Posting of Off-the-Record Communication

The attached document was sent to the Department of Energy in reference to this proceeding, NFE Altamira FLNG, S. de R.L. de C.V., docket number 22-110-LNG. This document is considered "off-the-record

communication" under 10 CFR 590.102 and 590.108 because the person/entity who submitted it is an "interested person," the communication was directed to a "decisional employee," and the communication addressed the merits of the proceeding.

The comment period for this proceeding has closed. Therefore, this communication will not be considered as a part of the record. It is posted here in compliance with regulations. As provided in 10 CFR 590.108(a)(5), a request by a party wishing to rebut this communication, on the record, may be submitted in writing. As specified in this regulation, such requests will be granted "only for good cause."

RECEIVED

By Docket Room at Fri 2/10/2023 4:12 PM



Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, NY 10019-6142

+1 212 506 5000 orrick.com

Lisa Tonery

E Itonery@orrick.com D +1 212 506 3710 F +1 212 506 5151

February 10, 2023

Ms. Amy Sweeney
Office of Regulation, Analysis, and Engagement
Office of Fossil Energy and Carbon Management
U.S. Department of Energy
1000 Independence Ave., SW, FE-34
Washington, D.C. 20585

Re: NFE Altamira FLNG, S. de R.L. de C.V. FECM Docket No. 22-110-LNG

Dear Ms. Sweeney:

On September 9, 2022, NFE Altamira FLNG, S. de R.L. de C.V. ("NFE Altamira"), an indirect subsidiary of New Fortress Energy Inc. ("NFE"), filed an Application with the United States Department of Energy's ("DOE") Office of Fossil Energy and Carbon Management ("DOE/FECM") requesting authorization to engage in long-term multi-contract exports of domestically-produced natural gas by pipeline to Mexico via existing cross-border facilities, and further requesting long-term, multi-contract authorization to re-export liquefied natural gas ("LNG") from the proposed NFE Altamira Project ("Project") in Mexico to both free trade agreement ("FTA") and non-FTA nations for a term extending through December 31, 2050.

As background, NFE owns, constructs and operates global gas-to-power energy infrastructure assets around the world, utilizing LNG as a means to provide cleaner, more stable, and more affordable fuel for power generation. NFE currently operates regasification terminals and power plants in numerous locations, including, but not limited to, Puerto Rico, Jamaica, Mexico, and Brazil, and is actively developing additional facilities around the world.

As detailed in the Application, the proposed Project and associated exports of U.S.-sourced gas will generate significant public benefits to the United States and its allies. First, the Project equipment is being constructed in Texas, where ongoing construction has resulted in the employment of over 3,000 U.S. workers. To date, NFE Altamira has invested more than four million manhours on the Project in Texas, and expects this number to exceed five million manhours by the time the Project is complete in the second quarter of this year. Once operational, the Project will generate millions of dollars in tax revenues for the United States each year through a variety of activities, including sales of LNG, rents on leases of U.S. equipment such as marine vessels and rigs, and the employment of hundreds of U.S. workers.

Once the pending Application is approved by DOE/FECM and the Project is placed in service, the LNG produced by the Project can be supplied to regions around the world in need of natural gas. The ongoing international conflict in Ukraine has highlighted the need for the United States to assist its allies globally in reducing their dependence on Russian energy sources, and NFE Altamira's LNG exports will provide a key alternative to our allies in those areas where Russian

Ms. Amy Sweeney February 10, 2023 Page 2



gas is being displaced. In addition, and consistent with NFE's principal mission to accelerate the world's transition to reliable, affordable, and clean energy, the LNG will be supplied to regions around the world where NFE's operations aim to replace fuel sources that have higher emissions profiles, such as coal and fuel oil, with cleaner sources of energy.

As detailed in the Application, the Project is designed using a modular approach to facilitate liquefaction capacity more quickly, in order to rapidly address the global shortage in available LNG. The Project facilities are in the final stages of construction and will be ready for installation and start-up within the next few months. NFE's efficient and repeatable construction process substantially reduces the cost and time to build the incremental liquefaction capacity the global energy market so urgently needs. The Project will initially involve the installation of two liquefaction systems off the coast of Altamira Tamaulipas, Mexico, in the Gulf of Mexico, each of which can produce 1.4 million metric tons of LNG per year. In the future, these facilities could be repurposed and utilized in a different location, including in waters off the coast of the United States.

Finally, DOE/FECM itself recognized in two very recent orders authorizing natural gas exports to Mexico for re-export as LNG, that proposed re-exports of LNG to non-FTA nations will improve the liquidity of international natural gas markets and will make a positive contribution to the United States' trade balance, and generate net economic benefits to the broader U.S. economy.¹

Given the foregoing public benefits, NFE Altamira respectfully requests that DOE/FECM move forward with review and approval of its pending Application, including issuance of the Environmental Assessment associated with the review of the non-FTA export authorization request and issuance of the FTA export authorization, as expeditiously as possible.

Respectfully submitted,

/s/ Lisa M. Tonery
Lisa M. Tonery
Mariah T. Johnston
Attorneys for
NFE Altamira FLNG, S. de R.L. de C.V.

See Energía Costa Azul, S. de R.L. de C.V., Order Amending Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Nations, DOE/FECM Order No. 4365-B, Docket No. 18-145-LNG (Dec. 20, 2022); Vista Pacifico LNG, S.A.P.I. de C.V., Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquified Natural Gas from Mexico to Non-Free Trade Agreement Nations, DOE/FECM Order No. 4929, Docket No. 20-153-LNG (Dec. 20, 2022).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding.

Dated at New York, N.Y., this 13th day of February, 2023.

/s/ Dionne McCallum-George Dionne McCallum-George Executive Assistant on behalf of NFE Altamira FLNG, S. de R.L. de C.V.