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SUSTAIN ENERGY LLC

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October 19, 2026

Via Electronic Mail: fergas@hq.doe.gov

Ms. Amy Sweeney
Director, Office of Global Energy Security
Office of Strategic Resources
Hydrocarbons and Geothermal Energy Office
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

**Re: Sustain Energy LLC, HGEO Docket No. 26-52-LNG
Application to Amend DOE/HGEO Order No. 5473**

Dear Ms. Sweeney:

Enclosed for filing is the Application of Sustain Energy LLC ("Sustain") to amend DOE/HGEO Order No. 5473, issued September 11, 2026. The Order authorizes Sustain to export up to the equivalent of 51.75 Bcf per year of liquefied natural gas ("LNG") to Free Trade Agreement and non-Free Trade Agreement nations, for a term extending through December 31, 2050.

Sustain seeks an amendment to add one facility to Appendix C of its Application, the list of facilities from which Sustain may source LNG for export. No other changes are requested, including to the authorized export volume. Sustain respectfully submits that the requested amendment does not change its qualification under the small-scale export provisions of DOE's regulations.

The \$50.00 filing fee required by 10 C.F.R. § 590.207 was paid via Pay.gov on October 15, 2026 (Tracking ID: 286U3F5K).

Please do not hesitate to contact me with any questions.

Respectfully submitted,



Clement Neige
Founder & Manager
Sustain Energy LLC

cc: Kevin P. Walters, Royston, Rayzor, Vickery & Williams, L.L.P.

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

In the Matter of

SUSTAIN ENERGY LLC
HGEO Docket No. 26-52-LNG

**APPLICATION OF SUSTAIN ENERGY LLC TO AMEND
DOE/HGEO ORDER NO. 5473 TO ADD A FACILITY
TO THE LIST OF POTENTIAL LNG SOURCES**

Clement Neige
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Counsel for Sustain Energy LLC

Filed: October 19, 2026

I. INTRODUCTION

Pursuant to Section 3 of the Natural Gas Act ("NGA")¹ and Part 590 of the Department of Energy ("DOE") regulations,² SUSTAIN ENERGY LLC ("Sustain" or "Applicant") hereby requests that the Hydrocarbons and Geothermal Energy Office of the DOE ("DOE/HGEO") amend DOE/HGEO Order No. 5473 (the "Order"), issued September 11, 2026.³

The Order authorizes Sustain to export domestically produced liquefied natural gas ("LNG") in a volume equivalent to 51.75 billion cubic feet ("Bcf") of natural gas per year to any country with which the United States has a Free Trade Agreement ("FTA") requiring national treatment for trade in natural gas, and, as small-scale natural gas exports, to any other country with which trade is not prohibited by United States law or policy ("non-FTA" nations), for a term extending through December 31, 2050.⁴

Specifically, Sustain requests that DOE/HGEO amend the Order to add one existing facility to Appendix C of its Application, the list of facilities from which Sustain may source LNG for export: the Hawkins facility of Merit Energy Company, located in Hawkins, Wood County, Texas. Sustain is not requesting any other change to the Order.

¹ 15 U.S.C. § 717b.

² 10 C.F.R. Part 590.

³ Sustain Energy LLC, DOE/HGEO Order No. 5473, Docket No. 26-52-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations, and Long-Term Authorization for Small-Scale Exports of Liquefied Natural Gas (Sept. 11, 2026).

⁴ The U.S. currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore.

II. DESCRIPTION OF THE APPLICANT

The exact legal name of the applicant is SUSTAIN ENERGY LLC. Sustain is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 3515 W Dallas St, Suite 6224, Houston, Texas 77019.

Sustain is wholly owned by Clement Neige, who serves as Founder and Manager of the company. There has been no change in the ownership, control or corporate information of Sustain since the filing of its Application, as described in Appendix D to the Application.

III. COMMUNICATIONS AND CORRESPONDENCE

All communications regarding this Application, including service of all pleadings and notices, should be directed to:

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Counsel for Sustain Energy LLC

IV. BACKGROUND AND ORDER NO. 5473

On May 12, 2026, Sustain filed its Application for long-term, multi-contract authorization to export LNG to FTA and non-FTA nations.⁵ On September 10, 2026, DOE issued a categorical exclusion determination for the non-FTA portion of the Application.⁶ On September 11, 2026, DOE/HGEO issued the Order, authorizing Sustain to export LNG obtained from any of the 17 facilities listed in Appendix C to the Application, in approved ISO containers transported by truck to existing U.S. marine terminals and loaded onto ocean-going container vessels.⁷

The Order provides that if Sustain wishes to obtain LNG for export from facilities other than the 17 facilities listed in Appendix C, it will be required to file with DOE a request to amend the Order to add those facilities.⁸

V. AMENDMENT REQUESTED

Due to new business opportunities, Sustain wishes to add the Hawkins facility of Merit Energy Company to the list of potential sources from which it may obtain LNG for export. The broader list of sources will provide Sustain with greater flexibility to meet the needs of its customers.

The Hawkins facility is an existing facility located in Hawkins, Wood County, Texas, that produces LNG, stores it on site and loads it onto trucks. As for the facilities already listed, the LNG would be loaded into DOT-approved ISO containers, transported by truck to an existing U.S. marine terminal, such as the Port of Houston, Texas, and loaded onto ocean-going container vessels for export. An amended Appendix C, listing the 17 facilities identified in the Application and the Hawkins facility, is attached.

All other representations made in Sustain's Application remain accurate. Sustain is not seeking any other change to the Order, including the quantity of LNG it is authorized to export, the mode of transportation or the term of the authorization. As established in the Order, the amendment would not give Sustain an independent right to purchase or load LNG at the Hawkins facility.⁹

⁵ Sustain Energy LLC, Application for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations, Docket No. 26-52-LNG (May 12, 2026) (the "Application").

⁶ U.S. Dep't of Energy, Categorical Exclusion Determination, Sustain Energy LLC, Docket No. 26-52-LNG (Sept. 10, 2026).

⁷ Order No. 5473, Ordering Para. A.

⁸ *Id.* at 10 n.38.

⁹ *Id.*, Ordering Para. B.

VI. CONSISTENCY WITH THE PUBLIC INTEREST

A. Exports to FTA Nations.

Section 3(c) of the NGA, as amended by § 201 of the Energy Policy Act of 1992, requires that applications to authorize exports of natural gas, including LNG, to nations with which there is in effect a FTA requiring national treatment for trade in natural gas be "deemed to be consistent with the public interest" and "granted without modification or delay."¹⁰ Accordingly, the requested amendment to the FTA portion of the Order should be granted without modification or delay.

B. Small-Scale Exports to Non-FTA Nations.

DOE has determined by rule that small-scale natural gas exports are deemed to be consistent with the public interest under NGA Section 3(a).¹¹ Small-scale natural gas exports are exports that meet two criteria: (1) the application proposes to export natural gas in a volume up to and including 51.75 Bcf per year; and (2) DOE's approval of the application does not require an environmental impact statement or an environmental assessment under the National Environmental Policy Act ("NEPA").¹²

The requested amendment meets both criteria. Sustain is not requesting any change to the authorized volume of 51.75 Bcf per year and, as discussed below, the amendment does not require an environmental impact statement or an environmental assessment. Sustain respectfully submits that the requested amendment does not change its qualification under the small-scale export provisions of DOE's regulations, nor DOE's conclusion in the Order that Sustain's small-scale exports are consistent with the public interest.

C. Environmental Impact.

On September 10, 2026, DOE determined that the non-FTA portion of Sustain's Application qualifies for categorical exclusion B5.7, Export of natural gas and associated transportation by marine vessel.¹³ Categorical exclusion B5.7 applies to authorizations to export natural gas under Section 3 of the NGA that involve minor operational changes but not new construction. The Hawkins facility is an existing facility, and no new construction is required in connection with this amendment. The LNG would be transported in ISO containers by truck to an existing marine terminal and loaded onto ocean-going container vessels using existing facilities. Nothing in this amendment changes Sustain's qualification for categorical exclusion B5.7.

¹⁰ 15 U.S.C. § 717b(c).

¹¹ 10 C.F.R. § 590.208(a); Small-Scale Natural Gas Exports, Final Rule, 83 Fed. Reg. 35106 (July 25, 2018).

¹² 10 C.F.R. § 590.102(p).

¹³ 10 C.F.R. Part 1021, Subpart D, Appendix B, B5.7; *see* note 6.

VII. RELATED PROCEEDINGS

Pursuant to 10 C.F.R. § 590.103(c), Sustain states that, to the best of its knowledge, the same or a related matter is not being considered by any other part of DOE, including the Federal Energy Regulatory Commission, or by any other Federal agency or department.

VIII. APPENDICES

The following appendices are attached to this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

Appendix C: Amended List of Potential LNG Sources

IX. CONCLUSION

For the reasons set forth above, Sustain Energy LLC respectfully requests that DOE/HGEO amend DOE/HGEO Order No. 5473 to authorize Sustain to export LNG obtained from any of the facilities listed in the amended Appendix C attached hereto, with all other terms and conditions of the Order remaining in effect.

Respectfully submitted,

A handwritten signature in black ink that reads "Clement Neige". The signature is written in a cursive, flowing style.

Clement Neige
Founder & Manager
Sustain Energy LLC

Dated: October 19, 2026

APPENDIX A

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE
HGEO Docket No. 26-52-LNG

VERIFICATION

The undersigned, being duly authorized, on oath states that he is the Founder and Manager of SUSTAIN ENERGY LLC; that he has read the foregoing Application to Amend DOE/HGEO Order No. 5473 and that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Houston, Texas on October 19, 2026.

A handwritten signature in black ink, reading "Clement Neige". The signature is written in a cursive, flowing style.

Clement Neige
Founder & Manager
SUSTAIN ENERGY LLC

October 6, 2026

OPINION OF COUNSEL

Re: Department of Energy LNG Export Authorization – Sustain Energy LLC
HGEO Docket No. 26-52-LNG – Application to Amend Order No. 5473
Our File: 68499

To Whom It May Concern:

This opinion is submitted pursuant to 10 C.F.R. § 590.202(c) of the Department of Energy administrative procedures, in connection with the Application of SUSTAIN ENERGY LLC to amend DOE/HGEO Order No. 5473, which authorizes SUSTAIN ENERGY LLC to export liquefied natural gas under Section 3 of the Natural Gas Act.

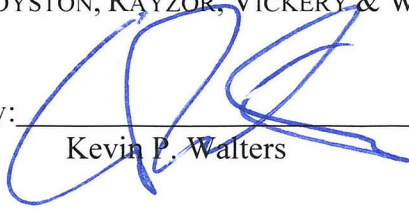
The undersigned is counsel to SUSTAIN ENERGY LLC, a limited liability company organized under the laws of the State of Texas. I have reviewed the Company's Certificate of Formation and other relevant corporate documents.

Based upon the foregoing, it is my opinion that:

1. SUSTAIN ENERGY LLC is duly organized, validly existing, and in good standing under the laws of the State of Texas;
2. SUSTAIN ENERGY LLC has the corporate power and authority to engage in the export of liquefied natural gas as described in the Application to Amend; and
3. The execution and filing of the Application to Amend has been duly authorized.

Respectfully submitted,

ROYSTON, RAYZOR, VICKERY & WILLIAMS, L.L.P.

By: 

Kevin P. Walters

APPENDIX C

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE
HGEO Docket No. 26-52-LNG

AMENDED LIST OF POTENTIAL LNG SOURCES

The following facilities are existing, operational LNG production and peak-shaving facilities located within the United States. A description of each facility based on publicly available information is provided. The following facilities have not been licensed by FERC. Facilities 1 through 17 are unchanged from Appendix C to the Application. Facility 18 is added by this amendment. Sustain Energy LLC will notify DOE/HGEO of any additional facilities from which it will source LNG for export and will amend this Appendix C accordingly.

1. **JAX LNG Facility (Jacksonville (Dames Point), FL).** Located on the St. Johns River, jointly owned by subsidiaries of Southern Company Gas and North Star Midstream, LLC. The facility has a liquefaction capacity of approximately 360,000 gallons of LNG per day and storage of over 4 million gallons. JAX LNG has both marine and truck-loading capabilities. Port: Jacksonville, Florida.
2. **Eagle LNG Partners (Maxville Facility) (Jacksonville, FL).** A natural gas liquefaction plant near Jacksonville with a capacity of approximately 187,000 gallons per day and 1 million gallons of storage. The facility is designed specifically to load LNG ISO containers for transport to nearby island markets. Eagle LNG is also building a fuel depot dockside at the Talleyrand Marine Terminal on the St. Johns River. Port: Jacksonville, Florida.
3. **Sawgrass LNG Facility (Miami LNG) (Hialeah, FL).** A small-scale liquefaction facility with approximately 100,000 gallons per day of production capacity and 270,000 gallons of permanent on-site storage. The facility is capable of loading LNG ISO containers for transport to Port Everglades by truck. Port: Port Everglades, Florida.
4. **Puget LNG Facility (Tacoma, WA).** Located on the Blair Waterway on Puget Sound, wholly owned by Puget Energy. Production capacity of approximately 225,000 gallons per day with over 1.7 million gallons of storage. Provides both marine and truck-loading capabilities. Port: Tacoma, Washington.
5. **Clean Energy Fuels, Pickens Plant (Willis, TX).** A small-volume LNG production facility owned and operated by Clean Energy Fuels Corporation. Liquefaction capacity of approximately 100,000 gallons per day and storage capacity of 1 million gallons. Capable of loading twelve trucks per day. Port: Port of Houston or Port of Galveston, Texas.
6. **Alkane Midstream, Seminole Plant (Seminole, TX).** A small-volume LNG production facility owned and operated by Alkane Midstream, using pipeline gas. Production capacity of 60,000 gallons per day, expandable to 100,000 gallons per day, with 60,000 gallons of permanent storage. Port: Port of Houston or Port of Galveston, Texas.

7. **Pivotal LNG, Trussville Plant (Trussville, AL).** Owned and operated by Pivotal LNG, a wholly-owned subsidiary of Berkshire Hathaway Energy Gas Transmission and Storage. Storage capacity of 4.8 million gallons and production of approximately 60,000 gallons per day. Features two truck scales and three loading racks. Port: Port of Mobile, Alabama.
8. **Kinetrex Energy (LNG North & South Plants) (Indianapolis, IN).** Wholly-owned subsidiary of Kinder Morgan. Two LNG facilities each with 1 Bcf of storage capacity, producing approximately 125,000 gallons of LNG per day each, with two loading stations capable of fueling 48 loads of LNG daily. Port: Multiple Midwest and Gulf access points.
9. **Frontier Natural Resources, Mansfield Plant (Mansfield, PA).** Small-scale LNG facility producing approximately 6,000 gallons of LNG per day from stranded natural gas assets, stored on site for transfer to cryo-tankers. Port: Northeast U.S. marine terminals.
10. **Frontier Natural Resources, Clearfield Plant (Clearfield, PA).** Small-scale LNG facility producing approximately 36,000 gallons of LNG per day from stranded natural gas assets, stored on site for transfer to cryo-tankers. Port: Northeast U.S. marine terminals.
11. **Spire Energy, Coosada LNG Facility (Alabama).** 80 MMCF total capacity. LNG source: Liquefaction. Port: Port of Mobile, Alabama.
12. **Spire Energy, Pinson LNG Facility (Alabama).** 120 MMCF total capacity. LNG source: Liquefaction. Port: Port of Mobile, Alabama.
13. **Spire Energy, East Lauderdale LNG Facility (Alabama).** 2.988 MMCF total capacity. LNG source: Truck. Port: Port of Mobile, Alabama.
14. **Spire Energy, Double Springs LNG Facility (Alabama).** 0.768 MMCF total capacity. LNG source: Truck. Port: Port of Mobile, Alabama.
15. **Atlanta Gas Light Co., Cherokee LNG Facility (Georgia).** 624 MMCF total capacity. LNG source: Liquefaction. Port: Port of Savannah, Georgia.
16. **Atlanta Gas Light Co., Macon LNG Facility (Georgia).** 150 MMCF total capacity. LNG source: Liquefaction. Port: Port of Savannah, Georgia.
17. **Atlanta Gas Light Co., Riverdale LNG Facility (Georgia).** 400 MMCF total capacity. LNG source: Liquefaction. Port: Port of Savannah, Georgia.
18. **Merit Energy Company, Hawkins Facility (Hawkins, TX).** An existing natural gas processing facility located in Hawkins, Wood County, Texas, owned and operated by Merit Energy Company. The facility produces LNG, which is stored on site and loaded onto trucks. Port: Port of Houston or Port of Galveston, Texas. (Added by this amendment.)