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**VIA EMAIL**

Ms. Larine A. Moore  
Docket Room Manager, Office of Fossil Energy and Carbon Management (FE-34)  
Office of Regulation, Analysis, and Engagement  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

**Re: Mexico Pacific Limited LLC  
FE Docket Nos. 18-70-LNG and 22-167-LNG  
April 2024 Semi-Annual Report**

Dear Ms. Moore:

Pursuant to Ordering Paragraph J of DOE/FE Order No. 4248,<sup>1</sup> Ordering Paragraph N of DOE/FE Order No. 4312,<sup>2</sup> and Ordering Paragraph J of DOE/FECM Order No. 4995,<sup>3</sup> I submit to the Department of Energy's ("DOE") Office of Fossil Energy and Carbon Management ("DOE/FECM") on behalf of Mexico Pacific Limited LLC ("MPL") this semi-annual report describing the progress MPL has made in the development and commercialization of its proposed LNG production and storage facility to be located in the State of Sonora, Mexico (the "MPL Facility").

MPL has made significant progress in advancing the project since MPL filed its October 2023 Semi-Annual Report:

- (i) The Government of Mexico maintains an extensive and robust project review and approval protocol largely governed by two relevant federal statutes: (i) *Ley de Hidrocarburos* and (ii) *Ley General del Equilibrio Ecológico y la Protección al Ambiente* (LGEEPA). Competent regulatory agencies in Mexico have completed numerous safety, environmental, social, and cultural reviews pertaining to the construction and operation of the MPL Facility and associated pipelines. The MPL Facility has now received all federal, state, and municipal permits necessary to commence construction, including a renewed environmental impact assessment issued by the *Agencia de Seguridad, Energía y Ambiente* (ASEA) in October 2023 and a series of social impact assessments for the MPL Facility and associated pipelines issued by *Secretaría de Energía* (SENER) in November 2023, among others.
- (ii) On November 14, 2023, the Government of the State of Chihuahua and MPL signed a collaboration agreement supporting the developing of MPL's Sierra Madre Pipeline. The collaboration agreement focuses on energy technology, logistics, security, and community engagement, among other issues. It was signed by the Governor of Chihuahua during a state-sponsored conference called *Foro-Expo Internacional de Energía 2023*.
- (iii) On November 27, 2023, MPL announced that it had awarded the engineering, procurement, and construction (EPC) contracts for its Sierra Madre Pipeline to a joint venture of GDI Sicim Pipelines and Bonatti, each with extensive and proven track records of pipeline execution and delivery in Mexico. The contractors entered into lump-sum turnkey EPC contracts for the Sierra Madre Pipeline, including the compressor stations to be constructed in the States of Sonora and Chihuahua.
- (iv) On November 30, 2023, and again on February 14, 2024, *Secretaría de Economía* identified MPL as the largest private investment in Mexico. As we reported in our October 2023 Semi-Annual Report, the project remains a foundational pillar of the Sonora Plan, which seeks to promote clean energy development, investment, and economic prosperity for the benefit of Mexico and its North American allies.

<sup>1</sup> *Mexico Pacific Limited LLC*, DOE/FE Order No. 4248 (Sept. 19, 2018).

<sup>2</sup> *Mexico Pacific Limited LLC*, DOE/FE Order No. 4312 (Dec. 14, 2018).

<sup>3</sup> *Mexico Pacific Limited LLC*, DOE/FECM Order No. 4995 (Apr. 28, 2023).

- (v) On December 14, 2023, *Secretaría de Marina* (SEMAR), Mexico's Navy, and MPL signed a collaboration agreement supporting an energy infrastructure project of strategic importance to Mexico and the U.S.-Mexico bilateral relationship. Pursuant to the agreement, the parties are focused on security of the MPL Facility, associated pipelines, and personnel, as well as rehabilitation of a government-owned airfield close to the MPL Facility that will provide logistical benefits during the construction and operations phases of the project.
- (vi) On February 27, 2024, Ivan Van der Walt, MPL's Chief Executive Officer, was appointed Chair of the U.S.-Mexico Economic Council, the leading platform for high-level dialogue among business and government leaders of the two countries. Under his leadership, the Council will continue its vital work in boosting economic growth and facilitating trade and investment between the U.S. and Mexico.

Further, in the last six months, MPL affiliate Mexico Pacific LNG Exports S. de R. L. de C. V. ("MPL Exports") has entered into, and filed with DOE/FECM, a Sale and Purchase Agreement dated January 5, 2024, with ExxonMobil Asia Pacific Pte. Ltd. for approximately 1.2 MPTA of LNG from the MPL Facility. Also, since MPL filed its October 2023 Semi-Annual Report, on December 5, 2024, MPL Exports entered into, and subsequently filed with DOE/FECM, a Sale and Purchase Agreement with Woodside Energy Trading Singapore Pte. Ltd. for approximately 1.3 MPTA of LNG from the MPL Facility. Collectively, as of April 1, 2024, MPL and MPL Exports have entered into contracts providing, in aggregate, for the sale of just over 11.5 MPTA of LNG produced in the MPL Facility to third parties. These agreements evidence strong market demand for the LNG to be supplied from the MPL Facility.

As MPL has said in prior filings submitted to DOE/FECM, MPL anticipates that it will receive U.S.-sourced natural gas for liquefaction in the MPL Facility through both existing and newbuild gas transmission pipeline systems.<sup>4</sup> The U.S. portion of one such newbuild pipeline system will be developed and constructed by Saguaro Connector Pipeline, L.L.C. ("Saguaro Connector"). The route of the Saguaro Connector pipeline will originate in the vicinity of the Waha Hub in West Texas and will terminate at a border crossing pipeline facility to be constructed at the International Boundary between the U.S. and Mexico in the Rio Grande River in Hudspeth County, Texas.

The Federal Energy Regulatory Commission (the "Commission") recently granted Saguaro Connector a Presidential Permit and authorization pursuant to section 3 of the Natural Gas Act, Part 153 of the Commission's regulations, and Executive Order Nos. 10485 and 12038 to site, construct, and operate a natural gas pipeline and related facilities for the export of natural gas at the International Boundary. *Saguaro Connector Pipeline, LLC*, 186 FERC ¶ 61,114 (Feb. 15, 2024), *reh'g pending*. In that order, the Commission noted that the Secretaries of State and Defense have indicated that they have no objections to the issuance of the proposed Presidential Permit to Saguaro Connector. For its part, the Commission rejected arguments that the Saguaro Connector project is not needed, and that the project's adverse impacts outweigh its benefits, finding that project opponents had failed to make the affirmative showing of inconsistency with the public interest that is necessary to overcome the statutory presumption in section 3 favoring authorization of natural gas exports. Saguaro Connector filed its Testimony of Acceptance of all provisions, conditions, and requirements of the Presidential Permit in Commission Docket No. CP23-29-000 on March 13, 2024.

Finally, MPL is currently in advanced discussions with prospective lenders that will provide financing for the MPL project. In addition, the company is currently in the final stages of negotiating commercial terms for the engineering, procurement and construction agreements with international construction contractors experienced in the construction of LNG terminal and storage facilities that will provide for the construction of the MPL Facility and related infrastructure. MPL expects to achieve additional progress towards a positive final investment decision for the MPL Facility prior to filing its next semi-annual report in October 2024.

If you have any questions regarding this submission, please contact me at (713) 589-7457.

Sincerely,



Krysta De Lima  
General Counsel and Corporate Secretary  
Mexico Pacific Limited LLC

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<sup>4</sup> See, e.g., Supplement to Application of Mexico Pacific Limited LLC for Additional Long-Term, Multi-Contract Authorization to Export Natural Gas to Mexico and to Re-export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations – Supplemental Information on Available Pipeline Transportation Alternatives, Docket No. 22-267-LNG (Jan. 24, 2023).