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April 25, 2022

**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 No. 18-70-LNG
Registration Materials for Mexico Pacific LNG Exports, S. de R.L. de C.V.**

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” or “Registrant”) to provide the Department of Energy, Office of Fossil Energy and Carbon Management (“DOE/FE”), with certain registration materials for MPL Exports as contemplated by DOE/FE Order No. 4312 (defined below).¹

By order dated September 19, 2018 (“DOE/FE Order No. 4248”), DOE 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 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 DOE/FE Order No. 4248 was up to the equivalent of 621 Bcf/yr of natural gas for a 20-year term. In a subsequent order dated December 14, 2018 (“DOE/FE Order No. 4312”), DOE/FE granted MPL authorization to export U.S.-sourced natural gas by pipeline

¹ *Mexico Pacific Limited LLC*, DOE/FE Order No. 4248 (Sept. 19, 2018); *Mexico Pacific Limited LLC*, DOE/FE Order No. 4312 (Dec. 14, 2018).

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, for a term of 20 years. DOE/FE Order No. 4312 authorizes MPL to export LNG as an agent for others, after such other entities register with DOE/FE. DOE/FE Order No. 4312 further provides the registration materials shall include:

[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].²

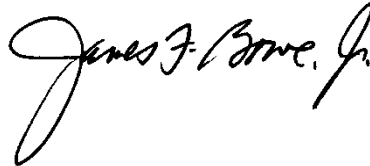
MPL Exports, an indirect, wholly-owned subsidiary of MPL, has been established for the purposes of contracting for supplies of U.S.-sourced natural gas to be liquified in the MPL LNG terminal and of securing contractual commitments to purchase that LNG. MPL will act as MPL Exports' agent in connection with the export of natural gas and the re-export of LNG to the markets MPL Exports secures. Accordingly, MPL Exports provides in **Exhibit A** to this letter the required registration material. MPL and MPL Exports respectfully request that DOE/FE give immediate effect to this registration. MPL further requests that DOE/FE reaffirm its conclusion that the natural gas exports it has authorized MPL to undertake remain not inconsistent with the public interest.

² DOE/FE Order No. 4312 at Ordering Paragraph J.

Ms. Amy Sweeney
Office of Fossil Energy and Carbon Management
April 25, 2022
Page 3

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,

A handwritten signature in black ink that reads "James F. Bowe, Jr." The signature is written in a cursive style with a large, looping initial 'J'.

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

Attachment

cc: Douglas D, Shanda, MPL
Brian Hintze, MPL
Peri Ulrey, Senior Economist, DOE

**Exhibit A
Registration
Materials of
Mexico Pacific LNG
Exports, S. de R.L.
de C.V.**

- (1) Registrant agrees to comply with DOE/FE Order No. 4312 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 is Mexico Pacific LNG Exports, S. de R.L. de C.V. The state/location of incorporation/registration is Mexico City, Mexico. The primary place of doing business is Pedregal 24, piso 3, Col. Molino del Rey, CP 11040, Miguel Hidalgo, Ciudad de México. Registrant's ownership structure is as follows: MPL Exports is owned 99.99% by Mexico Pacific Asset Holdings S. de R.L. de C.V. (Mexico) ("AssetCo") and 0.01% by Mexico Pacific Permit Holdings S. de R.L. de C.V. (Mexico); AssetCo is owned 99.9% by Mexico Pacific Limited Holdings LLC (DE) ("HoldCo") and 0.1% by Mexico Pacific Limited LLC (DE); HoldCo is owned 100% by Mexico Pacific Limited LLC, the export authorization holder and the ultimate parent company.
- (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:

Douglas D. Shanda
President and CEO
Mexico Pacific Limited
700 Louisiana, Suite 2410 | Houston, TX 77002
dshanda@mpllng.com
Phone number: 713-589-7451

- (4) MPL and MPL Exports intend to file with DOE/FE the agreement under which MPL Exports will export natural gas and re-export LNG produced at the MPL facility and MPL will act as MPL Exports' agent in connection with such exports. There are no other long-term contracts for natural gas supply or LNG sales to which MPL is a party that have not been filed with DOE/FE.