

Thomas Knight tknight@velaw.com Tel +1.202.639.6524 Fax +1.202.879.8914

April 17, 2025

Via E-Filing to FERGAS@HQ.DOE.GOV

Office of Fuels Programs Fossil Energy Office of Fossil Energy and Carbon Management U.S. Department of Energy Docket Room 3F-056, FE-50 Forrestal Building 1000 Independence Avenue, SW Washington, DC 20585

> Re: Lake Charles LNG Export Company, LLC Docket Nos. 13-04-LNG and 16-109-LNG Application of Lake Charles LNG Export Company, LLC for an Amendment to Extend the <u>Commencement of Operations Deadline and Request for Expedited Action</u>

Dear Madam or Sir:

Please find enclosed for filing the Application of Lake Charles LNG Export Company, LLC for an Amendment to Extend the Commencement of Operations Deadline and Request for Expedited Action ("Extension Application"). Lake Charles LNG Export Company, LLC ("Lake Charles LNG Export") is filing the Extension Application to amend its DOE non-FTA Export Order Nos. 3868 and 4010 to extend the commencement of export operations deadline to December 31, 2031. As time is of the essence, Lake Charles LNG Export respectfully requests that the Department of Energy's Office of Fossil Fuel and Carbon Management approve the Extension Application on or before June 16, 2025.

This filing is comprised of the following:

- 1. Transmittal Letter;
- 2. Extension Application;
- 3. Appendix A Verifications and Certified Statements on Authorized Representatives;
- 4. Appendix B Opinion of Counsel;
- 5. Appendix C Declaration of Thomas P. Mason with <u>Exhibit A</u> (Project-related construction activities and other activities reported to DOE and FERC)

Pursuant to 10 C.F.R. § 590.207 (2025), Lake Charles LNG Export has transmitted the \$50.00 filing fee via pay.gov.



Please return a date-stamped copy of this filing at your earlier convenience.

Please contact the undersigned with any questions. Thank you.

Respectfully submitted,

<u>/s/ Thomas E. Knight</u> Thomas E. Knight *Counsel for Lake Charles LNG Export Company, LLC*

cc: Mrs. Amy Sweeney Service Lists in Docket Nos. 13-04-LNG and 16-109-LNG

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

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Lake Charles LNG Export Company, LLC

Docket Nos.

13-04-LNG 16-109-LNG

APPLICATION OF LAKE CHARLES LNG EXPORT COMPANY, LLC FOR AN AMENDMENT TO EXTEND THE COMMENCEMENT OF OPERATIONS <u>DEADLINE AND REQUEST FOR EXPEDITED ACTION</u>

Thomas P. Mason President, LNG Lake Charles LNG Export Company, LLC 8111 Westchester Drive, Suite 600 Dallas, TX 75225 (214) 981-0700 tom.mason@energytransfer.com Thomas E. Knight Vinson & Elkins LLP 2200 Pennsylvania Avenue NW Suite 500 West Washington, DC 20037 (202) 639-6524 tknight@velaw.com

Dated: April 17, 2025

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

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Lake Charles LNG Export Company, LLC

Docket Nos.

13-04-LNG 16-109-LNG

APPLICATION OF LAKE CHARLES LNG EXPORT COMPANY, LLC FOR AN AMENDMENT TO EXTEND THE COMMENCEMENT OF OPERATIONS DEADLINE AND REQUEST FOR EXPEDITED ACTION

Pursuant to section 3 of the Natural Gas Act ("NGA"), 15 U.S.C. § 717b, and Part 590 of the regulations of the Department of Energy ("DOE"), 10 C.F.R. § 590, Lake Charles LNG Export Company, LLC ("Lake Charles LNG Export") submits this application ("Extension Application") to the DOE Office of Fossil Energy and Carbon Management ("DOE/FECM") for an amendment to its DOE non-FTA Export Order Nos. 3868 and 4010¹ to extend the commencement of export operations deadline to December 31, 2031. As time is of the essence as set out below, Lake Charles LNG Export respectfully requests that DOE/FECM <u>approve this Extension Application on or</u>

before June 16, 2025.

In support of this Extension Application, Lake Charles LNG Export states as follows:

I. EXECUTIVE SUMMARY

On April 1, 2025, DOE announced that it was rescinding the April 2023 Biden-era policy statement on extensions and would again review requests to extend the commencement date of non-FTA export authorizations on a case-by-case basis.² DOE stated that the April 2023 policy

¹ Lake Charles LNG Export Co., LLC, DOE/FE Order No. 3868 (issued Jul. 29, 2016); Lake Charles LNG Export Co., LLC, DOE/FE Order No. 4010 (issued Jun. 29, 2017).

² Rescission of Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries, 90 Fed. Reg. 14411 (Apr. 2, 2025).

was an "additional regulatory barrier[] standing in the way of unleashing U.S. liquefied natural gas (LNG) exports" and the policy has "made it unnecessarily rigid to obtain and maintain an authorization to export U.S. LNG to non-free trade agreement countries."³ DOE characterized rescinding the extension policy as a "return to common-sense policy on reviewing commencement date extension requests."⁴

The rescission of such policy is but just one example of the Trump administration's bold actions over the last four months to change America's direction through a mandate that once again America's energy abundance is to be recognized as a tremendous asset and not a liability. President Trump's energy policies will enable the United States to fully use its unrealized energy resources domestically and to sell to its allies and trade partners a reliable, diversified, and affordable supply of energy. The export of U.S. LNG is at the forefront of this effort to increase energy production that will benefit the U.S. economy, catalyze U.S. employment growth, and promote energy security for its allies and trade partners. As Secretary Wright has declared, "[w]hen American energy is unleashed, human lives are bettered."⁵

Lake Charles LNG Export is authorized to export up to 851 Billion cubic feet per year ("Bcf/yr") of liquified natural gas ("LNG") from the existing import terminal site in Lake Charles, Louisiana ("Lake Charles Terminal") pursuant to orders wherein DOE/FECM held that the export of LNG to countries with which the United States does not have a Free Trade Agreement ("FTA") requiring national treatment for trade in natural gas with which trade is not prohibited by United States law or policy ("non-FTA countries") is not inconsistent with the public interest under NGA

³ Energy Department Takes Action to Remove Barriers for Requests to LNG Export Commencement Date Extensions, (Apr. 1, 2025), https://www.energy.gov/articles/energy-department-takes-action-remove-barriers-requests-lng-export-commencement-date.

⁴ Id.

⁵ Statement from Energy Secretary Chris Wright (Feb. 3, 2025), https://www.energy.gov/articles/statement-energy-secretary-chris-wright.

section 3.⁶ Since October 2020 (the date DOE approved Lake Charles LNG Export's previous extension request), Lake Charles LNG Export and Energy Transfer LP and its various affiliates (collectively, "Energy Transfer") have in good faith made significant and concrete progress towards execution of a commercially viable level of long-term commercial agreements with LNG offtake customers for the Lake Charles Terminal export project and reaching a Final Investment Decision ("FID"). Lake Charles LNG Export and Energy Transfer have undertaken, and continue to undertake, numerous export project construction-related activities, and, to date approximately \$398 million has been spent on the development of the export project, including approximately \$75.6 million since October 2020.

Lake Charles LNG Export is unable to meet the current December 17, 2025 commencement of export operations deadline due to circumstances completely outside of its control. Because it is a precondition of FID that all non-FTA export authorizations remain in full force and effect during construction of the export project, it is necessary to have a six-year extension until December 31, 2031 to ensure that the export project is in-service before the expiration of the deadline in the DOE export orders. Lake Charles LNG Export needs DOE to expeditiously act on this Extension Application so that Energy Transfer can proceed to FID and release its engineering, procurement, and construction ("EPC") contractor to move to the next phase of the export project. Without such an extension, the Project likely would not be able to get to FID.

⁶ Lake Charles LNG Export, DOE/FE Order Nos. 3868 and 4010. Lake Charles Exports, LLC ("LCE") also holds authorizations from DOE to export this same amount of LNG from the Lake Charles Terminal. *See Lake Charles Exports, LLC,* DOE/FE Order No. 3324 (issued Aug. 7, 2013); *Lake Charles Exports, LLC,* DOE/FE Order No. 3324-A (issued Jul. 29, 2016); *Lake Charles Exports, LLC,* DOE/FE Order No. 4011 (issued Jun. 29, 2017). In addition, LCE has a pending non-FTA application at DOE in Docket No. 23-87-LNG for the same amount of export capacity.

Although DOE recently closed the comment period on its 2024 LNG Export Study, this study and the comments provided thereto are not applicable to this Extension Application because the requested extension relates to export volumes already authorized by DOE. DOE recently held in the *Delfin* extension order that if an applicant is "requesting additional time for construction and operation of the facilities from which it plans to export LNG, without seeking additional volume authorization," then "the studies before the update are the appropriate frame of reference."⁷ Accordingly, Lake Charles LNG Export's request for expedited action is appropriate, and DOE is able to approve this Extension Application as soon as possible and at least by June 16, 2025. Lake Charles LNG Export's continued advancement of the export project, as demonstrated by the undertaking of substantial construction and other activities in furtherance of the export project, and its inability to meet the current export commencement deadline due to circumstances outside of its control demonstrate good cause for DOE to approve the requested extension.

II. <u>BACKGROUND</u>

Import Terminal

In 1977, the Federal Power Commission, initially authorized Trunkline LNG Company ("Trunkline LNG"), now known as Lake Charles LNG Company, LLC ("Lake Charles LNG"), to construct and operate the Lake Charles Terminal to receive, store and regasify LNG imported from Algeria.⁸ At the same time, FERC authorized Trunkline Gas Company ("Trunkline")⁹ to construct an approximately 46-mile gas pipeline lateral extending from the tailgate of the Lake Charles Terminal to Trunkline's existing interstate natural gas pipeline system in Longville, Louisiana to

⁷ Delfin LNG LLC, DOE/FECM Order Nos. 3393-C and 4028-D at 23 (issued Mar. 10, 2025).

⁸ Trunkline LNG Co. and Trunkline Gas Co., 58 FPC 726 (1977), amended on reh'g, 58 FPC 2935 (1977).

⁹ Trunkline is now known as Trunkline Gas Company, LLC. Trunkline, Lake Charles LNG Export, LCE and Lake Charles LNG are wholly-owned subsidiaries of Energy Transfer.

transport the gas that was made available by the revaporization of the imported LNG.¹⁰ The Lake Charles Terminal received imported LNG in 1982. Deliveries were suspended in 1983, but resumed in 1989, when the Federal Energy Regulatory Commission ("FERC") authorized several requests to modify and expand the Lake Charles Terminal and the import services.¹¹

In 2001, BG LNG Services, LLC entered into a firm service agreement with Trunkline LNG and subscribed all of the uncommitted firm capacity of the Lake Charles Terminal for the receipt, storage and vaporization of imported LNG.¹² Consistent therewith, Trunkline LNG expanded and enhanced the Lake Charles Terminal through the construction of additional storage capacity, additional gas-fired vaporization capacity, and an additional marine berth.¹³ Trunkline LNG also received authorization from FERC in 2006 to construct and operate ambient air vaporization equipment and natural gas liquids extraction capacity of 1.8 Bcf/day of gas (13.7 million tons per annum ("mtpa") of LNG) and a peak send-out capacity of 2.1 Bcf/day.¹⁵ The Lake Charles Terminal has four LNG storage tanks with a combined capacity of approximately 2.7 million barrels (425,000 cubic meters) of LNG, or approximately 9.0 Bcf of gas.

Liquefaction Project and Pipeline Modifications Project – FERC Authorizations

¹⁰ Trunkline Gas, 58 FPC 726 at 744.

¹¹ Trunkline LNG Co. et al., 49 FERC ¶ 61,199 (1989), order clarifying and amending certificate, 69 FERC ¶ 61,129 (1994).

¹² Since September 2005 (when Duke Energy LNG's service agreement expired), BG LNG Services, LLC has been the sole import customer of the Lake Charles Terminal. *See* Declaration of Thomas P. Mason at ¶ 5 ("Declaration"), which is attached hereto as Appendix C.

¹³ See CMS Trunkline LNG Co., LLC, 101 FERC ¶ 61,300 (2002) and 100 FERC ¶ 61,217 (2002) (authorizing, among other things, (i) the addition of a fourth storage tank to increase the total storage capacity to 9.0 Bcf and (ii) the construction of LNG pumps and vaporizers to increase the daily sustainable sendout capability to 1,200 MMcf/day); *Trunkline LNG Co., LLC,* 105 FERC ¶ 61,137 (2003) (authorizing the modification of unloading facilities).

¹⁴ *Trunkline LNG Co., LLC*, 117 FERC ¶ 61,339 at P 2 (2006).

¹⁵ *Id.* at P 5.

As a result of the shale revolution in the United States, a newly abundant supply of natural gas precipitated a dramatic decrease in United States natural gas prices, making LNG imports uneconomic.¹⁶ Accordingly, Trunkline LNG decided to expand its existing LNG import terminal and regasification facility at Lake Charles to also provide for liquefaction and export facilities ("Liquefaction Project"). Related thereto, Trunkline would expand and modify its interstate natural gas pipeline to provide capacity to transport gas to the Lake Charles Terminal for liquefaction ("Pipeline Modifications Project"). The Pipeline Modifications Project and the Liquefaction Project collectively are referred to herein as the "Project".

The Liquefaction Project would incorporate existing core infrastructure already constructed at the import terminal, including four LNG storage tanks, two deep water docks capable of handling large LNG vessels, LNG sendout facilities, and other infrastructure on the 152-acre import site.¹⁷ On March 30, 2012, Trunkline LNG and Trunkline requested FERC to commence the pre-filing review process required by 18 C.F.R. § 157.21 for the Project, which FERC approved on April 6, 2012.¹⁸ Trunkline LNG and Trunkline spent nearly two years engaged in FERC's mandatory pre-filing process.

On March 25, 2014, Trunkline LNG and Trunkline filed for authorizations at FERC for the Project. Trunkline LNG explained that the Lake Charles Terminal is an existing 152-acre LNG import terminal that will require modifications to existing facilities and systems to integrate with the proposed export components.¹⁹ The Liquefaction Project is an approximate 286-acre site adjacent to the existing import facilities and will have three liquefaction trains with LNG and vapor

¹⁶ Declaration at \P 6.

¹⁷ *Id.* at ¶ 7.

¹⁸ Trunkline LNG Co., LLC et al., Docket No. PF12-8-000, Approval of Pre-filing Request (issued Apr. 6, 2012).

¹⁹ Application for Authorization under Section 3 of the Natural Gas Act for the Proposed Lake Charles Liquefaction Project, *Lake Charles LNG Co., LLC, et al.*, Docket No. CP14-120-000 (filed Mar. 25, 2014).

tie-ins to the existing import terminal and feed gas line from the Trunkline LNG meter station. Certain modifications to the existing facilities and systems at the LNG import terminal will be required as part of the Liquefaction Project, including (i) installation of larger in-tank LNG pumps; (ii) replacement of LNG loading arms at the west dock; (iii) modifications to boil-off compression and handling systems; (iv) expansion and integration of electrical systems; (v) installation of LNG rundown lines from liquefaction area to LNG storage tanks; (vi) expansion and integration of the security system; (vii) integration of control and emergency shutdown systems; (viii) expansion and integration of the telecommunication system; (ix) installation of larger vapor return pipeline from each dock to the LNG tanks; (x) installation of a marine flare; (xi) addition of mooring dolphins and breasting dolphins at west dock; (xii) addition of breasting dolphins at east dock; (xiii) construction of temporary construction docks; and (xiv) dredging of temporary construction docks with disposal onshore.²⁰

The Pipeline Modifications Project consists of modifications to Trunkline's system to enable (i) the delivery of 2.6 Bcf/day of natural gas to the Lake Charles Terminal, (ii) bi-directional flow (north-south) in Trunkline's system and (iii) increased access to natural gas supplies. Trunkline would construct (i) an 11-mile long, 42-inch diameter pipeline, (ii) a 6-mile long, 24inch diameter pipeline, (iii) a 103,175 horsepower compressor station, (iv) a new 15,900 horsepower compressor unit at an existing compressor station and (v) additional meter stations, piping modifications and related facilities.²¹

FERC authorized the Project on December 17, 2015, which for the Liquefaction Project included three liquefaction trains, with a design production capacity of 16.45 mtpa of LNG, to be

²⁰ Application for Authorization under Section 3 of the Natural Gas Act for the Proposed Lake Charles Liquefaction Project, *Lake Charles LNG Co., LLC, et al.*, Docket No. CP14-120-000 (filed Mar. 25, 2014) at Resource Report 1 (General Project Description), pages 1-5 to 1-6.

²¹ Lake Charles LNG Co., LLC et al., 153 FERC ¶ 61,300 at P 21 (2015).

constructed and placed into service in phases.²² The Liquefaction Project also will incorporate major existing LNG infrastructure at the Lake Charles Terminal that was constructed in connection with the import terminal and regasification facility, including the four LNG storage tanks (with a combined capacity of approximately 2.7 million barrels (425,000 cubic meters) of LNG, or approximately 9.0 Bcf of gas), two deep water docks capable of handling large LNG vessels, LNG sendout facilities, and other infrastructure on the existing Lake Charles Terminal.²³ The value of these import facilities that will be incorporated into the Liquefaction Project is estimated to be in excess of \$1.0 billion.²⁴

FERC recognized that the "Liquefaction Project is located on, and adjacent to, the footprint of the previously-approved, existing [import] terminal."²⁵ FERC concluded that "[m]uch of the land in the area was previously disturbed during construction of the [import] terminal, and, as a result, we concur with the findings set forth in the final EIS that most of the proposed project's environmental impacts would be reduced to less than significant levels with the implementation of Lake Charles LNG's proposed mitigation and the conditions required in [the FERC

²² Lake Charles LNG Co., LLC et al., 153 FERC ¶ 61,300 (2015), reh'g denied, 155 FERC ¶ 61,328 (2016) ("FERC Authorization Order").

²³ In particular, the following existing facilities and systems at the Lake Charles Terminal will be incorporated into the Liquefaction Project: (i) two shipping berths (east dock and west dock), each equipped with mooring and breasting dolphins (each dock contains four liquid loading arms and one vapor return arm; one arm on each dock serves as a hybrid arm that can be used for liquid loading or vapor return); (ii) four LNG storage tanks: three with a capacity of 95,000 m³ and one with a capacity of 140,000 m³, for a total combined capacity of 425,000 m³; (iii) LNG sendout facilities, including 12 pumps, 14 vaporizers, and 2 boil-off gas compressors; (iv) hazard detection, control and prevention systems, cryogenic piping and insulation, and electrical and instrumentation systems; (v) a firewater system; (vi) a natural gas liquids recovery system; (vii) ancillary utilities, buildings and service facilities; (viii) access roads and terminal road; and (ix) existing dredge spoil management area. Final Environmental Impact Statement, *Lake Charles LNG Co., LLC*, Docket Nos. CP14-119-000 et al. (issued Aug. 14, 2015) at 2-6 and 2-10.

²⁴ Declaration at ¶ 7. The estimated value is based on a variety of factors, including the estimated cost to construct these facilities under the current cost environment and the overall impact on the construction schedule if not already existing. The estimated value of these import facilities is not included in the approximately \$398 million that has been spent on the development of the Liquefaction Project.

²⁵ FERC Authorization Order at P 38.

Authorization] Order."²⁶ Accordingly, FERC found that the Liquefaction Project "is not inconsistent with the public interest."²⁷

FERC found that the public convenience and necessity pursuant to NGA section 7(c) required approval of the Pipeline Modifications Project. FERC granted Trunkline a certificate based on the benefits its new construction will provide to the market, and the minimal adverse effects on existing shippers, other pipelines and their captive customers, and on landowners and surrounding communities.²⁸ The Pipeline Modifications Project is an integral part of the Project.

Export Terminal – DOE Authorizations

In the FERC Authorization Order, FERC recognized DOE/FECM's²⁹ conditional order granting Lake Charles Exports, LLC ("LCE") long-term authorization to export LNG from the Lake Charles Terminal to non-FTA countries.³⁰ In the August 7, 2013 conditional order, DOE/FECM "concluded that the opponents of the LCE Application have not demonstrated that the requested authorization will be inconsistent with the public interest", finding in particular that the opponents have not "overcome the statutory presumption that the proposed export authorization is consistent with the public interest."³¹ DOE/FECM found substantial evidence of economic and other public benefits of the Liquefaction Project, holding that the proposed exports "are likely to yield net economic benefits to the United States."³² In addition, DOE/FECM found

²⁶ *Id.* DOE/FECM participated in FERC's environmental review as a cooperating agency and therefore was permitted to adopt FERC's final Environmental Impact Statement for the Liquefaction Project because DOE/FECM conducted an independent review of the final Environmental Impact Statement and determined that its comments and conditions had been satisfied. *LCE*, DOE/FE Order No. 3324-A at 127-128, citing 40 C.F.R. § 1506.3(c); *see also Lake Charles LNG Export*, DOE/FE Order No. 3868 at 136.

²⁷ FERC Authorization Order at P 39.

²⁸ *Id.* at P 56.

²⁹ DOE's Office of Fossil Energy (FE) changed its name to the Office of Fossil Energy and Carbon Management (FECM) on July 4, 2021.

³⁰ FERC Authorization Order at P 37; *LCE*, DOE/FE Order No. 3324.

³¹ *LCE*, DOE/FE Order No. 3324 at 6 and 125.

³² *Id.* at 6.

that exporting natural gas will lead to net benefits to the United States economy and can counteract concentration within global LNG markets, thereby diversifying international supply options and improving energy security for United States allies and trading partners.³³ On balance, DOE/FECM found that the likely net economic benefits and other non-economic or indirect benefits outweighed the potential negative impacts of the proposed exports.³⁴

On July 29, 2016, DOE/FECM issued LCE a final authorization and Lake Charles LNG Export an authorization to export LNG in an amount equivalent to 730 Bcf/yr of natural gas, making substantially similar findings in both orders that the export of LNG to non-FTA countries from the Project was not inconsistent with the public interest.³⁵ DOE/FECM explained that "[b]ecause the source of LNG for all four of these export authorizations is the proposed Lake Charles Liquefaction Project, none of the volumes authorized for export in those orders – DOE/FE Order Nos. 2987 [LCE], 3252 [Lake Charles LNG Export], 3324-A [LCE], and 3868 [Lake Charles LNG Export] – are additive to one another."³⁶

DOE/FECM found that neither protester to Lake Charles LNG Export's application "demonstrated that the proposed exports will be inconsistent with the public interest, as would be required to deny the Application under NGA section 3(a)."³⁷ Several factors supported granting Lake Charles LNG Export authorization to export LNG to non-FTA countries:

EIA's most recent projections in AEO 2016 provide independent support for the proposition that domestic supplies will be adequate to meet domestic needs *and* to supply Lake Charles LNG Export's exports and other final non-FTA LNG exports previously authorized by DOE/FE.

³³ *Id.* at 124.

³⁴ Id.

³⁵ Lake Charles LNG Export, DOE/FE Order No. 3868; LCE, DOE/FE Order No. 3324-A.

³⁶ Lake Charles LNG Export, DOE/FE Order No. 3868 at 3; LCE, DOE/FE Order No. 3324-A at 3-4.

³⁷ Lake Charles LNG Export, DOE/FE Order No. 3868 at 10; see also LCE, DOE/FE Order No. 3324-A at 11.

[T]he proposed exports will benefit the local economy in and around Calcasieu Parish, Louisiana; the regional economy in the Gulf Coast; and the greater national economy.

[T]he evidence shows that the market will be capable of sustaining the level of exports proposed in the Application over the term of the requested authorization without significant negative price or other impacts.³⁸

In particular, DOE/FECM found that Lake Charles LNG Export's proposed exports to non-FTA countries "are likely to generate net economic benefits for the United States" and that there will be no "deleterious economic and societal impacts" as result of such exports.³⁹ DOE/FECM concluded that it did not find there to be an adequate basis to conclude that the Project will be inconsistent with the public interest and therefore authorized Lake Charles LNG Export's proposed exports to non-FTA countries.⁴⁰ DOE/FECM found that "[o]n balance, we find that the potential negative impacts of Lake Charles LNG Export's proposed exports are outweighed by the likely

net economic benefits and by other non-economic or indirect benefits."41

Lake Charles LNG Export then applied for, and DOE/FECM authorized on June 29, 2017, the export of an additional 121 Bcf/yr of natural gas (0.33 Bcf/day) to FTA and non-FTA countries from the Lake Charles Terminal.⁴² The previously approved 730 Bcf/yr of natural gas and the 121 Bcf/yr of natural gas totals the design production of the Lake Charles Terminal as approved by FERC.⁴³ DOE/FECM's grant of this authorization was supported by the following: (i) the requested export amount will have no practical impact on the domestic supply of natural gas in the United States or natural gas markets, (ii) DOE/FECM's export studies project that exports of LNG

³⁸ Lake Charles LNG Export, DOE/FE Order No. 3868 at 129 (emphasis in original); see also LCE, DOE/FE Order No. 3324-A at 121.

³⁹ Lake Charles LNG Export, DOE/FE Order No. 3868 at 130-31; see also LCE, DOE/FE Order No. 3324-A at 121. ⁴⁰ Lake Charles LNG Export, DOE/FE Order No. 3868 at 151; see also LCE, DOE/FE Order No. 3324-A at 140 and 150.

⁴¹ Lake Charles LNG Export, DOE/FE Order No. 3868 at 151; see also LCE, DOE/FE Order No. 3324-A at 139.

⁴² Lake Charles LNG Export, DOE/FE Order No. 4010; see also LCE, DOE/FE Order No. 4011.

⁴³ FERC Authorization Order at P 10, n. 13.

will generate net economic benefits to the broader United States economy, and (iii) the proposed exports will benefit the liquidity of international natural gas markets and make a positive contribution to the United States' trade balance.⁴⁴ DOE/FECM ruled that it had "not found an adequate basis to conclude that Lake Charles LNG Export's proposed exports of LNG to non-FTA countries will be inconsistent with the public interest."⁴⁵

In addition, DOE/FECM issued a categorical exclusion from the preparation of an environmental impact statement or environmental assessment under NEPA for Lake Charles LNG Export's request for authorization for 121 Bcf/yr.⁴⁶ Specifically, DOE/FECM applied categorical exclusion B5.7 of its regulations (10 C.F.R. Part 1021, Subpart D, Appendix B5), which applies to export activities requiring minor operational changes to existing projects, but no new construction. Lake Charles LNG Export's application for a new authorization to export LNG from the Lake Charles Terminal fell within the scope of the B5.7 categorical exclusion because no additional construction beyond that previously authorized or modification of the approved facilities was required.⁴⁷ DOE/FECM also noted that the Liquefaction Project has already been evaluated under NEPA and approved by FERC.⁴⁸

Export Terminal – FERC and DOE Extensions

Due to a material development in 2016 regarding BG Group plc, one of the two original Project sponsors, the Project encountered an unforeseen delay in the projected construction

⁴⁴ Lake Charles LNG Export, DOE/FE Order No. 4010 at 26; see also LCE, DOE/FE Order No. 4011 at 25.

⁴⁵ *Lake Charles LNG Export*, DOE/FE Order No. 4010 at 43; *see also id*. at 13 ("On the basis of this record, DOE/FE has determined that it has not been demonstrated that the proposed exports of LNG will be inconsistent with the public interest, as would be required to deny the Application under NGA section 3(a)."); *see also LCE*, DOE/FE Order No. 4011 at 13 and 42.

⁴⁶ Lake Charles LNG Export, DOE/FE Order No. 4010 at 12, citing U.S. Dep't of Energy, Categorical Exclusion Determination, Lake Charles LNG Export Co., LLC, FE Docket No. 16-109-LNG (issued Jun. 29, 2017); see also LCE, DOE/FE Order No. 4011 at 12.

⁴⁷ *Lake Charles LNG Export*, DOE/FE Order No. 4010 at 30-31; *see also LCE*, DOE/FE Order No. 4011 at 30-31. ⁴⁸ *Id.*

schedule.⁴⁹ On February 15, 2016, Shell Oil acquired BG Group plc in a complex international merger. The resulting merger and integration process required a reevaluation of the Project by Shell Oil and the negotiation of new project agreements with Energy Transfer, which were not completed until March 2019. On August 30, 2019, Lake Charles LNG Export, Lake Charles LNG and Trunkline filed for an extension of time at FERC to construct and place into service the Project facilities by December 16, 2025, which FERC approved on December 5, 2019.⁵⁰

On March 4, 2020, Lake Charles Export LNG filed for an extension at DOE.⁵¹ DOE/FECM found good cause for amending the time for Lake Charles LNG Export to commence export operations out to December 16, 2025.⁵² DOE stated, "[f]irst, DOE/FE notes that FERC already has extended the in-service deadline for the Liquefaction Project through December 16, 2025."⁵³ DOE then agreed with Lake Charles LNG Export that extending the deadline "does not alter DOE/FE's public interest determination in granting the authorizations under NGA section 3(a)."⁵⁴ DOE/FECM found that "[n]o facts associated with Lake Charles LNG Export's original applications, and no requirements of the non-FTA authorizations, are affected by this extension beyond the additional time period for Lake Charles LNG Export to commence export operations."⁵⁵ DOE/FECM noted that "Lake Charles LNG Export is working to complete the export facilities necessary to commence its approved exports, which promotes the public interest

⁴⁹ Declaration at ¶ 8.

⁵⁰ Lake Charles LNG Co., LLC, et al., Docket Nos. CP14-119-000, et al., Letter Order (issued Dec. 5, 2019).

⁵¹ LCE also filed for an extension with DOE on March 4, 2020 stating the same grounds as Lake Charles LNG Export for good cause for an extension.

⁵² Lake Charles LNG Export Co., LLC, DOE/FE Order Nos. 3868-A et al. (issued Oct. 6, 2020); see also Lake Charles Exports, LLC, DOE/FE Order Nos. 3324-B et al. (issued Oct. 6, 2020).

⁵³ Lake Charles LNG Export, DOE/FE Order No. 3868-A at 6; see also LCE, DOE/FE Order No. 3324-B at 6. ⁵⁴ Id.

⁵⁵ Id.

under NGA section 3(a)," and, subsequently concluded that granting the extension "has not been shown to be inconsistent with the public interest under NGA section 3(a)."⁵⁶

In the spring of 2020, Energy Transfer received bids for the EPC of the Liquefaction Project from two EPC contractors for components not already constructed.⁵⁷ Energy Transfer received those bids just as the effects of COVID-19 began to cause a major worldwide economic downturn. Among other things, this downturn almost entirely shut down the demand for long-term LNG contractual commitments by international customers that could not forecast future demand for LNG based on the unknown duration and extent of the impacts of the pandemic. Citing the impacts of COVID-19, Shell Oil withdrew as a Project sponsor on April 1, 2020, and Energy Transfer assumed 100% of the Project. In early to mid-2022, as the effects of COVID-19 began to lessen and worldwide demand for LNG began to increase following Russia's invasion of Ukraine, Energy Transfer ramped up its development activities.

On February 3, 2022, Lake Charles LNG Export, Lake Charles LNG and Trunkline filed a second request with FERC for an extension of the construction deadline for an additional three years out to December 16, 2028. FERC noted that construction deadlines may be extended for good cause, which can be shown by a project sponsor demonstrating that it made good faith efforts to meet its deadline but encountered circumstances that prevented it from doing so.⁵⁸ On May 6, 2022, FERC granted the extension request to December 16, 2028 based on Lake Charles LNG Export's and Energy Transfer's continuing commitment to the Project, noting their active efforts to pursue long-term offtake contracts and completing front-end engineering design with engineering, procurement and contracting companies and the expenditure of several hundreds of

⁵⁶ Lake Charles LNG Export, DOE/FE Order No. 3868-A at 7; see also LCE, DOE/FE Order No. 3324-B at 7.

⁵⁷ Declaration at ¶ 9.

⁵⁸ Lake Charles LNG Co., LLC et al., 179 FERC ¶ 61,086 at P 8 (2022).

millions of dollars to advance the Project.⁵⁹ FERC held that "[t]he unforeseeable impacts of the COVID-19 pandemic combined with [the movants'] continued interest in the project satisfy [FERC]'s good cause inquiry."⁶⁰

FERC also found that the second extension request represents only a change to the timing, not the nature of the Project, and therefore an extension will not undermine its findings in the FERC Authorization Order, including its environmental findings and finding that the Project is required by the public convenience and necessity.⁶¹ FERC explicitly held that "[t]he authorization order's environmental analysis remains valid."⁶² FERC also held that "[a]pproval of a request for extension of time is an administrative action and is not considered to be a major Federal action significantly affecting the quality of the human environment."⁶³

In August 2022, Energy Transfer engaged the two potential EPC contractors to provide updated EPC bids as the former bids had become invalid due to severe supply-chain disruptions and increased costs stemming from the COVID-19 pandemic.⁶⁴ In order to prepare the two updated bids, the potential EPC contractors solicited new cost estimates and bids from their suppliers and subcontractors to support the overall EPC bid, a process that took an additional nine months. It was only after that process ended in May 2023 that Energy Transfer could begin to negotiate the terms of the EPC contract with the two potential EPC contractors.

On June 21, 2022, Lake Charles LNG Export filed a request with DOE/FECM for an extension of the time for it to commence export operations from December 16, 2025 to December

⁵⁹ *Id.* at P 21.

⁶⁰ Id.

⁶¹ *Id.* at P 10.

⁶² *Id.* at P 12.

⁶³ *Id.* at P 17, citing in part, *Eagle Crest Energy Co.*, 168 FERC ¶ 61,186 at P 22 (2019) (holding that an extension of time to comply with a license requirement to commence and complete construction by a certain date, that involves no construction or changes to the project development, is an administrative action appropriately categorically excluded from further NEPA review), *aff'd sub nom.*, *Nat'l Parks Conservation Ass'n v. FERC*, 6 F.4th 1044 (9th Cir. 2021). ⁶⁴ Declaration at ¶ 10.

16, 2028.⁶⁵ Lake Charles LNG Export cited in its request the same grounds that FERC found to be good cause to grant an extension of the FERC deadline. Despite FERC finding good cause for an extension, DOE/FECM took ten months to consider the extension request but denied it on April 21, 2023, finding that Lake Charles LNG Export had not shown good cause under NGA section 3(a) for the extension.⁶⁶ On the same date, DOE under the Biden Administration announced a new policy imposing new restrictions on approvals of extension requests.

In the order denying rehearing of the extension, DOE advised that notwithstanding the denials, the existing export authorizations remain in effect and invited Lake Charles LNG Export, as well as LCE, to file for a new non-FTA authorization if they were unable to meet the December 16, 2025 commencement of exports deadline.

...should Lake Charles LNG Export be unable to commence exports by December 16, 2025, it is welcome to resubmit a non-FTA request so that it can be evaluated under current policies with the most recent market information.⁶⁷

Biden Administration's LNG Export "Pause"

At DOE's direction, LCE filed an application at DOE in August 2023 for a new non-FTA authorization to achieve a new commencement of export operations deadline.⁶⁸ Lake Charles LNG Export elected at that time not to make a further filing at DOE. The continued need for a later DOE deadline for the commencement of exports (i.e., to at least match FERC's extension date) was the sole reason for LCE filing for a new non-FTA authorization.

⁶⁵ LCE also filed for a second extension with DOE on June 21, 2022 stating the same grounds as Lake Charles LNG Export for good cause for an extension.

 ⁶⁶ Lake Charles LNG Export Co., LLC, DOE/FECM Order Nos. 3868-B et al. (issued Apr. 21, 2023), reh'g denied, DOE/FECM Order Nos. 3868-C et al. (issued Jun. 21, 2023); see also Lake Charles Exports, LLC, DOE/FECM Order Nos. 3324-C et al. (issued Apr. 21, 2023), reh'g denied, DOE/FECM Order Nos. 3324-D et al. (issued Jun. 21, 2023).
 ⁶⁷ Lake Charles LNG Export, DOE/FECM Order Nos. 3868-C et al. at 5; see also LCE, DOE/FECM Order Nos. 3324-D et al. at 5.

⁶⁸ Application of Lake Charles Exports, LLC for Long-term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries and Request for Expedited Consideration, Docket No. 23-87-LNG (filed Aug. 18, 2023).

Prior to DOE acting on LCE's new non-FTA application, President Biden announced on January 26, 2024 a "pause" on the review and any approval of all pending and future non-FTA applications at DOE.⁶⁹ In connection therewith, DOE/FECM announced that it would initiate a process to update the economic and environmental analyses used to review LNG export applications to non-FTA countries.⁷⁰ The Biden administration's "pause" was challenged in the courts and was found to be illegal. In July 2024, the Honorable James D. Cain, Jr., United States District Judge for the Western District of Louisiana, enjoined the DOE from halting and/or pausing the approval process for pending and future applications for LNG exports to non-FTA countries and ruled that President Biden's export ban contravened the express language of the NGA requiring expeditious rulings on non-FTA applications.⁷¹ In contravention of the court's order, the Biden administration did not end the "pause," and DOE has yet to act on LCE's pending non-FTA application in Docket No. 23-87-LNG.⁷²

In November 2024, President Donald Trump won the presidential election, running on a platform that included revitalizing the country's energy production and exporting LNG to the country's allies and trade partners. Despite the impending change in presidential administrations and anticipated wholesale change in energy policy, DOE/FECM issued the DOE 2024 Study on December 17, 2024. The DOE 2024 Study's key findings focused on (1) the domestic natural gas supply and economic impacts, (2) energy security, (3) greenhouse gas emissions, and (4)

⁶⁹ Statement from President Joe Biden on Decision to Pause Pending Approvals of Liquefied Natural Gas Exports (Jan. 26, 2024), https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2024/01/26/statement-from-president-joe-biden-on-decision-to-pause-pending-approvals-of-liquefied-natural-gas-exports/.

⁷⁰ DOE to Update Public Interest Analysis to Enhance National Security, Achieve Clean Energy Goals and Continue Support for Global Allies (Jan. 26, 2024), https://www.energy.gov/articles/doe-update-public-interest-analysis-enhance-national-security-achieve-clean-energy-goals.

⁷¹ State of Louisiana, et al. v. Joseph R. Biden, et al., Case No. 2:24-CV-00406 (W.D. La. July 1, 2024).

⁷² During the "pause," DOE only issued a single non-FTA authorization, which was an order approving NFE Altamira FLNG's non-FTA application to export LNG. *NFE Altamira FLNG, S. De. R.L. De C.V.*, DOE/FECM Order No. 5156 (issued Aug. 31, 2024). However, DOE issued the order for a term of 5 years rather than a standard term expiring on December 31, 2050.

environmental and community effects.⁷³ DOE established a 60-day comment period that was later extended to a 90-day comment period.

On January 20, 2025, President Trump was sworn into office as the 47th President of the United States, ushering in policy changes seeking to further the public interest by unleashing American energy. On his first day in office, President Trump issued the Unleashing American *Energy* Executive Order, directing the Secretary of Energy to "restart reviews of applications for approvals of liquified natural gas export projects as expeditiously as possible, consistent with applicable law."⁷⁴ The Executive Order stated that "[i]n assessing the 'Public Interest' to be advanced by any particular application, the Secretary of Energy shall consider the economic and employment impacts to the United States and the impact to the security of allies and partners that would result from granting the application."⁷⁵ As DOE's jurisdiction is limited to regulating exports of LNG and not authorizing export projects, DOE interprets the Executive Order as directing DOE to review non-FTA export applications "as expeditiously as possible."⁷⁶ Due to the previous administration's ill-advised and short-sighted energy policies, President Trump also issued the Declaring a National Energy Emergency Executive Order on his first day in office.⁷⁷ Such an executive order is necessary because the United States has been hampered in the use of its abundant energy resources to better the lives of its citizens and to aid its foreign allies and partners. The Executive Order states:

> Moreover, the United States has the potential to use its unrealized energy resources domestically, and to sell to international allies and partners a reliable, diversified, and affordable supply of energy. This would create jobs and economic prosperity for Americans forgotten in the present

⁷³ 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports, 89 Fed. Reg. 104132 (Dec. 20, 2024).

⁷⁴ Exec. Order No. 14154, *Unleashing American Energy*, 90 Fed. Reg. 8353 (Jan. 29, 2025) (issued Jan. 20, 2025). ⁷⁵ *Id.* (emphasis added).

⁷⁶ Commonwealth LNG, LLC, DOE/FECM Order No. 5238 at n. 38 (issued Feb. 14, 2025).

⁷⁷ Exec. Order No. 14156, *Declaring a National Energy Emergency*, 90 Fed. Reg. 8433 (Jan. 29, 2025) (issued Jan. 20, 2025).

economy, improve the United States' trade balance, help our country compete with hostile foreign powers, strengthen relations with allies and partners, and support international peace and security. Accordingly, our Nation's dangerous energy situation inflicts unnecessary and perilous constraints on our foreign policy.⁷⁸

On January 21, 2025, DOE announced that it was ending the "pause" imposed by the Biden administration on the approvals of non-FTA LNG export authorizations by DOE and returning to regular order, following the direction given by President Trump in the *Unleashing American Energy* Executive Order.⁷⁹ After being sworn in as the 17th DOE Secretary, Secretary Chris Wright issued a statement that a key component of President Trump's agenda for restoring this country's energy dominance and leading the world in energy development and innovation is DOE "cutting red tape, prioritizing common-sense solutions, and fostering American ingenuity."⁸⁰ Secretary Wright stated that "[w]hen American energy is unleashed, human lives are bettered."⁸¹ This was quickly followed up with his *Unleashing the Golden Era of American Dominance* secretarial order where Secretary Wright announced that:

America is blessed with abundant energy resources – we are the world's top oil and gas producer and a net energy exporter for the first time in decades. Our energy abundance is an asset, not a liability.⁸²

DOE is in a position to again make the U.S. the leader in energy innovation through common sense energy policies. Secretary Wright stated that ending the LNG export freeze was one example of a

⁷⁹ U.S. Department of Energy Reverses Biden LNG Pause, Restores Trump Energy Dominance Agenda (Jan. 21, 2025), https://www.energy.gov/articles/us-department-energy-reverses-biden-lng-pause-restores-trump-energy-dominance-agenda.

⁷⁸ Id.

⁸⁰ Statement from Energy Secretary Chris Wright (Feb. 3, 2025), https://www.energy.gov/articles/statement-energy-secretary-chris-wright.

⁸¹ Id.

⁸² Secretary Wright Acts to "Unleash Golden Era of American Energy Dominance" (Feb. 5, 2025), https://www.energy.gov/articles/secretary-wright-acts-unleash-golden-era-american-energy-dominance. See also Secretary Wright's Welcome Remarks to DOE Staff on February 5, 2025 where he discusses the abundance of American energy that enabled the U.S. to go from the largest importer of natural gas to the largest exporter of natural gas in less than twenty years. "This is technology here—technology which the DOE played a role [in], as well as myself and several others, in the late '90s, to help start the shale revolution."

common sense energy policy replacing burdensome and unreasonable government overreach. Overall, "[a] strong energy foundation, expanded energy infrastructure, more American ingenuity, and fewer barriers mean a stronger America" and "we're just getting started."⁸³

In light of the factors causing delays related to further construction activities with respect to the Liquefaction Project described above, particularly those factors related to the Biden Administration's denial of the requests of Lake Charles LNG Export and LCE for an extension of the deadline to commence exports, as well as the Biden Administration's "pause" that precluded LCE from receiving approval of its application for a new non-FTA authorization, Lake Charles LNG Export, Lake Charles LNG and Trunkline filed a request with FERC on April 11, 2025 for an extension of the construction deadline for an additional three years out to December 31, 2031.⁸⁴

III. <u>REQUEST FOR EXTENSION</u>

A. Lake Charles LNG Export is unable to meet the current commencement of export operations deadline due to circumstances outside of its control.

Lake Charles LNG Export and Energy Transfer have made substantial and substantive efforts to advance the Project in a timely manner. However, due to extenuating circumstances outside of its control as detailed herein, Lake Charles LNG Export is unable to commence export operations by December 17, 2025 and therefore needs an extension to December 31, 2031.

Lake Charles LNG Export filed for its first extension at DOE in March 2020 due to a material change in BG Group plc, one of the two original sponsors of the Project.⁸⁵ In a large complex international merger, BG Group plc was acquired by Shell Oil and during the resulting

 ⁸³ Statement from Energy Secretary Chris Wright on President Trump's Joint Address to Congress, (Mar. 4, 2025), https://www.energy.gov/articles/statement-energy-secretary-chris-wright-president-trumps-joint-address-congress.
 ⁸⁴ Request for Three-Year Extension, *Lake Charles LNG Co., LLC*, Docket Nos. CP14-119-000 et al. (filed Apr. 11, 2025).

⁸⁵ Declaration at ¶ 8.

integration process Shell Oil reevaluated the Project. New project agreements between Shell Oil and Energy Transfer had to be renegotiated and this was not done until March 2019. On October 6, 2020, DOE granted an extension until December 17, 2025 to account for the Project's construction schedule.

In the spring of 2020, Energy Transfer received bids from two EPC contractors for the EPC of the Liquefaction Project components not already constructed.⁸⁶ At this same time, the world-wide COVID-19 pandemic started to cause a major worldwide economic downturn. The Project was specifically impacted by COVID-19. The resulting economic downturn almost entirely shut down the demand for long-term LNG export contractual commitments for the Lake Charles Terminal for over two years. Lake Charles LNG Export's prospective international customers could not forecast future demand for LNG based on the unknown duration and extent of the impacts of the pandemic. In addition, citing the impacts of COVID-19, Shell Oil withdrew as a Project sponsor on April 1, 2020 and Energy Transfer assumed 100% of the Project. It was not until early to mid-2022, as the effects of COVID-19 began to lessen and worldwide demand for LNG began to increase following Russia's invasion of Ukraine, that Energy Transfer was able to ramp up its development activities.

The COVID-19 pandemic also caused significant supply chain issues that resulted in severe shortages of critical LNG equipment to be used in the Project, particularly electrical components, heat exchangers, turbines and compressors, as well as substantial increases in the cost of materials.⁸⁷ These issues ultimately led to the determination by the Project's two potential EPC contractors that they could not honor their prior EPC bids. The two EPC contractors started a nine-month process in early Fall of 2022 to solicit updated bids from every supplier of materials and

⁸⁶ *Id.* at ¶ 9.

⁸⁷ *Id.* at ¶ 10.

parts for the Project. The process for obtaining new bids was time-consuming and arduous and Energy Transfer paid nearly \$25 million for the bid updating process alone. Energy Transfer did not receive revised final bids from the two EPC contractors until May 2023. Upon receipt of the revised bids, Energy Transfer began negotiating the EPC contract. Negotiations were completed in September 2024, and Energy Transfer and KTJV, a joint venture between KBR and Technip Energies, executed the EPC contract.

FERC cited the unforeseen impacts of the COVID-19 pandemic on the Project as grounds for approval of Lake Charles LNG Export's extension of the FERC deadline.⁸⁸ DOE also recognized the difficulties caused by COVID-19 and the resulting additional demands by EPC contractors.⁸⁹ In addition, the low availability of qualified EPC contractors, as evidenced by the recent bankruptcy of Golden Pass LNG's EPC contractor, Zachry Industrial, Inc.,⁹⁰ delayed and complicated Energy Transfer's finalization of its EPC contract.

In June 2022, Lake Charles LNG filed for an extension with DOE, citing the same grounds that FERC found to be good cause to grant a similar extension in May 2022. Despite FERC finding good cause for an extension, DOE denied Lake Charles LNG Export's request for a DOE deadline extension on April 21, 2023,⁹¹ and issued the now-rescinded Biden-era extension policy. At

⁸⁸ Lake Charles LNG Co., LLC et al., 179 FERC ¶ 61,086 at P 21 ("[t]he unforeseeable impacts of the COVID-19 pandemic combined with [the movants'] continued interest in the project satisfy [FERC]'s good cause inquiry.").

⁸⁹ See Delfin LNG, DOE/FECM Order Nos. 3393-C and 4028-D at 10 ("..., according to Delfin, the global COVID-19 pandemic disrupted LNG project financing, 'and U.S. LNG projects generally ceased to make progress.'"); *Golden Pass LNG Terminal LLC*, DOE/FECM Order Nos. 3147-F and 3978-G at 10 (issued Mar. 5, 2025) ("In 2022, Zachry demanded certain cost and schedule adjustments under the EPC Contract, including for COVID-related delays and transportation cost increases.").

⁹⁰ See Golden Pass LNG Terminal LLC, DOE/FECM Order Nos. 3147-F and 3978-G at 15 (Golden Pass LNG "has established that it is unable to comply with its existing export commencement deadline (September 30, 2025) due to extenuating circumstances outside of its control—both the work stoppage and bankruptcy filing of its lead contractor, Zachry, and related delays as [Golden Pass LNG] seeks to complete construction of the Project with a new lead contractor.").

⁹¹ Lake Charles LNG Export Co., LLC, Order Denying Application for Second Extension of Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries, DOE/FECM Order Nos. 3868-B and 4010-B (issued Apr. 21, 2023); see also Lake Charles Exports, LLC, Order Denying Application for Second Extension of

DOE's direction, and having no other recourse, LCE filed an application at DOE in August 2023 for a new non-FTA authorization in order to achieve a new commencement of export operations deadline for the Project.⁹² Energy Transfer's continued need for a later DOE deadline for the commencement of exports (i.e., to at least match FERC's extension date) was the sole reason for LCE filing the application for a new non-FTA authorization.⁹³ DOE did not act on LCE's new application and President Biden announced on January 26, 2024 a formal "pause" on the review and any approval of all non-FTA applications at DOE, leaving the Project in limbo.

The Biden Administration's "pause" on DOE's review of LCE's application caused considerable angst among the companies that previously had entered into long-term LNG offtake contracts with Energy Transfer for the Liquefaction Project.⁹⁴ These offtake customers have real world needs for these committed LNG volumes. In addition, Energy Transfer's discussions with other LNG customers and with potential equity participants in the Liquefaction Project experienced setbacks due to the uncertainty of the timing and substance of DOE's review process related to the "pause." Even though a Federal court ruled that the "pause" violated the express language of the NGA requiring expeditious ruling on non-FTA applications,⁹⁵ DOE did not act on LCE's April 2023 application. It took an executive order by President Trump on January 20, 2025 to restart reviews of pending DOE non-FTA export applications. DOE's failure to grant Lake Charles LNG Export's extension and its failure to act on LCE's application for a new export

Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries, DOE/FECM Order Nos. 3324-C and 4011-B (issued Apr. 21, 2023).

⁹² Lake Charles Exports, LLC, Application of Lake Charles Exports, LLC for Long-term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries and Request for Expedited Consideration, Docket No. 23-87-LNG (filed Aug. 18, 2023).

⁹³ Declaration at ¶ 11.

⁹⁴ *Id.* at ¶ 12.

⁹⁵ State of Louisiana et al. v. Jospeh R. Biden et al., Case No. 2:24-CV-00406 (order issued Jul. 1, 2024).

authorization based on the "pause" has significantly affected the commercialization of the Project for nearly two years.⁹⁶

As noted above, the Project experienced difficulties, delays and added costs after October 2020 due to the lingering impacts of COVID-19. The two-year disruption caused by the former administration's "pause" on the consideration of the Project's pending non-FTA authorization application at DOE and the other circumstances noted herein outside of Lake Charles LNG Export's and Energy Transfer's control necessitate this request for an extension of the export commencement deadline in the DOE export orders.

B. Lake Charles LNG Export's and Energy Transfer's ongoing and substantial efforts to advance the Project demonstrate good cause for the requested extension.

Despite the challenging, completely unforeseen circumstances outside of their control, Lake Charles LNG Export and Energy Transfer diligently and in good faith have made ongoing and substantial efforts to advance the development of the Project since 2012 with the initiation of the required pre-filing process at FERC. Energy Transfer has incurred approximately \$398 million of costs to develop the Project, including approximately \$75.6 since October 2020, which is the date when DOE approved the current extended deadline.⁹⁷ Energy Transfer received FERC approval to undertake certain construction activities, and it has completed a substantial portion of them, such as clearing approximately 150 acres of trees from the Liquefaction Project site,

⁹⁶ See Delfin LNG, DOE/FECM Order Nos. 3393-C and 4028-D at 20-21 (DOE found that Delfin could not comply with the export commencement deadline due to extenuating circumstances outside of its control, including "MARAD declin[ing] to issue the [Deepwater Port] license due to extenuating circumstances outside of [Delfin's] control" and that Delfin "could not obtain a space on [the shipbuilder's] construction schedule due to uncertainties over the timing of [Delfin's] financing while it pursued its final [Deepwater Port] license issuance.").

⁹⁷ Declaration at ¶ 13.

constructing test piles, and installing erosion control devices.⁹⁸ FERC has conducted inspections of these construction activities and have issued inspection reports finding no issues.⁹⁹

Energy Transfer has acquired, maintained, repaired and prepared existing import terminal facilities for use as the foundation of the Liquefaction Project, including four LNG storage tanks, two deep water docks capable of handling large LNG vessels, LNG sendout facilities, and other infrastructure on the 152-acre import site.¹⁰⁰ The value of these import facilities that will be incorporated into the Liquefaction Project is estimated to be in excess of \$1.0 billion.¹⁰¹ In addition, Energy Transfer has spent nearly \$8.0 million in maintaining, repairing and upgrading these facilities over the last seven years, including repairs due to several hurricanes, in order for them to be incorporated into the Liquefaction Project.¹⁰² These activities also included actions to maintain such facilities to remain in compliance with U.S. Department of Transportation PHMSA requirements. The Project would not be possible without the incorporation of these existing facilities and the efforts Energy Transfer has undertaken related thereto.

In 2024, Trunkline completed and put into service a portion of the Pipeline Modifications Project, which was certificated by FERC in the Authorization Order as the part of the Project,

⁹⁸ FERC's webpage unofficially lists the Project as "Approved, Not Under Construction." This, however, is a misnomer because FERC separately has authorized Energy Transfer to proceed with certain Project construction activities that Energy Transfer has completed. Absent such separate authorization from FERC in addition to the Authorization Order, Energy Transfer would not have been permitted to perform construction. Similarly, FERC lists the Delfin LNG project as "Approved, Not Under Construction" but this did not appear to be a factor in DOE's recent approval of an extension for Delfin LNG. *See Delfin LNG*, DOE/FECM Order Nos. 3393-C and 4028-D at 19-20 ("... we find that Delfin has provided adequate evidence to demonstrate that it has 'physically commenced construction on the associated export facility."").

⁹⁹ Construction Inspection Report, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (filed Mar. 29, 2016); Construction Inspection Report, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (filed Jun. 22, 2016); Construction Inspection Report, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (filed Jan. 23, 2017).

¹⁰⁰ Declaration at ¶ 15.

¹⁰¹ *Id.* at ¶ 7. The estimated value is based on a variety of factors, including the estimated cost to construct these facilities under the current cost environment and the overall impact on the construction schedule if not already existing. The estimated value of these import facilities is not included in the approximately \$398 million that has been spent on the development of the Liquefaction Project.

 $^{^{102}}$ *Id.* at ¶ 15. These costs to maintain, repair and upgrade these import facilities is not included in the approximately \$398 million that has been spent on the development of the Liquefaction Project.

providing capacity for the natural gas to be transported to the Lake Charles Terminal for liquefaction. Trunkline put into service various piping modifications of four Trunkline gas compressor stations to enable bi-directional flow. Trunkline spent approximately \$100.0 million to construct these facilities.¹⁰³ This portion of the Pipeline Modifications Project is an integral component of the Project.

Energy Transfer is expending significant manpower resources on improving the design of the Project, as well as developing detailed Project execution plans covering all aspects of construction. Energy Transfer has more than 40 employees actively working on the Project in the areas of engineering and construction, finance, commercial development, legal, public relations, and government affairs, as well as several third-party consulting firms providing services related to engineering and construction, commercial development, and finance¹⁰⁴. As noted herein, Energy Transfer has made extensive efforts and capital expenditures to continue to develop the Project. Energy Transfer has taken regular action before DOE and FERC to advance the Project and has undertaken numerous efforts to progress the Project and continue construction,¹⁰⁵ including:

Construction Activities

• Energy Transfer has received authorizations from FERC and has performed ground disturbance construction at the Liquefaction Project site, including tree clearing of 150 acres, drilling of test piles for the foundation, constructing and maintaining erosion control devices, conducting geotechnical investigations, relocating an existing road and an existing pipeline, and plugging of an oil and gas well on site.¹⁰⁶ After completion of such construction, FERC conducted

¹⁰³ Declaration at ¶ 16. The costs to construct this portion of the Pipeline Modifications Project is not included in the approximately \$398 million that has been spent on the development of the Liquefaction Project. ¹⁰⁴ *Id.* at ¶ 22.

¹⁰⁵ See Declaration, Exhibit A for a chart detailing the Project-related construction activities and other activities reported to DOE and FERC.

¹⁰⁶ Declaration at ¶ 14; *see also* Letter Order Approving Notice to Proceed with Tree Clearing of the Liquefaction Facility Site, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (issued Feb. 23, 2016); Letter Order Approving Notice to Proceed with Test Piles, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (issued Feb. 26, 2016); Letter Order Granting Variance Approval to Relocate Alcoa Pipeline, *Lake Charles LNG*

inspections of the construction and filed Construction Inspection Reports.¹⁰⁷ Energy Transfer also has executed contracts with third-party construction contractors to implement the remaining FERC-approved site preparation work.¹⁰⁸

- Energy Transfer has maintained, operated and repaired its existing import facilities for use in the Project, including four LNG storage tanks with a total combined storage capacity of 425,000 cubic meters, two deep water loading docks capable of handling large LNG vessels, LNG sendout facilities, and other infrastructure on the 152-acre brownfield import terminal site.¹⁰⁹ Some of these activities include:
 - Energy Transfer has conducted routine preventive maintenance, including instrument, electrical and equipment checks and maintenance painting.¹¹⁰
 - Energy Transfer is undertaking a project to repair perimeter piles and ameliorate corrosion at the LNG tanks.¹¹¹
 - Energy Transfer fixed damaged utility water fittings and valves at forty-one locations throughout the Lake Charles Terminal due to the December 2022 freeze.¹¹²
 - Energy Transfer made extensive repairs to the import facility due to the Category 4 Hurricane Laura that directly passed over the Lake Charles Terminal, as well as Hurricane Delta that passed just to the east of the terminal.¹¹³
 - Energy Transfer removed the unloading arms at the East and West berths for maintenance and due to minor damage to the arm auxiliary systems during Hurricane Laura and stored the arms under a nitrogen pad for future repair and reinstallation.¹¹⁴

Co., LLC, et al., Docket Nos. CP14-119-000 et al. (issued Apr. 18, 2023); Letter Order Granting Notice to Proceed with Certain Activities, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (issued Jan. 23, 2023). ¹⁰⁷ Construction Inspection Report, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (filed Mar. 29, 2016); Construction Inspection Report, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (filed Jun. 22, 2016); Construction Inspection Report, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (filed Jun. 22, 2016); Construction Inspection Report, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (filed Jun. 23, 2017).

¹⁰⁸ Declaration at ¶ 17.

 $^{^{109}}$ *Id.* at ¶ 15.

¹¹⁰ See, e.g., Lake Charles LNG Semi-Annual Report (07/01/2024 – 12/31/2024), *Lake Charles LNG Co., LLC*, Docket Nos. CP74-138, et al. (filed Feb. 7, 2025).

¹¹¹ Id.

¹¹² See, e.g., Lake Charles LNG Semi-Annual Report (01/01/2023 – 06/30/2023), *Lake Charles LNG Co., LLC*, Docket Nos. CP74-138, et al. (filed Aug. 8, 2023).

¹¹³ See, e.g., Lake Charles LNG Semi-Annual Report (07/01/2023 – 12/31/2023), *Lake Charles LNG Co., LLC*, Docket Nos. CP74-138, et al. (filed Feb. 10, 2023); Lake Charles LNG Semi-Annual Report (01/01/2022 - 06/30/2022), *Lake Charles LNG Co., LLC*, Docket Nos. CP74-138, et al. (filed Aug. 2, 2022); Lake Charles LNG Semi-Annual Report (07/01/2020 – 12/31/2020), *Lake Charles LNG Co., LLC*, Docket Nos. CP74-138, et al. (filed Feb. 9, 2021).

¹¹⁴ Lake Charles LNG Semi-Annual Report (07/01/2021 – 12/31/2021), *Lake Charles LNG Co., LLC*, Docket Nos. CP74-138, et al. (filed Feb. 11, 2022).

- Energy Transfer has performed actions to maintain such facilities to remain in compliance with U.S. Department of Transportation PHMSA requirements.¹¹⁵
- In December 2022, FERC issued Trunkline a notice to proceed with construction of a portion of the Pipeline Modifications Project regarding piping modifications of four Trunkline compressor stations to enable bi-directional flow.¹¹⁶ On July 18, 2023, FERC approved a variance for Trunkline to install a flow control valve outside one of the compressor station's fence line.¹¹⁷ Trunkline put these facilities into service on January 1, 2024 at a cost of approximately \$100.0 million.¹¹⁸ This portion of the Pipeline Modifications Project is an integral component of the Project.
- Energy Transfer has obtained variance approvals from FERC for various design enhancements to the Project.¹¹⁹
- In April 2019, Energy Transfer issued an Invitation to Tender to prospective LNG EPC bidders to construct the Liquefaction Project.¹²⁰ Also, in the second quarter of 2019, the Liquefaction Project executed contracts with LNG EPC companies to verify existing front-end engineering design.
- In the spring of 2020, Energy Transfer received bids from two EPC contractors for the EPC of the Liquefaction Project components not already constructed.¹²¹ However, the EPC contractors took the position that the bids were invalid due to severe supply-chain disruptions and increased costs stemming from the COVID-19 pandemic. In August 2022, Energy Transfer engaged the two potential EPC contractors to provide updated EPC bids. Energy Transfer paid nearly \$25 million for the bid updating process alone, which was not completed until May 2023. Energy Transfer then began the negotiations of the EPC contract, which was executed in September 2024 with KTJV, a joint venture between KBR and Technip Energies.

¹¹⁵ Declaration at ¶ 15.

¹¹⁶ Trunkline Gas Co., LLC, Docket Nos. CP14-119-000, et al., Letter Order (issued Dec. 9, 2022).

¹¹⁷ Letter Order Granting Variance Approval for Modification at the Longville Compressor Station, *Lake Charles LNG Co., LLC, et al.*, Docket Nos. CP14-119-000 et al. (issued Jul. 18, 2023).

¹¹⁸ Declaration at ¶ 16.

¹¹⁹ Lake Charles LNG Co., LLC, Docket No. CP14-120-000, Delegated Order Approving Variance Regarding Ethane Modification (issued Nov. 12, 2024); Lake Charles LNG Co., LLC, Docket No. CP14-120-000, Delegated Order Approving Variance Regarding Flare Design (issued Nov. 12, 2024); Lake Charles LNG Co., LLC, Docket No. CP14-120-000, Delegated Order Approving Variance Regarding Gas Turbine Supplier (issued Oct. 18, 2024); Lake Charles LNG Co., LLC, Docket No. CP14-120-000, Delegated Order Approving Variance to Relocate Alcoa Pipeline (issued Apr. 18, 2023); Lake Charles LNG Co., LLC, Docket No. CP14-120-000, Delegated Order Approving Variance to Relocate Communication Tower (issued Jul. 15, 2016).

¹²⁰ Declaration at ¶ 17.

¹²¹ *Id.* at ¶ 10.

Commercial and Customer Activities

- Energy Transfer is making significant progress in the commercialization of the Project and to date has executed long-term commercial agreements with LNG offtake contracts for approximately 10.0 mtpa of LNG, which is 60% of the FERC-approved LNG production capacity of the Project,¹²² for terms of 18-25 years.¹²³
 - In April 2025, Energy Transfer signed a Heads of Agreement ("HOA") with MidOcean Energy, an LNG company formed and managed by EIG, a leading institutional investor in the global energy and infrastructure sectors, which provides a framework for the major terms for MidOcean Energy's participation in the Project, including an equity investor that will commit to fund 30% of the construction costs of the Project that will entitle MidOcean to 30% of the LNG production (approximately 5.0 mtpa).¹²⁴
 - On December 19, 2024, Energy Transfer entered into a 20-year term LNG Sale and Purchase Agreement with Chevron U.S.A. Inc., a copy of which was filed with DOE/FECM under seal along with a public summary of the major provisions of the agreement.¹²⁵
 - On October 3, 2024, Energy Transfer entered into a 20-year term LNG Sale and Purchase Agreement with Gunvor International B.V., Amsterdam, Geneva Branch, a copy of which was filed with

¹²² *Id.* at \P 18.

¹²³ In the order denying rehearing of Lake Charles LNG Export's extension request, DOE took "administrative notice of the fact that offtake contracts Lake Charles LNG Export used to demonstrate progress on the Liquefaction Project are not necessarily tied to this facility, as noted in the public summaries." Lake Charles LNG Export Co., LLC, DOE/FECM Order Nos. 3868-C et al. at 27 (issued Jun. 21, 2023). DOE apparently failed to understand that because LNG offtake contracts are take-or-pay agreements, the seller must have the ability to source the LNG from other export terminals in case the seller's export terminal is unable to fulfill the order in full or the terminal is down for repairs. Hence, the provision that "LNG may be delivered by Seller to Buyer at the Lake Charles Facility ... or any alternate source located in the U.S. Gulf Coast" is a common industry term in the typical form for offtake contracts. See, e.g., LNG Sale and Purchase Agreement, dated May 27, 2021, between Driftwood LNG, LLC and Gunvor Singapore PTE Ltd, filed in DOE/FECM Docket No. 16-144-LNG on June 25, 2021 at Section 3.1.2 ("... subject to the prior written consent of Buyer ..., Seller may deliver cargoes to Buyer from any alternate source ..."); LNG Sale and Purchase Agreement (FOB), dated October 22, 2021, between Cheniere Marketing, LLC and Glencore Ltd., filed in DOE/FECM Docket No. 10-85-LNG et al. on November 9, 2021 at Public Summary No. 2 ("LNG may be delivered by Seller to Buyer at the Sabine Pass LNG Terminal ... or at any number of liquefaction plants ..."); LNG Sale and Purchase Agreement (FOB), dated June 2, 2014, between Corpus Christi Liquefaction, LLC and Gas Natural Fenosa LNG SL, public summary filed on June 10, 2015 in FE Docket No. 12-97-LNG but see the full copy of the agreement filed in Cheniere Energy. Inc.'s 2021 SEC 10-K. Exhibit 10.122 at Section 3.1.2 ("Seller intends to load cargoes from the Corpus Christi Facility, but, subject to the prior written consent of Buyer ..., Seller may deliver cargoes to Buyer from any alternate source ...").

¹²⁴ Declaration at ¶ 19.

¹²⁵ LNG Sale and Purchase Agreement, dated December 19, 2024, between Energy Transfer LNG Export, LLC and Chevron U.S.A. Inc., filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on Jan. 10, 2025.

DOE/FECM under seal along with a public summary of the major provisions of the agreement.¹²⁶

- On August 24, 2022, Energy Transfer announced that it had entered into a 20-year term LNG Sale and Purchase Agreement with Shell NA LNG, LLC for 2.1 mtpa of LNG, a copy of which was filed with DOE/FECM under seal along with a public summary of the major provisions of the agreement.¹²⁷
- On June 5, 2022, Energy Transfer announced that it had entered into a 25-year term LNG Sale and Purchase Agreement with China Gas Hongda Energy Trading Co., LTD for 0.7 mtpa of LNG, a copy of which was filed with DOE/FECM under seal along with a public summary of the major provisions of the agreement.¹²⁸
- On May 3, 2022, Energy Transfer announced that it had entered into a 18-year term LNG Sale and Purchase Agreement with SK Gas Trading LLC for 0.4 mtpa of LNG, a copy of which was filed with DOE/FECM under seal along with a public summary of the major provisions of the agreement.¹²⁹
- On May 2, 2022, Energy Transfer announced that it had entered into a 20-year term LNG Sale and Purchase Agreement with Gunvor Singapore Pte Ltd. for 2.0 mtpa of LNG, a copy of which was filed with DOE/FECM under seal along with a public summary of the major provisions of the agreement.¹³⁰
- On March 29, 2022, Energy Transfer announced that it had entered into two 20-year term LNG Sale and Purchase Agreements with ENN Natural Gas and ENN Energy Holdings Limited for a combined 2.7 mtpa of LNG, copies of which were filed with DOE/FECM under seal along with a public summary of the major provisions of the agreements.¹³¹

¹²⁶ LNG Sale and Purchase Agreement (free on board basis), dated October 3, 2024, between Energy Transfer LNG Export, LLC and Gunvor International B.V., Amsterdam, Geneva Branch, filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on Oct. 22, 2024.

¹²⁷ LNG Sale and Purchase Agreement, dated August 23, 2022, between Energy Transfer LNG Export, LLC and Shell NA LNG LLC, filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on Sep. 19, 2022.

¹²⁸ LNG Sale and Purchase Agreement, dated June 1, 2022, between Energy Transfer LNG Export, LLC and China Gas Hongda Energy Trading Co., Ltd., filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on Jun. 30, 2022.

¹²⁹ LNG Sale and Purchase Agreement (Free on Board), dated April 29, 2022, between Energy Transfer LNG Export, LLC and SK Gas Trading LLC, filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on May 19, 2022.

¹³⁰ LNG Sale and Purchase Agreement (Free on Board Basis), dated April 29, 2022, between Energy Transfer LNG Export, LLC and Gunvor Singapore Pte Ltd, filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on May 19, 2022.

¹³¹ LNG Sale and Purchase Agreement (Free on Board), dated March 28, 2022, between Energy Transfer LNG Export, LLC and ENN LNG (Singapore) Pte. Ltd., filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on Apr. 25, 2022; LNG Sale and Purchase Agreement (Free on Board), dated March 28, 2022, between Energy Transfer LNG Export, LLC and ENN Global Trading Pte. Ltd., filed in DOE/FECM Docket Nos. 11-59-LNG, et al. on Apr. 25, 2022.

• At the end of 2020, Energy Transfer entered into an amended and restated regasification agreement with its LNG import shipper, BG LNG Services, LLC, to allow greater flexibility on the use of existing terminal facilities to enhance liquefaction and export capabilities.¹³²

Permits and Land

- Lake Charles LNG has obtained all required federal, state, and local authorizations and permits related to construction and operation of the Liquefaction Project facilities.¹³³ Such authorizations and permits have been maintained, remain valid and are in full force and effect.
 - Lake Charles completed the review and revalidation of the facility Waterway Suitability Assessment, which the U.S. Coast Guard approved in February 2023. As part of the revalidation, Lake Charles LNG requested and received an increase in the number of authorized vessels in order to allow the Liquefaction Project to operate more efficiently. The then-current authorization of 225 vessels per year would have required that vessels average about 174,000 m³ capacity, among the largest in the LNG fleet, to deliver the 16.45 mtpa certificated capacity. Increasing the number of authorized vessels will allow a wider range of vessel sizes from the LNG fleet to deliver the full capacity of the Lake Charles Terminal. This increase in the number of vessels will not result in increasing the actual production of the Lake Charles Terminal.
- Energy Transfer has secured all land rights for the 256-acre LNG export terminal parcel.¹³⁴

Financing and Equity Activities¹³⁵

• Energy Transfer engaged a financial advisor related to arranging financing for the Project. Energy Transfer also engaged several consultants to prepare detailed subject matter reports essential for prospective lenders and equity participants; these consultants include an independent engineering consultant, an independent marketing consultant, and an independent environmental consultant. These reports have required months of extensive work by the respective consultants.

¹³² Declaration at \P 20.

¹³³ *Id.* at \P 21.

¹³⁴ *Id.*; *see also* Application of Lake Charles Exports, LLC for Long-term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries and Request for Expedited Consideration, Docket No. 23-87-LNG (filed Aug. 18, 2023) at Exhibits 1.1 et al.

¹³⁵ Declaration at \P 22.

- In April 2025, Energy Transfer signed a HOA with MidOcean Energy, which provides a framework for the major terms for MidOcean Energy's participation in the Project, including an equity interest that will commit to fund 30% of the construction costs of the Project that will entitle MidOcean to 30% of the LNG production (approximately 5.0 mtpa).
- Energy Transfer is in active discussions with potential parties for the remaining portion of the equity financing necessary for the Project.

The Project remains an active, fully-supported project and Energy Transfer stands ready to move the Project forward.¹³⁶ Complex FID financing arrangements require an extension that recognizes the full schedule to reach in-service, prior to advancing to FID and starting full-scale construction. Due to the large scale of the LNG export terminal facilities, Lake Charles LNG Export anticipates that construction of all trains will take an estimated five years to complete after FID, which could take place as early as the fourth quarter of this year. Lake Charles LNG Export and Energy Transfer have continued to do what they can, within their control, to advance the Project and commence export operations consistent with DOE's objectives.

DOE's approval of the requested extension would eliminate the uncertainty that has confronted Energy Transfer's committed and prospective customers and financing sources due to the Biden administration's LNG "pause". The elimination of this uncertainty also would benefit America's allies and trade partners¹³⁷ and create new jobs benefiting the national, regional and local economies. There will be nearly 3,000 estimated construction jobs during the peak period of the Project's multi-year construction period and billions of dollars of overall construction expenditures.¹³⁸ Once completed, the Project will generate hundreds of high-paying jobs for the

¹³⁶ *Id.* at \P 23.

¹³⁷ "[O]ver the term of the authorization, the proposed exports will improve the United States' ties with its allies and trade partners and make a positive contribution to the United States' economy, including the trade balance." *Commonwealth LNG, LLC,* DOE/FE Order No. 5238 at 45. DOE noted that Commonwealth LNG's export project "could reduce the trade deficit by up to approximately \$2.8 billion annually[.]" *Id.* LCE's export project capacity is almost double the size of Commonwealth LNG's export project capacity.

 $^{^{138}}$ Declaration at § 24.

region related to LNG operations, tug operations, and ancillary services. The Project will provide a much-needed boost to Louisiana's local and regional economy through resource development, an enhanced tax base, direct and indirect job creation, and economic activity.

Lake Charles LNG Export only requests a change in the timing and does not request any changes to the nature of the Project. Lake Charles LNG Export confirms that the Project has not experienced any significant changes, and the public interest findings underlying DOE's export orders remain valid.¹³⁹ Extending the deadline to commence export operations will not undermine DOE's findings in the export orders that the Project is not inconsistent with the public interest. Lake Charles LNG Export has confidence in its ability to complete the commercialization of the Project as evidenced by its recent execution of long-term commercial agreements with LNG offtake customers. Lake Charles LNG Export needs DOE to expeditiously act on this Extension Application so that it can proceed to FID and release its EPC contractor to move to the next phase of the construction of the Project.

IV. 10 C.F.R. § 590.202(a)

A. Legal Name of Applicant

The exact legal name of the applicant is Lake Charles LNG Export Company, LLC. Lake Charles LNG Export is a limited liability company formed under the laws of Delaware with its principal place of business at 1300 Main Street, Houston, Texas 77002. Lake Charles LNG Export is a wholly owned subsidiary of Energy Transfer LP.

¹³⁹ *Id*.

B. <u>Service List Contacts</u>

All correspondence and communications concerning this Extension Application should be

directed to the following persons:¹⁴⁰

Thomas P. Mason President, LNG Lake Charles LNG Export Company, LLC 8111 Westchester Drive, Suite 600 Dallas, TX 75225 (214) 981-0700 tom.mason@energytransfer.com Thomas E. Knight Ankush J. Joshi Vinson & Elkins LLP 2200 Pennsylvania Avenue NW Suite 500 West Washington, DC 20037 (202) 639-6524 (202) 639-6692 tknight@velaw.com ajoshi@velaw.com

C. Statement Of Action Sought From DOE/FECM

Lake Charles LNG Export respectfully requests that DOE/FECM amend Order Nos. 3868 and 4010 so that the commencement of operations deadline in both orders is extended to December 31, 2031. Lake Charles LNG Export respectfully requests that DOE/FECM approve this Extension Application on or before June 16, 2025.

D. Justification For Action Sought From DOE/FECM

As set out above in detail, Lake Charles LNG Export's continued advancement of the Project, as demonstrated by the undertaking of substantial construction and other activities in furtherance of the Project, and its inability to meet the current export commencement deadline due to circumstances outside of its control demonstrate good cause for DOE/FECM to approve this Extension Application.

¹⁴⁰ Lake Charles LNG Export respectfully requests a waiver of Section 590.202(a) of DOE/FECM regulations, 10 C.F.R. § 590.202(a) (2025), to the extent necessary to include more than two persons on the official service list.

E. <u>10 C.F.R. § 590.202(b)</u>

The requirements of 10 C.F.R. § 590.202(b) are not applicable to this Extension Application because Lake Charles LNG Export is requesting an extension of the export commencement deadline. Lake Charles LNG Export is not seeking to export any additional quantities of LNG.

V. <u>APPENDICES</u>

The following appendices are included with this Extension Application:

- Appendix A Verifications and Certified Statements of Authorized Representatives
- Appendix B Opinion of Counsel
- Appendix C Declaration of Thomas P. Mason with Exhibit A (Project-related construction activities and other activities reported to DOE and FERC).

VII. CONCLUSION

WHEREFORE, for the reasons set forth above, Lake Charles LNG Export Company, LLC respectfully requests that DOE/FECM issue an order amending Order Nos. 3868 and 4010 so that the commencement of export operations deadline is December 31, 2031. Lake Charles LNG Export respectfully requests that DOE/FECM approve this Extension Application on or before June 16, 2025.

Respectfully submitted,

Thomas P. Mason President, LNG Energy Transfer LP 8111 Westchester Drive Suite 600 Dallas, TX 75225 (214) 981-0700 tom.mason@energytransfer.com <u>/s/Thomas E. Knight</u> Thomas E. Knight Vinson & Elkins, LLP 2200 Pennsylvania Avenue NW Suite 500 West Washington, DC 20037 (202) 639-6524 tknight@velaw.com

Attorneys for Lake Charles LNG Export Company, LLC

Dated: April 17, 2025

APPENDIX A

VERIFICATIONS AND CERTIFIED STATEMENTS OF AUTHORIZED REPRESENTATIVES

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

Lake Charles LNG Export Company, LLC

Docket Nos.

13-04-LNG 16-109-LNG

VERIFICATION AND CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

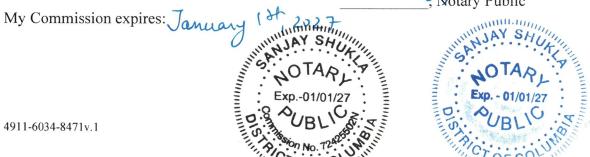
Washington, DC

BEFORE ME, the undersigned authority, on this day personally appeared Thomas E. Knight, who, having been by me first duly sworn, on oath says that he is an Attorney for Lake Charles LNG Export Company, LLC; that he is a duly authorized representative of Lake Charles LNG Export Company, LLC authorized to make this Verification and Certified Statement of Authorized Representative on behalf of Lake Charles LNG Export Company, LLC; that he is authorized to sign and file the foregoing instrument with the Department of Energy, Office of Fossil Energy and Carbon Management on behalf of Lake Charles LNG Export Company, LLC; and that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

> <u>/s/ Thomas E. Knight</u> Thomas E. Knight

SWORN TO AND SUBSCRIBED before me on this 16 day of April, 2025.

Jotary Public



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

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Lake Charles LNG Export Company, LLC

Docket Nos.

13-04-LNG 16-109-LNG

<u>VERIFICATION AND CERTIFIED STATEMENT OF AUTHORIZED</u> <u>REPRESENTATIVE</u>

Dallas, TX

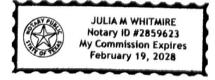
BEFORE ME, the undersigned authority, on this day personally appeared Thomas P. Mason, who, having been by me first duly sworn, on oath says that he is a President, LNG of Lake Charles LNG Export Company, LLC; that he is a duly authorized representative of Lake Charles LNG Export Company, LLC authorized to make this Verification and Certified Statement of Authorized Representative on behalf of Lake Charles LNG Export Company, LLC; that he is authorized to sign and file the foregoing instrument with the Department of Energy, Office of Fossil Energy and Carbon Management on behalf of Lake Charles LNG Export Company, LLC; and that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

<u>/s/ Thomas P. Mason</u> Thomas P. Mason

SWORN TO AND SUBSCRIBED before me on this 11 day of April, 2025.

Atolia M. 1/1/1/

My Commission expires:



4911-6034-8471v.1

APPENDIX B

OPINION OF COUNSEL

April 17, 2025

Mrs. Amy Sweeney Office of Fossil Energy and Carbon Management U.S. Department of Energy Docket Room 3F-056, FE-50 1000 Independence Avenue, S.W. Washington, DC 20585

Re: Lake Charles LNG Export Company, LLC, Docket Nos. 13-04-LNG and 16-109-LNG Application for an Amendment to Extend the Commencement of Operations Deadline and Request for Expedited Action Opinion of Counsel

Dear Mrs. Sweeney:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the U.S. Department of Energy, 10 C.F.R. § 590.202(c) (2025). The undersigned is counsel to Lake Charles LNG Export Company, LLC. I have reviewed the corporate documents of Lake Charles LNG Export Company, LLC and it is my opinion that the proposed export of natural gas as described in the application filed by Lake Charles LNG Export Company, LLC to which this Opinion of Counsel is attached as Appendix B, is within the limited liability company powers of Lake Charles LNG Export Company, LLC.

Respectfully submitted,

<u>/s/ Sean Wion</u> Associate General Counsel Lake Charles LNG Export Company, LLC

APPENDIX C

DECLARATION OF THOMAS P. MASON

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

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Lake Charles LNG Export Company, LLC

Docket Nos.

13-04-LNG 16-109-LNG

DECLARATION OF THOMAS P. MASON

- 1. My name is Thomas P. Mason. I currently serve as President, LNG and Executive Vice President of Alternative Energy for Energy Transfer LP ("Energy Transfer"), Lake Charles LNG Company, LLC ("Lake Charles LNG"), Lake Charles LNG Export Company, LLC ("Lake Charles LNG Export") and Lake Charles Exports, LLC ("LCE").
- 2. I have worked at Energy Transfer for over 18 years. Since April 2018, I have been President of Lake Charles LNG, Lake Charles LNG Export and LCE. From October 2018 to December 2022, I served as Executive Vice President and General Counsel of Energy Transfer. I have previously held roles as (i) Senior Vice President, General Counsel and Secretary of Energy Transfer from April 2012 to December 2015; (ii) Vice President, General Counsel and Secretary of Energy Transfer from June 2008 to April 2012; and (iii) General Counsel and Secretary of Energy Transfer from February 2007 to June 2008. Prior to joining Energy Transfer, I was a partner in the Houston office of Vinson and Elkins LLP. I have a bachelor's degree in finance from the University of Nebraska, and a juris doctorate from the University of Texas at Austin.
- 3. The purpose of this Declaration is to support certain factual assertions set forth in the Application of Lake Charles LNG Export Company, LLC for an Amendment to Extend the Commencement of Operations Deadline and Request for Expedited Action ("Extension Application") filed at Department of Energy's ("DOE") Office of Fossil Energy and Carbon Management. In the Extension Application, Lake Charles LNG Export is requesting an amendment to its DOE non-FTA Export Order Nos. 3868 and 4010 to extend the commencement of export operations deadline at the terminal site in Lake Charles, Louisiana ("Lake Charles Terminal") to December 31, 2031.
- 4. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, my review of internal Energy Transfer, Lake Charles LNG, Lake Charles LNG Export and LCE documents, or my opinions based upon my experience and knowledge. I am authorized to submit this Declaration on behalf of Lake Charles LNG Export as part of the Extension Application.
- 5. In 2001, BG LNG Services, LLC entered into a firm service agreement with Trunkline LNG Company ("Trunkline LNG") and subscribed all of the uncommitted firm capacity of the Lake Charles Terminal for the receipt, storage and vaporization of imported liquefied natural gas ("LNG"). Since September 2005 (when Duke Energy LNG's service agreement expired), BG LNG Services, LLC has been the sole import customer of the Lake Charles Terminal.

- 6. As a result of the shale revolution in the United States, a newly abundant supply of natural gas precipitated a dramatic decrease in United States natural gas prices, making LNG imports uneconomic. Accordingly, Trunkline LNG decided to expand its existing LNG import terminal and regasification facility at Lake Charles to also provide for liquefaction and export facilities ("Liquefaction Project"). Related thereto, Trunkline would expand and modify its interstate natural gas pipeline to provide capacity to transport gas to the Lake Charles Terminal for liquefaction ("Pipeline Modifications Project"). The Pipeline Modifications Project and the Liquefaction Project collectively are referred to herein as the "Project".
- 7. The Liquefaction Project would incorporate existing core infrastructure already constructed at the import terminal, including four LNG storage tanks, two deep water docks capable of handling large LNG vessels, LNG sendout facilities, and other infrastructure on the 152-acre import site. The value of these import facilities that will be incorporated into the Liquefaction Project is estimated to be in excess of \$1 billion. The estimated value is based on a variety of factors, including the estimated cost to construct these facilities under the current cost environment and the overall impact on the construction schedule if not already existing. The estimated value of these import facilities is not included in the approximately \$398 million that has been spent on the development of the Liquefaction Project.
- 8. Due to a material development in 2016 regarding BG Group plc, one of the two original Project sponsors, the Project encountered an unforeseen delay in the projected construction schedule. On February 15, 2016, Shell Oil acquired BG Group plc in a complex international merger. The resulting merger and integration process required a reevaluation of the Project by Shell Oil and the negotiation of new project agreements with Energy Transfer, which were not completed until March 2019. Lake Charles LNG Export and LCE filed for their first extension at DOE in March 2020 due to these developments.
- 9. In the spring of 2020, Energy Transfer received bids for the engineering, procurement, and construction ("EPC") of the Liquefaction Project from two EPC contractors for components not already constructed. Energy Transfer received those bids just as the effects of COVID-19 began to cause a major worldwide economic downturn. Among other things, this downturn almost entirely shut down the demand for long-term LNG contractual commitments by international customers that could not forecast future demand for LNG based on the unknown duration and extent of the impacts of the pandemic. Citing the impacts of COVID-19, Shell Oil withdrew as a Project sponsor on April 1, 2020, and Energy Transfer assumed 100% of the Project. In early to mid-2022, as the effects of COVID-19 began to lessen and worldwide demand for LNG began to increase following Russia's invasion of Ukraine, Energy Transfer ramped up its development activities
- 10. In August 2022, Energy Transfer engaged the two potential EPC contractors to provide updated EPC bids as the former bids had become invalid due to severe supply-chain disruptions and increased costs stemming from the COVID-19 pandemic. The significant supply chain issues resulted in severe shortages of critical LNG equipment to be used in the Project, particularly electrical components, heat exchangers, turbines and compressors, as well as substantial increases in the cost of materials. In order to prepare the two updated bids, the potential EPC contractors solicited new cost estimates and bids from their suppliers and subcontractors to support the overall EPC bid, a process that took an additional nine months.

The process for obtaining new bids from every supplier of materials and parts for the Project was time-consuming and arduous and Energy Transfer paid nearly \$25 million for the bid updating process alone. It was only after that process ended in May 2023 that Energy Transfer could begin to negotiate the terms of the EPC contract with the two potential EPC contractors. Negotiations were completed in September 2024, and Energy Transfer and KTJV, a joint venture between KBR and Technip Energies, executed the EPC contract.

- 11. After DOE's denial of extensions of the export commencement deadline in April 2023, and having no other recourse, LCE filed an application at DOE in August 2023 for a new non-FTA authorization in order to achieve a new commencement of export operations deadline for the Project. Energy Transfer's continued need for a later DOE deadline for the commencement of exports (i.e., to at least match FERC's extension date) was the sole reason for LCE filing the application for a new non-FTA authorization.
- 12. The Biden Administration's "pause" on DOE's review of LCE's application caused considerable angst among the companies that previously had entered into long-term LNG offtake contracts with Energy Transfer for the Liquefaction Project. These offtake customers have real world needs for these committed LNG volumes. In addition, Energy Transfer's discussions with other LNG customers and with potential equity participants in the Liquefaction Project experienced setbacks due to the uncertainty of the timing and substance of DOE's review process related to the "pause." DOE's failure to grant Lake Charles LNG Export's extension and its failure to act on LCE's application for a new export authorization based on the "pause" has significantly affected the commercialization of the Project for nearly two years.
- 13. Energy Transfer has made extensive efforts and capital expenditures to continue to develop the Project. Energy Transfer has incurred approximately \$398 million of costs to develop the Project, including approximately \$75.6 million since October 2020. Energy Transfer has taken regular action before DOE and FERC to advance the Project and has undertaken numerous efforts to progress the Project and continue construction. Attached hereto as <u>Exhibit A</u> is chart detailing the Project-related construction activities and other activities reported to DOE and FERC starting in 2012.
- 14. Energy Transfer has performed ground disturbance construction at the Liquefaction Project site, such as tree clearing of 150 acres, drilling of test piles for the foundation, constructing and maintaining erosion control devices, conducting geotechnical investigations, relocating an existing road and an existing pipeline, and plugging of an oil and gas well on site.
- 15. Energy Transfer has acquired, maintained, operated and repaired its existing import facilities for use in the Project, including four LNG storage tanks with a total combined storage capacity of 425,000 cubic meters, two deep water loading docks capable of handling large LNG vessels, LNG sendout facilities, and other infrastructure on the 152-acre brownfield import terminal site. Energy Transfer has spent nearly \$8.0 million in maintaining, repairing and upgrading these facilities, including repairs due to several hurricanes, in order for them to be incorporated into the Liquefaction Project. These costs to maintain, repair and upgrade these import facilities is not included in the approximately \$398 million that has been spent on the development of the Liquefaction Project. In addition to the actions described in the semi-

annual reports filed at FERC as summarized in <u>Exhibit A</u>, Energy Transfer has performed actions so that such constructed Lake Charles Terminal facilities remain in compliance with U.S. Department of Transportation PHMSA requirements.

- 16. In December 2022, FERC issued Trunkline a notice to proceed with construction of a portion of the Pipeline Modifications Project regarding piping modifications of four Trunkline compressor stations to enable bi-directional flow. Trunkline put these facilities into service on January 1, 2024 at a cost of approximately \$100.0 million. This portion of the Pipeline Modifications Project is an integral component of the Project.
- 17. In April 2019, Energy Transfer issued an Invitation to Tender to prospective LNG EPC bidders to construct the Liquefaction Project. Also, in the second quarter of 2019, the Liquefaction Project executed contracts with LNG EPC companies to verify existing front-end engineering design.
- 18. Energy Transfer is making significant progress in the commercialization of the Project and to date has executed long-term commercial agreements with LNG offtake contracts for approximately 10.0 mtpa of LNG, which is 60% of the FERC-approved LNG production capacity of the Project. The Project's LNG offtake contracts are take-or-pay agreements. Energy Transfer must have the ability to source the LNG from other export terminals in case Lake Charles LNG is unable to fulfill the order in full or the Lake Charles Terminal is down for repairs.
- 19. In April 2025, Energy Transfer signed a Heads of Agreement ("HOA") with MidOcean Energy, an LNG company formed and managed by EIG, a leading institutional investor in the global energy and infrastructure sectors, which provides a framework for the major terms for MidOcean Energy's participation in the Project, including an equity investor that will commit to fund 30% of the construction costs of the Project that will entitle MidOcean to 30% of the LNG production (approximately 5.0 mtpa).
- 20. At the end of 2020, Energy Transfer entered into an amended and restated regasification agreement with its LNG import shipper, BG LNG Services, LLC, to allow greater flexibility on the use of existing terminal facilities to enhance liquefaction and export capabilities.
- 21. Lake Charles LNG has obtained all required federal, state, and local authorizations and permits related to construction and operation of the Liquefaction Project facilities. Such authorizations and permits have been maintained, remain valid and are in full force and effect. For example, in February 2023, the U.S. Coast Guard approved the reevaluation of the Waterway Suitability Assessment providing for an increase in the number of authorized vessels, which will allow the Liquefaction Project to operate more efficiently. Energy Transfer has secured all land rights for the 256-acre LNG export terminal parcel.
- 22. Energy Transfer has more than 40 employees actively working on the Project in the areas of engineering and construction, finance, commercial development, legal, public relations, and government affairs, as well as several third-party consulting firms providing services related to engineering and construction, commercial development, and finance. Energy Transfer engaged a financial advisor related to arranging financing for the Project. Energy Transfer

also engaged several consultants to prepare detailed subject matter reports essential for prospective lenders and equity participants; these consultants include an independent engineering consultant, an independent marketing consultant, and an independent environmental consultant. These reports have required months of extensive work by the respective consultants. Energy Transfer is in active discussions with potential parties for the remaining portion of the equity financing necessary for the Project.

- 23. Lake Charles LNG Export is unable to meet the current December 17, 2025 commencement of export operations deadline due to circumstances completely outside of its control. It is a precondition of Final Investment Decision ("FID") that all non-FTA export authorizations remain in full force and effect during construction of the Project. Complex FID financing arrangements require an extension that recognizes the full schedule to reach in-service, prior to advancing to FID and starting full-scale construction. Due to the large scale of the LNG export terminal facilities, Lake Charles LNG Export anticipates that construction of all trains will take an estimated five years to complete after FID, which could take place as early as the fourth quarter of this year. Therefore, it is necessary to have a six-year extension until December 31, 2031 to ensure that the export project is in-service before the expiration of the groced to FID and release the EPC contractor to move to the next phase of the Project. Without an extension, the Project likely would not be able to get to FID. Energy Transfer has confidence in its ability to complete the commercialization of the Project and stands ready to move the Project forward.
- 24. There will be nearly 3,000 estimated construction jobs during the peak period of the Project's multi-year construction period and billions of dollars of overall construction expenditures. Once completed, the Project will generate hundreds of high-paying jobs for the region related to LNG operations, tug operations, and ancillary services. The Project will provide a much-needed boost to Louisiana's local and regional economy through resource development, an enhanced tax base, direct and indirect job creation, and economic activity. The Project has not experienced any significant changes, and the public interest findings underlying DOE's export orders remain valid.

EXHIBIT A

Project-related construction activities and other activities reported to DOE and FERC

LAKE CHARLES LNG PROJECT CONSTRUCTION ACTIVITIES AND OTHER ACTIVITIES REPORTED IN PUBLIC FILINGS AT DEPARTMENT OF ENERGY AND FEDERAL ENERGY REGULATORY COMMISSION

FERC Accession	Document Title	Notes
No. / DOE Filing		
Date FERC 20250411- 5230	Request for Three-Year Extension	 Request by Lake Charles LNG, Lake Charles LNG Export and Trunkline for a three extension of time until December 31, 2031 to complete construction of the Project and make it available for service.
FERC 20250410- 5172	Lake Charles LNG Monthly Status Report No. 109	 On 03/03/2025, Lake Charles LNG submitted an application for extension to USACE, New Orleans District. The LDWF's Threatened and Endangered Species consultation was deemed valid through 01/04/2026. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
DOE 04/01/2025	Lake Charles Exports, LLC Semi- Annual Report (10/01/2024 – 03/31/2025), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2024 – 03/31/2025), FE Docket No. 13-04- LNG	 On 10/04/2024, Lake Charles LNG submitted to FERC a design variance to consolidate the flare system, which FERC approved on 11/12/2024. On 10/04/2024, Lake Charles LNG submitted to FERC a variance to modify the ethane refrigerant makeup system to remove the de-ethanizer system, which FERC approved on 11/12/2024. On 10/023/2024, Trunkline submitted to FERC its post-construction Quarterly Activity Report No. 1 regarding the construction of a portion of the Pipeline Modifications Project, which consisted of piping modifications of four Trunkline compressor stations to enable bi-directional flow Trunkline put into service on 01/01/2024. This portion of the Pipeline Modifications Project is an integral component of the Project. Trunkline informed FERC that it completed construction and restoration activities at the four compressor stations and there no problem areas or noncompliance issues nor did it receive any landowner complaints. On 12/03/2024, Lake Charles LNG submitted a request for renewed Section 7 clearance to the National Marine Fisheries Service ("NMFS"), and NMFS-PRD confirmed that no new consultation was required. On 01/12/2025, Lake Charles LNG submitted a renewal application to the LDEQ – Air Quality Division. On 03/03/2025, LCLNG submitted an application for extension (Section 404/ Section 10) to the USACE–New Orleans District. On 12/19/2024, Energy Transfer LNG and Gunvor International B.V., Amsterdam, Geneva Branch entered into a 20-year LNG Sale and Purchase Agreement. On 02/25/2025, Lake Charles Exports, LLC filed in Docket No. 23-87-LNG a Request for Action on Pending Application to Export LNG to non-FTA Nations in Furtherance of the Unleashing American Energy Executive Order.

FERC Accession	Document Title	Notes
No. / DOE Filing		
Date		 On 03/20/2025, Energy Transfer submitted comments on DOE's 2024 LNG export study. On 02/06/2025, Lake Charles LNG filed its semi-annual report at FERC regarding its import facilities at the Lake Charles Terminal in Docket Nos. CP74-138, et al. As set out in the Authorization Order, Lake Charles LNG will incorporate into the Liquefaction Project major existing LNG infrastructure at the Lake Charles Terminal that was constructed in connection with the import terminal and regasification facility. The semi-annual report details Lake Charles LNG's latest actions to maintain, upgrade and repair these import facilities that will form the foundation of the Liquefaction Project. These activities included actions to maintain such facilities to be compliance with USDOTZ PHMSA requirements. Lake Charles LNG has secured all LNG export terminal land rights for the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. Lake Charles LNG confirms that the Project area has not experienced any significant changes and the environmental and other public interest findings underlying the FERC's authorizations for the Project remain valid.
FERC 20250318- 5094	Lake Charles LNG Monthly Status Report No. 108	 On 02/26/2025, Lake Charles LNG submitted renewal application to LDEQ. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20250212- 5188	Lake Charles LNG Monthly Status Report No. 107	 On 01/13/2025, Lake Charles LNG submitted request for renewed Section 7 clearances to USFWS. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20250207- 5161	Lake Charles LNG Semi-Annual Report (07/01/2024 – 12/31/2024), FERC Docket Nos. CP74-138, et al.	 A failure of a fusion weld on the HDPE firewater piping caused the two firewater engines to start and run dry. This caused a small fire in the gearbox of pump B. An investigation and repairs are underway. Implementation of plan for inspecting, repairing and returning AVUs to service. Engine controller related to the 2216-JE Firewater Diesel to be replaced. Small liquid nitrogen leak discovered in the 2710-L Plant Nitrogen Dewar. Dewar was removed from service and will be repaired. Discovery of a small leak in the high-pressure makeup line to the 2102-E Recondenser. The line was isolated and blinded. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period. As previously reported, a detailed inspection of the perimeter piles on 2101-FA/FB/FC/FD LNG Tanks identified some minor surface cracks and isolated spalling on some of the piles. Phase 4 of this project,

FERC Accession	Document Title	Notes
No. / DOE Filing		
Date		focusing on 2101 ED is glowned for 2025. This against will ansure the long term reliability of the LNC
		focusing on 2101-FD, is planned for 2025. This project will ensure the long-term reliability of the LNG Tank pilings.
		 As previously reported, corrosion on some of the LNG Tank structures was identified. The third phase of
		this project, repair of the tank chime area on A Tank, was completed. Phase 4 of the project is planned for 2025.
		• The 5-year electrical protective equipment testing is scheduled for 2Q 2025.
FERC 20250110-	Lake Charles LNG Monthly Status	o On 12/19/2024, Energy Transfer announced that Energy Transfer LNG and Chevron U.S.A. Inc. entered
5132	Report No. 106	into a 20-year LNG Sale and Purchase Agreement.
		• Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to
		supply natural gas to the Liquefaction Project, remain under development.
		• The Project remains an active, fully-supported project.
		• No problems were encountered and no non-compliances were observed.
FERC 20241213-	Lake Charles LNG Monthly Status	• Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to
5124	Report No. 105	supply natural gas to the Liquefaction Project, remain under development.
		• The Project remains an active, fully-supported project.
EEDC 20241110		No problems were encountered and no non-compliances were observed.
FERC 20241118-	Lake Charles LNG Monthly Status	• On 10/03/2024, Energy Transfer LNG and Gunvor International B.V., Amsterdam, Geneva Branch
5084	Report No. 104	entered into a 20-year LNG Sale and Purchase Agreement.
		 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.
		 The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20241112-	Approval of Variance 05 – Ethane	 FERC granted design variance to remove the de-ethanizer.
3008	Modification	5 TERC graned design variance to remove the de-emainzer.
FERC 20241112-	Approval of Variance 04 – Flare	• FERC granted design variance to change from three elevated flare derricks to one elevated flare derrick
3005	Design	and one ground flare with no change to the marine flare.
FERC 20241018-	Approval of Variance 03 – Gas Turbine	• FERC granted design variance to modify the gas turbine supplier and model.
3003	Supplier	
FERC 20241017-	Lake Charles LNG Monthly Status	o Lake Charles LNG entered into an EPC contract with a joint venture between Technip Energies and KBR
5127	Report No. 103	with respect to the Liquefaction Project, including the fabrication, procurement, transportation,
		installation, commissioning and startup of the proposed three 5.5 MTPA modular design LNG trains and
		brownfield modifications to the existing LNG storage tanks and marine berths. Commencement of
		activities under the contract is subject to Lake Charles LNG's determination to issue a notice to proceed,
		which in turn will be subject to Lake Charles LNG making a final investment decision.
		• Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to
		supply natural gas to the Liquefaction Project, remain under development.
		 The Project remains an active, fully-supported project.

FERC Accession No. / DOE Filing Date	Document Title	Notes
		 No problems were encountered and no non-compliances were observed.
FERC 20241004- 5131	Variance Request 05 – Ethane Modification	• Filed request for authorization of a design variance to modify the ethane refrigerant makeup system to remove the de-ethanizer system.
FERC 20241004- 5126	Variance Request 04 – Flare Design	• Filed request for authorization of a design variance to consolidate the flare system.
DOE 10/01/2024	Lake Charles Exports, LLC Semi- Annual Report (04/01/2024 – 09/30/2024), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2024 – 09/30/2024), FE Docket No. 13-04- LNG	 On 08/21/2024, Lake Charles LNG submitted Variance Request 03 for approval of a design variance to modify the gas turbine supplier and model. In September 2024, Lake Charles LNG entered into an EPC contract with a joint venture between Technip Energies and KBR with respect to the Liquefaction Project, including the fabrication, procurement, transportation, installation, commissioning and startup of the proposed three 5.5 MTPA modular design LNG trains and brownfield modifications to the existing LNG storage tanks and marine berths. Commencement of activities under the contract is subject to Lake Charles LNG's determination to issue a notice to proceed, which in turn will be subject to Lake Charles LNG making a final investment decision. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project, remain under development. Definitive agreements to implement the Project area has not experienced any significant changes and the environmental and other public interest findings underlying the FERC's authorizations for the Project remain valid.
FERC 20240917- 5116	Lake Charles LNG Monthly Status Report No. 102	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20240821- 5153	Variance Request 03 – Gas Turbine Supplier	• Filed request for authorization of a design variance to modify the gas turbine supplier and model.
FERC 20240808- 5093	Lake Charles LNG Semi-Annual Report (01/01/2024 – 06/30/2024), FERC Docket Nos. CP74-138, et al.	 Demolition of the 2204-JA Turbine Generator and associated equipment was completed. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period. As previously reported, a detailed inspection of the perimeter piles on 2101-FA/FB/FC/FD LNG Tanks identified some minor surface cracks and isolated spalling on some of the piles. Phase 3 of this project, focusing on 2101-FC, was completed. This project will ensure the long-term reliability of the LNG Tank pilings. As previously reported, corrosion on some of the LNG Tank structures was identified. The third phase of this project, repair of the tank chime area on A Tank, was commenced and expected to be completed in 4Q 2024.

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FERC 20240808 - 5087	Lake Charles LNG Monthly Status Report No. 101	• On 06/28/2024, LDEQ issued the air permit renewal for the Epps compressor station.
FERC 20240712- 5020	Lake Charles LNG Monthly Status Report No. 100	 On 07/01/2024, the U.S. District Court for the Western District of Louisiana issued a Memorandum Ruling granting a preliminary injunction and ordering that the LNG Export Ban be stayed in its entirety, effective immediately. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20240612- 5193	Lake Charles LNG Monthly Status Report No. 99	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20240515- 5021	Lake Charles LNG Monthly Status Report No. 98	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20240412- 5129	Lake Charles LNG Monthly Status Report No. 97	 On 01/26/2024, the Biden Administration announced pending approvals for non-FTA applications would be paused and DOE announced it will initiate a process to update economic and environmental analyses used to review LNG export applications to non-FTA countries. Lake Charles LNG is in the process of determining whether to issue notices to proceed for its enabling projects in light of the Biden Administration's and DOE's LNG pause. Lake Charles LNG is waiting for more clarity relating to the pause and DOE's policies and timing prior to completing negotiations and executing an EPC contract for the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
DOE 04/01/2024	Lake Charles Exports, LLC Semi- Annual Report (10/01/2023 – 03/31/2024), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2023 – 03/31/2024), FE Docket No. 13-04- LNG	 0 02/13/2024 meeting with FERC LNG staff to discuss an informal data request regarding seven minor potential design changes and a variance. 0 Lake Charles LNG is evaluating the EPC bids recently received from vendors and is continuing EPC contract negotiations prior to selection. Lake Charles LNG has executed contracts with Enabling Projects contractors and is waiting for prime EPC contractor selection before issuing notice to proceed for the Enabling Projects. Lake Charles LNG is working toward final selection of an EPC contractor. 0 The Project continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. 0 The Project remains an active, fully supported project by Energy Transfer.

FERC Accession	Document Title	Notes
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Date		
		 Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. Lake Charles LNG confirms that the Project area has not experienced any significant changes and the environmental and other public interest findings underlying the FERC's authorizations for the Project remain valid.
FERC 20240318- 5233	Lake Charles LNG Monthly Status Report No. 96	 0 02/13/2024 meeting with FERC LNG staff to discuss an informal data request regarding seven minor potential design changes and a variance. 0 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. 0 The Project remains an active, fully-supported project. 0 No problems were encountered and no non-compliances were observed.
FERC 20240212- 5028	Lake Charles LNG Monthly Status Report No. 95	 Trunkline Gas notified FERC that those certain Pipeline Modifications Project facilities were placed into service on 01/01/2024. On 01/01/2024, Louisiana Department of Wildlife and Fisheries issued a renewed state-species clearance. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20240209- 5157	Lake Charles LNG Semi-Annual Report (07/01/2023 – 12/31/2023), FERC Docket Nos. CP74-138, et al.	 Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period. As previously reported, a detailed inspection of the perimeter piles on 2101-FA/FB/FC/FD LNG Tanks identified some minor surface cracks and isolated spalling on some of the piles. Phase 2 of this project for 2101-FB was completed. This project will ensure the long-term reliability of the LNG Tank pilings. As previously reported, corrosion on some of the LNG Tank structures was identified. The second phase of this project, focusing on Tanks B & C, was completed.
FERC 20240111- 5148	Lake Charles LNG Monthly Status Report No. 94	 On 12/20/2023, FERC granted Trunkline Gas to place those certain Pipeline Modifications Project facilities into service. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20231212- 5203	Lake Charles LNG Monthly Status Report No. 93	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project.

FERC Accession No. / DOE Filing Date	Document Title	Notes
		 No problems were encountered and no non-compliances were observed.
FERC 20231109- 5271	Lake Charles LNG Monthly Status Report No. 92	 On 10/17/2023, National Marine Fisheries Service PRD determined that no new consultation was required. On 10/11/2023, USFWS issued the renewed Section 7 (Louisiana) clearance. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
DOE 11/01/2023	Order Extending Export Term Through 12/31/2050	 In Order Nos. 2987-B, 3324-E and 4011-D (Lake Charles Exports, LLC), DOE granted the request to extend the terms of exports out to 12/31/2050. In Order Nos. 3252-C, 3868-D and 4010-D (Lake Charles LNG Export Company, LLC), DOE granted the request to extend the terms of exports out to 12/31/2050
FERC 20231013- 5054	Lake Charles LNG Monthly Status Report No. 91	 On 07/12/2023, Energy Transfer announced that it had entered into three non-binding Heads of Agreements ("HOAs") related to long-term LNG offtake from the Lake Charles LNG terminal for an aggregate of 3.6 MTPA. One of the HOAs specifies that a Japanese consortium would purchase 1.6 MTPA for a 20-year term, subject to an option to convert the offtake arrangement to an equity participation providing for the same volume of LNG. Under one of the HOAs, Chesapeake Energy Marketing LLC would supply to Lake Charles LNG volumes of natural gas sufficient to produce 1.0 MTPA of LNG for a period of 15 years and, post liquefaction, Gunvor Singapore Pte Ltd. would purchase LNG from Chesapeake at a price indexed to the Japan Korea Marker for a period of 15 years. The other HOA is with a U.S. customer and relates to a tolling arrangement for 1.0 MTPA for a 15-year term. The HOAs are subject to negotiation and execution of definitive agreements. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
DOE 09/29/2023	Lake Charles Exports, LLC Semi- Annual Report (04/01/2023 – 09/30/2023), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2023 – 09/30/2023), FE Docket No. 13-04- LNG	 On 04/17/2023, Lake Charles LNG submitted its supplemental response to FERC Informal Environmental Information Request (Alcoa Pipeline Relocation) under Docket No. CP14-120. On 04/18/2023, FERC issued its variance approval to relocate the Alcoa Pipeline under Docket No. CP14-120. Lake Charles LNG received the updated EPC contractor bids in May 2023. Lake Charles LNG is evaluating the EPC bids recently received from vendors and is continuing EPC contract negotiations prior to selection. Lake Charles LNG has executed contracts with Enabling Projects contractors and is waiting

FERC Accession	Document Title	Notes
No. / DOE Filing		
Date		 for prime EPC contractor selection before issuing notice to proceed for the Enabling Projects. Lake Charles LNG is working toward final selection of an EPC contractor. The Project continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully supported project by Energy Transfer. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. On 07/12/2023, Energy Transfer announced that it had entered into three non-binding Heads of Agreements ("HOAs") related to long-term LNG offtake from the Lake Charles LNG terminal for an aggregate of 3.6 MTPA. One of the HOAs specifies that a Japanese consortium would purchase 1.6 MTPA for a 20-year term, subject to an option to convert the offtake arrangement to an equity participation providing for the same volume of LNG. Under one of the HOAs, Chesapeake Energy Marketing LLC would supply to Lake Charles LNG volumes of natural gas sufficient to produce 1.0 MTPA of LNG for a period of 15 years and, post liquefaction, Gunvor Singapore Pte Ltd. would purchase LNG from Chesapeake at a price indexed to the Japan Korea Marker for a period of 15 years. The HOAs are subject to negotiation and execution of definitive agreements Lake Charles LNG completed onsite activities for the supplementary geotechnical investigations, which included 25 geotechnical borings, 13 geophysical borings, three test pits and 18 electrical resistivity soundings. Lab testing of such samples was completed in June 2023. Lake Charles LNG confirms that the Project area has not experienced any significant changes and the environmental and other public
FERC 20230914- 5105	Lake Charles LNG Monthly Status Report No. 90	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
DOE 08/18/2023	Lake Charles Exports, LLC Application for Authorization to Export	 In light of the DOE's 2023 policy on extension requests, Lake Charles Exports filed an application (23- 87-LNG) with DOE/FE seeking long-term multi-contract authorization to export domestically produced LNG from the Lake Charles LNG Terminal up to the equivalent of 851 billion cubic feet of natural gas

FERC Accession	Document Title	Notes
No. / DOE Filing Date		
Date	to Non-FTA Countries; FE Docket No. 23-87-LNG	 per year to Non-Free Trade Agreement countries, which is the authorization that DOE already approved for the Liquefaction Project in Docket Nos. 11-59-LNG, 13-04-LNG, 16-109-LNG and 16-110-LNG. On 01/26/2024, the Biden Administration announced a decision to pause pending approvals of LNG exports and DOE announced it will initiate a process to update economic and environmental analyses used to review LNG export applications to Non-FTA countries. On 07/01/2024, the United States District Court for the Western District of Louisiana issued a Memorandum Ruling granting a preliminary injunction and ordering that the LNG Export Ban be stayed in its entirety, effective immediately. On 12/17/2024, DOE released an updated study of U.S. LNG exports with a 60 day comment period that was later extended to March 20, 2025. On 01/20/2025, President Trump issued the Unleashing American Energy executive order directing the DOE Secretary to restart reviews of applications for approvals of LNG export projects as expeditiously as possible, consistent with applicable law. The executive order stated that in assessing the "public interest" to be advanced by any particular application, the DOE Secretary shall consider the economic and employment impacts to the United States and the impact to the security of allies and partners that would result from granting the application. On 01/21/2025, DOE announced that it was ending the moratorium imposed by the Biden administration on the approvals of LNG export authorizations by DOE and returning to regular order following direction given by President Trump in the Unleashing American Energy executive order.
FERC 20230809- 5165	Lake Charles LNG Monthly Status Report No. 89	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20230808- 5122	Lake Charles LNG Semi-Annual Report (01/01/2023 – 06/30/2023), FERC Docket Nos. CP74-138, et al.	 As previously reported, during the week of 12/22/2023, Lake Charles LNG experienced temperatures below freezing for 2 consecutive days. Lake Charles LNG experienced damage to utility water fittings & valves at 41 locations within the plant. Final repairs were completed during this reporting period. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period. As previously reported, a detailed inspection of the perimeter piles on 2101-FA/FB/FC/FD LNG Tanks identified some minor surface cracks and isolated spalling on some of the piles. Phase 2 of this project is currently underway on 2101-FB. This project will ensure the long-term reliability of the LNG Tank pilings. As previously reported, corrosion on some of the LNG Tank structures was identified. The second phase of this project, focusing on Tanks B & C, is currently underway.
FERC 20230718- 3001	Variance Approval for Modification at the Longville Compressor Station	• FERC approved request to install a flow control valve and expand compressor station fencing.

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Date FERC 20230714- 5190	Lake Charles LNG Monthly Status Report No. 88	 Lake Charles LNG completed onsite activities for the supplementary geotechnical investigations, which included 25 geotechnical borings, 13 geophysical borings, three test pits and 18 electrical resistivity soundings. Lab testing of such samples was completed in June 2023. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project.
DOE 06/21/2023	Opinion and Order Denying Request for Rehearing of Order Denying Application for Second Extension of Deadline to Commence Exports	 No problems were encountered and no non-compliances were observed. In Order Nos. 3324-D and 4011-C, DOE denied Lake Charles Exports, LLC's request for rehearing of the order denying a second extension. In Order Nos. 3868-C and 4010-C, DOE denied Lake Charles Exports, LLC's request for rehearing of the order denying a second extension.
FERC 20230615- 5128	Lake Charles LNG Monthly Status Report No. 87	 The Project is presently working through, and nearing completion of, several detailed design enhancement strategies with the selected EPC provider that will enable EPC pricing updates. Lake Charles LNG completed EPC bid activities and received bids from vendors. Evaluation of bids is ongoing and continuing EPC contract negotiations prior to selection. Lake Charles LNG has executed contracts with the enabling projects contractors and is waiting for prime EPC contractor selection before issuing a notice to proceed for enabling projects. Laser scanning of the existing facility slated for reuse to support export operations was completed in May 2023. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project. No problems were encountered and no non-compliances were observed.
FERC 20230524- 5127	Lake Charles LNG Monthly Status Report No. 86	 Lake Charles LNG has selected contractors for the Enabling Projects approved by FERC in the 01/23/2023 notice to proceed. The Project is presently working through, and nearing completion of, several detailed design enhancement strategies with the selected EPC provider that will enable EPC pricing updates. Approximately 25 acres of maintenance clearing in the greenfield site to support the Enabling Projects was completed in February 2023. On 01/30/2023, Lake Charles LNG completed onsite activities for the supplementary geotechnical investigations, which included 25 geotechnical borings, 13 geophysical borings, three test pits and 18 electrical resistivity soundings. Lab testing of such samples is ongoing. In April 2023, laser scanning of the existing facilities to be reused to support export operations commenced. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project.

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		 No problems were encountered and no non-compliances were observed.
DOE 05/22/2023	Request for Rehearing	 Lake Charles Exports, LLC and Lake Charles LNG Export Company, LLC request for rehearing of DOE orders denying second extension.
DOE 04/21/2023	Order Denying Application for Second Extension of Deadline to Commence Exports of LNG to Non-FTA Countries	 In Order Nos. 3324-C and 4011-B, DOE denied Lake Charles Exports, LLC's request for an extension. In Order Nos. 3868-B and 4010-B, DOE denied Lake Charles Exports, LLC's request for an extension DOE also issued a new policy on extension requests, Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries.
FERC 20230418- 5206	Lake Charles LNG Monthly Status Report No. 85	 On 01/30/2023, Lake Charles LNG completed onsite activities for the supplementary geotechnical investigations and these activities are ongoing. On 01/23/2023, FERC issued its Notice to Proceed with Certain Activities, and Lake Charles LNG anticipates commencing these activities in the 2nd Quarter 2023. Trunkline Gas' Pipeline Modifications Project construction activities outlined in 12/09/2022 notice to proceed anticipated to commence in 2Q 2023. The Project is presently working through several detailed design enhancement strategies with the selected EPC provider that will enable EPC pricing updates. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20230418- 3038	FERC Variance Approval to Relocate Alcoa Pipeline	 Lake Charles LNG to relocate an existing 3-inch diameter pipeline currently providing natural gas service to the Alcoa facility west of the LNG Terminal. Lake Charles LNG would abandon most of pipeline in place and install a new 1.1 mile, 3-inch diameter pipeline using 3 horizontal drills. Purpose of variance is to avoid conflicts during construction of the Liquefaction Project.
DOE 04/03/2023	Lake Charles Exports, LLC Semi- Annual Report (10/01/2022 – 03/31/2023), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2022 – 03/31/2023), FE Docket No. 13-04- LNG	 On 12/16/2022, Lake Charles LNG submitted its Request for Written Authorization for Enabling Projects to FERC under Docket No. CP14-120. On 12/19/2022, Lake Charles LNG submitted its Request for Written Authorization for the Alcoa Pipeline Relocation to FERC under Docket No. CP14-120. On 01/18/2023, Lake Charles LNG submitted its Response to Informal Environmental Information Request issued 01/05/2023 (Alcoa Pipeline Relocation) to FERC under Docket No. CP14-120. On 01/20/2023, Lake Charles LNG submitted its Response to Informal Environmental Information Request issued 01/19/2023 (Alcoa Pipeline Relocation) to FERC under Docket No. CP14-120. On 02/01/2023, Lake Charles LNG submitted its Response to Informal Environmental Information Request issued 01/19/2023 (Alcoa Pipeline Relocation) to FERC under Docket No. CP14-120. On 02/01/2023, Lake Charles LNG submitted its Response to Informal Data Request issued 01/23/2023 (Alcoa Pipeline Relocation) to FERC under Docket No. CP14-120. On 02/02/2023, Lake Charles LNG submitted its Response to Informal Data Request issued 01/23/2023 (Alcoa Pipeline Relocation) to FERC under Docket No. CP14-120. On 02/02/2023, Lake Charles LNG submitted its Response to Informal Data Request issued 02/01/2023 (Alcoa Pipeline Relocation) to FERC under Docket No. CP14-120. On 02/02/2023, Lake Charles LNG submitted its Response to Informal Data Request issued 02/01/2023 (Alcoa Pipeline Relocation) to FERC under Docket No. CP14-120.

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Date		 On 03/24/2023, Lake Charles LNG submitted its Response to Informal Data Request issued 02/28/2023 (regarding Lake Charles LNG/FERC Staff Project discussion on 11/30/2022) to FERC under Docket No. CP14-120. Lake Charles LNG has reengaged EPC contractors to conduct additional engineering work in connection with identified design enhancement opportunities as well as to prepare an updated EPC contract bid. The bid refresh process is in progress and the updated EPC bids are expected to be received in the next several months followed by selection of the EPC contractor. Maintenance clearing of the greenfield site to support the Enabling Projects was performed in February 2023. The Project continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. On 02/03/2023, USCG issued its updated Letter of Recommendation (LOR) pursuant to 33 CFR 127.009, and recommends that the Calcasieu River Ship Channel be considered suitable for accommodating the type and frequency of LNG marine traffic associated with this project. Lake Charles LNG received its approval for the <i>Categorical Clearance Agreement for Routine Construction and Maintenance Activities</i> from the Louisiana SHPO, issued 01/10/2023, which remains in effect until 12/31/2025. On 01/11/2023, USFWS concurred with self-certification, provided its 11/27/2012 MBTA recommendations are followed and No Effect determination confirmed by the USFWS for minor modification (relocation of ALCOA pipeline). On 02/02/2023, Lake Charles LNG received is Use and Occupancy Permit for ALCOA Pipeline Relocation, from the Consolidated Gravity Drainage District No. Two of East Calcasieu Parish. Lake Charles LNG submitted a minor modification application to the LDEQ on 02/24/2023, to address design updates from EPC Contractor. This application is pending at the LDEQ. Lake Charles LNG submit
		remain valid.
FERC 20230316-	U.S. Coast Guard Updated Letter of	• USCG issued its Updated Letter of Recommendation on 02/03/2023 in response to a Letter of Intent
3019	Recommendation	submitted by Lake Charles LNG on 09/01/2022.

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		• USCG recommends that the requested increase of annual vessel transits from 225 to 300 annually be approved.
FERC 20230310- 5210	Lake Charles LNG Monthly Status Report No. 84	 On 01/11/2023, USFWS concurred with self-certification, provided its 11/27/2012 MBTA recommendations are followed. No Effect determination for minor modification (relocation of ALCOA pipeline) confirmed on 01/11/2023. On 02/03/2023, USCG issued its updated Letter of Recommendation (LOR) pursuant to 33 CFR 127.009, and recommends that the Calcasieu River Ship Channel be considered suitable for accommodating the type and frequency of LNG marine traffic associated with this project as requested by Lake Charles LNG. On 02/03/2023, Lake Charles LNG submitted a minor modification application to the LDEQ to address design updates from EPC Contractor. On 02/10/2023, Lake Charles LNG submitted a Notice of Intent (NOI) to the LDEQ, which will go into effect 48 hours after submittal. On 01/10/2023, Lake Charles LNG received its clearance letter from the LA SHPO, for the relocation of the ALCOA pipeline. On 01/10/2023, Lake Charles LNG received approval for the Categorical Clearance Agreement for Routine Construction and Maintenance Activities from the LA SHPO. On 02/2023, Lake Charles LNG received its Use and Occupancy Permit for the ALCOA pipeline relocation, from the Consolidated Gravity Drainage District No. Two of East Calcasieu Parish. Maintenance clearing of the greenfield site to support the Enabling Projects was completed in February 2023. The Project is presently working through several detailed design enhancement strategies with the selected EPC provider that will enable EPC pricing updates. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encoun
FERC 20230210- 5157	Lake Charles LNG Semi-Annual Report (07/01/2022 – 12/31/2022), FERC Docket Nos. CP74-138, et al.	 As previously reported, on 08/27/2020, Hurricane Laura passed directly over the facility resulting in moderate damage to the facility. Repairs to the East Dock crane/gangway were completed during this reporting period. This completes the damage repairs from Hurricanes Laura and Delta. During the week of 12/22/2023, Lake Charles LNG experienced temperatures below freezing for 2 consecutive days. Lake Charles LNG experienced damage to utility water fittings & valves at 41 locations within the plant. Repairs were substantially completed by the end of this reporting period. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period.

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Date		 As previously reported, a detailed inspection of the perimeter piles on 2101-FA/FB/FC/FD LNG Tanks identified some minor surface cracks and isolated spalling on some of the piles. The first phase of this project was completed on 2101-FA during this reporting period. Corrosion on some of the LNG Tank structures was identified during this reporting period. As a result, a phased project has been budgeted to mitigate the issues. The first phase was completed as an unbudgeted project during this reporting period.
FERC 20230210- 5149	Lake Charles LNG Monthly Status Report No. 83	 On 01/23/2023, Lake Charles LNG commenced the supplementary geotechnical investigations, as previously discussed with FERC Staff, and these activities are anticipated to last approximately six weeks. Lake Charles LNG will perform limited clearing to support the Enabling Projects. The Project is presently working through several detailed design enhancement strategies with the selected EPC provider that will enable EPC pricing updates. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20230123- 3006	Letter Order Approving Notice to Proceed with Certain Activities	 FERC granted permission to conduct the following limited site preparation activities: Plug and abandon seven wells Remove the Boardwalk Louisiana Midstream, LLC meter station Remove the Boardwalk and Trunkline Gas Company pipeline segments within the terminal footprint and isolate the Boardwalk and Trunkline Gas pipeline segments outside the terminal footprint Abandon Granger Road and remove the existing utilities along Granger Road, within the terminal FERC confirmed receipt of all required federal authorizations relevant to the approved activities.
FERC 20230111- 5133	Lake Charles LNG Monthly Status Report No. 82	 The Project is presently working through several detailed design enhancement strategies with the selected EPC provider that will enable EPC pricing updates. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20221219- 5055 FERC 20221216- 5273	Request for Written Authorization (EC- 6) Request for Written Authorization	 Request permission to undertake the demolition of an existing pipeline and relocate it to facilitate construction of Project facilities. Request to perform activities to prepare the site for initial site preparation, including tree clearing, existing facilities demolition and well plugging and abandonment.
FERC 20221216- 5237	Lake Charles LNG Monthly Status Report No. 81	 On 11/10/2022, Lake Charles LNG received clearance from LDWF for review of minor modification for the relocation of the ALCOA pipeline.

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		 On 11/30/2022, FERC Staff held a virtual meeting with Lake Charles LNG personnel to discuss the Project. The Project is presently working through several detailed design enhancement strategies with the selected EPC provider that will enable EPC pricing updates. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20221209- 3003	Notice to Proceed with Construction	 With respect to the Pipeline Modifications Project, Trunkline Gas is authorized to commence construction of certain piping modifications to enable bi-directional flow at the following compressor stations: Longville Compressor Station, Beauregard Parish, LA Pollock Compressor Station, Grant Parish, LA Shaw Compressor Station, Bolivar County, MS Epps Compressor Station, West Carroll Parish, LA
FERC 20221110- 5155	Lake Charles LNG Monthly Status Report No. 80	 FERC Staff scheduled a virtual meeting with Lake Charles LNG for 11/30/2022, to discuss the Project and for a presentation of design changes from FEED to the final design. On 10/18/2022, USFWS confirmed that its 11/27/2012 MBTA recommendations remain valid for the project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20221018- 5138	Lake Charles LNG Monthly Status Report No. 79	 On 08/24/2022, Energy Transfer and Shell announced that they entered into a 20-year LNG Sale and Purchase Agreement. On 09/12/2022, Lake Charles LNG took part in a conference call with FERC LNG staff to discuss the proposed Geotechnical Investigation Plan for supplemental borings. Lake Charles LNG is preparing a request for renewed MBTA consultation, for submittal to USFWS in October 2022. On 05/05/2020 Lake Charles LNG received its LDEQ Water Quality Certification extension. On 07/27/2022 Lake Charles LNG received the Exemption/NDSI Determination from Office of Coastal Management. On 07/13/2022, Lake Charles LNG completed the facility Waterway Suitability Assessment workshop in accordance with NVIC 01-2011. On 09/01/2022, Lake Charles LNG submitted the Letter of Intent ("LOI") and the WSA to the USCG for review and approval to increase the number of authorized vessels from 225 to 300 in order to allow the project to operate at full capacity.

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Date	Lake Charles Exports, LLC Semi- Annual Report (04/01/2022 – 09/30/2022), FE Docket No. 11-59-	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed. In 2017, Lake Charles LNG completed a FEED study. In April 2019, Lake Charles LNG engaged various companies to conduct a FEED verification as well as submit bids for the engineering, procurement and construction ("EPC") related to the Project. In April 2020, Lake Charles LNG received bids for the EPC
	LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2022 – 09/30/2022), FE Docket No. 13-04- LNG	 contract related to the Project. These EPC bids were evaluated; however, due to the onset of the COVID pandemic, the EPC contract was not finalized with any of the bidding parties. Lake Charles LNG has engaged one of the EPC bidding parties to conduct additional engineering work in connection with identified design enhancement opportunities as well as to prepare an updated EPC contract bid, which bid refresh process is in progress and the updated EPC bid is expected to be received in the next several months. Maintenance clearing of the Project site is tentatively being targeted for the winter of 2022/2023. The Project remains an active, fully-supported project by Energy Transfer with no changes proposed to the scope or design that the DDE/FE reviewed and approved. Lake Charles LNG filed the Section 7 consistency letters from the USFWS at FERC on 06/16/2020, for the LNG Terminal. Lake Charles LNG requived the Section 7 consistency letter from the National Marine Fisheries Service Protected Resources Division on 01/19/2021 for the LNG Terminal, including in-water activities. Lake Charles LNG requested renewal of the Section 7 consistency determination from the USFWS on 05/23/2022, and received the renewed clearance on 06/20/2022, and renewal of clearance from LDWF on 03/02/2022. Lake Charles LNG filed its USACE permit extension at FERC and Louisiana Department of Natural Resources Office of Coastal Management ("OCM") Determination from the OCM on 06/03/2022, and will file the responses at FERC when received. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. On 05/02/2022, Energy Transfer and SK Gas Trading LLC announced that Energy Transfer LNG and SK Gas Trading have entered into a 20-year LNG Sale and Purchase Agreement. On 06/05/2022, Energy Transfer and SK Gas Trading LLC announced that China Gas Hongda Energy Trading Co., LTD and Energy Tra

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		 On 08/24/2022, Energy Transfer and Shell NA LNG LLC announced that Shell and Energy Transfer LNG have entered into a 20-year LNG Sale and Purchase Agreement. Lake Charles LNG confirms that the Project area has not experienced any significant changes and the environmental and other public interest findings underlying the FERC's authorizations for the Project remain valid.
FERC 20220908- 5116	Lake Charles LNG Monthly Status Report No. 78	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project Team continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20220810- 5127	Lake Charles LNG Monthly Status Report No. 77	 On 06/20/2022 received the renewed clearance from USFWS. On 03/02/2022 received renewed clearance from LA Dept. of Wildlife and Fisheries. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project Team continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20220802- 5154	Lake Charles LNG Semi-Annual Report (01/01/2022 - 06/30/2022), FERC Docket Nos. CP74-138, et al.	 As previously reported, on 08/27/2020, Hurricane Laura passed directly over the facility resulting in moderate damage to the facility. Repairs to buildings and roofs began in the 3rd quarter of 2021 and were completed during this reporting period. Repairs to the East Dock crane/gangway began during this reporting period and are expected to be completed by the end of the 3rd Quarter. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period. As previously reported, a detailed inspection of the perimeter piles on 2101-FA/FB/FC/FD LNG Tanks identified some minor surface cracks and isolated spalling on some of the piles. The first phase of this project, Priority 1 & 2 repairs to the pilings on tank 2101-FA, was completed during this reporting period.
FERC 20220715- 5181	Lake Charles LNG Monthly Status Report No. 76	 On 06/05/2022, Energy Transfer and China Gas Holdings Limited announced that China Gas Hongda Energy Trading Co., LTD and Energy Transfer LNG have entered into a 25-year LNG Sale and Purchase Agreement. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.

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Date		 The Project Team continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
DOE 06/21/2022	Amendment to Extend Commencement Operation Date	 Lake Charles Exports, LLC and Lake Charles LNG Export Company, LLC each file an amendment to extend deadline to 12/16/2028 to align with the FERC extension. Protested by Industrial Energy Consumers of America, Public Citizen, Inc. and Sierra Club et al.
FERC 20220613- 5154	Lake Charles LNG Monthly Status Report No. 75	 On 05/02/2022, Energy Transfer and Gunvor Group Ltd announced that Gunvor Singapore Pte Ltd and Energy Transfer LNG have entered into a 20-year LNG Sale and Purchase Agreement. On 05/03/2022, Energy Transfer and SK Gas Trading LLC announced that they entered into a 18-year LNG Sale and Purchase Agreement. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project Team continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20220513- 5004	Lake Charles LNG Monthly Status Report No. 74	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. The Project Team continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20220506- 3073	Order Granting Extension of Time Request	 Extending the deadline will not undermine FERC's finding in the Authorization Order that the liquefaction project is not inconsistent with the public interest. Lake Charles LNG continued to demonstrate commitment to the project and have made a good faith effort to meet the previous deadline. The unforeseeable impacts of the COVID-19 pandemic combined with Lake Charles LNG's continued interest in the project satisfy FERC's good cause inquiry. Extension granted to 12/16/2028
FERC 20220414- 5091	Lake Charles LNG Monthly Status Report No. 73	 On 03/29/2022, Energy Transfer and ENN NG and ENN Energy announced that ENN NG and ENN Energy have signed 20-year LNG Sale and Purchase Agreements. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. On 03/04/2022, LDEQ granted a 18 month extension to commence construction.

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Date DOE 04/01/2022	Lake Charles Exports, LLC Semi- Annual Report (10/01/2021 –	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed. Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process.
	03/31/2022), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2021 – 03/31/2022), FE Docket No. 13-04- LNG	 The Project is presently working through several detail design enhancement strategies with the selected EPC provider that will enable EPC pricing updates in the summer of 2022. Maintenance clearing of the greenfield site is tentatively being considered for the winter of 2022/2023. The Project continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project by Energy Transfer with no changes proposed to the scope or design that the DOE/FE reviewed and approved. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project, remain under development. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. On 03/29/2022, Energy Transfer and ENN Natural Gas ("ENN NG") and ENN Energy Holdings Limited ("ENN Energy") announced that ENN NG and ENN Energy have signed 20-year LNG Sale and Purchase Agreements related to the Liquefaction Project. Lake Charles LNG confirms that the Project area has not experienced any significant changes and the environmental and other public interest findings underlying the FERC's authorizations for the Project remain valid.
FERC 20220311- 5278	Lake Charles LNG Monthly Status Report No. 72	 remain valid. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20220211- 5093	Lake Charles LNG Monthly Status Report No. 71	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20220211- 5052	Lake Charles LNG Semi-Annual Report (07/01/2021 – 12/31/2021), FERC Docket Nos. CP74-138, et al.	 An inspection of the oily water Corrugated Plate Interceptor (CPI) revealed that some of the internal media plates had collapsed, reducing efficiency, which collapse was caused by corrosion of the steel frames holding the media plates. A temporary rental unit was obtained and placed unto service until new stainless-steel frames were constructed and new media installed. Repairs were completed during this reporting period.

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		 As previously reported, on 08/27/2020, Hurricane Laura passed directly over the facility resulting in moderate damage to the facility. Repairs to buildings and roofs began in the 3rd quarter of 2021 and are expected to be completed by the end of the first quarter of 2022. As previously reported, based on inspection of the unloading arms at the East and West berths, a project to remove the arms was completed during this reporting period. This project was driven by needed maintenance activities as well as minor damage to the arm auxiliary systems during Hurricane Laura. The arms are currently stored under a nitrogen pad for future repair and reinstallation. The arms are subject to replacement as part of the Lake Charles LNG Liquefaction Project. Routine preventative maintenance, including instrument, electrical and equipment checks and routine
FERC 20220131- 5461	Request for Three-Year Extension	maintenance painting. o Request filed at FERC for extension of time to 12/16/2028.
FERC 20220111- 5110	Lake Charles LNG Monthly Status Report No. 70	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20211210- 5170	Lake Charles LNG Monthly Status Report No. 69	 The Project is presently working through several detail design enhancement strategies with the selected EPC provider that will enable EPC pricing updates in the summer of 2022. Maintenance clearing of the greenfield site is tentatively being considered for the Spring of 2022. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20211115- 5182	Lake Charles LNG Monthly Status Report No. 68	 The Project Team continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20211014- 5127	Lake Charles LNG Monthly Status Report No. 67	 The Project Team continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
DOE 10/01/2021	Lake Charles Exports, LLC Semi- Annual Report (04/01/2021 – 09/30/2021), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2021	 On 07/13/2021, FERC Staff informally requested Lake Charles LNG provide pictures representative of the revegetation status of the Liquefaction Project site in its next report to FERC, and Lake Charles LNG filed the pictures with Monthly Status Report No. 65. Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process.

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Date	– 09/30/2021), FE Docket No. 13-04- LNG	 The Project continues to evaluate pandemic driven schedule impacts including equipment availability, supply chain constraints, and labor availability. The Project remains an active, fully-supported project by Energy Transfer with no changes proposed to the scope or design that the DOE/FE reviewed and approved. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to
FERC 20210914- 5064	Lake Charles LNG Monthly Status Report No. 66	 supply natural gas to the Liquefaction Project, remain under development. On 08/26/2021, FERC LNG Staff informally requested information on what special preparations Lake Charles LNG was undertaking prior to Hurricane Ida making landfall, and requested information on current maintenance activities planned at the facility. Lake Charles LNG responded directly to FERC LNG Staff on 08/26/2021.
		 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20210810- 5178	Lake Charles LNG Semi-Annual Report (01/01/2021 - 06/30/2021), FERC Docket Nos. CP74-138, et al.	 On 03/08/2021, an inspection of the oily water Corrugated Plate Interceptor (CPI) revealed that the some of the internal media plates had collapsed, reducing efficiency and that was corrosion of the steel frames holding the media plates. A temporary rental unit was acquired and placed into service until new stainless-steel frames are constructed and new media installed. Repairs are expected to be completed in the 3rd quarter of 2021. During week of 02/14/2021, Lake Charles LNG experienced temperatures below freezing for 3 consecutive days with only a short period of time above freezing. Caused minor damage to utility water piping and valves. All repairs have been completed. As previously reported, on 08/27/2020, Hurricane Laura passed directly over the facility resulting in moderate damage to the facility as a result of hurricane force winds. Facility damage included buildings and roofs, lighting, instrument cable and trays, East Dock crane/gangway, and East & West Dock loading arm auxiliary systems. Facility repairs were completed on lighting, instrument cable and trays during this reporting period. Repairs to buildings and roofs are scheduled to begin in the 3rd quarter of 2021. As previously reported, de-inventory of the IEP glycol system continued in 2021. The de-inventory was completed on 03/24/2021. Glycol system piping and equipment have been placed under a nitrogen pad. As previously reported, a project was initiated to perform the 5-year scheduled testing of electrical protective equipment within the plant. The critical elements of this testing were completed in 2020 and remaining testing has been completed during this reporting period. Routine preventative maintenance, including instrument, electrical and equipment checks and routine maintenance painting.
FERC 20210810-	Lake Charles LNG Monthly Status	 On 07/13/2021, FERC Staff informally requested pictures representative of the revegetation status of the
5175	Report No. 65	Liquefaction Project.

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Date		 On 12/17/2020, Lake Charles LNG and BG LNG executed an Amended and Restated Regasification Services Agreement. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20210712- 5103 FERC 20210609- 5140	Lake Charles LNG Monthly Status Report No. 64 Lake Charles LNG Monthly Status Report No. 63	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order.
FERC 20210511- 5125	Lake Charles LNG Monthly Status Report No. 62	 No problems were encountered and no non-compliances were observed. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20210413- 5276	Lake Charles LNG Monthly Status Report No. 61	 On 03/17/2021, Lake Charles LNG provided a Hurricane Laura Damage Report to FERC Staff in response to a request for information, detailing the status of facility damage associated with the hurricane. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
DOE 04/06/2021	Lake Charles Exports, LLC Semi- Annual Report (10/01/2020 – 03/31/2021), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2020 – 03/31/2021), FE Docket No. 13-04- LNG	 Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process. Lake Charles LNG is working with FERC technical staff and providing updates on Hurricane Delta preparation. Lake Charles LNG filed its permit renewal application with the LDEQ for Iowa compressor station (CS 203-A), and received approval on 05/14/2020. Lake Charles LNG filed its USACE permit extension at FERC on 07/14/2020. Lake Charles LNG submitted its renewal application for Air Permit to the LDEQ, and the Air Permit renewal for the Export facility was issued by the LDEQ on 09/03/2020. The Project remains an active, fully-supported project by Energy Transfer with no changes proposed to the scope or design that the DOE/FE reviewed and approved. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development. On 12/17/2020, Lake Charles LNG and BG executed an Amended and Restated Gasification Services Agreement.

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FERC 20210309- 5190	Lake Charles LNG Monthly Status Report No. 60	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20210210- 5140	Lake Charles LNG Monthly Status Report No. 59	 On 10/01/2020, Lake Charles LNG abandoned an existing gas turbine generator and related appurtenances ("Unit 2204-JA") in place, which provided a back-up power source for auxiliary facility operations power needs, and was last utilized in 2012. Existing emergency power generation facilities were not impacted by the abandonment of Unit 2204-JA. In addition, Lake Charles LNG abandoned a fuel oil storage tank and related appurtenances ("Bunker C Facilities") in place, which were initially installed to support LNG tankers for storage and/or loading fuel oil into the LNG tankers, because the need for bunkering with the Bunker C Facilities ceased in 1997, and the responsibility for bunkering was transferred to the LNG vessel operator. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order.
FERC 20210209- 5157	Lake Charles LNG Semi-Annual Report (07/01/2020 – 12/31/2020), FERC Docket Nos. CP74-138, et al.	 No problems were encountered and no non-compliances were observed. On 08/27/2020 Hurricane Laura passed directly over the facility and the terminal lost commercial power for 21 days. During the power outage emergency power generation was utilized to operate emergency equipment, security systems and safety systems. During the hurricane, the Surf Challenger (offshore supply vessel) moored at the neighboring Gulf Island facility broke loose and struck Lake Charles LNG mooring dolphins and docks causing damage to pilings and structures. Repairs are in progress. On 10/09/2020, Hurricane Delta passed just to the east of the facility resulting in minimal damage to the facility as a result of hurricane force winds. During the 2019 Canal Firewater Pump testing, two pumps were discovered to be performing below their design capacity. These pumps were repaired, flow tested and reinstalled. Two additional pumps were repaired, flow tested and reinstalled. Two additional pumps were repaired, flow tested and reinstalled during this reporting period. Lake Charles LNG began the de-inventory of the KF system including the 3101-CA/B/C/D LNG Vaporizers and all associated piping. The KF system piping and equipment has been placed under a N2 pad. De-inventory of the glycol system will continue in 2021. Based on inspection of the unloading arms at the East and West berths, a project to remove the arms is planned for 2021. The project is driven by needed maintenance activities as well as minor damage to the arm auxiliary systems during Hurricane Laura. The arms will be inspected and stored for future repair and reinstallation. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period.

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		 As previously reported, a project was initiated, to perform the 5-year scheduled testing of electrical protective equipment within the plant. The critical elements of this testing were completed in 2020 and remaining testing will continue in 2021. On 10/01/2020, Lake Charles LNG abandoned an existing gas turbine generator and related appurtenances, which provided a back-up power source for auxiliary facility operations power needs and was last utilized in 2012. Lake Charles LNG also abandoned a fuel oil storage tank and related appurtenances (Bunker C Facilities) in place, which were initially installed to support LNG tankers for storage and/or loading fuel oil into the LNG tankers. Responsibility for bunkering was transferred to the LNG vessel operator.
FERC 20210112- 5200	Lake Charles LNG Monthly Status Report No. 58	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20201209- 5155	Lake Charles LNG Monthly Status Report No. 57	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20201112- 5034	Lake Charles LNG Monthly Status Report No. 56	 Lake Charles LNG provided updates on its Hurricane Delta preparations to FERC LNG Technical Staff. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20201009- 5128	Lake Charles LNG Monthly Status Report No. 55	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
DOE 10/06/2020	DOE Order Nos. 2987-A, 3324-A and 4011-A	 DOE orders amending term of export from 25 years to 30 years and amending commencement of operations deadline to 12/16/2025.
DOE 10/01/2020	Lake Charles Exports, LLC Semi- Annual Report (04/01/2020 – 09/30/2020), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2020 – 09/30/2020), FE Docket No. 13-04- LNG	 Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process. In the second quarter of 2019, the parties executed contracts with EPC companies to verify existing frontend engineering design. Lake Charles LNG has received commercial bids from EPC companies in response to the commercial tender package issued on 12/03/2019, for engineering, procurement and contracting, and these bids are being evaluated. Lake Charles LNG is working with the USCG to conduct an annual review and revalidation of the facility WSA in accordance with NVIC 01-2011. As part of this review, Lake Charles LNG is requesting an increase in the number of authorized vessels in order to allow the project to operate at full capacity. The current authorization of 225 vessels per year would require that vessels average about 174,000 m3 capacity, among the largest in the LNG fleet, to deliver the 16.45 MTPA certificated capacity. Increasing the number of authorized vessels will allow a wider range of vessel sizes from the LNG fleet to deliver the full capacity of the facility. This increase will not result in increasing the actual production of the

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Date		 terminal. Lake Charles LNG's request to the USCG, for review and revalidation of the WSA to increase the number of LNG vessels, requires no change to the currently proposed facility modifications or the certificated capacity, all previously authorized in the Authorization Order. The Project remains an active, fully-supported project by Energy Transfer with no changes proposed to the scope or design that the DOE/FE reviewed and approved. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to
FERC 20200916- 5114	Lake Charles LNG Notice of Abandonment	 supply natural gas to the Liquefaction Project, remain under development. Authorization Order approved Lake Charles LNG's request to abandon its NGA section 7 certificate and have all facilities under NGA section 3 authorizations. Abandonment completed 08/21/2020.
FERC 20200911- 5310	Lake Charles LNG Monthly Status Report No. 54	 Received approval from LDEQ regarding compressor station. Received approval from LDEQ regarding air permit renewal. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20200818- 3004	Letter Order approving cancelling of FERC Tariff	• FERC approved the cancelling of Lake Charles LNG's FERC Tariff, effective 08/21/2020.
FERC 20200810- 5158	Lake Charles LNG Semi-Annual Report (01/01/2020 - 06/30/2020), FERC Docket Nos. CP74-138, et al.	 During the 2019 Canal Firewater Pump testing, two pumps were discovered to be performing below their design capacity. These pumps were repaired, flow tested and reinstalled during this reporting period. Two additional pumps were removed and sent to the manufacturer for repair and flow testing during this reporting period. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting was completed during this reporting period. A project was initiated in 2020 to perform the 5-year scheduled testing of electrical protective equipment within the plant. This testing is on-going.
FERC 20200810- 5149	Lake Charles LNG Monthly Status Report No. 53	 Filed for construction extension at LDEQ for compressor station. Filed at FERC the Section 7 consistency letters from USFWS regarding LNG Terminal. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20200714- 5054	Lake Charles LNG Monthly Status Report No. 52	 Lake Charles LNG cancelled its FERC Tariff effective 08/21/2020. Lake Charles LNG and BG LNG are negotiating an Amended and Restated Regasification Services Agreement. Lake Charles LNG avows that, until such new agreement is executed, it will continue to

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		 serve BG LNG under the terms of the existing service agreements, including terms of the Fourth Revised Volume No. 1-A Tariff as it existed prior to such cancellation. On 06/29/2020, Lake Charles LNG received the USACE permit extension to 12/16/2025. Lake Charles LNG has initiated plans with the U.S. Coast Guard ("USCG") to conduct a review and revalidation of the facility Waterway Suitability Assessment ("WSA"). As part of this review, Lake Charles LNG is requesting an increase in the number of authorized vessels in order to allow the project to operate at full capacity. The USCG is currently reviewing this process with FERC staff, and Lake Charles LNG will proceed once this review is complete. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20200622- 5166	Lake Charles LNG Submits Tariff Filing to Cancel its Tariff	 Authorization Order approved Lake Charles LNG's request to cancel its FERC Tariff. Lake Charles LNG requested a 08/21/2020 effective date for cancelling its FERC Tariff.
FERC 20200616- 5052	Lake Charles LNG Monthly Status Report No. 51	 Lake Charles LNG has received commercial bids from EPC companies in response to the commercial tender package issued on 12/03/2019, for engineering, procurement and contracting, and these bids are being evaluated. On 03/19/2020 Lake Charles LNG submitted the permit extension request to the U.S. Army Corps. of Engineers ("USACE"). On 06/04/2020, Lake Charles LNG received Section 7 consistency letters from the U.S. Fish and Wildlife Service ("USFWS"). The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20200512- 5163	Lake Charles LNG Monthly Status Report No. 50	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20200413- 5032	Lake Charles LNG Monthly Status Report No. 49	 On 03/30/2020, Shell announced it would withdraw from the liquefaction project. The Project remains an active project fully-supported by Energy Transfer. On 03/04/2020, Lake Charles Exports, LLC and Lake Charles LNG Export Company, LLC filed applications at DOE to amend term of export from 25 years to 30 years and amend commencement of operations deadline to 12/16/2025. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
DOE 04/01/2020	Lake Charles Exports, LLC Semi- Annual Report (10/01/2019 –	 On 12/06/2019, FERC issued a letter order granting Lake Charles LNG's request for extension of time to 12/16/2025.

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Date	03/31/2020), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2019 – 03/31/2020), FE Docket No. 13-04- LNG	 Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process. The Project remains an active, fully-supported project with no changes proposed to the scope or design that the DOE/FE reviewed and approved. On 03/30/2020, Shell announced it would withdraw from the Liquefaction Project. The Project remains an active project fully-supported by Energy Transfer. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.
FERC 20200310- 5166	Lake Charles LNG Monthly Status Report No. 48	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
DOE 03/04/2020	Request for Amendment, Lake Charles Exports, LLC FE Docket Nos. 11-59- LNG and 16-110-LNG Request for Amendment, Lake Charles LNG Export Company, LLC FE Docket Nos. 13-04-LNG and 16-109- LNG	 Amendment application files requesting amendment to term of export from 25 years to 30 years and amendment to commencement of operations deadline to 12/16/2025.
FERC 20200212- 5005	Lake Charles LNG Semi-Annual Report (07/01/2019 – 12/31/2019), FERC Docket Nos. CP74-138, et al.	 As previously reported, a phased project to replace the deluge piping on each of the three original LNG Tanks was budgeted. The project to replace deluge piping on Tank C was completed during this reporting period. As previously reported, a phased project to repair the tank structural steel supporting the piping risers on each of the three original LNG Tanks. Tank C repairs were completed during this reporting period. As previously reported, a phased project to repair the foam generator housings replaced two more housings during this reporting period. As previously reported, a phased project to repair the FMC Unloading arms was initiated with the delivery of replacement parts in 2019. During this reporting period, additional inspection of the arms was completed. Based on these inspection results, completion of the arm repairs have been reevaluated and will be postponed to a future budget cycle. The next phase of the DCS project is being re-evaluated to determine if these elements are required to maintain the reliability of the DCS system. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting and insulation repairs were completed during this reporting period.

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FERC 20200211- 5176	Lake Charles LNG Monthly Status Report No. 47	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20200107- 5092	Lake Charles LNG Monthly Status Report No. 46	 In the 2ndQ of 2019, Shell and Lake Charles LNG executed contracts with EPC companies to verify existing front-end engineering design. On 12/03/2019, Lake Charles LNG and Shell announced that a comprehensive commercial tender package has been issued for engineering, procurement and EPC companies to submit final commercial bids for the proposed Lake Charles LNG liquefaction project. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20191210- 5171	Lake Charles LNG Monthly Status Report No. 45	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20191205- 3025	Letter Order Granting Extension of Time	 Based on the facts presented in the request, FERC granted an extension of time until and including 12/16/2025 to complete construction of the Liquefaction Project and make it available for service.
FERC 20191112- 5283	Lake Charles LNG Monthly Status Report No. 44	 On 10/30/2019, Lake Charles LNG submitted its renewal application for Air Permit to the LDEQ. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20191010- 5186	Lake Charles LNG Monthly Status Report No. 43	 The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
DOE 10/01/2019	Lake Charles Exports, LLC Semi- Annual Report (04/01/2019 – 09/30/2019), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2019 – 09/30/2019), FE Docket No. 13-04- LNG	 Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process. On 04/30/2019, Lake Charles LNG and Shell issued an Invitation to Tender to EPCs. Contracts to complete FEED verification by the EPCs were executed in April 2019. In the 2ndQ 2019, the parties executed contracts with EPC companies to verify existing front-end engineering design. The Project remains an active, fully-supported project with no changes proposed to the scope or design that the DOE/FE reviewed and approved. On 04/01/2019, Energy Transfer announced it is expanding its presence in China to meet growing demand for ethane and liquid natural gas products by opening an office in Beijing, which will support the marketing and sales of energy products including liquefied natural gas. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project.

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		• Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.
FERC 20190910- 5152	Lake Charles LNG Monthly Status Report No. 42	 On 08/30/2019 submitted at FERC a request for extension of time. The Project remains an active, fully-supported project with no changes proposed to the scope or design that FERC reviewed and approved in the Authorization Order. No problems were encountered and no non-compliances were observed.
FERC 20190830- 5193	Request for Extension of Time	 Request for extension of time filed at FERC so that Lake Charles LNG may construct and place into service the Project facilities by 12/16/2025.
FERC 20190809- 5155	Lake Charles LNG Monthly Status Report No. 41	• No problems were encountered and no non-compliances were observed.
FERC 20190809- 5154	Lake Charles LNG Semi-Annual Report (01/01/2019 – 06/30/2019), FERC Docket Nos. CP74-138, et al.	 As previously reported, a phased project to replace the deluge piping on each of the three original LNG Tanks was budgeted. The project to replace deluge piping on Tank C began during this reporting period. As previously reported, a phased project to repair the tank structural steel supporting the piping risers on each of the three original LNG Tanks began on Tank C during this reporting period. The second phase of a project to repair structural columns at the West Dock, based on results from the annual support system inspection, was completed during this reporting period. The final phase of the automatic valve actuator project replaced two more actuators in the tank trestle area in 2019. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting and insulation repairs were completed during this reporting period.
FERC 20190710- 5053	Lake Charles LNG Monthly Status Report No. 40	• No problems were encountered and no non-compliances were observed.
FERC 20190613- 5169	Lake Charles LNG Monthly Status Report No. 39	• No problems were encountered and no non-compliances were observed.
FERC 20190514- 5148	Lake Charles LNG Monthly Status Report No. 38	 Lake Charles LNG and Shell issued an Invitation to Tender to EPC companies on 04/30/2019. Contracts to complete FEED verification by the EPC's were executed in April 2019. On 04/01/2019, Energy Transfer announced it is expanding its presence in China to meet growing demand for ethane and LNG products by opening an office in Beijing, which will support the marketing and sales of energy products including liquefied natural gas. No problems were encountered and no non-compliances were observed.
FERC 20190412- 5232	Lake Charles LNG Monthly Status Report No. 37	 On 03/25/2019, Lake Charles LNG and Shell signed a Project Framework Agreement that provides the framework to further develop the LNG export facility toward a potential FID. Lake Charles LNG and Shell have started actively engaging with EPC companies with a plan to issue an Invitation to Tender in the weeks ahead. No problems were encountered and no non-compliances were observed.

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DOE 04/01/2019	Lake Charles Exports, LLC Semi- Annual Report (10/01/2018 – 03/31/2019), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2018 – 03/31/2019), FE Docket No. 13-04- LNG	 On 03/25/2019, Lake Charles LNG and Shell US LNG, LLC ("Shell") signed a Project Framework Agreement that provides the framework to further develop a large-scale LNG export facility in Lake Charles, LA toward a potential final investment decision. In addition, Lake Charles LNG and Shell have started actively engaging with Engineering, Procurement and Contracting ("EPC") companies with a plan to issue an Invitation to Tender in the weeks ahead. Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.
FERC 20190311- 5239	Lake Charles LNG Monthly Status Report No. 36	 No problems were encountered and no non-compliances were observed.
FERC 20190211- 5016	Lake Charles LNG Monthly Status Report No. 35	• No problems were encountered and no non-compliances were observed.
FERC 20190206- 5134	Lake Charles LNG Semi-Annual Report (07/01/2018 – 12/31/2018), FERC Docket Nos. CP74-138, et al.	 As previously reported, the Control Building UPS batteries were removed from service and a temporary battery bank was installed. The replacement battery bank was installed and placed into service on 08/18/2018. As previously reported, a phased project to replace the deluge piping on each of the three original LNG Tanks was budgeted. The project to replace deluge piping on Tank B was completed during this reporting period. The next phase of the DCS update project was completed during this reporting period. This phase of the OPC (open platform communications) to DCS interface computer. As previously reported, a phased project to repair the tank structural steel supporting the piping risers on each of the three original LNG Tanks was budgeted. The tank structural steel replacement project on Tank B was completed during this reporting period. A project to update the engineering stations for the plant Emergency Shutdown System (ESS) was completed during this reporting period. The first phase of a project to repair structural columns at the West Dock based on results from the annual support system inspection was completed during this reporting period. A project to repair impoundment insulation systems at Tanks A/B/C and the West Dock was completed during this reporting period. A project period and included a new seal coat over the existing insulation. As previously reported, a phased project to repair the FMC Unloading arms was initiated this reporting period with the purchase of replacement parts for two arms. These parts were delivered during this reporting this reporting period with the purchase of the project will begin in 2019 and will include the removal and repair of two arms.

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		 Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting and insulation repairs were completed during this reporting period.
FERC 20190107-	Lake Charles LNG Monthly Status	 No problems were encountered and no non-compliances were observed.
5014	Report No. 34	
FERC 20181213- 5206	Lake Charles LNG Monthly Status Report No. 33	• No problems were encountered and no non-compliances were observed.
FERC 20181113-	Lake Charles LNG Monthly Status	• No problems were encountered and no non-compliances were observed.
5254	Report No. 32	
FERC 20181011- 5157	Lake Charles LNG Monthly Status Report No. 31	• No problems were encountered and no non-compliances were observed.
DOE 10/02/2018	Lake Charles Exports, LLC Semi- Annual Report (04/01/2018 – 09/30/2018), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2018 – 09/30/2018), FE Docket No. 13-04- LNG	 Lake Charles LNG continues to do further engineering and risk reduction work in preparation for a bid revalidation process. On 02/02/2018, Lake Charles LNG requested the LDEQ to consider an additional 18 month commence construction extension to extend the deadline until 11/01/2019, and Lake Charles LNG received its approval on 08/15/2018. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.
FERC 20180914-	Lake Charles LNG Monthly Status	• Received approval of the extension request from LDEQ on 08/15/2018.
5088	Report No. 30	 No problems were encountered and no non-compliances were observed.
FERC 20180813- 5047	Lake Charles LNG Semi-Annual Report (01/01/2018 – 06/30/2018), FERC Docket Nos. CP74-138, et al.	 As previously reported, an internal inspection of the 3202-CB Glycol Heater was performed and minor cracked refractory around the tip of Burner #3 was identified. Repairs to the refractory were completed on 01/21/2018. On 02/20/2018, the Control Building UPS batteries were removed from service after a routine maintenance check determined they were no longer able to deliver the required power and were in danger of failure from elevated temperatures. To provide required service, a temporary battery bank was installed and remains in service pending receipt of replacement batteries which are on order. During the week of 01/15/2018, Lake Charles LNG experienced temperatures below freezing for 3 consecutive days with only a short period of time above freezing. Lake Charles LNG experienced widespread damage to utility water piping & valves throughout the plant. On 01/12/2018, Lake Charles LNG experienced a voltage dip on the incoming 13.8kV power feed and the uninterrupted power supply (UPS) that provides power to the Corporate IT network in the Control Building failed. The failed UPS was replaced.

FERC Accession No. / DOE Filing Date	Document Title	Notes
		 The next phase of the DCS update project was initiated during this reporting period and will be completed during the next reporting period. This phase of the project will replace the OPC (open platform communications) to DCS interface computer. The next phase of the automatic valve actuator project replaced 3 actuators in the tank trestle area during this reporting period. As previously reported, a phased project to repair the tank structural steel supporting the piping risers on each of the three original LNG Tanks was budgeted. The tank structural steel replacement project on Tank B began during this reporting period and will be completed during the next reporting period. As previously reported, the next phase of the foam generator housing project replaced two more housings during this reporting period. As previously reported, a project to replace the existing facility access control system was implemented during this reporting period. As previously reported, a phased project to repair the FMC Unloading arms was initiated this reporting period. As previously reported, a phased project to repair the FMC Unloading arms was initiated this reporting period. As previously reported, a phased project to repair the FMC Unloading arms was initiated this reporting period. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical, and equipment checks. Additionally, routine maintenance painting and insulation repairs were completed during this reporting period.
FERC 20180809- 5099	Lake Charles LNG Monthly Status Report No. 29	No problems were encountered and no non-compliances were observed.
FERC 20180711- 5219	Lake Charles LNG Monthly Status Report No. 28	• No problems were encountered and no non-compliances were observed.
FERC 20180611- 5041	Lake Charles LNG Monthly Status Report No. 27	• No problems were encountered and no non-compliances were observed.
FERC 20180510-	Lake Charles LNG Monthly Status	• LDEQ comment deadline for extension request is 05/08/2018.
5201 FERC 20180410- 5193	Report No. 26 Lake Charles LNG Monthly Status Report No. 25	 No problems were encountered and no non-compliances were observed. 18 month commence construction extension request at LDEQ undergoing a 30 day public comment period. No problems were encountered and no non-compliances were observed.
DOE 04/03/2018	Lake Charles Exports, LLC Semi- Annual Report (10/01/2017 – 03/31/2018), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (10/01/2017 – 03/31/2018), FE Docket No. 13-04- LNG	 Work continues with two bidding consortia to do further engineering and risk reduction work and there have been further reviews of the EPC terms and conditions in preparation for a bid revalidation process. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.

FERC Accession	Document Title	Notes
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FERC 20180308- 5186	Lake Charles LNG Monthly Status Report No. 24	 On 02/02/2018, Lake Charles LNG requested the Louisiana Department of Environmental Quality ("LDEQ") consider an additional (18) eighteen month commence construction extension to extend the deadline until 11/01/2019. No problems were encountered and no non-compliances were observed.
FERC 20180215- 5021	Lake Charles LNG Semi-Annual Report (07/01/2017 – 12/31/2017), FERC Docket Nos. CP74-138, et al.	 During annual load testing of the 2410-J Security Generator, it was determined that undersized fuel injectors previously were installed, which caused performance issues. On 12/13/2017, correct fuel injectors were installed and a successful load test was completed. On 11/27/2017, an internal inspection of the 3202-CB Glycol Heater was performed and minor cracked refractory around the tip of Burner #3 was identified. Repairs to this refractory are planned for January 2018. The next phase of the DCS update project was implemented during this reporting period. This phase of the project replaced the East and West Dock operator control stations and the IEP engineering workstation. The next phase of the automatic valve actuator project replaced 4 actuators in the tank trestle area during this reporting period. A project to replace two of the cathodic protection anode beds with one larger well was completed during this reporting period. As previously reported, a phased project to repair the tank structural steel supporting the piping risers on each of the three original LNG Tanks was budgeted. The tank structural steel on Tank A was repaired
FERC 20180208-	Lake Charles LNG Monthly Status	 during this reporting period. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical and equipment checks. Additionally, routine maintenance painting and insulation repairs were completed during this reporting period. No problems were encountered and no non-compliances were observed.
5092	Report No. 23	
FERC 20180109- 5178	Lake Charles LNG Monthly Status Report No. 22	• No problems were encountered and no non-compliances were observed.
FERC 20171206- 5139	Lake Charles LNG Monthly Status Report No. 21	• No problems were encountered and no non-compliances were observed.
FERC 20171108- 5166	Lake Charles LNG Monthly Status Report No. 20	• No problems were encountered and no non-compliances were observed.
FERC 20171010- 5114 DOE 09/27/2017	Lake Charles LNG Monthly Status Report No. 19 Lake Charles Exports, LLC Semi-	 All erosion controls will be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed Work continues with two bidding consortia to do further engineering and risk reduction work and there
	Annual Report (04/01/2017 – 09/30/2017), FE Docket No. 11-59- LNG	have been further reviews of the EPC terms and conditions in preparation for a bid revalidation process. Engineering work for the relocation of the Communications Facilities has been completed.

FERC Accession	Document Title	Notes
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	Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2017 – 09/30/2017), FE Docket No. 13-04- LNG	 Some preliminary site work was undertaken in order to facilitate the main construction. Road widening and other improvements were completed at three main junctions on adjacent public roads impacted by the project to improve traffic safety during construction. Approximately 150 acres of the liquefaction area was cleared of trees, temporary drainage following natural contours was incorporated as part of this. Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property comprising the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.
FERC 20170908-	Lake Charles LNG Monthly Status	• All erosion controls will be monitored and maintained in accordance with the SWPPP.
5172	Report No. 18	• No problems were encountered and no non-compliances were observed.
FERC 20170809-	Lake Charles LNG Monthly Status	• All erosion controls will be monitored and maintained in accordance with the SWPPP.
5107	Report No. 17	 No problems were encountered and no non-compliances were observed.
FERC 20170809- 5104	Lake Charles LNG Semi-Annual Report (01/01/2017 – 06/30/2017), FERC Docket Nos. CP74-138, et al.	 One of the phases of the foam generator housing replacement project was completed during this reporting period, with the new housings being constructed of stainless steel. A phased project to replace the deluge piping on each of the three original LNG Tanks has been budgeted over the next three years. The deluge piping on Tank A is planned for replacement in the second half of 2017. The next phase of the DCS project is planned for the second half of 2017 and will replace the East and West Dock operator control stations and the IEP engineering workstation. The next phase of the foam generator housing project will replace two more housings in 2018. The new housings will be constructed of stainless steel to improve equipment life. The next phase of the automatic valve actuator project to replace four more actuators in the tank trestle area is planned for the second half of 2017. Project to replace two of the cathodic protection anode beds is expected to be completed in the third quarter of 2017. Phased project to repair the tank structural steel supporting the piping risers on each of the three original LNG Tanks has been budgeted over the next three years. The tank structural steel on Tank A is planned for replacement in the second half of 2017 and will include arm removal, inspection and identification of needed repairs to allow the ordering of long lead replacement parts. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical and equipment checks. Additionally, routine maintenance painting and insulation repairs were completed during this reporting period. Completed tree clearing of greenfield portion of the Liquefaction Facilities in April 2017.
FERC 20170710-	Lake Charles LNG Monthly Status	 All erosion controls will be monitored and maintained in accordance with the SWPPP.
5137	Report No. 16	 No problems were encountered and no non-compliances were observed.

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FERC 20170606-	Lake Charles LNG Monthly Status	• All erosion controls will be monitored and maintained in accordance with the SWPPP.
5133	Report No. 15	• No problems were encountered and no non-compliances were observed.
FERC 20170504-	Lake Charles LNG Monthly Status	• Completed tree clearing of the greenfield site.
5024	Report No. 14	• All erosion controls will be monitored and maintained in accordance with the SWPPP.
EED C 20150 405		• No problems were encountered and no non-compliances were observed.
FERC 20170407-	Lake Charles LNG Monthly Status	• Continued tree clearing of the greenfield site. This activity should be completed by mid-April 2017.
5277	Report No. 13	Additional erosion control measures will be implemented as warranted.
		• All erosion controls will be monitored and maintained in accordance with the SWPPP.
DOF 04/02/2017		• No problems were encountered and no non-compliances were observed.
DOE 04/03/2017	Lake Charles Exports, LLC Semi-	• On 01/23/2017, FERC Contractor issued a Field Inspection Report – No instances of noncompliance or
	Annual Report (10/01/2016 –	problem areas were identified.
	03/31/2017), FE Docket No. 11-59- LNG	• Some preliminary site work was undertaken in order to facilitate the main construction. Road widening
	LING Lake Charles LNG Export Company,	and other improvements were completed at three main junctions on adjacent public roads impacted by the project to improve traffic safety during construction. Approximately 150 acres of the liquefaction area
	LLC Semi-Annual Report (10/01/2016	was cleared of trees, temporary drainage following natural contours was incorporated as part of this.
	-03/31/2017), FE Docket No. 13-04-	 Lake Charles LNG owns, leases or has option agreements in place for the purchase/lease of all property
	LNG	comprising the Liquefaction Project.
	LING	 Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to
		supply natural gas to the Liquefaction Project, remain under development.
FERC 20170308-	Lake Charles LNG Monthly Status	 Continued tree clearing of the greenfield site. This activity should be completed by mid-March 2017.
5014	Report No. 12	Additional erosion control measures will be implemented as warranted.
0011		 All erosion controls will be monitored and maintained in accordance with the SWPPP.
		 No problems were encountered and no non-compliances were observed.
FERC 20170215-	Lake Charles LNG Semi-Annual	• On 07/20/2016, the deluge valve for base facility firewater diesel building was removed from service to
5064	Report (07/01/2016 – 12/31/2016),	install a new valve due to corrosion found during routine maintenance. The thermostatic releases that
	FERC Docket Nos. CP74-138, et al.	control this valve were also replaced. Final installation and testing of the new valve was completed on
	,	07/26/2016.
		• On 08/08/2016, the motor on the IEP instrument air compressor (3204-LA) failed due to winding
		contamination. The motor was replaced and the compressor returned to service on 10/06/2016.
		• Project to update servers and client computers used for security video and access control system was
		completed during this reporting period.
		 Project to refurbish two of the 4000 pound Dry Chemical Units was completed during this reporting
		period.
		• Project to replace the DCS Historian, DCS Engineering station and computers used for operator control
		was completed during this reporting period.
		 Project to replace automatic valve actuators was completed during this reporting period.

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		 Project to replace corroded foam generator housings with stainless steel was completed during this reporting period. Additional inspection of the deluge system piping determined that there is considerable internal corrosion on all three original tank deluge systems and, as a result, a phased project to replace the piping on one tank per year began this reporting period. The next phase of the DCS project is scheduled for 2017 and will replace the East and West Dock operator control stations, the operator process simulator and the OPC computer for communication from field controllers to the DCS. The next phase of the foam generator housing project will replace two more housings in 2017. The new housings will be constructed of stainless steel. The next phase of the automatic valve actuator project will replace four more actuators in the tank trestle area in 2017. A project to replace two of the cathodic protection anode beds is planned for 2017. Routine annual inspections of the cathodic protection systems have indicated a decay of these anode beds. An inspection of the ubing components of the structures. A project to repair these structures in phases over 3 years is being initiated in 2017. Routine preventative maintenance activities were carried out during this reporting period. These activities include instrument, electrical and equipment checks. Additionally, routine maintenance painting and insulation repairs were completed during this reporting period. Commenced tree clearing of greenfield portion of the Liquefaction Facilities in this reporting period and should be completed by the end of February 2017.
FERC 20170210- 5007	Lake Charles LNG Monthly Status Report No. 11	 Continued tree clearing of the greenfield site. This activity should be completed by the end of February 2017. Additional erosion control measures will be implemented as warranted. All erosion controls will be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
FERC 20170123- 4004	FERC Construction Inspection Report	 On 01/05/2017, Louis Herndon of Tetra Tech performed a construction inspection of the liquefaction project, under contract to FERC and per the request of the FERC Project Manager. The purpose of the inspection was to determine Lake Charles LNG's compliance with the environmental conditions of the Authorization Order and to inspect the construction conditions of the pipeline and facility right-of-way. The inspection covered the entire construction site of the new LNG facility. The only construction activities accomplished since the 05/25/2016 inspection were tree clearing activities on approximately 140 acres of the proposed site. At the time of the inspection, trees had been cleared, roots were removed, and the resulting timber was being cut to length and staged for burning. Lake Charles LNG stated that all construction activities, except those required by the Project's SWPPP, will be suspended following completion of tree clearing until further notice.

FERC Accession No. / DOE Filing Date	Document Title	Notes
Date		• A follow-up letter is not required at this time, because no instances of noncompliance were identified. All observed construction activities were within approved workspace limits; all environmental controls were properly maintained; and no environmental concerns were noted. The next inspection will be scheduled when construction activities resume, or at the discretion of the FERC Project Manager.
FERC 20170105- 5143	Lake Charles LNG Monthly Status Report No. 10	 Continued tree clearing of the greenfield site. This activity should be completed by mid-January 2017. Additional erosion control measures will be implemented as warranted. All erosion controls will be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
FERC 20161207- 5027	Lake Charles LNG Monthly Status Report No. 9	 Tree clearing of approximately 150 acres on the greenfield site was initiated. This activity should be completed by mid-January 2017. Additional erosion control measures will be implemented as warranted. All erosion controls will be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
FERC 20161107- 5070	Lake Charles LNG Monthly Status Report No. 8	 The construction for the relocation/replacement of the communications tower is currently on hold. All erosion controls related to disturbed areas will continue to be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
FERC 20161004- 5065	Lake Charles LNG Monthly Status Report No. 7	 Engineering work for the relocation of the Communications Facilities has been completed, however the construction for the relocation/replacement of the communications tower is currently on hold. All erosion controls related to disturbed areas will continue to be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
DOE 10/03/2016	Lake Charles Exports, LLC Semi- Annual Report (04/01/2016 – 09/30/2016), FE Docket No. 11-59- LNG Lake Charles LNG Export Company, LLC Semi-Annual Report (04/01/2016 – 09/30/2016), FE Docket No. 13-04- LNG	 On 03/29/2016, FERC Contractor issued a Field Inspection Report - No instances of noncompliance or problem areas were identified. On 05/25/2016, FERC Contractor issued a Field Inspection Report - No instances of noncompliance or problem areas were identified. On 07/08/2016, Lake Charles LNG submitted a Supplement to the Implementation Plan / Request for Variance Authorization to Relocate/Replace Communication Facilities. On 07/15/2016, FERC issued a Letter Order granting the 07/08/2016 request for variance approval. Work continues with two bidding consortia to do further engineering and risk reduction work and there have been further reviews of the EPC terms and conditions in preparation for a bid revalidation process. Engineering work for the relocation of the Communications Facilities has been completed. Definitive agreements to implement the Liquefaction Project remain under development.
FERC 20160909- 5388	Lake Charles LNG Monthly Status Report No. 6	 Shell decided in July to delay the final investment decision on the Lake Charles LNG export project that was planned for 2016. Lake Charles LNG completed the geotech survey of the ACW-C site for the relocation/replacement communication tower facilities, and no further work is scheduled at this time.

FERC Accession	Document Title	Notes
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Date		
		 All erosion controls related to disturbed areas will continue to be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
FERC 20160809- 5125	Lake Charles LNG Semi-Annual Report (01/01/2016 – 06/30/2016), FERC Docket Nos. CP74-138, et al.	 On 04/04/2016, during routine testing of the fire detection system, six UV detectors were found to be malfunctioning. There detectors were replaced with modern UV/IR detectors. On 05/09/2016, one of the base plant air compressors failed to load due to unloader valve issues. The unloader valve was repaired and the air compressor was returned to service. During routine maintenance painting of the tank areas, some of the deluge system piping on Tanks A and B were found to have extensive corrosion. As a result, several sections of corroded piping were replaced during this reporting period. As previously reported, the entire facility has been placed in standby mode. As previously reported, Lake Charles LNG began purging the gas from the piping, tanks and equipment during 1Q 2016. The only area that remains in gas service is the fuel gas system which continues to be delivered by Trunkline Gas. All areas purged will be maintained under a nitrogen atmosphere. Project to update servers and client computers used for security video and access control system as initiated in this reporting period and is to be completed in second half of 2016. Project to refurbish two of the 4000 pound Dry Chemical Units was initiated during this reporting period and is scheduled to be complete during the second half of 2016. Project to replace the DCS Historian and computers used for operator control stations was initiated during this reporting period and is scheduled to be complete during the second half of 2016. Project to replace corroded foam generator housings were initiated during this reporting period and is scheduled to be complete during the second half of 2016. Project to replace corroded foam generator housings were initiated during this reporting period and is scheduled to be complete during the second half of 2016. Project to replace corroded foam generator housings were initiated during
FERC 20160804- 5144	Lake Charles LNG Monthly Status Report No. 5	 Lake Charles LNG is tentatively planning to commence construction of the access road and proceed with the Geotech survey of the ACW-C site, in preparation for the relocation/replacement communication tower facilities, during the next reporting period. All erosion controls related to disturbed areas will continue to be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
DOE 07/29/2016	DOE Order No. 3324-A	 No problems were checomerced and no non-compnances were observed. DOE Order granting Lake Charles Exports, LLC long-term, multi-contract authorization to export LNG from the Lake Charles Terminal to non-FTA nations.

FERC Accession	Document Title	Notes
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Date FERC 20160715- 3009	Letter Order Issuing Variance Approval to Relocate Existing Communication Tower	 Relocate an existing communication tower from the liquefaction facility to additional construction workspace site and install an access road to the tower. Tower is being relocated to improve security by reducing the amount of traffic and personnel accessing the terminal facilities. FERC confirms the receipt of all required federal authorizations relevant to the approved activities. FERC's approval does not grant Lake Charles LNG the authority to commence construction of additional project facilities at the LNG terminal.
FERC 20160708- 5208	Request for Variance Authorization	• Request to proceed with the relocation/replacement of an existing communications tower from the liquefaction facility to the additional construction workspace site and install an access road to the tower.
FERC 20160707- 5187	Lake Charles LNG Monthly Status Report No. 4	 All erosion control related to disturbed areas will continue to be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
FERC 20160630- 3073	Order Denying Rehearing	 FERC denied Sierra Club's request for rehearing. Sierra Club did not file a Petition for Review at the Courts.
FERC 20160622- 4005	FERC Construction Inspection Report	 On 05/25/2016, Louis Herndon of Tetra Tech performed a construction inspection of the liquefaction project, under contract to FERC and per the request of the FERC Project Manager. Inspection covered the entire construction site of the new LNG facility. The only construction activities accomplished since the 03/29/2016 inspection were analysis of the four abandoned oil well sites and completion of activities at the test pile locations. All four of the abandoned well sites were stable, with no environmental concerns observed. Per Lake Charles LNG, following completion of the driving and testing of piles, all activities, except those required by the Project's SWPPP, were suspended until further notice. A follow-up letter is not required at this time, because no instances of noncompliance were identified. The next inspection will be scheduled once construction activities resume.
FERC 20160606- 5185	Lake Charles LNG Monthly Status Report No. 3	 A FERC inspection was performed the week of 05/30/2016, no problem areas or non-compliance were observed. All erosion controls related to disturbed areas will continue to be monitored and maintained in accordance with the SWPPP. No problems were encountered and no non-compliances were observed.
FERC 20160504- 5041	Lake Charles LNG Monthly Status Report No. 2	 Test pile work has been completed. All erosion control related to disturbed areas will continue to be monitored and maintained in accordance with the Storm water Pollution Prevention Plan ("SWPPP"). No problems were encountered and no non-compliances were observed.
FERC 20160405- 5030	Lake Charles LNG Monthly Status Report No. 1	 Authorization Order requires filing of a monthly status report beginning with the filing of the Implementation Plan and ending when all construction and restoration activities are complete. Received all required federal authorizations related to the liquefaction facility and modifications to the existing LNG Terminal.

FERC Accession	Document Title	Notes
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Date		 Silt fencing for tree clearing and test piles have been completed.
		 Piling will be delivered to site on 04/05/2016. Test piles will be driven in early April 2016. No problems were encountered and no non-compliances were observed.
DOE 04/01/2016	Lake Charles Exports, LLC Semi-	 On 12/21/2015, Lake Charles LNG submitted the Implementation Plan, including request to commence
DOE 04/01/2010	Annual Report (10/01/2015 –	tree clearing and perform test piles.
	03/31/2016), FE Docket No. 11-59-	 On 02/23/2016, FERC issued a Letter Order granting 12/21/2015 request to begin pre-construction tree
	LNG	clearing.
	Lake Charles LNG Export Company,	 On 02/26/2016, FERC issued a Letter Order granting 12/21/2015 request to proceed with test piles.
	LLC Semi-Annual Report (10/01/2015	 On 02/29/2015, Lake Charles LNG began tree clearing at the Liquefaction Facility Site.
	-03/31/2016), FE Docket No. 13-04-	 An Invitation to Tender was issued to three EPC contractor consortia. Bids were received and evaluated.
	LNG	One of the three consortia was eliminated from consideration. The remaining two consortia are going
		through a terms review and bid revalidation process.
		 Lake Charles LNG currently has option agreements in place for the purchase/lease of all property
		comprising the Liquefaction Project and the agreements were finalized and executed during this reporting
		period. Lake Charles LNG exercised its option to purchase approximately 80 acres from Reynolds Metals
		Company and that purchase closed on 06/25/2015.
		• Lake Charles LNG and BG LNG/BG Energy Merchants, LLC entered into a Project Development
		Agreement to jointly develop the Liquefaction Project.
		• Definitive agreements to implement the Liquefaction Project remain under development. Lake Charles LNG will own and finance the Liquefaction Project and BG will have a long-term tolling agreement for
		liquefaction, storage and loading services. BG will oversee the design and construction management of
		the Liquefaction Project and operate the Liquefaction Project and the existing LNG Terminal.
		 Trunkline Gas will provide pipeline transportation services to supply natural gas to the Liquefaction
		Project.
FERC 20160329-	FERC Construction Inspection Report	 On 03/29/2016, Louis Herndon of Tetra Tech performed a construction inspection of the liquefaction
4018		project, under contract to FERC and per the request of the FERC project manager.
1010		• The purpose of the inspection was to determine Lake Charles LNG's compliance with the environmental
		conditions of the Authorization Order and to inspect the construction conditions of the LNG facility site.
		• The inspection covered the entire construction site of the new LNG facility.
		 Noted that minimal activity had been completed as of the day of the inspection.
		 Clearing was complete along with some site preparation work.
		• Per Lake Charles LNG, construction will be suspended until further notice, pending the disposition of four
		dormant oil wells.
		• With the suspension of construction, in conjunction with the completion of the above activities, another
		inspection to observe the conditions of the site as of the shut-down is planned for the week of 05/30/2016.

FERC Accession	Document Title	Notes
No. / DOE Filing		
Date	Letter Only Annual in Nation to	
FERC 20160226- 3041	Letter Order Approving Notice to Proceed with Test Piles	 FERC granted request to proceed with test piles at the liquefaction site. FERC confirms the receipt of all required federal authorizations relevant to the approved activities.
5041	Troceed with rest rifes	 FERC's approval does not grant Lake Charles LNG the authority to commence construction of additional
		project facilities at the LNG terminal.
FERC 20160223-	Letter Order Approving Notice to	• FERC granted request to begin pre-construction tree clearing of the liquefaction site.
3028	Proceed with Tree Clearing of the	• The Implementation Plan included the information necessary to meet the conditions set out in the
	Liquefaction Facility Site	Authorization Order.
		 FERC confirms the receipt of all required federal authorizations relevant to the approved activities. FERC's approval does not grant Lake Charles LNG the authority to commence construction of additional
		project facilities at the LNG terminal.
FERC 20160216-	Order Granting Rehearing for Further	• FERC issued "tolling" order.
3038	Consideration	 FERC did not address the merits of Sierra Club's request for rehearing.
FERC 20160119-	Sierra Club Request for Rehearing	• Sierra Club argued:
5385		• FERC erred when it found that indirect effects relating to supply and consumption of natural gas were
		outside the scope of NGA and NEPA analysis.
		• FERC erred in failing to adequately consider greenhouse gas emissions.
		 FERC erred in failing to consider the cumulative impacts of the Project together with other approved and pending LNG export projects.
FERC 20151221-	Implementation Plan and Request for	 Lake Charles LNG filed its Implementation Plan and "request[s] authorization to commence construction
5265	Notice to Proceed with Construction	at the site designated for the Lake Charles LNG Export Company, LLC liquefaction facilities on or about
		01/01/2016 in order to initiate the following construction activities:
		• Commence tree clearing of the liquefaction facility site in accordance with the attached Greenfield
		Deforestation Plan in order to avoid the migratory bird nesting period of March 1 – July 31; and
		• Perform test piles in accordance with the attached Pile Testing Program."
		• All requested construction activities would be limited to the liquefaction facility site with the exception of
FERC 20151217-	Order Granting Section 3 and Section 7	 hauling any remaining tree debris to an approved landfill. FERC found that, subject to the conditions imposed in the Authorization Order, the liquefaction proposal
3026	Authorizations and Approving	 FERC found that, subject to the conditions imposed in the Authorization Order, the liquefaction proposal is not inconsistent with the public interest.
5020	Abandonment ("Authorization Order")	• The Liquefaction Project consists of two parts: (i) construction and operation of the Liquefaction
		Facilities proposed by Lake Charles LNG Export and (ii) construction and operation of the Modified
		Facilities, which includes modification of certain existing facilities at the existing import LNG terminal.
		• Additionally, the Liquefaction Project includes construction and operation of
		Lake Charles LNG's Modified Facilities at the terminal. Specifically, Lake Charles LNG proposes to:
		Replace in-tank LNG pumps with larger pumps and associated piping Deplace LNG loading arms at the most dark
		 Replace LNG loading arms at the west dock Modify its hold off compression and headling system
		Modify its boil-off compression and handling system

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		• Expand and integrate the electrical and security systems
		• Integrate the control and emergency shutdown systems
		• Expand and integrate the telecommunications system
		• Install a larger vapor return pipeline from the west dock to the LNG storage tanks
		• Upgrade the marine relief system
		• Replace the mooring dolphins and breasting dolphins at the west dock
		• Add new mooring and breasting dolphins and upgrade equipment on the existing breasting dolphins at the east dock
FERC 20151208-	Draft Implementation Plan	o Lake Charles LNG filed its draft Implementation Plan, which sets out how Lake Charles LNG will
5134		comply with the expected conditions set out in the Authorization Order, and draft request for a notice to
		proceed to commence construction of the Project.
FERC 20150814- 4001	Final Environmental Impact Statement	• The existing LNG Terminal includes the following existing major facilities that will be incorporated into the Liquefaction Project:
		• Two shipping berths (east dock and west dock), each equipped with mooring and breasting dolphins.
		Each dock contains four liquid loading arms and one vapor return arm; one arm on each dock serves as a hybrid arm that can be used for liquid loading or vapor return.
		• Four LNG storage tanks: three with a capacity of 95,000 m ³ and one with a capacity of 140,000 m ³ , for a total combined capacity of 425,000 m ³ .
		 LNG sendout facilities, including 12 pumps, 14 vaporizers, and 2 boil-off gas compressors.
		 Hazard detection, control and prevention systems, cryogenic piping and insulation, and electrical and
		instrumentation systems.
		• A firewater system.
		 A natural gas liquids recovery system.
		 Ancillary utilities, buildings and service facilities.
		Access roads and terminal road.
		• Existing dredge spoil management area.
FERC 20140325-	Lake Charles LNG NGA Section 3	• LNG Terminal is an existing 152-acre LNG import terminal that will require modifications to existing
5137	Application, Resource Report No. 1	facilities and systems to integrate with proposed export components.
	(General Project Description)	o Proposed Liquefaction Facility is an approximate 286-acre site for 3 liquefaction trains with LNG and
		vapor tie-ins to the LNG Terminal and feed gas line from Trunkline LNG meter station.
		• Certain modifications to the existing facilities and systems at the LNG Terminal will be required as part of
		the proposed Project, including the following:
		Installation of larger in-tank LNG pumps
		• Replacement of LNG loading arms at the west dock
		Modifications to boil-off compression and handling systems
		 Expansion and integration of electrical systems

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		 Installation of LNG rundown lines from liquefaction area to LNG storage tanks
		• Expansion and integration of security system
		 Integration of control and emergency shutdown systems
		 Expansion and integration of telecommunication system
		 Installation of larger vapor return pipeline from each dock to the LNG tanks
		• Installation of a marine flare
		 Addition of mooring dolphins and breasting dolphins at west dock
		 Addition of breasting dolphins at east dock
		Construction of temporary construction docks
		 Dredging of temporary construction docks with disposal onshore
20120406-3028	Approval of Pre-Filing Request	 FERC Office of Energy Project's approval of the request to use the Pre-Filing process.
20120330-5321	Request for Pre-Filing Review	o March 30, 2012 request by Trunkline LNG Company, Trunkline LNG Export and Trunkline to use the
	Determination for Lake Charles LNG	Pre-Filing process for the Project.
	Project	

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

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Lake Charles LNG Export Company, LLC

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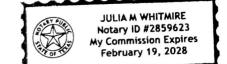
VERIFICATION OF THOMAS P. MASON

I, Thomas P. Mason, state that the foregoing Declaration is true and correct, to the best of

my knowledge, information, and belief.

Mason Thomas P. Mason

Submitted and sworn before me this ull IA M WHITMIRE Notary Public



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

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Lake Charles LNG Export Company, LLC

Docket Nos.

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CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. §590.107, I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Department of Energy in this proceeding.

Dated at Washington, D.C. this 17th day of April, 2025.

<u>/s/Thomas E. Knight</u> Thomas E. Knight Vinson & Elkins, LLP 2200 Pennsylvania Avenue NW Suite 500 West Washington, DC 20037 (202) 639-6524 tknight@velaw.com