



Department of Energy
Washington, DC 20585

November 12, 2025

Via Email

James F. Bowe, Jr.
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RE: Request for Further Updates in Change in Control Proceeding
Mexico Pacific Limited LLC
Docket Nos. 18-70-LNG and 22-167-LNG

Dear Mr. Bowe:

We are writing regarding Mexico Pacific Limited LLC's (MXP) ongoing change in control proceeding in the above-referenced dockets, pursuant to the Department of Energy's (DOE) Change in Control (CIC) Procedures.¹

I. Relevant Background

On October 29, 2025, DOE issued a "Request for Information in Change of Control Proceeding" that asked MXP to submit information to DOE identifying the three minority investors that each hold 10 percent of the economic interest in MXP's parent company, most recently identified as Mexico Pacific Holdings, LLC (MXP Holdings).² DOE asked MXP to respond by November 5, 2025.

On November 4, 2025, MXP submitted a "Response to Request for Information in Change of Control Proceeding"³ in which it gave DOE the names of the entities that hold MXP Holdings'

¹ See 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).

² U.S. Dep't of Energy, Request for Information in Change of Control Proceeding, Docket Nos. 18-70-LNG and 22-167-LNG, at 1-2 (Oct. 29, 2025), <https://www.energy.gov/sites/default/files/2025-10/MXP%20Request%20for%20Information%20CIC%20Proceeding.pdf> [hereinafter Request for Information].

³ Mexico Pacific Limited LLC, Response to Request for Information in Change of Control Proceeding, Docket Nos. 18-70-LNG and 22-167-LNG (Nov. 4, 2025), <https://www.energy.gov/sites/default/files/2025-11/MXP%20Response%20to%20Request%20for%20Information%20CIC%20Proceeding.pdf>.

membership interests. MXP submitted a public version of its Response in which the three names—of one individual and two entities—holding the minority interests were redacted. MXP separately filed under seal a version of its Response identifying the minority interest holders. According to MXP, the latter version of its Response “contains highly sensitive business and personal ownership information, the public disclosure of which could result in an invasion of privacy and potential harassment of the individual and entities.”⁴ MXP requested that DOE treat the names of the minority investors confidentially “[t]o protect the privacy interests of the owners of the minority interests in its parent company.”⁵

II. Request for Update

As stated in the Request for Information, DOE’s regulations require that applications for authorization to export natural gas from the United States disclose “all the participants in the transaction, including the parent company, if any, and identification of any corporate or other affiliations among the participants.”⁶ Additionally, under DOE’s regulations, an application will not receive confidential treatment “unless the party shows why the information or data should be exempted from public disclosure and the Assistant Secretary or Assistant Secretary’s delegate determines that such information or data shall be afforded confidential treatment.”⁷ A determination of confidentiality must be made in accordance with 10 C.F.R. § 1004.11.⁸ We note that, to date, DOE has not reviewed a request by an applicant to exempt one of its upstream owners from public disclosure.

To evaluate a request for confidential treatment, DOE requires supporting details on which it can make factual findings regarding why the information should not be disclosed to the public. In reviewing MXP’s Response, DOE did not find facts sufficient to support MXP’s request for confidential treatment.

Accordingly, we find that MXP must either:

- 1) Withdraw its request for confidential treatment of the three minority investors, or
- 2) Supplement its Response with specific facts that DOE can rely upon to determine whether the information should be exempted from public disclosure.

Once MXP has responded to this letter, DOE can resume its review of the change in control proceeding, including submitting a change in control notice for publication in the *Federal Register* summarizing the most recent changes in ownership at the appropriate time.

[11/PUBLIC%20MXP%20Response%20to%20DOE_FECM%20Information%20Request%20of%2010-29-2025.pdf](#) [hereinafter Response].

⁴ *Id.* at 2.

⁵ *Id.*

⁶ Request for Information at 3 (citing 10 C.F.R. § 590.202(b)(3)).

⁷ 10 C.F.R. § 590.202(e) (emphasis added).

⁸ *See id.*

Once 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.

Sincerely,

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

cc: CIC Service List