



April 1, 2026

U.S. Department of Energy  
Office of Fossil Energy and Carbon Management  
Natural Gas Regulatory Activities  
P.O. Box 44375  
Washington, D.C. 20026-4375

**Re: ECA Liquefaction, S. de R.L. de C.V.**  
**(originally issued to Energía Costa Azul, S. de R.L. de C.V.)**  
***ECA Mid-Scale Project***  
**DOE/HGEO Order Nos. 4317, 4364, 4317-A, 4364-A, 4317-B, 4364-B**  
**DOE/HGEO Order Nos. 4317-C, 4364-C**  
**Docket No. 18-144-LNG**  
**Semi-Annual Report**

Dear FERGAS Staff,

On January 25, 2019, in DOE/FE Order No. 4317, the U.S. Department of Energy, Office of Fossil Energy and Carbon Management (“DOE/FE”) (now known as the Hydrocarbons and Geothermal Energy Office), granted to Energía Costa Azul, S. de R.L. de C.V. (“Energía Costa Azul”), a long-term, multi-contract authorization to export natural gas to Mexico and to re-export liquefied natural gas (“LNG”) from its proposed ECA Mid-Scale Project to nations that have free trade agreements with the United States requiring national treatment in the trade of natural gas (“FTA countries”). On March 29, 2019, in DOE/FE Order No. 4364, the DOE/FE granted to Energía Costa Azul a long-term, multi-contract authorization to export natural gas to Mexico and to re-export LNG from the ECA Mid-Scale Project to Non-FTA countries. On October 7, 2019, in DOE/FE Order Nos. 4317-A and 4364-A, the DOE/FE approved the transfer of the authorizations granted in DOE/FE Order Nos. 4317 and 4364 from Energía Costa Azul to its affiliate, ECA Liquefaction, S. de R.L. de C.V. (“ECA Liquefaction”). On December 10, 2020, in DOE/FE Order Nos. 4317-B and 4364-B, the DOE/FE extended natural gas export authorizations to Free Trade and Non-free Trade Agreement Countries through the year 2050. More recently, on March 20, 2026, in DOE/HGEO Order Nos. 4317-C and 4364-C, issued in response to ECA Liquefaction’s Request for Extensions filed on September 19, 2025, the U.S. Department of Energy, Hydrocarbons and Geothermal Energy Office (“DOE/HGEO”), amended the FTA

authorization to establish the commencement of the export term as the date of first export, granted an extension of the re-export commencement deadline under the non-FTA authorization to September 21, 2026, and approved a three-year Make-Up Period for both authorizations. One of the conditions of the DOE/FE's authorizations, as transferred to ECA Liquefaction, is that ECA Liquefaction file semi-annual written reports (on or before April 1 and October 1 of each year) describing the progress of the planned ECA Mid-Scale Project. ECA Liquefaction hereby submits the semi-annual report covering the period from October 1, 2025, through March 31, 2026.

ECA Liquefaction remains in compliance with all federal, state, and local Mexican authorizations necessary to construct and operate the liquefaction terminal facilities for the ECA Mid-Scale Project.

As mentioned in the previous semi-annual reports, ECA Liquefaction took a final investment (“FID”) decision in November 2020 which marked the start of the construction phase of the project. There are no changes to the executed LNG sale and purchase agreements with Total Gas & Power, Asia Private Limited and Mitsui & Co., Ltd., which have been filed with the DOE/FE. On January 15, 2026, ECA Liquefaction submitted under seal to DOE/HGEO a long-term sale and purchase agreement signed with SI LNG Optimization Services, LLC, and a public summary of such agreement for filing.

During the reporting period, technical engineering and procurement support activities continued to focus on operational startup readiness, while selectively supporting remaining close out construction activities at site. The project transitioned from final construction into advance pre-commissioning and commissioning phases, with the majority of systems mechanically complete. Electrification activities are largely complete, and system testing has progressed across multiple areas, including motor runs, loop testing and functional checks. Pre-Startup Safety Review (PSSR) activities are ongoing, supported by the execution of (Pre-Startup Safety Review) PESR tasks and the implementation of approved commissioning procedures. Final equipment, spare parts, and operational materials continue arriving at site and are being managed in accordance with preservation and readiness requirements to support startup and early operations.

As discussed in the previous semi-annual reports, ECA Liquefaction has reviewed its project schedule and has conducted a detailed analysis, identifying and implementing measures to mitigate schedule impacts and support commissioning and startup activities. Consistent with the amendments granted under DOE/HGEO Order Nos. 4317-C and 4364-C, which align the commencement of the export authorization term with the date of first export and extend the non-FTA export commencement deadline to September 21, 2026, ECA Liquefaction expects to reach commercial operations in summer of 2026.

ECA Liquefaction, S. de R.L. de C.V.  
Semi-Annual Report  
FE Docket No. 18-144-LNG

Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Jerrod L. Harrison

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*On Behalf of ECA Liquefaction, S. de R.L. de C.V.*