

RECEIVED

By Docket Room at 4:30 pm, May 10, 2024

SheppardMullin

Sheppard, Mullin, Richter & Hampton LLP
2099 Pennsylvania Avenue, NW, Suite 100
Washington, D.C. 20006-6801
202.747.1900 main
202.747.1901 fax
www.sheppardmullin.com

Mark F. Sundback
202.747.1946 direct
msundback@sheppardmullin.com

May 10, 2024

VIA E-MAIL

File Number. 94NM-384134

Ms. Amy Sweeney
Director, Office of Regulation, Analysis, and
Engagement
U.S. Department of Energy
Office of Fossil Energy and Carbon
Management
FE-34 - ROOM 3E-056
1000 Independence Avenue, S.W.
Washington, D.C. 20585
E-Mail: fergas.gov

Re: Gato Negro Permitium Uno, S.A.P.I. de C.V., Docket No. 24-43-LNG

Dear Mrs. Sweeney:

Enclosed for filing on behalf of Gato Negro Permitium Uno, S.A.P.I. de C.V. ("Gato"), please find attached Gato's Application for Long-Term Authorization to (1) Export Natural Gas to Mexico and (2) Upon Liquefaction, Re-Export LNG to Other Free Trade Agreement Countries and Request for Expedited Consideration. As noted therein, Gato respectfully requests that DOE/FECM issue the requested authorization on or before September 1, 2024. This filing includes the following:

1. Transmittal Letter
2. Application
3. Appendix A – Verification
4. Appendix B – Opinion of Counsel
5. Appendix C – Location of Pipeline Facilities
6. Appendix D – (Confidential) Property Documentation for the Liquefaction Project site

The volumes requested for authorization have been changed from Gato's April 19, 2024 filing by virtue of additional demand that appears to have arisen for service from this project. The April

Amy Sweeney
May 10, 2024
Page 2

19, 2024 filing thus should be deemed superseded as to volumes and any other statement contained therein inconsistent with the instant filing.

Gato hereby requests privileged and confidential treatment of the Confidential Exhibit contained in Appendix D and an exemption from disclosure under the Freedom of Information Act, 5 U.S.C. § 552, as amended. See *also* 10 C.F.R. §§ 590.202(e) and 1004.11. That material, which constitutes Appendix D, will be sent under separate correspondence to the Department via overnight courier, and marked as non-public information.

Pursuant to 10 C.F.R. § 590.207, Gato has transmitted the \$50.00 filing fee via pay.gov. Please return a date-stamped copy of the filing at your earliest convenience.

Please contact me if you have any questions.

Sincerely,

/s/ Mark F. Sundback
Mark F. Sundback
Attorney for Gato Negro Permitium Uno, S.A.P.I de C.V.

SMRH:4859-5013-6765.1

cc: Jennifer Wade
Peri Ulrey

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

)
Gato Negro Permitium Uno, S.A.P. I. de C.V.) Docket No. 24-43-LNG
)

**APPLICATION OF GATO NEGRO PERMITIUM UNO, S.A.P. I. de C.V.
FOR EXPEDITIOUS LONG-TERM AUTHORIZATION TO EXPORT
NATURAL GAS TO MEXICO FROM THE UNITED STATES AND UPON
LIQUEFACTION, RE-EXPORT LNG FROM MEXICO TO OTHER FTA COUNTRIES**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the Department of Energy (“DOE”) Regulations,² Gato Negro Permitium Uno, S.A.P. I. de C.V. (“Applicant” or “Gato”)³ hereby applies (“Application”) to DOE’s Office of Fossil Energy and Carbon Management (“DOE/FECM”)⁴ for expeditious long-term authorization to export via pipeline initially to Mexico up to 0.647 billion cubic feet (“Bcf”) per day of natural gas, and ultimately re-export for delivery to any country that has signed a Free Trade Agreement with the United States (“FTA”) (such countries are “FTA Countries”) up to 0.556 Bcf/d of liquefied natural gas (“LNG”). Applicant requests this authorization for a 20-year term commencing on September 1, 2027, on its own behalf and as agent for affiliates of Applicant who may hold title to the natural gas at the time of export.

Applicant requests authorization to export natural gas via pipeline to Mexico, an FTA

¹ 15 U.S.C. § 717b.

² 10 C.F.R. Part 590.

³ Big River Energy, LLC, an affiliate of Applicant, was granted authority under a Blanket Authorization to Export Natural Gas to Mexico in FECM Docket No. 22-151-NG on December 15, 2022. *See* DOE/FECM Order No. 4938.

⁴ Authority to regulate the imports and exports of natural gas, including liquefied natural gas, under section 3 of the NGA (15 U.S.C. § 717b) has been delegated to the Assistant Secretary for FECM in Redelegation Order No. S4-DEL-FE1-2021, issued on March 25, 2021. On July 4, 2021, the Office of Fossil Energy changed its name to the Office of Fossil Energy and Carbon Management.

nation requiring national treatment for trade in natural gas. Once in Mexico, the volumes may be liquefied in the Gato Negro Manzanillo LNG plant under development in the State of Colima, Mexico (“Manzanillo Plant”). Once liquefied, the methane could be exported to other FTA Countries. Section 3(c) of the NGA provides that such exports are “deemed to be within the public interest,” and that applications for such exports must be granted “without modification or delay.”⁵ Applicant expects to sign contractual obligations associated with sales of gas involved in the Project as of September 1, 2024. Hence, Applicant requests that DOE/FECM issue an order no later than September 1, 2024, granting the authorization requested in the Application without modification or further delay, for natural gas exportation to Mexico and re-exportation of LNG to any country with which the U.S. has a Free Trade Agreement.

In support of this Application, Applicant respectfully states as follows:

I. DESCRIPTION OF APPLICANT

The exact legal name of the Applicant is Gato Negro Permitium Uno, S.A.P. I. de C.V. Applicant is a corporation organized under the laws of Mexico. Applicant is engaged in arranging natural gas export volumes from the U.S. to FTA Countries. Affiliates of Applicant are involved in developing a liquefaction complex in Manzanillo, Mexico to provide LNG to markets accessible through shipping in the Pacific Ocean. Applicant has its principal place of business at Montes Urales 754, Piso 4, Col. Lomas de Chapultepec C.P. 11000, Ciudad de México. Half of the outstanding shares in Gato is owned by Mr. Carlos Camacho, and half is owned by Mr. Emilio Fuentes (both of whom are citizens of Mexico), who also own, in the same proportions, the

⁵ 15 U.S.C. § 717b(c) (“For purposes of this section . . . the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and applications for such [] exportation shall be granted without modification or delay.”).

outstanding voting securities of affiliates Gato Negro Permitium Duo, S.A.P.I, de C.V. and Gato Negro Manzanillo S.A.P.I., de C.V., the latter of which is directly involved in developing the Manzanillo Plant.

II. COMMUNICATIONS

All communications and correspondence regarding this Application, including all service of pleadings and notice, should be addressed to the following persons:

Mark F. Sundback
Sheppard, Mullin, Richter & Hampton LLP
2099 Pennsylvania Avenue, NW, Suite 100
Washington, D.C. 20006-6801
Telephone: 202.747.1946
Fax: 202.747.1901
Email: msundback@sheppardmullin.com

Steve Magness
Agent for
Gato Negro Permitium Uno, S.A.P. I. de C.V.
5726 Bayou Glen Road
Houston, TX 77057
Telephone: 405.535.6077
Email: smagness@bigriverenergy.com

III. PROJECT DESCRIPTION

A. LNG Facility

Applicant requests long-term authorization to export up to 0.647 Bcf per day of natural gas to Mexico via pipeline. The liquification will occur at an approximately 24.7 acre site, controlled by Applicant's affiliates, in Manzanillo. A map of the location of the facility is included in Appendix D. The specific map is filed under seal. The Project's exact location could be used by competitors in an effort to capture commercial advantage, or raise the cost to Applicant of accessing that property, and hence is entitled to protected treatment.

The major components that will be constructed as part of the Project include: (a) up to four (4) liquefaction trains capable of producing up to approximately 4 MMTA of LNG and a gas pre-treatment unit for removal of Mercury, acid gas, water, and natural gas liquids; (b) a marine jetty; (c) emergency vapor management equipment; (d) piping and other facilities to permit the interconnection of the Project to existing pipeline infrastructure and (e) associated utilities

interconnections. Feed gas for the Project will be supplied through the TC Energy Guadalajara Manzanillo pipeline. New or modified utilities and offsite facilities will be provided for the Project as required.

The Project will use a modular structure employing a refrigerant technology process. Exported volumes may be liquefied to be re-exported from the Manzanillo Plant to other nations with whom the U.S has entered into a Free Trade Agreement, or transported for consumption in Mexico (all of the foregoing, “FTA Countries”). The LNG will be loaded for ocean-going transport. In addition, the Manzanillo Plant will include a truck rack in case some proportion of the natural gas volumes would be resold and consumed in Mexico.

The Manzanillo plant’s location will benefit signatories to Free Trade Agreements with the U.S., including not only Mexico but Columbia, the Republic of Korea, Singapore, Chile, and Costa Rica because the LNG from Manzanillo will not need to transit the potential bottleneck of the Panama Canal that other LNG supplies from the U.S. Gulf Coast may experience when headed into the Pacific. The Manzanillo location also will reduce consumption of maritime fuel for ships transporting LNG to countries located on the Pacific Ocean relative to those cargoes that might serve the same markets that are transported from the U.S. Gulf Coast.

B. Transport to Manzanillo

Applicant will source the natural gas that it intends to export to Mexico and other FTA Countries pursuant to the requested authorization from the highly liquid Waha trading hub in Texas. The Commodity Futures Trading Commission has found that “[t]he Waha hub is a major trading center for natural gas in the United States [based in part on] . . . [t]he substantial volume of trading and open interest in the WAH contract. . . . The Commission notes that the Waha hub is a major natural gas trading point.” *See* 75 Fed Reg. 24655-24662 (5/5/2010).

Through the upstream interconnection at the highly liquid Waha trading hub, Applicant

will be able to source gas from a variety of suppliers in the domestic market.

Applicant plans on exporting natural gas to FTA Countries through the duration of the 20-year term of the authorization requested herein, by negotiating and entering into one or more supply agreements of various durations with natural gas producers and marketers in the Permian Basin and potentially other production areas in Texas. Consistent with other export authorization applicants, Applicant may supply a substantial part of such exports through short-term agreements and spot market purchases. Maintaining this flexibility to acquire natural gas supplies from multiple producers on different terms will allow Applicant to access a diversity of natural gas supplies on favorable economic terms.

Applicant has not entered into any long-term natural gas supply arrangements with producers or marketers as of the date of this Application. Applicant will file with DOE/FECM, under seal, all executed long-term supply agreements associated with the export of natural gas under the requested authorization within 30 days of execution of such agreements, in each case in accordance with DOE's regulations.

Applicant will enter into agreements to receive transportation service on one or more connecting pipelines, starting with capacity on one or more U.S. pipelines transporting volumes to border-crossings with Mexico ("Pipeline Capacity"). The options available are:

1. Roadrunner Pipeline, LLC ("Roadrunner")⁶ an intrastate pipeline accessing the San Elizario border crossing point, originating near Cayanosa, Texas. Roadrunner transports up to 640 MMcf/d through approximately 200 miles of 30-inch diameter pipeline. ONEOK is the operator of the pipeline;

⁶ ONEOK Partners, L.P. (NYSE: OKS) owns half of the 50-50 joint venture in Roadrunner with a subsidiary of Esentia Energy, formerly Fermaca Infrastructure B.V. (Fermaca), a Mexico City-based natural gas infrastructure company.

2. The Comanche Trail Pipeline, LLC, with a capacity of 1.1 Bcf/d, an intrastate pipeline operated by Energy Transfer which follows approximately the same route as Roadrunner;⁷ and

3. Trans-Peco Pipeline, LLC (“TPP”), which is an intrastate pipeline that also originates in the Waha area and delivers gas to the border-crossing point that is adjacent to the State of Chihuahua.⁸

The Pipeline Capacity will transport the volumes to two points on the U.S.-Mexico border:

A. The San Elizario Border Crossing to Mexico, located along the international border between the United States (about 40 miles from El Paso, Texas) and Mexico in the vicinity of Colombia, State of Nuevo León will be accessed by Roadrunner and Comanche Trail. There volumes will be tendered to the Tarahumara Gas Pipeline owned by Esentia Energy, formerly known as Fermaca de Mexico. Tarahumara is regulated by the Comisión Federal de Electricidad. Esentia is a leading gas infrastructure player in Mexico that develops, builds, owns, and operates pipelines and other related energy assets in the country. Its current-operating pipelines are capable of transporting 1.2 billion cubic feet per day.

B. The Presidio/Ojinaga border-crossing in the State of Chihuahua will be accessed by TPP. Supplies available at Presidio/Ojinaga will be transported in the Gasoducto Ojinaga-El Encino system for 220 kilometers before connecting to the Wahalajara system. Gasoducto is operated by Semptra and owned by Comisión Federal de Electricidad.

C. Mexican Regulatory Review of the Project and Pipelines in Mexico

The Project does not involve construction in the United States. Given the location of the

⁷ Comanche Trail is subject to a Statement of Operating Conditions on file with FERC. *See* FERC Docket No. PR22-67-000 (1/18/22) letter from J. White, Director of Regulatory Affairs to Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission.

⁸ TPP has a Statement of Operating Conditions on file with FERC. *See* FERC Docket No. PR22-68.

Project in Mexico, the facility will not be subject to the review of the FERC under the NGA or NEPA. Instead, the Project and any pipeline facilities that may be constructed in Mexico are subject to review and approval by Mexican agencies under the state and federal laws of that nation.

Gato began the Mexican permitting process in June 2022. Over one hundred permits, licenses or authorizations in Mexico are required, including archaeological, construction, water, commercial and transportation and, as detailed below, environmental. The Mexican permitting process includes a thorough environmental review under Mexican state and federal legislation analogous to the review conducted by U.S. agencies under NEPA. Specifically, Mexico's primary statute governing the environmental reviews of projects is the Ley General del Equilibrio Ecológico y la Protección al Ambiente/General Law of Ecological Balance and Environmental Protection ("LGEEPA"), which is administered by the Secretaría de Medio Ambiente y Recursos Naturales/Ministry of Environmental and Natural Resources ("SEMARNAT"). Within the SEMARNAT, the Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos/National Agency for Industrial Security and Environmental Protection for the Hydrocarbon Industry ("ASEA"), is responsible for regulating and supervising industrial, operational and environmental safety for projects related to the hydrocarbon sector, including the construction of natural gas pipelines and liquefaction facilities.

As part of ASEA's review of projects under the LGEEPA, a Manifestación de Impacto Ambiental/Environmental Impact Assessment ("MIA") must be prepared. Similar to an Environmental Impact Assessment Statement ("EIS") under NEPA, a MIA presents the results of comprehensive analysis and studies of potential environmental impacts associated with a project, including site preparation, construction, operation, and decommissioning, as well as an assessment of measures to mitigate environmental impacts and an analysis demonstrating compliance with

Mexican laws and regulations, as well as prudent industry practices and international standards. The MIA must describe the stages of construction and the ecosystems in which it will be developed. The document presents the results of comprehensive analyses and environmental studies, including an assessment of mitigation measures. The MIA for gas pipelines and liquefaction facilities must also include an Environmental Risk Analysis, which analyzes safety and risk mitigation procedures.

If ASEA concludes that a project is environmentally viable, it will issue a resolution approving the MIA and an Environmental Impact Authorization (“ERA”), which specifies the authorization’s terms and conditions, including required measures to mitigate environmental impacts. In doing so, ASEA reviews public consultation process inputs. Various federal and state agencies are notified during the evaluation process. The ASEA enforces the terms of a MIA and the ERA falls under the jurisdiction of ASEA, which can periodically verify to ensure compliance with all applicable environmental regulations, as well as the terms and conditions of environmental permits. ASEA also oversees a facility’s continued compliance with applicable laws, regulations, and conditions governing safety, risk mitigation, technical processes, and the environment through enforcement of the Sistemas de Administración de Seguridad Industrial, Seguridad Operativa y Protección/Industrial, Operational, and Environmental Safety Management System.

ASEA also reviews and issues authorizations for projects, such as pipelines and liquefaction facilities, that will impact existing land use. In reviewing such proposals, ASEA relies upon a technical opinion issued by the members of the Consejo Forestal Estatal/State Forestry Council in the form of an Estudio Técnico Justificativo/Technical Justification Study submitted by the applicant analyzing impacts regarding biodiversity and discussing effects on soil erosion, detriment to water quality, or diminished rate of recovery, among other environmental impacts.

Any land use change must be authorized by ASEA in a permit referred to as a Cambio de Uso de Suelo en Terrenos Forestales/Forestry Land Use Change Permit which also specifies mitigation requirements similar to those included in the MIA

Project proponents in the hydrocarbon industry, including pipeline and liquefaction facilities, must perform a Social Impact Assessment (“Evaluación de Impacto Social”) (“EvIS”) identifying, characterizing, and assessing social impacts stemming from the project and propose a social management plan. The EvIS is subject to review and approval of the Secretaría de Energía/Ministry of Energy. In addition, permits are required from the Comisión Reguladora de Energía/Energy Regulatory Commission to engage in activities that are subject to third-party access and those activities that are not subject to third-party access but require a permit, including the self-supply of electric energy, transportation, liquefaction regasification, and storage of natural gas in Mexico.

Applicant anticipates receipt no later than the third quarter of this year of all permits to be issued by Mexican authorities that are necessary for construction.

IV. REQUESTED AUTHORIZATION

Applicant requests long-term authorization to export up to 0.647 Bcf per day of natural gas to Mexico via pipeline for a 20-year term⁹ commencing on September 1, 2027, on its own behalf and as agent for others¹⁰ who hold title to the natural gas at the time of export. Applicant further requests authority to re-export from Mexico to any other FTA Country such volumes, less pipeline system lost, unaccounted-for and fuel volumes and amounts consumed for liquefaction at the

⁹ A long-term authorization need not be limited by the terms of the associated long-term commercial agreements. *See, e.g., SB Power Solutions Inc.*, Docket No. 12-50-LNG, DOE/FECM Order No. 3105 (Jun. 15, 2012) (granting 25-year authorization without coextensive long-term arrangements).

¹⁰ Such affiliates would include any entity, directly or indirectly, through one or more intermediaries, controlling, controlled by, or under common control with the Applicant. It may also include unaffiliated entities.

Manzanillo Plant.¹¹ This application seeks authority to re-export to FTA Countries aside from Mexico the equivalent of 0.556 Bcf/d, or 10,959 Mt/d of LNG.

Applicant will fully comply with all applicable DOE/FECM requirements for both exporters and their agents, including but not limited to registering with DOE/FECM each natural gas title holder that Applicant seeks to export natural gas as agent and providing DOE/FECM a written statement by the title holder that acknowledges and agrees to (1) comply with all requirements in Applicant's long-term export authorization and (2) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.¹² Applicant will file any long term gas supply or long term export contracts with DOE/FE, under seal, and provide relevant information in accordance with DOE regulations,¹³ once executed.

An affiliate of Applicant currently has a blanket authorization to export up to 13.58 Bcf of natural gas to Mexico via pipeline pursuant to DOE/FECM Order No. 4938 for a two-year term that began on December 15, 2022. That affiliate has also applied for authority to export natural gas only to Mexico and only by truck, and only through 2030. That authorization in no way overlaps with the instant Application. Applicant further states that, to the best of its knowledge, the same or any related matter is not being considered by any other part of DOE, including the Federal Energy Regulatory Commission, or any other Federal agency or department.

V. PUBLIC INTEREST STANDARD

The authorization requested in the Application is consistent with the public interest.

¹¹ Applicant anticipates that lost, unaccounted for and fuel volumes associated with transmission on pipelines in Mexico will not exceed 7.6%, and that fuel and loss for liquefaction will not exceed 6.6%, of the total export authorization, and may be materially lower.

¹² Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC, DOE/FECM Order No. 2913 (Feb. 10, 2011) (establishing the criteria for exports for agents subsequently adopted in a number of orders); Gulf Coast LNG Export LLC, DOE/FECM Order No. 3163 at 7-8 (Oct. 16, 2012) (reiterating agency policy).

¹³ See e.g., 10 C.F.R. § 1004.1, *et seq.*

Section 3(a) of the NGA states that DOE/FECM shall authorize the export of natural gas unless DOE/FECM “finds that the proposed exportation . . . will not be consistent with the public interest.”¹⁴ Under Section 3(c) of the NGA, “the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and applications for such [] exportation shall be granted without modification.”¹⁵ Because Applicant requests authorization for the export of natural gas from the United States to Mexico, and any other nation that has an FTA requiring national treatment for trade in natural gas in effect, such authorization meets the criterion of NGA Section 3(c) and is therefore consistent with the public interest. As such, Applicant requests DOE/FECM to grant this Application without modification or delay, consistent with Section 3(c) of the NGA.

VI. ENVIRONMENTAL IMPACT

The authorization requested in the Application is not expected to have any environmental impacts. The natural gas to be exported pursuant to such authorization will be transported over existing pipeline facilities within the United States, across the U.S.-Mexico border, and within Mexico. No new facilities or major facility modifications or additions will be required in order for Applicant to export such natural gas to Mexico from the United States. Consequently, granting this Application will not constitute a federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act.¹⁶ Therefore,

¹⁴ 15 U.S.C. § 717b(a).

¹⁵ *Id.* at § 717(b)(c).

¹⁶ 42 U.S.C. § 4321, *et seq.* See also Categorical Exclusion B5.7, 10 C.F.R. Part 1021, Subpart D, Appendix B (providing a categorical exclusion for any “[a]pprovals or disapprovals of new authorizations or amendments of existing authorizations to export natural gas under section 3 of the Natural Gas Act and any associated transportation of natural gas by marine vessel.”).

an environmental impact statement or environmental assessment is not required.

VII. APPENDICES

The following appendices are submitted as part of this Application:

Appendix A	Verification
Appendix B	Opinion of Counsel
Appendix C	Location of Pipeline Facilities
Appendix D	Site-specific Map (Protected Material)

VIII. CONCLUSION

WHEREFORE, for the foregoing reasons, Applicant respectfully requests that DOE/FECM grant by September 1, 2024, without modification, Applicant's request for authorization to export up to 0.647 Bcf/d of natural gas to Mexico via pipeline and authorization to re-export LNG to FTA Countries aside from Mexico up to 0.556 Bcf/d, for a 20-year term commencing on September 1, 2027.

Respectfully submitted,


<p><u>/s/ Mark F. Sundback</u> Mark F. Sundback Sheppard, Mullin, Richter & Hampton LLP 2099 Pennsylvania Avenue, NW, Suite 100 Washington, D.C. 20006-6801 Telephone: 202.747.1946 Fax: 202.747.1901 Email: msundback@sheppardmullin.com <i>Attorney for Gato Negro Permitium Uno, S.A.P. I. de C.V.</i></p>

Dated: May 10, 2024

APPENDIX A
(Verification)

State of TEXAS)
)
County of HARRIS)

I, Steve Magness, being first duly sworn, hereby affirm that: as Gato Negro Permitium Uno, S.A.P. I. de C.V.'s Manager. I am authorized to execute this verification on behalf of Gato Negro Permitium Uno, S.A.P. I. de C.V.; I have read the foregoing Application and am familiar with the contents thereof; and that all allegations of fact therein contained are true and correct to the best of my knowledge, information and belief.


Name _____
Title: Manager

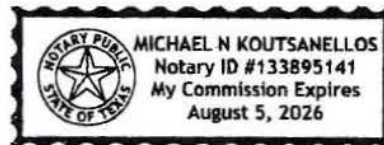
Subscribed and sworn to before me
This 3rd of April, 2024



Notary Public

My Commission Expires:

8/5/2026



APPENDIX B
Opinion of Counsel

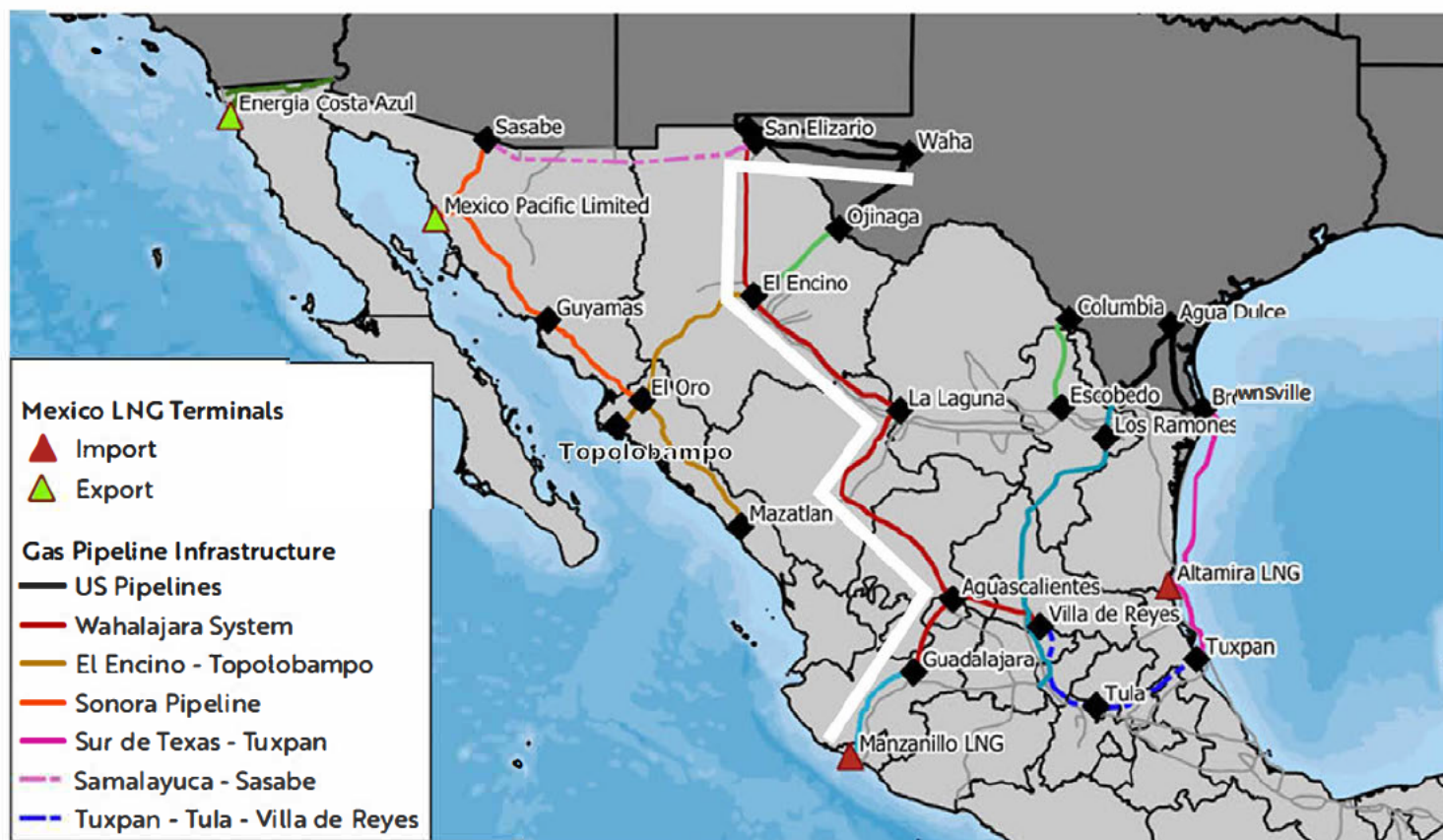
This opinion is submitted pursuant to Section 590.202(c) of the Department of Energy administrative procedures. The undersigned is counsel to Gato Negro Permutium Uno, S.A.P. I. de C.V. for this purpose.

It is my opinion that the proposed import/export of natural gas is/are within the company's corporate powers.

A handwritten signature in black ink, appearing to read "Emilio Paulon Fuentes", written over a horizontal line.

Name: Emilio Paulon Fuentes
Legal Representative

APPENDIX C
Location of Facilities



Note: Map only contains a subset of current and pending pipelines

APPENDIX D
Map

Materials Provided Under Seal