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UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE

Nopetro LNG, LLC) Docket No. 20-167-LNG

APPLICATION OF NOPETRO LNG, LLC TO AMEND LONG-TERM AUTHORIZATION FOR EXPORTS OF LIQUEFIED NATURAL GAS

Pursuant to Section 3 of the Natural Gas Act ("NGA"), 15 U.S.C. § 717b, and Part 590 of the regulations of the Department of Energy ("DOE"), 10 C.F.R. Pt. 590, Nopetro LNG, LLC ("Nopetro") submits this application ("Application") to amend Order No. 4671 issued on March 23, 2021 in the above-captioned docket (the "Order"). As relevant to this Application, the Order grants Nopetro the authority (the "Authorization") to engage in long-term exports of domestically produced liquefied natural gas ("LNG") to any country with which the United States currently has, or in the future enters into, a free trade agreement ("FTA") requiring national treatment for trade in natural gas ("FTA Countries").[1] The Authorization also includes the authority to engage in short-term exports of LNG to FTA Countries.

Nopetro hereby seeks elimination of the condition in Ordering Paragraph C of the Order that Nopetro must commence commercial LNG export operations under the Authorization within five years of the date of the Order, or by no later than March 23, 2026. In other words, Nopetro requests that the term of the Authorization be amended so that the term commences on the date of first export and extends through December 31, 2050.[2] Nopetro asks that the Hydrocarbons and

[1] The Order also authorized Nopetro to engage in long-term small-scale exports of domestically produced LNG to any country with which the United States does not have an FTA requiring national treatment for trade in natural gas and with which trade is not prohibited by United States law or policy ("Non-FTA Countries"). That authority has lapsed and has no bearing on this Application.

[2] Nopetro is not seeking any amendment to the Authorization other than removal of the condition requiring exports to commence by no later than March 23, 2026 and revision of the term to begin on the date of first export.

Geothermal Energy Office ("DOE/HGEO") act on this Application prior to March 23, 2026 so that there is no lapse in Nopetro's authority. Nopetro wishes to maintain the Authorization and expects to conduct exports under the Authorization in the future.

As explained below, Nopetro's requested amendment is consistent with the public interest.

I. DESCRIPTION OF APPLICANT

The exact legal name of the applicant is Nopetro LNG, LLC. Nopetro is a limited liability company organized under the laws of the State of Florida, with its principal place of business at 150 SE 2nd Avenue, PH1, Miami, Florida 33131. Nopetro is a wholly-owned subsidiary of Nopetro Energy Holdings, LLC ("Nopetro Energy Holdings"), which is a limited liability company organized under the laws of the State of Delaware.[3] Nopetro Energy Holdings is currently managed by a four-seat board, consisting of Jorge Herrera (two seats), Jay Demetree (one seat) and Chris Beall (one seat), all U.S. citizens. Nopetro Energy Holdings is majority owned by Nopetro LLC, a Florida limited liability company, which holds 59.79% of the membership interests. Nopetro LLC is managed by Jorge Herrera as sole manager and is primarily owned by Jorge Herrera (40.28%) and the William and Barbara Locke Joint Revocable Trust (40.28%). A substantial minority share of the membership interests in Nopetro Energy Holdings (30.99%) is owned by DNP Investments, LLC ("DNP Investments"), a Florida limited liability company.[4] DNP Investments is majority owned by Jay Demetree.

[3] Nopetro Energy Holdings was formerly known as Nopetro-CH4 Holdings, LLC ("Nopetro-CH4 Holdings"). In 2023, Nopetro-CH4 Holdings was converted to a Delaware limited liability company and its name was changed to Nopetro Energy Holdings, LLC.

[4] The remaining membership interests in Nopetro Energy Holdings are owned by the following Delaware limited partnerships and Delaware limited liability company: NOVA Infrastructure Fund I, L.P. (6.21%); NOVA-Nopetro Splitter, L.P. (2.30%); and NOVA-Nopetro Holdco, LLC (.71%).

II. COMMUNICATIONS

All communications and correspondence regarding this Application should be addressed to:

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III. BACKGROUND

On December 28, 2020, Nopetro filed an application ("Initial Application") with DOE's Office of Fossil Energy ("DOE/FE") under NGA Section 3, requesting authority to export domestically produced LNG. Nopetro requested a long-term authorization to export LNG (1) under Section 3(c) of the NGA, to FTA Countries, and (2) under Section 3(a) of the NGA, to Non-FTA Countries. In its Initial Application, Nopetro requested that the authorization for both FTA and Non-FTA Countries commence on the date of first commercial export and end on December 31, 2050.

On March 22, 2021, DOE/FE determined the proposed action was excluded from National Environmental Policy Act review. On March 23, 2021, DOE/FE issued Order No. 4671 granting Nopetro the long-term authorization to export to FTA Countries and the long-term small-scale authorization to export to Non-FTA Countries. Under Ordering Paragraph C of the Order, Nopetro must commence exports to FTA Countries within five years of the date of the Order (i.e., by March 23, 2026).

IV. REQUESTED AMENDMENT

Nopetro hereby respectfully requests that DOE/HGEO amend the Order by (i) eliminating the condition in Ordering Paragraph C of the Order that Nopetro must commence commercial LNG export operations under the Authorization within five years of the date of the Order, and (ii) instead providing that the term commences on the date of first export and extends through December 31, 2050.

V. NOPETRO'S REQUEST TO AMEND THE AUTHORIZATION IS CONSISTENT WITH THE PUBLIC INTEREST

Nopetro respectfully submits that amending the Order to eliminate the five-year deadline for commencing commercial LNG export operations under the Authorization is in the public interest and consistent with recent DOE/HGEO practice. Under the NGA, natural gas (including LNG) exports to FTA Countries are deemed to be in the public interest.[5] Recent Office of Fossil Energy and Carbon Management ("DOE/FECM") orders authorizing exports to FTA Countries do not include a deadline by which such exports must begin but rather the term commences on the date of first export and ends on December 31, 2050.[6] Further, the Trump Administration supports expanding LNG exports, as evidenced by Executive Order 14154, "Unleashing American Energy," which among other things lifted a pause on issuing authorizations for LNG exports.[7]

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[5] 15 U.S.C. § 717b(c).

[6] *See, e.g.*, *Delfin LNG LLC*, DOE/FECM Order No. 3393-E, Docket No. 13-129-LNG at 26 (Nov. 25, 2025) (providing that term for LNG exports to FTA Countries begins "on the date of first export" and extends "through December 31, 2025" under superseding Ordering Paragraph A; *Targray Indus. Inc.*, DOE/FECM Order No. 5308, Docket No. 25-58-LNG at 7 (Jul. 3, 2025) (providing in Ordering Paragraph A that term for FTA LNG authorization commences on the date of first commercial export and extends through December 31, 2050).

[7] Executive Order 14154 of January 20, 2025, "Unleashing American Energy," 90 Fed. Reg. 8353 (Jan. 29, 2025); DOE Fact Sheet: Delivering on U.S. Oil and Natural Gas Production, available at https://www.energy.gov/articles/fact-sheet-delivering-us-oil-and-natural-gas-production.

Nopetro has been actively seeking potential LNG export opportunities and expects to conduct such export operations in the future. Amending the existing Authorization as requested herein will save DOE/HGEO resources that would be consumed by an entirely new application for such authority.

For the above reasons, the requested amendment is consistent with the public interest.

VI. APPENDIX LIST

The below Appendix is attached hereto consistent with Section 590.202 of DOE/HGEO's regulations:[8]

Appendix A Verification

VII. CONCLUSION

For the reasons set forth in this Application, Nopetro respectfully requests that DOE/HGEO grant the amendment requested herein as consistent with the public interest.

Respectfully submitted,

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DATED: February 9, 2026

[8] Nopetro incorporates herein by reference the appendices in its Initial Application, including Appendix B, Opinion of Counsel, and Appendix C, Liquefaction Facilities and Ports.

APPENDIX A

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VERIFICATION

The undersigned attests that he is the President and Chief Operating Officer of Nopetro LNG, LLC, that he is authorized to make this verification, that he has read the foregoing application to amend long-term authorization for exports of liquefied natural gas, and that the statements and matters contained therein are true and correct to the best of his information, knowledge and belief.

Jorge Herrera

Jorge Herrera