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

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In the Matter of

JAX LNG, LLC

Docket No. 24-___-LNG

APPLICATION OF JAX LNG, LLC FOR LONG-TERM, MULTI-CONTRACT AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS TO FREE-TRADE AGREEMENT AND NON-FREE TRADE AGREEMENT NATIONS

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Counsel for JAX LNG, LLC

Filed: July 25, 2024

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

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Pursuant to Section 3 of the Natural Gas Act ("NGA") 1 and Part 590 of the Department of

Energy's ("DOE") regulations, <u>2</u> JAX LNG, LLC ("JAX") hereby files this application ("Application") with the Office of Fossil Energy and Carbon Management of the DOE ("DOE/FECM") for long-term, multi-contract authorization, including related short-term authorization, <u>3</u> to export domestically produced liquefied natural gas ("LNG"). Specifically, JAX requests authorization to export LNG of up to the equivalent of 51.75 billion cubic feet ("Bcf") of natural gas per year to any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the United States either (1) has a Free Trade Agreement ("FTA") requiring national treatment for trade in natural gas 4 or (2) does not have such a FTA but with which trade is not prohibited by United States law or

<u>1</u> 15 U.S.C. § 717(b) (2018).

<u>2</u> 10 C.F.R. Part 590 (2024).

4 The U.S. currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. In addition to current FTA nations, JAX expressly requests that its FTA authorization include any additional nation which DOE subsequently identifies publicly as having entered into a free trade agreement providing for national treatment for trade in natural gas, or that otherwise is treated as (or equivalent to) an FTA nation by the United States, provided that the destination

<u>3</u> DOE/FE issued a Policy Statement on December 18, 2020, discontinuing its practice of issuing separate long-term and short-term authorizations for exports of natural gas from the same facility. "Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis," Policy Statement, 86 Fed. Reg. 2243 (Jan. 12, 2021). Instead, long-term authorizations to export domestically produced natural gas may include additional authority to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis. Accordingly, JAX requests that its long-term authorization also allow for LNG exports on a short-term or spot basis.

policy ("non-FTA" nations). With respect to exports to non-FTA nations, the Application is submitted under DOE's rule expediting the application and approval process for "small-scale" natural gas exports, as no construction of any facilities is required or proposed. <u>5</u> JAX requests this export authorization for use on behalf of itself when it owns the LNG and as agent for other entities with which JAX may contract that would hold title to the LNG at the time of export, for a period extending through the end of 2050, consistent with DOE/FECM policy.<u>6</u>

JAX respectfully requests the DOE/FECM grant the authorizations requested herein expeditiously and without the need for administrative procedures, consistent with its treatment of similar "small-scale" export applications.<u>7</u> In support of this Application, JAX respectfully shows as follows:

I. DESCRIPTION OF THE APPLICANT

The exact legal name of JAX is JAX LNG, LLC. JAX is a limited liability corporation organized

and existing under the laws of the State of Delaware with its principal place of business located at 10700

Energy Way, Glen Allen, Virginia, 23060. JAX is jointly owned, in 50/50% shares, by Pivotal LNG,

LLC ("Pivotal") and Seaside LNG, LLC ("Seaside").

Pivotal is a limited liability corporation organized and existing under the laws of the State of

Delaware and is a majority-owned and controlled subsidiary of Berkshire Hathaway Energy Gas

nation has the capacity to import LNG. For ease of reference, JAX refers herein to all such nations simply as "FTA nations."

^{5 10} C.F.R. §590.208(a) (2023); *Small-Scale Natural Gas Exports*, Final Rule, 83 Fed. Reg. 35106 (July 25, 2018)(hereinafter the "Small-Scale Exports Rule").

⁶ Effective August 25, 2020, DOE/FECM discontinued its prior practice of granting a standard 20-year export term for long-term authorizations to export domestically produced natural gas from the lower-48 states to non-FTA nations and instead adopted a term through December 31, 2050, as the standard export term for long-term non-FTA authorizations, unless a shorter term is requested by the applicant. "Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050," Notice of Final Policy Statement and Response to Comments, 85 Fed. Reg. 52237 (Aug. 25, 2020).

<u>7</u> Because this Application qualifies under the Small-Scale Exports Rule, the "pause" on pending approvals of new non-FTA LNG export authorizations is not applicable here. *See* DOE/FECM posting "The Temporary Pause on Review of Pending Applications to Export Liquefied Natural Gas" at n. 1 (undated, but stating that it is "current as of February 2024), available at: <u>https://www.energy.gov/sites/default/files/2024-02/The%20Temporary%20Pause%20on%20Review%20of%20Pending%20Applications%20to%20Export%20Liqu efied%20Natural%20Gas_0.pdf.</u>

Transmission and Storage ("BHE GT&S"), with business offices located at 10700 Energy Way Glen Allen, VA 23060. Pivotal's primary business includes the development, ownership, and operation of LNG facilities and the sale of LNG. Pivotal operates three facilities that produce LNG, including the JAX facility.

Seaside is a limited liability corporation organized and existing under the laws of the State of Delaware and its principal offices are located at 1700 City Plaza Dr., Suite 400 Spring, TX. Seaside was established to meet the growing supply needs for LNG for a wide range of industries including maritime transportation and aerospace. Seaside is focused on safely delivering domestically produced LNG to end users utilizing assets throughout the coastal United States, and the company builds and invests in infrastructure and assets both marine and on land in order to establish new logistics paths for the rapidly growing LNG fuel demand across the U.S.

The JAX LNG facility is located at Dames Point along the St. Johns River, near Jacksonville, Florida, and has been in operation since late 2018. The JAX facility includes 360,000 gallons per day of liquefaction capacity and 4 million gallons of LNG storage capacity. The facility has both on-road (with dual truck loading bays) and marine-loading capabilities servicing the marine, rail, drilling, mining, trucking, power generation, aerospace, and industrial markets. JAX may also deliver LNG for use in power generation at the U.S. Naval Station at Guantanamo Bay Cuba, being utilized entirely at that naval base.<u>8</u> The JAX facility is not regulated by the Federal Energy Regulatory Commission ("FERC") because (1) it is not connected to an interstate natural gas pipeline and takes delivery of feed gas from a local distribution company system and (2) does not transfer LNG directly to or from ocean-going, bulkcarrier LNG tankers.

The ultimate use and destination of the LNG produced at the JAX facility varies and is determined by the purchaser. Most of the LNG is used by domestic end-users as a vehicular fuel, marine fuel, other end-use fuel, or feedstock. Some of the LNG produced by JAX may have been exported via

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JAX understands that such operations do not constitute exports within the meaning of NGA Section 3.

intermodal International Organization for Standardization (ISO) containers pursuant to export

authorizations issued by DOE/FECM to others.9

II. COMMUNICATIONS AND CORRESPONDENCE

The names, titles and mailing addresses of the persons to whom correspondence and communications concerning this Application, including service of all pleadings and notices, are to be

addressed are:

George W. Flugrad	J. Patrick Nevins
Senior Counsel	Latham & Watkins LLP
Eastern Gas Transmission and Storage, Inc.	555 11th Street, NW
6603 West Broad Street	Washington, D.C. 20004-1304
Richmond, VA 23230	(202) 637-3363
(804) 613-5206	patrick.nevins@lw.com
George.Flugrad@bhegts.com	·

These individuals are designated to receive service and should be placed on the official service list for this proceeding.

III. AUTHORIZATION REQUESTED

JAX requests authorization to export LNG of up to the equivalent of 51.75 Bcf of domestic natural gas per year to both FTA and non-FTA nations, for a term extending through December 31, 2050. JAX expects that its LNG exports will primarily be short-term (less than two years duration) transactions, but JAX seeks here long-term export authorization to provide it the flexibility to enter into both shortterm and long-term arrangements, as DOE/FECM's policy allows for short-term exports under long-term export authorizations. 10 Because JAX is currently producing and selling LNG at its facility, JAX may

⁹ Notably, several Small-Scale LNG export authorizations recently issued by DOE/FECM to others have listed JAX as a potential source of the LNG to be exported. *E.g., Otter Industries, LLC*, Docket No. 22-123-LNG, DOE/FERC Order No. 4926 (Dec. 7, 2022)(listing both JAX and its affiliate Trussville LNG among the 37 potential sources of LNG from which LNG could be purchased for export in ISO containers); *Manifest Shipping & Trading Corp.*, Docket No. 22-145-LNG, DOE/FERC Order No. 4927 (Dec. 13, 2022)(listing JAX LNG as one of the two facilities from which it would source LNG to be loaded onto small-scale vessels from either the marine terminal or from barges); *Eagle LNG Partners Jacksonville II LLC*, Docket Nos. 22-168-LNG and 17-79-LNG, DOE/FERC Order Nos. 4975 and 4078-B (March 12, 2022)(listing 13 potential sources including both JAX and Pivotal for LNG to be shipped in ISO containers), *amended* Order No. 5975-A (June 13, 2024)(expanding list of potential LNG sources to 41 facilities).

<u>10</u> See note 3 supra.

commence LNG exports soon after issuance of the requested export authorization though it does not currently have specific commitments to do so. Accordingly, JAX requests that its export authorization commence effective upon the issuance of the authorizing order.

JAX requests authorization to export LNG both on its own behalf and as agent for entities with which it may contract that hold title to the LNG at the time of export following a sale of LNG to them by JAX. JAX will comply fully with all applicable DOE/FECM requirements for authorized LNG exporters, including those applicable when acting as agent for others, as detailed in orders such as *Freeport LNG Development, L.P.* and *Gulf Coast LNG Export LLC.* <u>11</u> Thus, before acting as an agent for others under its export authorization, JAX will register with DOE/FECM each LNG title holder for which JAX plans to export LNG as its agent, with the required company identification, applicable contract details, and other requisite information. At this time, JAX has not yet entered into any contracts associated with the export of LNG, nor with the long-term supply of natural gas to the JAX facility but it will file, or cause to be filed, any such long-term contracts entered into in the future within 30 days after execution in accordance with established DOE policies.

The source of the natural gas to be exported by JAX generally will be LNG produced at the JAX facility from feed gas delivered off of the local distribution system of Peoples Gas System (a division of Tampa Electric Company). The Peoples Gas System, in turn, receives gas from the integrated interstate pipeline grid, which provides access to major sources of natural gas supply produced in the Gulf Coast region and, through other pipeline interconnections, from other producing regions of the country.

In addition to LNG produced at its own facility, JAX requests that its export authorization also encompass LNG that may be sourced from two other facilities, located in Trussville, Alabama, and Wyalusing, Pennsylvania, that are also operated by Pivotal and sometimes serve as backup supply sources of LNG for JAX. The Trussville LNG facility has been in service since 1978 and produces approximately

<u>11</u> Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC, FE Order No. 2913 at 7-8 (Feb. 10, 2011) (establishing the criteria for exports for agents subsequently adopted in numerous orders); *Gulf Coast LNG Export LLC*, DOE/FE Order No. 3163 at 7-8 (Oct. 16, 2012) (reiterating agency policy).

60,000 gallons of LNG per day and has 4.8 million gallons of LNG storage, and includes truck loading operations. The Towanda LNG facility in Wyalusing, Pennsylvania has been in service since 2021 and produces approximately 50,000 gallons of LNG per day with 180,000 gallons of storage.

Furthermore, in order to meet growing market demand, JAX might from time to time to procure LNG produced by other third parties. Numerous facilities around the country currently sell LNG on a commercial basis which could potentially be exported by JAX. To provide JAX maximum flexibility to meet the needs of its customers, JAX includes in Appendix C a list of all facilities from which it may obtain LNG for export. JAX requests that its export authorization encompass LNG sourced from any of those facilities, as well as from the JAX facility itself, Trussville, and Towanda.<u>12</u>

The LNG may be exported by JAX in the future in one of two ways. First, JAX may load LNG into ISO containers to be transported from the JAX facility by truck or barge and then loaded onto containers ships or roll-on/roll-off ocean-going carriers for export at the Port of Jacksonville or other ports that are capable of handling ISO containers using existing facilities. Any LNG sourced from any of the other facilities listed in Appendix C and exported pursuant to JAX's authorization similarly will be transported by road using Department of Transportation ("DOT")-approved highway trailers (in either LNG tanker trucks or ISO containers) either (1) to JAX's facility, where it will be offloaded into JAX's LNG storage facilities and commingled with LNG produced by JAX or (2) to nearby existing ports handling ISO containers. JAX anticipates that its LNG exports likely will be destined for Caribbean, Central American, or South American countries; but of course, its authorization would not be limited to such destinations and JAX will comply with DOE/FECM's established reporting requirements, including with respect to destinations.

Second, JAX may load bunkering vessels that may be used to transfer LNG for marine fuel to cargo ships and cruise ships in foreign ports. JAX has existing operations in which it loads LNG onto

<u>12</u> DOE/FECM recently approved this same list of facilities as approved facilities from which to source LNG for export in an amendment of the export authorization for the Eagle LNG Maxville facility. *Eagle LNG Partners Jacksonville II LLC*, Docket Nos. 22-168-LNG, Order No. 5975-A (June 13, 2024).

bunkering vessels, which are not large bulk-carrier LNG tankers used to transport LNG to foreign markets but rather are relatively small vessels that perform ship-to-ship transfers of LNG for use as marine fuel. The bunkering vessels that historically have loaded at the JAX dock have had capacity of 5,500 cubic meters (1.45 million gallons). Typically, the transfer by the bunkering vessels occurs in U.S. or international waters – which would not constitute an "export" for purposes of NGA Section 3. In the event that the ship-to-ship transfer occurs in international ports of call in a foreign nation, however, the potential applicability of Section 3 is less clear. Accordingly, JAX requests that DOE clarify when issuing the requested export authorization whether LNG transferred by a bunkering vessel at an international port of call should be treated as an export, whether such treatment is not required, or otherwise provide guidance regarding how bunkering operations should be reported to DOE.

IV. CONSISTENCY WITH THE PUBLIC INTEREST

Section 3(c) of the NGA, as amended by § 201 of the Energy Policy Act of 1992, requires that applications to authorize exports of natural gas, including LNG, to nations with which there is in effect a FTA requiring national treatment for trade of natural gas be "deemed to be consistent with the public interest" and "granted without modification or delay." <u>13</u> In addition, DOE/FE has held that the statutory requirement for granting FTA applications without delay or modification overrides otherwise applicable regulatory requirements for public notice and other procedures set forth in 10 C.F.R. Part 590. Under this statutory structure, the portion of this Application that requests authorization for JAX to export LNG to FTA countries should be granted without modification or delay, consistent with the statute and DOE/FE's established practice.

With respect to exports to non-FTA nations, Section 3(a) of the NGA <u>14</u> sets forth the following statutory standard:

[N]o person shall export natural gas from the United States to a foreign country or import any natural gas from a foreign country without first

<u>13</u> 15 U.S.C. § 717b(c).

<u>14</u> 15 U.S.C. 717b(a).

having secured an order of the [Secretary of Energy <u>15</u>] authorizing it to do so. The [Secretary] shall issue such order upon application, unless after opportunity for hearing, [he] finds that the proposed exportation or importation will not be consistent with the public interest. The [Secretary] may by [the Secretary's] order grant such application, in whole or in part, with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.

In the Small Scale Exports Rule, DOE/FECM determined, by rule, that "small-scale" natural gas exports are consistent with the public interest as required for authorization under NGA Section 3(a). Pursuant to the rule and its implementing regulations, small-scale natural gas exports are exports of natural gas, including LNG, that meet two criteria: (1) the quantity to be exported is 51.75 Bcf per year or less and (2) DOE/FECM's authorization of the exports does not require the preparation of an environmental impact statement or environmental assessment under the National Environmental Policy Act (NEPA) of

1969 (42 U.S.C. 4321, et seq.).<u>16</u>

JAX request authorization here of exports up to the volumetric limit established in the Small Scale Exports Rule. With respect to NEPA, DOE has established a categorical exclusion for the export of natural gas and associated transportation by marine vessel.<u>17</u> JAX will export LNG produced at existing facilities and transported in ISO containers to commercial ports where it will be loaded using existing facilities onto ocean-going carriers, consistent with the scope of this categorical exclusion from NEPA. JAX does not propose to build any new facilities for purpose of LNG exports. Granting the requested export authorization would result in no environmental impacts other than impacts generally associated with LNG exports by marine vessel that DOE/FECM has taken into consideration in its Small Scale Exports Rule and the categorical exclusion. Thus, DOE approval of JAX's request does not require the preparation of an environmental impact statement or environmental assessment.

¹⁵ The Secretary's authority was established by the DOE Organization Act of 1977, which transferred jurisdiction over gas import and export authorizations from the Federal Power Commission.

<u>16</u> 10 C.F.R. § 590.102(p); Small Scale Exports Rule 83 Fed. Reg. at 35113-15.

<u>17</u> 10 C.F.R. Part 1021, subpart D, appendix B5.7

Therefore, in accordance with the Small Scale Exports Rule, the authorization for exports to non-FTA nations requested by JAX is consistent with the public interest and should be granted by DOE/FECM. While not necessary given the established policy reflected in DOE/FECM's regulations, JAX notes that the policy determinations made in the Small Scale Exports Rule continue to be supported by more recent developments and information. For instance, the 2018 rulemaking relied on the 2015 Macroeconomic Impact of Increasing U.S. LNG Exports for the conclusion that natural gas exports provide macroeconomic benefits to the United States.<u>18</u> That conclusion was reaffirmed, and bolstered with further analysis and consideration of a wider range of export scenarios, by the similar 2018 study.<u>19</u> Similarly, the rulemaking focused on projections of natural gas supply, demand, and prices by the U.S. Energy Information Administration's (EIA) set forth in the 2017 and 2018 editions of the *Annual Energy Outlook* (AEO). More recent EIA projections in subsequent issuances of the AEO continue to show that there are ample U.S. natural gas resources and production to satisfy all domestic needs as well as LNG exports with little expected impact on domestic prices.<u>20</u>

In the Small Volume Exports Rule, DOE/FECM announced that it will issue qualifying small volume export authorizations on an expedited basis and will not provide notice of each individual application nor apply other administrative procedures typically conducted for non-FTA export

¹⁸ Center for Energy Studies at Rice University Baker Institute and Oxford Economics, *The Macroeconomic Impact of Increasing U.S. LNG Exports* (Oct. 29, 2015), *available at:* https://www.energy.gov/sites/prod/files/2015/12/f27/20151113 macro impact of lng exports 0.pdf.

<u>19</u> NERA Economic Consulting, *Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports* (June 7, 2018), available at:

https://www.energy.gov/sites/prod/files/2018/06/f52/Macroeconomic%20LNG%20Export%20Study%202018.pdf; see also

²⁰ See EIA, Annual Energy Outlook 2023, at p. 6 (Mar. 16, 2023), available at:

https://www.eia.gov/outlooks/aeo/ (finding that "continued growth in U.S. production, [] combined with relatively little growth in domestic consumption, allows the United States to remain a net exporter of ... natural gas through 2050 in all AEO2023 cases."); EIA, AEO2023 Issues in Focus: Effects of Liquefied Natural Gas Exports on the U.S. Natural Gas Market (May 3, 2023), at p. 3 available at:

<u>https://www.eia.gov/outlooks/aeo/IIF_LNG/pdf/LNG_Issue_in_Focus.pdf</u> (finding that while "LNG export volumes affected the resulting annual average U.S. natural gas price ... [t]he resulting variation in natural gas prices in the three cases, however, was narrower than recent in history and [the] AEO2023, despite a wide variety of U.S. LNG export volumes.").

applications under DOE's regulations set forth at 10 C.F.R. Section 590.205 and Part 590, subpart C.<u>21</u> DOE/FECM has consistently followed that expedited approval process for recent small volume export applications.<u>22</u> JAX respectfully requests that DOE/FECM grant the long-term export authorizations requested in this Application on a similar expedited basis.

V. APPENDICES

The following appendices are attached to this Application:

Appendix A:	Verification
Appendix B:	Opinion of Counsel
Appendix C:	List of Potential LNG Sources

VI. CONCLUSION

Based on the reasons set forth above, JAX respectfully requests that the DOE/FE expeditiously issue the requested long-term multi-contract authority to export LNG produced from domestic natural gas sources at the JAX LNG facility, or the other LNG facilities specifically identified above (Trussville, Towanda, and all facilities identified in Appendix C), in quantities of up to the equivalent of 51.75 Bcf of natural gas per year to both FTA and non-FTA nations, for a term extending through December 31, 2050.

²¹ Small-Scale Exports Rule, 83 Fed. Reg. at 35117.

²² E.g., MKVH Advisors, Inc., Docket No. 22-69-LNG, DOE/FERC Order No. 4875 (Sept. 23, 2022)(approving application filed July 11, 2022, without public notice or other similar process); Otter Industries, LLC, Docket No. 22-123-LNG, DOE/FERC Order No. 4926 (Dec. 7, 2022)(approving application filed Sept. 15, 2022, without public notice or other similar process); Manifest Shipping & Trading Corp., Docket No. 22-145-LNG, DOE/FERC Order No. 4927 (Dec. 13, 2022)(approving application filed Sept. 26, 2022, without public notice or other similar process); STXM LLC, Docket No. 22-125-LNG, DOE/FERC Order No. 4928 (Dec. 13, 2022)(approving application filed Sept. 28, 2022, without public notice or other similar process; Eagle LNG Partners Jacksonville II LLC, Docket Nos. 22-168-79 and 17-79-LNG, DOE/FERC Order Nos. 4975 and 4078-B (March 12, 2022)(approving application filed Dec. 29, 2022, without public notice or other similar process).

Respectfully submitted,

/s/ J. Patrick Nevins

George W. Flugrad Senior Counsel Eastern Gas Transmission and Storage, Inc. 6603 West Broad Street Richmond, VA 23230 (804) 613-5206 George.Flugrad@bhegts.com J. Patrick Nevins Latham & Watkins LLP 555 11th Street, NW Washington, D.C. 20004-1304 (202) 637-3363 patrick.nevins@lw.com

Counsel for JAX LNG, LLC

Dated: July 25, 2024

Appendix A

VERIFICATION

STATE OF VIRGINIA)) SS: CITY OF RICHMOND)

Roger Williams, being first duly sworn on his oath deposes and says: that he is the Manager for JAX LNG, LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contests thereof; that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief; and that he is authorized to execute and file the same with the U.S. Department of Energy.

ams Williams

Manager JAX LNG, LLC

Sworn to and subscribed before me this 23rd day of July, 2024

" BOYW CON

PUBLIC REG # 221752 MY COMMISSION **EXPIRES** 7/31/202 WEALTH OF ************

Notary Public In and For said City Richmond, VA

NB. CA

My Commission Expires: 7312

Appendix B

OPINION OF COUNSEL

Opinion of Counsel

This opinion is submitted pursuant to 10 C.F.R. Section 590.202(c) of the Department of Energy administrative procedures. The undersigned is counsel to JAX LNG, LLC.

I have reviewed the corporate documents of JAX LNG, LLC and it is my opinion that the proposed export of natural gas is within the company's corporate powers.

Respectfully submitted.

George W. Flugrad Senior Counsel Eastern Gas Transmission and Storage, Inc. 10700 Energy Way Glen Allen, VA 23060 (804) 613-5206 George.Flugrad@bhegts.com

Dated: July 23, 2024

Appendix C

LIST OF POTENTIAL LNG SOURCES

List of Potential LNG Sources

1. JAX LNG Facility; Jacksonville, FL. LNG production capacity of approximately 360,000 gallons per day and 4 million gallons of storage.

Trussville LNG Facility; Trussville, AL. LNG production capacity of approximately
60,000 gallons per day, and 4.8 million gallons of storage.

3. Towanda LNG Facility; Wyalusing, PA. LNG production capacity of 50,000 gallons per day with 180,000 gallons of storage.

4. Maxville LNG Facility; Jacksonville, FL. LNG production capacity of 187,000 gallons per day with 1 million gallons of storage.

5. Hialeah LNG Facility; Miami, FL. LNG production of approximately 100,000 gallons per day.

6. Port Allen LNG Facility; Port Allen, LA. LNG production capacity of 30,000 gallons per day and 100,000 LNG gallons of storage.

Richmond LNG Plant; Philadelphia, PA. LNG production capacity of approximately
200,000 gallons per day with 48 million gallons of storage.

8. Passyunk LNG Plant; Philadelphia, PA. No onsite LNG production with approximately 3 million of storage.

9. Chattanooga LNG Plant; Chattanooga, TN. LNG production capacity of 100,000 gallons per day with approximately 14 million gallons of storage.

10. Capleville LNG Facility; Capleville, TN. LNG production capacity of 65,000 gallons per day with 12,200,000 LNG gallons of storage.

11. Huntersville LNG Facility; Huntersville, NC. LNG production capacity of 120,000 gallons per day with 12,200,000 LNG gallons of storage.

12. Bentonville LNG Facility; Four Oaks, NC. LNG production capacity of 120,000 gallons per day with 12,200,000 LNG gallons of storage.

13. Robeson LNG Facility; Robeson NC. LNG production capacity of 120,000 gallons per day with 12,200,000 LNG gallons of storage.

14. Nashville LNG Facility; Nashville, TN. LNG production capacity of 60,000 gallons per day with 12,200,000 LNG gallons of storage.