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KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Suite 900
Washington, D.C. 20006-4707
Tel: +1 202 737-0500
Fax: +1 202 626-3737
www.kslaw.com

James F. Bowe, Jr.
Partner
Direct Dial: +1 202 626-9601
Direct Fax: +1 202 626-3737
jbowe@kslaw.com

December 12, 2023

VIA ELECTRONIC FILING
(FERGAS@HQ.DOE.GOV)

Ms. Amy R. Sweeney
Director, Office of Regulation, Analysis, and Engagement,
Office of Resource Sustainability
Office of Fossil Energy and Carbon Management
U.S. Department of Energy
P.O. Box 44375
Washington DC 20026-4375

Re: ***Mexico Pacific Limited LLC*, FE Docket Nos. 18-70-LNG and 22-167-LNG**
Registration Materials for CFE International LLC

Dear Ms. Sweeney:

I write on behalf of Mexico Pacific Limited LLC ("MPL") and Mexico Pacific LNG Exports S. de R. L. de C. V. ("MPL Exports"), and at the request of CFE International LLC ("CFEi" or "Registrant"), to provide the Department of Energy, Office of Fossil Energy and Carbon Management ("DOE/FECM"), with certain registration materials for CFEi as

contemplated by Order No. 4248,[1] Order No. 4312,[2] and Order No. 4995 (collectively, the "Export Authorizations").[3]

On October 3, 2023, MPL submitted to DOE/FECM:

A. (i) the Base Contract for Sale and Purchase of Natural Gas; (ii) the Special Provisions Attached to the Base Contract for Sale and Purchase of Natural Gas Dated July 7, 2023; and (iii) the corresponding Transaction Confirmation between MPL Exports and CFEnergía S.A. de C.V. ("CFE Mexico"), all executed on July 7, 2023 (collectively, the "CFE Mexican Gas Supply Contract"); and

B. (i) the Base Contract for Sale and Purchase of Natural Gas; (ii) the Special Provisions Attached to the Base Contract for Sale and Purchase of Natural Gas Dated July 7, 2023; and (iii) the corresponding Transaction Confirmation between MPL Exports and CFE International LLC, all executed on July 7, 2023 (collectively, the "CFEi Gas Supply Contract").

The CFE Mexican Gas Supply Contract and the CFEi Gas Supply Contract are collectively referred to in this letter as the "Gas Supply Contracts."

In the transmittal letter accompanying the Gas Supply Contracts, MPL indicated that, under the CFE Mexican Gas Supply Contract, CFE Mexico will sell and MPL Exports will purchase specified volumes of natural gas on a short-term basis, with title to this gas to transfer to MPL Exports in Mexico. MPL further indicated that at a later date it would file "with DOE/FECM registration materials to allow MPL to act as agent for CFE [Mexico] for sales under the CFE Mexican [Gas] Supply Contract only."

MPL and CFEi have since determined that MPL must register to act as agent for CFEi, not CFE Mexico, with respect to the CFE Mexican Gas Supply Contract. CFEi will transfer title to

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1 *Mexico Pacific Limited LLC*, DOE/FE Order No. 4248 (Sept. 19, 2018) ("Order No. 4248"). In Order No. 4248, DOE/FECM granted MPL authorization to export U.S.-sourced natural gas by pipeline from the United States to Mexico for end use in Mexico and/or, after liquefaction in Mexico, by vessel from the proposed MPL Facility to be constructed in the State of Sonora to countries with which the United States has entered into a free trade agreement ("FTA") requiring national treatment for trade in natural gas, and with which trade is not prohibited by U.S. law or policy ("FTA countries") for end use in FTA countries. The volume authorized in Order No. 4248 was up to the equivalent of 621 Bcf/yr of natural gas.

2 *Mexico Pacific Limited LLC*, DOE/FE Order No. 4312 (Dec. 14, 2018) ("Order No. 4312"). In Order No. 4312, DOE/FECM granted MPL authorization to export U.S.-sourced natural gas by pipeline from the United States for liquefaction in the MPL Facility and to re-export the natural gas from the MPL Facility in the form of LNG in a volume up to the equivalent of 621 Bcf/yr of natural gas to both FTA countries and countries with which the U.S. does not have a FTA requiring national treatment for trade in natural gas.

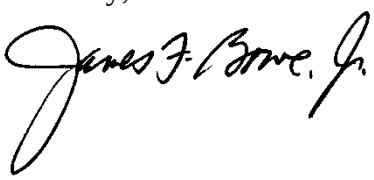
3 *Mexico Pacific Limited LLC*, DOE/FECM Order No. 4995, Docket No. 22-167-LNG (Apr. 28, 2023) ("Order No. 4995"). In Order No. 4995, DOE/FECM granted MPL authorization to export U.S.-sourced natural gas by pipeline from the United States to Mexico for end use in Mexico and/or, after liquefaction in Mexico, by vessel from the proposed MPL Facility to FTA countries. The volume authorized in Order No. 4995 was up to the equivalent of 425.7 Bcf/yr of natural gas.

the natural gas associated with the CFE Mexican Gas Supply Contract to CFE Mexico at the U.S.-Mexico border, pursuant to a purchase and sale agreement between CFEi and CFE Mexico. CFEi and CFE Mexico will file a copy of this purchase and sale agreement with DOE/FECM.

Accordingly, Registrant provides in **Exhibit A** to this letter the material for registration of CFEi required by the Export Authorizations.[4] MPL and Registrant respectfully request that DOE/FECM give immediate effect to this registration. MPL further requests that DOE/FECM reaffirm its conclusion that the natural gas exports it has authorized MPL to undertake remain not inconsistent with the public interest.

If you have any questions regarding this submission, please contact me at (202) 626-9601, by cell phone at (202) 744-7768, or by email at jbowe@kslaw.com. Thank you for your assistance.

Sincerely,



James F. Bowe, Jr.
Counsel for Mexico Pacific Limited LLC
and
Mexico Pacific LNG Exports, S. de R.L. de C.V.

Attachment

cc:
Krysta De Lima

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[4] *See*, *e.g.*, DOE/FE Order No. 4312 at Ordering Paragraph J ("[A]n acknowledgement and agreement by the Registrant to supply MPL with all information necessary to permit MPL to register that person or entity with DOE/FE, including: (1) the Registrant's agreement to comply with this Order and all applicable requirements of DOE/FE's regulations at 10 C.F.R. Part 590, including but not limited to destination restrictions; (2) the exact legal name of the Registrant, state/location of incorporation/registration, primary place of doing business, and the Registrant's ownership structure, including the ultimate parent entity if the Registrant is a subsidiary or affiliate of another entity; (3) the name, title, mailing address, e-mail address, and telephone number of a corporate officer or employee of the Registrant to whom inquiries may be directed; and (4) within 30 days of execution, a copy of any long-term contracts not previously filed with DOE/FE, described in Ordering Paragraph H of [DOE/FE Order No. 4312]").

Exhibit A

Registration Materials of CFE International LLC

(1) Registrant agrees to comply with the Export Authorizations and all applicable requirements of DOE/FECM's regulations at 10 C.F.R. Part 590, including but not limited to destination restrictions. Registrant agrees to sell or transfer natural gas exported pursuant to the Export Authorizations referenced above only to entities that have agreed in writing to the destination restrictions and reporting requirements set forth in the Export Authorizations and have agreed to include such terms in all subsequent sales or transfers.

(2) The exact legal name of the Registrant is CFE International LLC. CFE International LLC is a Delaware limited liability company. The primary place of doing business is 825 Town and Country Lane, Suite 1450, Houston TX 77024, USA. Registrant's ownership structure is as follows: CFE International LLC is a wholly-owned, direct subsidiary of Comisión Federal de Electricidad which is a Mexican state-owned productive enterprise (empresa productiva del Estado) of the Mexican Federal Government.

(3) The name, title, mailing address, e-mail address, and telephone number of a corporate officer or employee of the Registrant to whom inquiries may be directed is:

Fernando Tello García
Chief Compliance Officer
825 Town and Country Lane
Suite 1450
Houston, Texas, 77024
fernando.tello@cfeinternational.com and compliance@cfeinternational.com
+1 832 945 0081

(4) MPL and Registrant have filed with DOE/FECM the agreements under which Registrant will export natural gas via pipeline to the MPL Facility and MPL will act as Registrant's agent in connection with such exports. There are no other long-term contracts for natural gas supply or LNG sales to which Registrant is a party that have not been filed with DOE/FECM.

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

Mexico Pacific Limited LLC	**)**	**Docket No. 18-70-LNG**
		Docket No. 22-167-LNG

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 590.107, I, Tyler R. Brown, hereby certify that I caused the Registration dated December 12, 2023, to be served on the persons included on the official service list for this docket, as provided by DOE/FECM, on December 12, 2023.

/s/*Tyler R. Brown*
Tyler R. Brown
King & Spalding LLP
1180 Peachtree Street, NE
Suite 1600
Atlanta, GA 30309
Tel: 404 572-2809
trbrown@kslaw.com

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

Mexico Pacific Limited LLC	**)**	**Docket No. 18-70-LNG**
		Docket No. 22-167-LNG

VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b), I, Tyler R. Brown, hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the Registration dated December 12, 2023, and that the facts stated therein are true and correct to the best of my knowledge.

Electronically signed at Atlanta, GA, on December 12, 2023.

/s/*Tyler R. Brown*
Tyler R. Brown
King & Spalding LLP
1180 Peachtree Street, NE
Suite 1600
Atlanta, GA 30309
Tel: 404 572-2809
trbrown@kslaw.com