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January 26, 2024

Ms. Amy Sweeney
U.S. Department of Energy
Office of Fossil Energy and Carbon Management
Room 3E-052, FE-34
Forrestal Building
1000 Independence Avenue, SW
Washington, DC 20585

**Re: Carib Energy (USA) LLC, DOE/FECM Docket No. 23-____-LNG
Supplement to Application for Blanket Authorization to Export Liquefied Natural
Gas to Free Trade Agreement and Non-Free Trade Agreement Nations**

Dear Ms. Sweeney:

Pursuant to Section 3 of the Natural Gas Act and Part 590 of the regulations of the Department of Energy (“DOE”), Carib Energy (USA) LLC (“Carib Energy”) submits its Supplement to Application for Blanket Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations.

This supplement to Carib Energy’s December 13, 2023 Application provides (i) clarification concerning the potential sources of LNG exported under the requested authorization, (ii) Carib Energy’s State of incorporation, and (iii) the correct date on which its current export authorization expires.

A Verification and Opinion of Counsel also are enclosed. Carib Energy has submitted the \$50 filing fee through the online payment portal.

Please contact the undersigned with any questions concerning the enclosed supplement.

Respectfully submitted,

/s/ Paul F. Forshay
Paul F. Forshay

Counsel for Carib Energy (USA) LLC

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

Carib Energy (USA) LLC) DOE/FECM Docket No. 23-____-LNG

**SUPPLEMENT TO APPLICATION OF CARIB ENERGY (USA) LLC
FOR BLANKET AUTHORIZATION TO EXPORT
LIQUEFIED NATURAL GAS TO FREE TRADE AGREEMENT
AND NON-FREE TRADE AGREEMENT NATIONS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the Department Of Energy’s (“DOE”) regulations,² Carib Energy (USA) LLC (“Carib Energy”) hereby supplements its December 13, 2023 application to DOE/Office of Fossil Energy and Carbon Management (“DOE/FECM”) for blanket authorization to export Liquefied Natural Gas (“LNG”) to Free Trade Agreement (“FTA”) nations and to make small-scale exports of LNG to non-FTA nations. More specifically, Carib Energy has requested authorization to export up to 7.3 Bcf of LNG annually -- 14.6 Bcf over the requested two-year term -- either previously imported into Puerto Rico from foreign sources or received from sources within the United States to (i) any country with which the United States has, or in the future may enter into, a free trade agreement requiring national treatment for trade in natural gas, and (ii) any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas, which currently has or in the future develops the capacity to import LNG and with which trade is not prohibited by United States law or policy.

¹ 15 U.S.C. § 717b (a) and (c) (2018).

² 10 C.F.R. Part 590 (2022).

By this supplement, Carib Energy provides (i) clarification concerning the potential sources of LNG exported under the requested authorization, (ii) Carib Energy's State of incorporation, and (iii) the correct date on which its current export authorization expires.

I. COMMUNICATIONS

Communications regarding Carib Energy's supplement to its December 13 small-scale export application should be directed to the following:

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II. CLARIFICATION REGARDING SOURCES OF EXPORTED LNG

As described in its December 13 application, Carib Energy would export previously imported LNG from the Crowley LNG Puerto Rico Truck Loading Facility in Peñuelas, Puerto Rico ("Crowley Facility"). Carib Energy purchases previously imported LNG at the Crowley Facility. The Crowley Facility receives LNG that has been imported into Puerto Rico via the EcoEléctrica LNG Terminal. Historically, the LNG received at the EcoEléctrica LNG Terminal and ultimately purchased by Carib Energy has been imported from sources outside the United States.

With the evolving development of new global gas supply to serve Puerto Rico there is the potential for the EcoEléctrica Terminal to receive LNG from domestic as well as foreign LNG supply sources during the term of the small-scale export authorization requested by Carib Energy.

Third-party LNG suppliers would be responsible for the LNG imported into the EcoEléctrica Terminal that Carib Energy ultimately purchases at and exports from the Crowley Facility. The source location of the domestic LNG would originate from a current or possible future domestic LNG export terminal as selected by the LNG supplier. For this reason, Carib Energy’s December 13 application seeks the flexibility to export from the Crowley Facility LNG volumes “either previously imported into the Puerto Rico from foreign sources or received from sources within the United States.”³

III. CARIB ENERGY’S STATE OF INCORPORATION

The December 13 application’s description of Carib Energy neglected to provide Carib Energy’s State of incorporation. Carib Energy is incorporated in the State of Delaware.

IV. CORRECTION OF CURRENT AUTHORIZATION EXPIRATION DATE

Carib Energy’s December 13 application states that the two-year blanket export authorization granted by DOE/FECM Order No. 4772⁴ expires on April 6, 2024.⁵ Based on the April 6 date, Carib Energy requested that DOE/FECM issue an order granting the requested authorization effective “on the earlier of April 7, 2024 or the date of an order granting the requested authorization.”⁶

In fact, the authorization granted by DOE/FECM Order No. 4772 would expire one day earlier on April 5, 2024. Based on this corrected authorization expiration date, Carib Energy

³ Carib Energy Small-Scale Export Application at 1.

⁴ *Carib Energy (USA) LLC*, DOE/FECM Order No. 4772, Order Granting Blanket Authorization to Export Previously Imported Liquefied Natural Gas in ISO Containers By Vessel to Free Trade and Non-Free Agreement Nations (Dec. 20, 2021).

⁵ Carib Energy Small-Scale Export Application at 3.

⁶ *Id.* at 4.

requests that DOE/FECM grant the requested small-scale export authorization effective on the earlier of April 6, 2024 or the date of an order granting the requested authorization.

V. APPENDICES

The following appendices are included with this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

VI. CONCLUSION

Carib Energy submits the foregoing supplemental information in support of its December 13 small-scale export application to (i) provide clarification concerning the sources of LNG exported pursuant to the requested authorization, (ii) provide Carib Energy's State of incorporation, and (iii) correct the expiration date for its current two-year blanket export authorization.

Respectfully submitted,

/s/ Paul Forshay

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Counsel for Carib Energy (USA) LLC

January 26, 2024

APPENDIX A

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

Carib Energy (USA) LLC) DOE/FECM Docket No. 23-____-LNG

VERIFICATION

I, Matthew Jackson, declare that I am Vice President -- Crowley Advanced Energy and am duly authorized to make this Verification on behalf of Carib Energy (USA) LLC; that I have read the foregoing instrument and that the facts therein stated are true and correct to the best of my knowledge, information, 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 Jacksonville, Florida on January 26, 2024.

/s/ Matthew Jackson
Matthew Jackson
Vice President
Crowley Advanced Energy
9487 Regency Square Blvd.
Jacksonville, FL 32225

APPENDIX B

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

Carib Energy (USA) LLC) DOE/FECM Docket No. 23-____-LNG

OPINION OF COUNSEL

This opinion is furnished pursuant to Section 590.202(c) of the Department of Energy's Regulations, 10 C.F.R. § 590.202(c) and in connection with the supplemental information regarding the application of Carib Energy (USA) LLC ("Carib Energy") for blanket authorization to make small-scale exports of liquefied natural gas. I am counsel for Carib Energy. I have reviewed and relied upon the corporate formation documents of Carib Energy and information provided to me by its upstream parent company, Crowley Maritime Corporation. Based on the foregoing, and for the purposes of Carib Energy's application to the Office of Fossil Energy and Carbon Management, I am of the opinion that the proposed exports as described in the application and the supplemental information provided herein are within the corporate powers of Carib Energy.

Respectfully submitted,

/s/ Paul Forshay
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