order 14154 Unleashing American Energy

Section 8, Protecting America's National Security, clearly lays out the Administration's expectations of the DOE with respect to LNG exports under the NGA. It then goes on to define the Administration's expectations of the Maritime Administration ("MARAD") – including specific timeframes – with respect to the National Environmental Policy Act ("NEPA") and the Deepwater Port Act of 1974, as amended ("DWPA")[2].

4.2 Executive Order 14156 Declaring a National Energy Emergency

Section 5 of the Endangered Species Act ("ESA") Emergency Consultation Regulations ensures that ESA consultation will be conducted promptly by both the U.S. Fish & Wildlife Service ("USFWS") and the National Marine Fisheries Service-Protected Resources Division ("NMFS-PRD"). TRC also notes that recent discussions with federal regulators at the branch chief level indicate that regulatory agencies are making their own ESA jeopardy calls to expedite this process.

4.3 Executive Order 14260 Protecting American Energy from State Overreach

Although this Executive Order focuses specifically on that are unconstitutional or otherwise unenforceable, it sends a strong message to state regulators that state laws that interfere with the Administration's objective of unleashing American energy should not stand.

4.4 Executive Order 14270 Zero-Based Regulatory Budgeting to Unleash American Energy

Section 3, Covered Agencies and Regulations, notifies the major regulatory agencies involved in a complex offshore Project of the applicability of this Executive Order. These agencies include: the Environmental Protection Agency ("EPA"); Federal Energy Regulatory Commission ("FERC"); Bureau of Ocean Energy Management ("BOEM"); Bureau of Safety and Environmental Enforcement

[2] 33 U.S.C. 1501 et seq. The DWPA "establishes a licensing system for ownership, construction, operation, and decommissioning of deepwater port structures located beyond the U.S. territorial sea for the import and export of oil and natural gas." MARAD, About the Deepwater Port Act, available at: https://www.maritime.dot.gov/ports/deepwater-ports-and-licensing/about-deepwater-port-act.

("BSEE"); USFWS, U.S. Army Corps of Engineers ("USACE"), and other applicable agencies. Each of these agencies has been directed to provide a sunset date on each of their regulations with a duration of no more than one year and with active extension requirements built into the sunset rule.

5.0 PROJECT DESCRIPTION

5.1 Deepwater Port Platforms and Floating Storage Units:

The Project is being developed to provide a safe and reliable source of accessible natural gas supplies to the global market in the form of LNG. The Project will be at DWP under the definition and requirements pursuant to the DWPA, and in this regard, the Applicant has filed a Deepwater Port License Application ("DPLA") to secure a license to construct, own, operate, and decommission the Project pursuant to the DWPA, and in accordance with the following regulatory and licensing authorities. The licensing of the Project falls under the responsibility of the Secretary of the Department of Transportation (the "Secretary"), and the applicable regulations appear in Title 33 of the Code of Federal Regulations ("CFR") 148, 149, and 150. The Secretary has delegated authority to the MARAD to issue, transfer, amend, or reinstate a license for the construction and operation of a DWP, and has delegated authority to the U.S. Coast Guard ("USCG") to process applications submitted by private parties to construct, own, operate, and decommission DWP facilities.[3] The responsibility for preparing the Project's Record of Decision ("ROD") and for issuing or denying a DWP license under a DPLA has also been delegated to MARAD.

The Project is being developed in four (4) phases by the Applicant, each phase on a set of three (3) main and one (1) smaller fixed offshore platforms in the Gulf of America, offshore of Matagorda, Texas, located at Brazos Block BA-476 in federal waters approximately 10.4 nautical miles (or 19.2 kilometers) offshore of Matagorda, Texas, in water depths ranging between 65 and 72 feet (or between 19.8 and 21.9 meters).

Total LNG production capacity of the plant will be approximately 8.4 MTPA of LNG. The Project will be developed in four (4) phases, each phase being comprised of identical components and equipment designed to produce nominally 2.1 MTPA of LNG. Refer to Appendix-A for the conceptual layout of one phase within the Block BA-476.

Design of each phase will be identical. Each phase will comprise of three (3) main fixed platforms hosting LNG generation equipment as below:

1. LNG Liquefaction Platform – hosting all liquefaction equipment.
2. Gas Treatment Platform – hosting all gas treatment and thermal oxidizer equipment.
3. Accommodation and Utilities Platform – hosting living quarters and utility equipment

In addition, each phase will have the following additional installations:

1. LNG Transfer Platform
2. Bridge Support Trestle
3. Dolphin Mooring System comprising of three (3) berthing dolphins and six (6) mooring dolphins

[3] 33 C.F.R. Part 148.

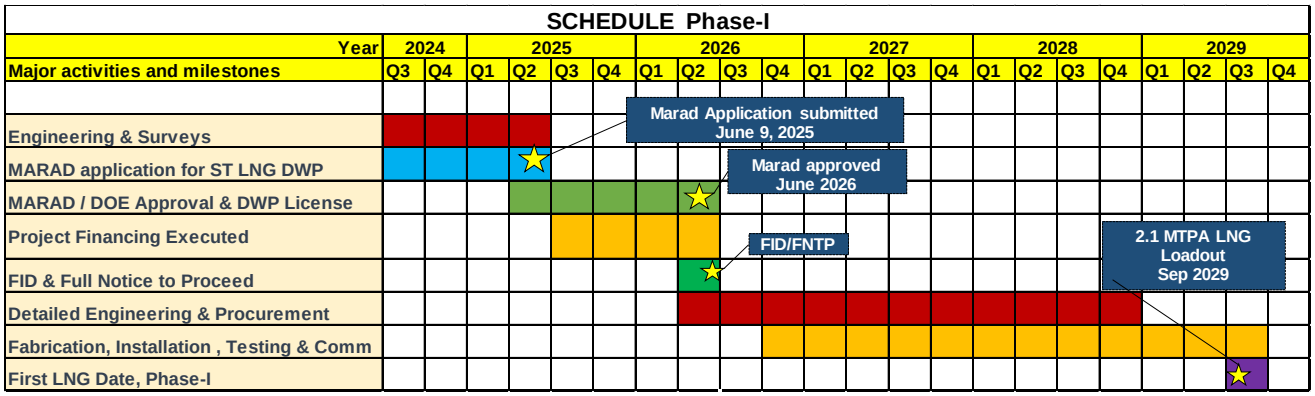
The Project will be connected to one (1) semi-permanently moored floating storage unit ("FSU") being used for LNG storage.

The LNG would be loaded from the FSU onto standard LNG ocean going carriers ("LNGCs") with nominal cargo capacities between 125,000 and 180,000 cubic meters ("m^3"), with an average expected capacity of 146,000 m^3, for the export of LNG, including to FTA Nations and Non-FTA Nations. The LNGCs are not considered part of the Project nor included in the DPLA, except to the extent relevant for the NEPA evaluation.

The construction of the Project will be done in phases. Each phase will be staggered by approximately eighteen (18) months for ease of constructability. Phase II on location construction will start eighteen (18) months after the start of Phase I on location construction and so on.

5.3 The Project Timeline:

1. Phase-I 2.1 MTPA LNG first load out Sep 2029
2. Phase-II 2.1 MTPA LNG first load out Mar 2031
3. Phase-III 2.1 MTPA LNG first load out Sep 2032
4. Phase-IV 2.1 MTPA LNG first load out Mar 2034



5.4 Feed Gas Supply & Pipeline:

The Project would involve constructing a lateral pipeline approximately five (5) kilometers in length that will connect to an existing offshore pipeline in vicinity of the Project. Under the base-case scenario, the proposed Project would require an estimated total of 1,260 million standard cubic feet per day ("MMSCFD") of feed gas to process and export approximately 8.4 MTPA of LNG. The Project would consist of approximately sixteen (16) platforms to be constructed over four (4) phases. Each phase would include construction of components capable of treating approximately 330 MMSCFD of pipeline quality gas to LNG quality standards.

The intended plan of service for supply of natural gas feedstock for the Project facility includes building a short lateral from the supply header of the facility to Transco's offshore system approximately 10 miles offshore near Brazos Block 450. The Transco offshore system consists of a 36-inch and 30-inch pipeline at that location. These two headers are currently operated for bringing offshore gas onshore, this flow of gas can be reversed to take gas from onshore to offshore. These pipelines are currently at a fifty percent (50%) utilization rate. It is our intention to interconnect the Project into one of these offshore headers to receive gas by way of the Transco system from both the Katy and Tres Palacios gas supply hubs. To this end, the Applicant submitted an interconnect request form with Transco on May

14, 2025. To facilitate the service, the Applicant would enter into an Interconnection Agreement and Precedent Agreement for firm service. These agreements will need to be negotiated between the Parties.

The Tres Palacios Gas Storage system owned by Enbridge, has natural gas storage and includes a gas header pipeline system that spans 62 miles and links to eleven (11) major gas pipelines, including Enbridge's Texas Eastern Pipeline. The Tres Palacios Gas Storage is a salt cavern storage facility located in Matagorda County, Texas. Tres Palacios has about 38.7 billion cubic feet (Bcf) of net working storage, and currently marketing an expansion that could add another 6.5 Bcf of capacity.

The Katy hub has working capacity in an amount of 23.5 Bcf; Katy Storage and Transportation is a high-deliverability, multicycle natural gas storage facility located in Fort Bend and Waller counties in Texas. The facility consists of a depleted gas production reservoir, redeveloped as a natural gas storage reservoir, and a dual pipeline header system interconnecting with fourteen (14) major natural gas pipelines. The facility's strategic location and connectivity place it at the intersection of production from the Northeast, South Texas and the Permian Basin. The Katy facility is well-positioned to serve growing market demand for LNG liquefaction and natural gas exports. The facility serves the storage needs of natural gas producers, energy marketers, electric power generators, utility and industrial users.

In conclusion, the Project is serviced by two major gas hubs, Katy and Tres Palacios; the location of the Project was selected in large part because of the locations superior access to gas supply hubs without competition for supplies from other mega LNG export projects located on the US Gulf Coast. Other considerations were of course buildability, including adequate water depth, bottom soil suitability, avoidance of busy shipping lanes and evading of other conflicts i.e. large debris on the ocean floor.

5.5 Onshore Base for Construction and Operation:

During construction of the Project, the Applicant would have a team of inspectors and administrative personnel located at the existing fabrication yard(s) constructing the Project components. The Applicant's team would be officed on site at the existing yard(s) performing the majority of construction. The inspectors would visit the existing yard(s) and shop buildings used for the fabrication of the Project's smaller components and equipment skids on a periodic, as-needed basis.

During construction of the Project, the Applicant will set-up a support base close to Point Comfort, Calhoun County, Texas. There would be a team of individuals at the Applicant's shore base who would be responsible for scheduling and dispatching the various crew boats and supply boats to the Project as well as receiving supplies and components that are to be sent to the Project.

Other than temporary staging areas during construction, Project will not build any permanent facility onshore.

5.6 Fabrication and Assembly Yards:

The fabrication and assembly of equipment for the Project will be performed primarily in the U.S.

The four (4) FSUs proposed for the Project would be repurposed LNGCs. These would be converted to FSUs in a shipyard located in Europe or Asia.

For Phases I to IV, jackets, pile, and topside fabrication and assembly would be contracted to various existing fabrication yards in the U.S. Gulf Coast with the capacity to build and load out up to a 10,000-short-ton deck. Most of the major components and equipment (e.g., generators, cranes, gas compressors, and gas treating equipment) would be purchased, fabricated, and assembled at vendor or supplier facilities and then shipped pre-commissioned and ready to install on each of the platform

topsides.

The living quarters and helideck that are part of the accommodation and utilities platform would be prefabricated and shipped separately. The selected contractor would install the prefabricated quarters onto the accommodation & utilities platform deck at the onshore fabrication yard.

5.7 Conversion of Existing LNGC into FSUs

The Applicant intends to acquire four (4) existing LNGCs, which would be converted to serve as FSUs. The conversion of the four (4) LNGCs to FSUs would include examining, repairing, and replacing the ballast tank and external coatings, and possible steel replacement/reinforcement, for a twenty-five (25) year service life. In addition, for the ship-to-ship operation (LNG loading from FSUs to LNGCs), quick release hooks and ship-to-ship communication link will be installed. For simultaneous operations of loading and unloading of LNG, new piping from existing manifold to the tanks will be engineered and installed.

The exact scope of the conversion work would be determined after a due diligence inspection of the candidate LNGCs. The Applicant anticipates completing the due diligence inspection of candidate LNGCs in Q1 2027 for Phase 1 FSU, Q1 2028 for Phase II FSU, Q1 2029 for Phase III FSU and Q1 2030 for Phase IV FSU.

5.8 Direct Labor Requirements

Project construction and installation would create employment of approximately 10,000-man years, totaling employment income of approximately one billion US dollars ("USD") over the Project duration of approximately eight (8) years.

The Project would require approximately 380 employees for DWP operations (inclusive of the four (4) phases combined) and forty (40) shore-based support staff. The total annual payroll for the Project is estimated to be approximately $40 million USD. The specialized shore-based staff would be paid commensurate wages with their specialized skill sets. Both DWP and shore-based wages for the Project are expected to be above the regional average.

6.0 AUTHORIZATION REQUESTED

The Applicant, respectfully requests long-term, multi-contract authorization to export up to 8.4 MTPA (equivalent to approximately 460 Bcf per year of natural gas) of LNG to FTA Nations and to Non-FTA Nations, commencing on the date of first export following the commencement of commercial operation of the Project. The Applicant requests that the term of the export authorizations extend up to and through December 31, 2050, in addition to the three-year Make-Up Period, as defined in Section 1.0, following this initial export term, *i.e.*, through December 31, 2053.

The Applicant requests authorization to engage in exports to FTA Nations and Non-FTA Nations, both on its own behalf and as agent for other parties who may hold title to the LNG at the time of export, pursuant to long-term agreements with the Applicant.

The Applicant will comply with all DOE/FECM requirements for exporters and agents, including all registration requirements. When acting as agent, the Applicant will register with DOE/FECM each LNG title holder for which the Applicant seeks to export LNG as agent. Such registrations will include the registrant's agreement to comply with any order issued by DOE/FECM under which

exports are made and all applicable requirements of DOE's regulations at 10 C.F.R. Part 590, including but not limited to destination restrictions.

7.0 COMMERCIAL AGREEMENTS

The Applicant has not entered into any natural gas supply or LNG export agreements or contracts specific to the authorization requested herein. The Applicant anticipates entering one or more long-term (more than two (2) years and up to twenty (20) years contractual agreements with vendors and customers for natural gas liquefaction and LNG export services. Long-term authorization by DOE/FECM to export LNG is required for contracts with potential vendors and customers.

The customer will purchase and transport LNG for distribution to downstream terminals or third-party customers. Consistent with DOE/FECM's prior practice, the Applicant will file any transaction-specific long-term contracts with DOE/FECM as they are entered.

Upon entering into such contracts, the Applicant will file, or cause to be filed, either unredacted contracts, or long-term contracts under seal, with either: (i) a copy of each long-term contract with commercially sensitive information redacted, or (ii) a summary of all major provisions of the contracts including, but not limited to, the parties to each contract, contract term, quantity, any take-or-pay or equivalent provisions/conditions, destinations, re-sale provisions, and other relevant provisions.

8. APPLICABLE LEGAL STANDARD AND PUBLIC INTEREST ANALYSIS

8.1 Exports to FTA Nations

Under Section 3(c) of the NGA, Applicant's request for authorization to export natural gas in the form of LNG to FTA Nations should be promptly granted, as such exports are statutorily held to be in the public interest. Section 3(c) of the NGA states that "the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and applications for such exportation shall be granted without modification or delay."[4]

Therefore, the Applicant's request for authorization to export LNG to FTA Nations should thus be deemed to be consistent with public interest and granted without modification or delay.

8.2 Exports to Non-FTA Nations

Section 3(a) of the NGA governs applications for exports to non-FTA Nations, which states that the Secretary of Energy "shall issue such authorization unless, after opportunity for hearing, it finds that the proposed exportation…will not be consistent with the public interest."[5] This statute creates a clear presumption in favor of finding LNG exports to be within the public interest unless there is a showing to the contrary, as noted by both DOE/FECM and the D.C. Circuit Court of Appeals.[6]

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[4] 15 U.S.C. § 717b(c)

[5] *Id.* §717b(a).

[6] *See e.g.*, Order No. 4800 at 26, Sierra Club v. US. Dep 't of Energy, 867 F.3d 189,203 (D.C. Cir. 2017) ("We have construed [NGA section 3(a)] as containing a 'general presumption favoring [export] authorization.'") (Quoting W. Va. Pub. Servs. Comm'n v. U.S. Dep't of Energy, 681 F.2d 847,856 (D.C. Cir. 1982)).

[20] https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports

DOE's document dated May 19, 2025, released its Response to Comments on the 2024 LNG Export Study, marking a critical step toward returning to regular order on liquefied natural gas (LNG) exports. "In sum, DOE concludes that the complete record from the 2024 LNG Export Study, inclusive of the Study, the comments received, and this Response to Comments, supports the proposition that exports of LNG from the United States are in the best interest of the American public. With the public comments to the 2024 LNG Export Study now addressed, DOE will proceed with issuing final orders on pending applications to export U.S.-sourced natural gas as LNG to non-free trade agreement countries."[20]

To evaluate the public interest, DOE developed policy guidelines that were "designed to establish natural gas trade on a market-competitive basis and to provide immediate as well as long-term benefits to the American economy."[7] The goals of these guidelines were twofold: to "minimize federal control and involvement in energy markets, and to promote a balanced and mixed energy resource system."[8] While the guidelines were developed with regard to LNG imports, DOE subsequently held that they applied to exports as well.[9]

DOE has relied upon several significant considerations relevant to its public interest evaluation:

> (i) the domestic need for the natural gas proposed to be exported, (ii) whether the proposed exports pose a threat to the security of domestic natural gas supplies, (iii) whether the arrangement is consistent with DOE's policy of promoting market competition, and (iv) any other factors bearing on the public interest as determined by DOE, such as international and environmental impacts.[10]

In this regard, and as described below, the Applicant's contemplated LNG exports should not be found inconsistent with, but rather should be recognized as supportive of, and therefore Applicant's request for authorization to export natural gas to non-FTA Nations should be granted.

8.3 LNG Export Supports US Economy

With reference to ENERGY-IN-DEPTH ("EID"), a project of the Independent Petroleum Association of America, published in June 2025, DOE outlined three key findings, which underscore the important role U.S. energy production and LNG exports play in global energy security:

- The U.S. has a robust natural gas supply that is sufficient to meet growing levels of exports while minimizing impacts to domestic prices.
- Growing LNG exports increases our gross domestic product and expands jobs while improving our trade balance.
- Increasing U.S. LNG exports enhances domestic and international global security with no discernible impact to global greenhouse gas ("GHG") emissions.

In short, DOE findings fully support LNG exports from US.

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[7] New Policy Guidelines and Delegation Orders from Secretary of Energy to Economic Regulatory Administration and Federal Energy Regulatory Commission Relating to the Regulation of Imported Natural Gas, 49 Fed. Reg. 6,684 (Feb. 22, 1984).
[8] *Id.* at 6,685.
[9] *Phillips Alaska Natural Gas Corp. , et al.,* DOE/FECM Order No. 1473, at 14, Docket No. 96-99-LNG, (Apr. 2, 1999).
[10] *Order 4800* at 28.

8.4 Domestic Impacts

According to industry estimates, U.S. LNG exports have provided more than 273,000 jobs to date, and are projected to provide $166 billion USD in tax revenue through 2040.

Reference to Section 5.8 Direct Labor Requirements and Section 10 Job and Employment Effects of this Application that explains the positive impact on US economy.

On a more local level, Project construction, as well as local expenditures by workers employed directly and indirectly by the Project, will generate local and state sales tax revenues, as will local Project-related expenditures on services, materials, equipment rentals, and other supplies. In addition, property purchased outside the state that is not taxed at the point of purchase is subject to use tax when it is brought into Texas. Texas levies an individual income tax, which is based on federal tax laws and an individual's federal adjusted gross income. The Project will employ skilled workers earning relatively high incomes and will also generate state and federal income tax revenues.

Similarly, the Project and continued operations will generate state and local sales and use tax revenues through local expenditures by workers employed directly and indirectly by the Project, as well as local Project-related expenditures on spare parts and process materials, among other things. In addition, equipment or materials brought into Texas for use by the Project may be subject to sales tax. The wages and salaries paid to operation workers will be subject to state and federal income tax.

8.5 International Impacts

The U.S. is experiencing strong demand for new LNG export facilities, driven by a combination of increasing global LNG demand and the need to replace existing, aging energy infrastructure worldwide. This growth is expected to continue, with several projects under construction and planned to significantly increase the nation's LNG export capacity.

The DOE agrees that U.S. LNG exports contribute to global energy security. The DOE has affirmed that energy security remains a central element of its public interest analysis for LNG export authorizations, recognizing that these exports bolster the resilience of allies, especially in the wake of geopolitical disruptions.

Reference the DOE dated May 19, 2025, released its Response to Comments on the 2024 LNG Export Study.

“The DOE Study highlights U.S. LNG as a cost-competitive and stable energy source in the global market. The Study recognizes that destination flexibility—allowing off takers to re-sell contracted cargoes—enhances global energy security…. For many users, this adaptability makes U.S. LNG more valuable than LNG from other nations.”

Geopolitical considerations are relevant in public interest determinations. One of DOE’s long-standing principles is that the market is generally the most efficient means for allocating natural gas supplies. Therefore, DOE’s non-FTA authorizations are destination flexible, as long as the destination is not prohibited by law or policy.

DOE considers the global energy security benefits from U.S. LNG exports to weigh favorably in public interest determinations for applications to export LNG to non-free trade agreement countries.

Therefore, for the foregoing reasons, the Project is consistent with, and clearly serves and advances,

the public interest and should be approved at the earliest date possible.

9. ENVIRONMENTAL IMPACT

Since the Project is located offshore, the construction, ownership, and operation of the Project is subject to the jurisdiction of the USCG and MARAD. As part of its concurrent application to MARAD, the Applicant is submitting an analysis that meets the requirements of the NEPA and comprehensively evaluates the potential impacts of the Project on the environment.[11] As demonstrated therein, the Project "will be constructed, operated, and decommissioned using the best available technology to prevent or minimize adverse impacts on the marine environment."[12] MARAD and USCG will conduct an environmental evaluation that covers installation, operation, and decommissioning of the Project and assesses the effects of the Project on, among other things, local marine life, water and air, oceanographic currents and wave patterns, coastal zone management, and human health and welfare.[13]

The emissions from the Project will be subject to numerous regulatory requirements that will limit emissions. Marine vessel engines must meet MARPOL Annex VI. Many of the Project's stationary operating sources must meet emission standards established in applicable new source performance standards ("NSPS") and national emission standards for hazardous air pollutants ("NESHAP") subparts. The Project's stationery operating sources will also be subject to the prevention of significant deterioration ("PSD") permitting. PSD permitting will require the installation of the best available control technology ("BACT") emission controls for regulated pollutants. PSD permitting will require an air dispersion modeling analysis to demonstrate that the Project's emissions will not adversely impact the ambient air quality in Class I and Class II areas.

MARAD and USCG will review any potential environmental impacts of the Project in an Environmental Impact Statement (EIS). DOE/FECM is anticipated to participate as a cooperating agency in the environmental review process for the Project. Regulations of DOE/FECM require that it "shall cooperate with the other agencies in developing environmental information…"[14] and DOE/FECM may adopt the conclusions of another agency's environmental review if it satisfactorily addresses comments and suggestions raised by DOE/FECM during the process.[15]

The Applicant believes that DOE's participation as a cooperating agency and adoption of the environmental document prepared by MARAD and USCG will be sufficient to comply with all obligations under NEPA.[16] Moreover, the Applicant notes that DOE revised its NEPA procedures to provide for a revised categorical exclusion for exports of natural gas and associated transportation by marine vessel.[17] Because the Applicant proposes to transport LNG via LNGCs to Non-FTA Nations, it hereby requests that DOE incorporate by reference the associated Marine Transport Technical Support Document prepared by DOE, pursuant to which DOE concluded that "the transport of natural gas by marine vessels… normally does not pose the potential for

[11] 33 C.F.R. § 148.105(z).
[12] 33 C.F.R. § 148.710(a)(2).
[13] 33 C.F.R. § 148.707(b).
[14] 10 C.F.R. § 1021.342; *see also* 40 C.F.R. §§ 1501.6, 1501.8.
[15] See 40 C.F.R. § 1506.3.
[16] 42 U.S.C. §§ 4321 et seq. (2012).
[17] 10 C.F.R. Part 1021, Subpart D, App. B, Categorical Exclusion B5.7.

significant environmental impacts."[18]

Energy in Depth published an article by Stanley Brown (Policy Lead at Department for Energy Security and Net Zero, London, United Kingdom) dated July 11, 2025, wherein is stated.

"LNG is not failing the climate test; it is passing the global one."

Part of what drives the high global demand for natural gas is its lower carbon emissions as compared to other fuel sources, which makes LNG a reliable source of clean and affordable energy, especially when it can displace the use of dirtier fuels such as coal. This displacement can have immediate, significant emissions reduction benefits. U.S. LNG exports can have an important role to play in reducing international consumption of fuels that have greater contribution to greenhouse gas emissions.

As the Energy Information Administration ("EIA") has confirmed that burning natural gas for energy results in fewer emissions of nearly all types of air pollutants and carbon dioxide ("CO_2") than burning coal or petroleum products to produce an equal amount of energy. About 117 pounds of CO_2 are produced per MMBtu equivalent of natural gas compared with more than 200 pounds of CO_2 per MMBtu of coal and more than 160 pounds per MMBtu of distillate fuel oil.

9.1 Environmental Evaluation

The Applicant has prepared an Environmental Evaluation of the proposed Project in support of the DPLA. The role of this Environmental Evaluation is to provide the primary information to determine whether the proposed Project meets the elements of the Secretary of Transportation's purpose and need. Where applicable, this document also considers safety but does not function as the final safety screening. More detailed aspects of port safety, including transportation routes, will be addressed in the Port's Operations Manual. The Applicant's Operations and Maintenance Philosophy is consistent with approved industry practices. The final Port Operations Manual requires USCG approval prior to the initiation of port operations.

The Environmental Evaluation assesses the potential environmental effects associated with construction/installation/commissioning, routine operations, potential upsets/accidents, and decommissioning of the proposed Project. This document has been prepared in anticipation of compliance with NEPA requirements, the Council on Environmental Quality regulations for implementing NEPA (40 CFR §§1500-1508), U.S. Department of Transportation (Order 5610.1C Procedures for Considering Environmental Impacts), and USCG policy (Commandant's Instruction [COMDINST] M16475.1D).

The primary objectives of the Environmental Evaluation document are to:

- Provide environmental analysis sufficiently to support the Secretary of Transportation's licensing decision.
- Demonstrate that the Project would be located, constructed, and operated in a manner that represents the best available technology necessary to prevent or minimize any adverse effects on the environment.
- Aid in the MARAD's and USCG's compliance with NEPA; and
- Facilitate public involvement in the decision-making process. The Environmental Evaluation analyzes

[18] *U.S. Dep 't of Energy, National Environmental Policy Act Implementing Procedures, Final Rule*; 85 Fed. Reg. 78,197, 78,200 (Dec. 4, 2020).

the potential consequences of the proposed Project and the alternatives that have been identified and deemed reasonable. The assessment is based on available data and literature, Project surveys, and desktop studies. In cases where limited data are available, the assessment is based on qualitative judgment through the understanding of the local and regional setting; understanding the proposed actions; and predicting effects from similar actions, agency positions on these, and/or published science. In addition, the Environmental Evaluation proposes measures to mitigate potentially adverse environmental consequences of different Project activities.

Environmental justice is also evaluated in this section. The environmental justice assessment area includes all census block groups in Matagorda region that are within 8.7 nautical miles (ten (10) statute miles, or 16.1 kilometers) of the seaward edge of the location. This area was selected based on two factors. First, this area encompasses the maximum areal extent of potential Project visibility. Second, any affected commercial fishermen are likely to be home ported in this area.

Based on the foregoing, the Applicant requests that the DOE determine that the exports proposed in this Application will not have a significant effect on the human environment.

10. JOB AND EMPLOYMENT EFFECTS

10.1 ST LNG Construction and Installation

The Project's most significant positive socioeconomic impacts would occur during the construction and installation, which would directly create 7,600 fulltime equivalent positions with a labor payroll of approximately $979.2 million and require $1.58 billion USD in domestic capital expenditures between the first quarter of 2027 and the end of 2030. These expenditures, along with indirect and induced economic activity, would significantly increase economic activity, labor demand, and tax revenue.

Because, at the peak of Project construction and installation, only 205 workers are expected to temporarily relocate into the socioeconomic study area, the Project's impacts on population levels, housing demand, and demand for public services would be negligible. By extension, the cumulative impact of Project construction and installation on these socioeconomic indicators would also be negligible.

10.2 ST LNG Operation

During operation, the Project would require 380 offshore workers and forty (40) shore-based support staff. The total annual payroll for the offshore workers is estimated to be $40 million USD; the 40 specialized shore-based staff would be paid wages commensurate with their specialized skill sets. In addition, the Project and continued operations and maintenance would require a base level of capital expenditures and contractor support. This expenditure, along with indirect and induced economic activity, would increase both sales and payroll tax revenue.

During operation, approximately thirty (30) Project workers are expected to permanently relocate into the socioeconomic study area, resulting in a total in-country immigration of seventy-five (75) individuals (workers and family members). This immigration would have a negligible effect on population levels, housing demand, and/or demand for public services. By extension, the cumulative impact of Project and continued operation on these socioeconomic indicators would also be minimum.

11. CONCLUSION

As referenced earlier, the DOE document dated May 19, 2025, released its Response to Comments on the 2024 LNG Export Study, marking a critical step toward returning to regular order on liquefied natural gas (LNG) exports. "In sum, DOE concludes that the complete record from the 2024 LNG Export Study, inclusive of the Study, the comments received, and this Response to Comments, supports the proposition that exports of LNG from the United States are in the best interest of the American public. With the public comments to the 2024 LNG Export Study now addressed, DOE will proceed with issuing final orders on pending applications to export U.S.-sourced natural gas as LNG to non-free trade agreement countries."

For the foregoing reasons, the Applicant respectfully requests that DOE/FECM grant it long-term, multi-contract authorization to export domestically produced LNG in a volume equivalent to approximately 460 Bcf per year of natural gas (equivalent to approximately 8.4 MTPA of LNG) from its Project to both FTA Nations and Non-FTA Nations, for a term extending through December 31, 2050, in addition to a three-year Make-Up Period following this initial export term, *i.e.*, through December 31, 2053. The Applicant respectfully requests that this authorization be granted, at the earliest date possible.

Respectfully submitted,

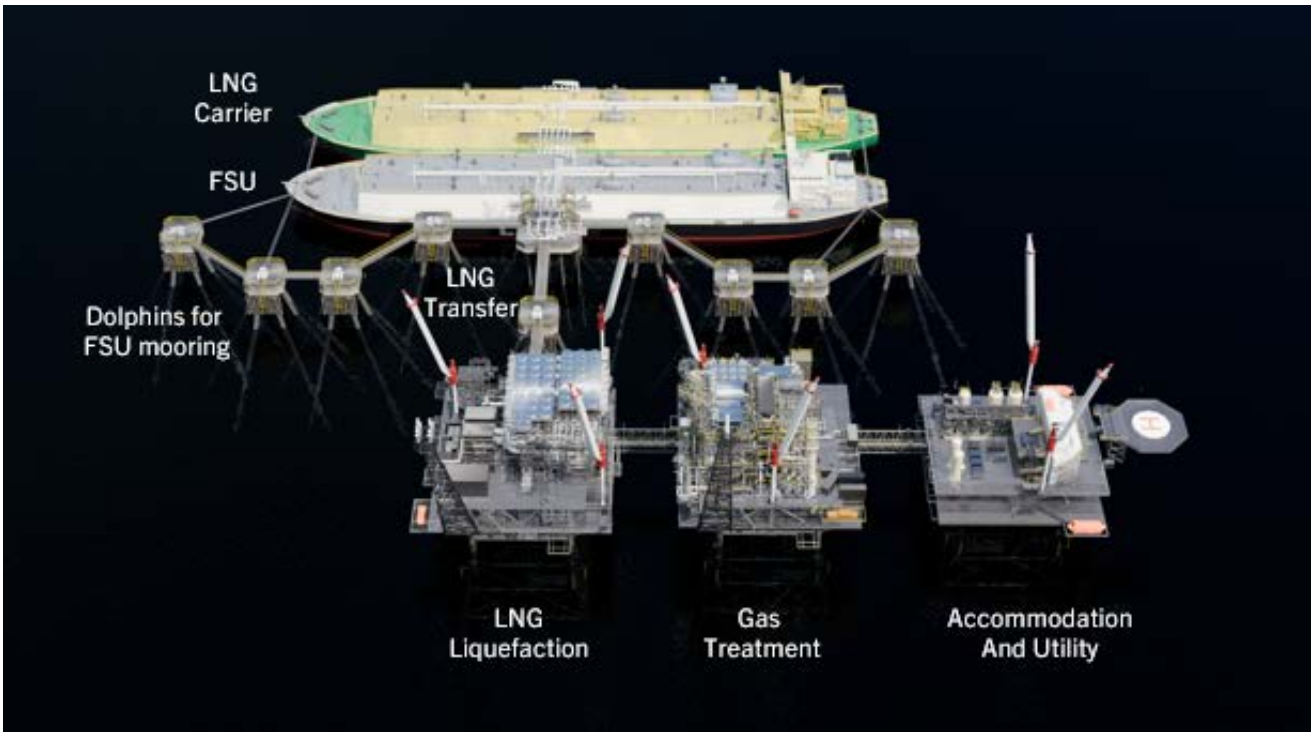
Himkar Tak
Vice President
ST LNG, LLC
9201 Corporate Blvd, Suite 420
Rockville, MD, 20850, USA
Phone: +1.301.404.8285
Email: hstak@stpaperllc.com

Dated: December 1, 2025

APPENDICES

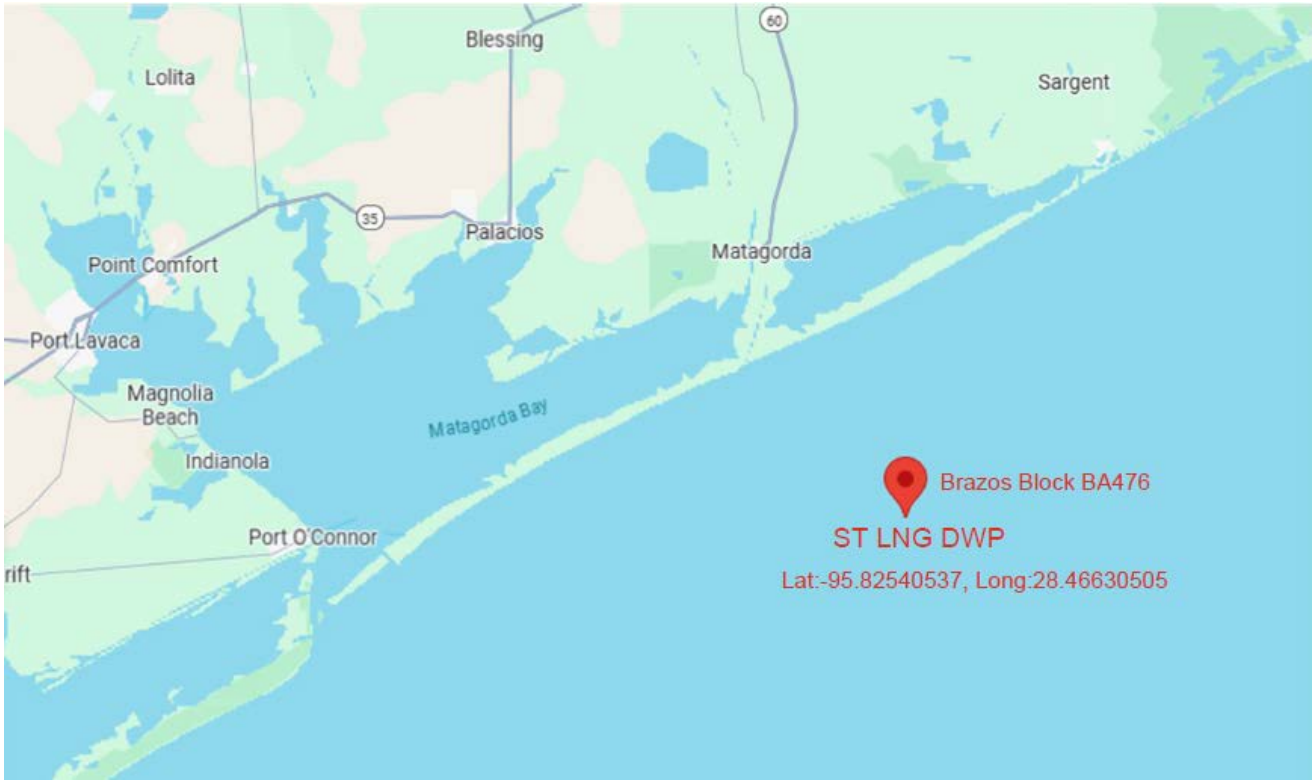
APPENDIX-A

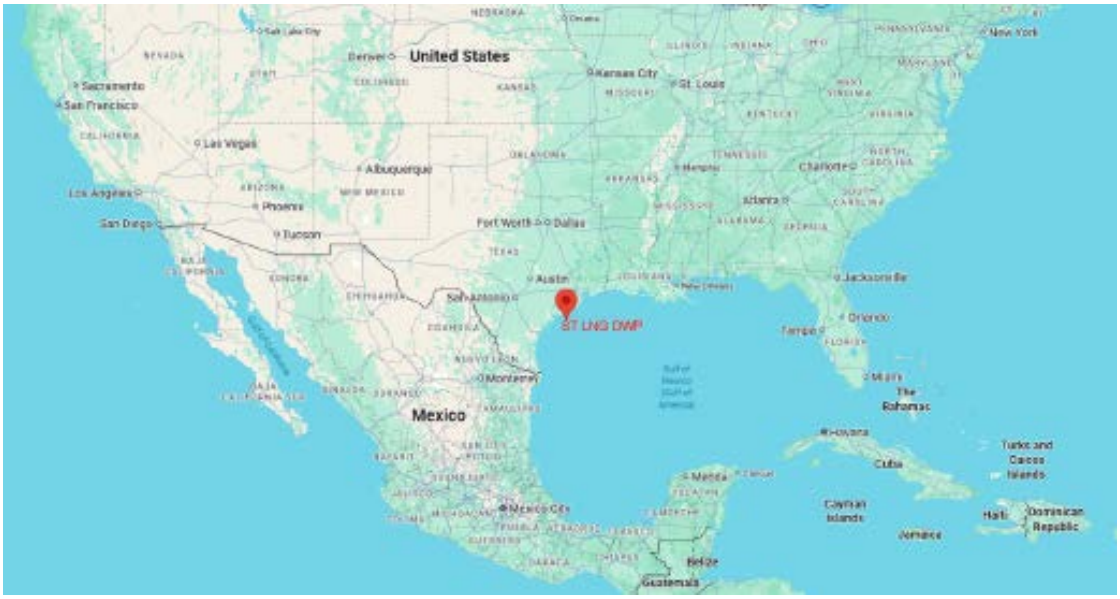
Project Conceptual Picture (Phase-1)



APPENDIX-B

Project Location Map





APPENDIX-C

Verification

State of Texas

County of Harris

BEFORE ME, the undersigned authority, on this day personally appeared **Cam Ellis**, who, having been by me first duly sworn on oath says that he is acting on behalf of ST LNG, LLC as legal counsel and is duly authorized to make this Verification; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

Signature: _____

Cam Ellis

as legal counsel for ST LNG, LLC

SWORN TO AND SUBSCRIBED before me on the 5th day of December 2025.

Signature: _____

Name: Melissa Miranda Burke

Title: Notary Public

Seal

NOTARY PUBLIC STATE OF TEXAS

MELISSA MIRANDA BURKE
Notary ID #134060291
My Commission Expires
November 11, 2026

APPENDIX-D

Opinion of Counsel

Date: 12/05/25

Ms. Amy Sweeney
U.S. Department of Energy Natural Gas Regulation
FE-34 - ROOM 3E-056
1000 Independence Avenue, S.W.
Washington DC 20585
Email: fergas@hq.doe.gov
Phone: +1.(202)586-9478

RE: ST LNG, LLC, DOT Docket No. MARAD-2025-0096; Application for Long Term Authorization to Export LNG to Free Trade Agreement and Non-Free Trade Agreement Nations.

Dear Sir or Madam:

This opinion of counsel is provided in accordance with the requirements of Section 590.202(c) of the U.S. Department of Energy's regulations.[19] I have examined the Limited Liability Company Agreement of ST LNG, LLC ("Applicant") and other authorities as necessary for this opinion, and have concluded that the proposed exportation of liquefied natural gas as described in the above-referenced application is within Applicant's corporate powers.

Respectfully submitted,

Cam Ellis
as legal counsel for ST LNG, LLC

[19] 10 C.F.R. § 590.202(c)
[Code of Federal Regulations, Title 10, Citation: 10 CFR 590.202]
(c) The application shall also have attached a statement, including a signed opinion of legal counsel, showing that a proposed import or export of natural gas is within the corporate powers of the applicant and a copy of all relevant contracts and purchase agreements.