

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT

MEXICO PACIFIC LIMITED LLC

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DOCKET NO. 18-70-LNG

NOTICE TOLLING EXPIRATION OF
NON-FTA AUTHORIZATION PENDING DOE ACTION

DECEMBER 12, 2025

I. BACKGROUND

On December 14, 2018, in DOE/FE Order No. 4312 (as amended),¹ the Department of Energy’s (DOE) Office of Fossil Energy (now the Office of Fossil Energy and Carbon Management)² authorized Mexico Pacific Limited LLC (MXP)³ to export U.S.-sourced natural gas by pipeline from the United States for liquefaction in Mexico and to re-export the natural gas in the form of liquefied natural gas (LNG) by vessel from its proposed LNG production and offtake facility in the State of Sonora, Mexico (now referred to as the Saguaro Energía Facility or Facility), to any countries with which the United States does not have a free trade agreement (FTA) requiring national treatment for trade in natural gas, which currently have or in the future develop the capacity to import LNG, and with which trade is not prohibited by U.S. law or policy (non-FTA countries), under section 3(a) of the Natural Gas Act (NGA).⁴ MXP is authorized to re-export this LNG in a volume equivalent to 621 billion cubic feet per year of natural gas for a term extending through December 31, 2050.⁵ Under Order No. 4312, MXP is required to “commence re-export operations using the planned liquefaction facilities no later than seven years from the date of issuance of [the] Order”—that is, by December 14, 2025.⁶ If MXP does not meet this deadline, Order No. 4312, as amended, will expire.

¹ *Mexico Pacific Limited LLC*, DOE/FE Order No. 4312, Docket No. 18-70-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export U.S.-Sourced Natural Gas by Pipeline to Mexico for Liquefaction and Re-Export in the Form of Liquefied Natural Gas to Non-Free Trade Agreement Countries (Dec. 14, 2018), *amended by* Order No. 4312-A (June 3, 2022) (extending export term).

² The Office of Fossil Energy (FE) changed its name to the Office of Fossil Energy and Carbon Management (FECM) on July 4, 2021.

³ DOE’s references to “MPL” in Order No. 4312, as amended, have been updated for purposes of this Notice as “MXP,” consistent with MXP’s current practice.

⁴ 15 U.S.C. § 717b(a). The authority to regulate the imports and exports of natural gas, including liquefied natural gas (LNG), under section 3 of the NGA (15 U.S.C. § 717b) has been delegated to the Assistant Secretary for FECM in Redelegation Order No. S4-DEL-FE1-2023, issued on April 10, 2023.

⁵ *Mexico Pacific Limited LLC*, DOE/FECM Order No. 4312-A, at 9-10 (Ordering Para. C) (amending Ordering Para. A of DOE/FE Order No. 4312).

⁶ *Mexico Pacific Limited LLC*, DOE/FE Order No. 4312, at 49 (Ordering Para. D); *see also id.* at 42 (Term and Condition B).

Export Commencement Extension Proceeding. On June 18, 2025, MXP filed an “Application for an Amendment to Extend the Deadline for Commencement of Export Operations and Request for Expedited Action” (Application).⁷ MXP states that, “despite [its] efforts to advance the project . . . due to circumstances and challenges outside MXP’s control, MXP will be unable to meet the current deadline of December 14, 2025 to commence export operations at the Facility.”⁸ MXP therefore asks DOE to further amend Order No. 4312 by providing “an extension of the current deadline to commence its export operations to December 14, 2032.”⁹ MXP asserts “that good cause exists to grant the requested extension.”¹⁰

On July 9, 2025, DOE published a notice of the Application in the *Federal Register* (Notice of Application).¹¹ The Notice of Application invited interested persons to submit protests, motions to intervene, notices of intervention, as applicable, or written comments addressing the Application by August 8, 2025. In response to the Notice of Application, DOE received a “Motion to Intervene and Protest of Application for Extension of Commencement Deadline” jointly filed by Centro Mexicano de Derecho Ambiental (CEMDA), Sierra Club, Public Citizen, Inc., and Natural Resources Defense Council (NRDC) (collectively, Movants).¹² DOE also received over 600 comments.¹³ On August 25, 2025, MXP submitted an “Answer to

⁷ Mexico Pacific Limited LLC, Application for an Amendment to Extend the Deadline for Commencement of Export Operations and Request for Expedited Action, Docket No. 18-70-LNG (June 18, 2025) [hereinafter App.].

⁸ *Id.* at 4.

⁹ *See id.* at 4; *see also id.* at 2, 19. MXP states that it is not seeking to modify any other aspect of its non-FTA authorization. *See id.* at 17.

¹⁰ *Id.* at 2; *see also id.* at 8, 16-18.

¹¹ Mexico Pacific Limited LLC; Application for an Amendment to Extend the Deadline for Commencement of Export Operations in Long-Term Authorization to Re-Export Liquefied Natural Gas; Notice of Application, 90 Fed. Reg. 30,223 (July 9, 2025).

¹² Centro Mexicano de Derecho Ambiental, *et al.*, Motion to Intervene and Protest of Application for Extension of Commencement Deadline, Docket No. 18-70-LNG (Aug. 8, 2025).

¹³ Due to the number of comments received in response to the Notice of Application, DOE has compiled them in one entry in MXP’s docket, entitled “Comments in Response to Notice of Application” (Entry #45), <https://www.energy.gov/fecm/articles/comments-response-notice-application-amendment-extend-deadline-commencement-export>.

Protest” filed by Movants.¹⁴

Change in Control Proceeding. On March 6, 2025, DOE received MXP’s notice of “a recent set of transactions through which a change in control of MXP has been effected” (CIC Notice),¹⁵ followed on March 21, 2025, by a “Supplement Describing Changes in Equity Ownership that Preceded Changes in Control Described in CIC Notice Submitted March 5, 2025” (First Supplement).¹⁶ The CIC Notice references Mexico Pacific Holdings, L.P. (MXP Holdings)—the entity that owns MXP and is now known as Mexico Pacific Holdings, LLC, following a change in its form of organization.¹⁷

On May 7, 2025, DOE published notice of both the CIC Notice and First Supplement in the *Federal Register*.¹⁸ In response to the notice, DOE received a pleading jointly filed by Public Citizen (protest), NRDC (protest and motion to intervene), and Sierra Club (protest and motion to intervene).¹⁹

Since that time, MXP has continued to supplement its CIC Notice—most recently, with a “Fourth Supplement to March 5, 2025 CIC Notice” filed on November 24, 2025.²⁰ On December 12, 2025, a notice of the Fourth Supplement to the CIC Notice was published in the

¹⁴ Mexico Pacific Limited LLC, Docket No. 18-70-LNG, Answer to Protest of CEMDA, Sierra Club, Public Citizen and Natural Resources Defense Council to Application for Extension of Commencement Deadline (Aug. 25, 2025).

¹⁵ Mexico Pacific Limited LLC, Notice of Change in Control, Docket Nos. 18-70-LNG and 22-167-LNG, at 1 (Mar. 6, 2025) [hereinafter CIC Notice]. Because DOE received the CIC Notice after the close of business on March 5, 2025, it was date-stamped and docketed by DOE on March 6, 2025. However, MXP references the CIC Notice as “submitted March 5, 2025” throughout its documents.

¹⁶ Mexico Pacific Limited LLC, Supplement Describing Changes in Equity Ownership that Preceded Changes in Control Described in CIC Notice Submitted March 5, 2025, Docket Nos. 18-70-LNG and 22-167-LNG (Mar. 21, 2025).

¹⁷ See CIC Notice at 3 and Exh. A.

¹⁸ U.S. Dep’t of Energy, Change in Control: Mexico Pacific Limited LLC; Notice of Change in Control, 90 Fed. Reg. 19,288 (May 7, 2025).

¹⁹ Public Citizen, Inc., *et al.*, Protest of Public Citizen, Inc., Natural Resources Defense Council and Sierra Club, and Intervention of Natural Resources Defense Council and Sierra Club, Docket Nos. 18-70-LNG and 22-167-LNG (May 22, 2025).

²⁰ Mexico Pacific Limited LLC, Response to Request for Further Updates in Change in Control Proceeding and Fourth Supplement to March 5, 2025 CIC Notice, Docket Nos. 18-70-LNG and 22-167-LNG (Nov. 24, 2025) [hereinafter Fourth Supp.]. For all documents filed as part of this CIC proceeding, please see Docket No. 18-70-LNG.

Federal Register.²¹ The public comment period for this notice will close on December 29, 2025.

Following the close of the comment period, DOE intends to evaluate MXP's CIC Notice, as supplemented through the Fourth Supplement, and any filings in response thereto, in accordance with DOE's Change in Control Procedures.²²

II. NOTICE OF TOLLED EXPIRATION

In light of MXP's contested change in control proceeding, which is still ongoing as described above, DOE finds it necessary to delay review of MXP's Application for an export commencement extension to Order No. 4312 until the change in control proceeding is completed.²³ Accordingly, the expiration of MXP's non-FTA authorization—Order No. 4312, as amended—on December 14, 2025, is tolled until DOE issues an order on the pending Application.²⁴

Issued in Washington, D.C., on December 12, 2025.

Amy Sweeney
Director, Office of Regulation, Analysis, and Engagement
Office of Resource Sustainability

²¹ U.S. Dep't of Energy, Change in Control: Mexico Pacific Limited LLC; Notice of Change in Control, 90 Fed. Reg. 57,754 (Dec. 12, 2025) (providing notice of MXP's Fourth Supplement to CIC Notice and providing additional procedural history).

²² U.S. Dep't of Energy, Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas, 79 Fed. Reg. 65,541 (Nov. 5, 2014).

²³ By letters dated October 29, 2025, and November 12, 2025, DOE informed MXP that, "[o]nce DOE completes its review in this change in control proceeding, DOE may conclude its review of MXP's pending applications for a non-free trade agreement authorization (Docket No. 22-167-LNG) and an export commencement extension (Docket No. 18-70-LNG), respectively." See MXP Docket No. 18-70-LNG, Entries #49 and #51.

²⁴ MXP also holds long-term authorizations to export LNG to FTA countries in DOE/FE Order No. 4248, as amended (Docket No. 18-70-LNG), and DOE/FECM Order No. 4995 (Docket No. 22-167-LNG). This Notice does not apply to either of MXP's FTA authorizations.