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VIA ELECTRONIC MAIL

Ms. Amy Sweeney
Director, Office of Regulation, Analysis, and
Engagement
U.S. Department of Energy
Office of Fossil Energy and Carbon
Management
FE-34- ROOM -056
Washington, D.C. 20585
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Re: Gato Negro Permitium Dos, S.A.P.I. de C.V., Docket No.24-87-LNG

Dear Ms. Sweeney:

We write to clarify the pending Application in Docket No. 24-87-LNG. As part of the Docket No. 24-87-LNG Application filed in August 2024 with the Department of Energy (the "Department" or "DOE") the Applicant stated:

If, . . . , authorization in this docket for exportation from the U.S. to Mexico of volumes then consumed within Mexico as fuel or lost and unaccounted for volumes, is deemed to be duplicative of authority obtained in DOE/FECM Docket No. 24-43-LNG for fuel, lost and accounted volumes, for FTA use, then Applicant need not receive separate FTA country authority herein for volumes consumed in Mexico.

This correspondence follows up on the quoted statement.

At the time the Docket No. 24-87-LNG Application was filed (which as noted above was August, 2024), the application in Docket No.24-43-LNG, which relates to FTA exports, had not been granted.

The Docket No. 24-43-LNG Application sought, *inter alia*, authorization to export up to .647 Bcf/d via pipeline to Mexico. On October 1, 2024, the DOE in Order No. 5171 in Docket No. 24-43-LNG issued "long term authorization to export U.S.-sourced natural gas . . . for consumption in Mexico and/or, after liquefaction . . . to deliver and consume the LNG in Mexico . . ." (Order No. 5171, p. 2). The authorization in that docket allowed exportation of .647 Bcf/d of natural gas and re-exportation after liquefaction in Mexico to FTA countries of up to 203 Bcf/yr. Order No. 5171, pp. 3-4.

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If the Docket No. 24-43-LNG authorization granted in Order No. 5171 to export volumes to Mexico is available to be used for fuel, lost and accounted-for and cooling volumes associated with volumes ultimately liquefied and exported from Mexico to non-FTA countries at issue in Docket No. 24-87-LNG, then provided that the Department agrees, Gato Dos will not require separate authorization in its Docket No. 24-87-LNG application to consume volumes within Mexico for pipeline transportation (e.g., fuel and lost and accounted-for volumes), or for operations at the Manzanillo Plant such as cooling/chiller fuel, and other activities to load non-FTA volumes on to tankers.

If the Department concurs with the foregoing interpretation, then the Applicant respectfully requests that its Docket No. 24-87-LNG request be limited to .556 Bcf/d for re-export, and the following language be stricken from Applicant's application.

In the first sentence on page 1, delete the phrase "up to 0.647 . . . Bcf . . . per day of natural gas."

In the first sentence on Part IV, on page 11: the volume "0.647" should be replaced with "0.556"

The second sentence of Part IV on p. 11 and n.11 should be deleted.

The fifth and sixth full sentence on p. 12 should be eliminated.

In the first full sentence on p. 31, delete everything beginning with ".647 Bcf/d of . . ." through "volumes", and insert in lieu thereof the phrase "and re-export."

On page 55, delete the following language " : (1) export .647 Bcf/d of natural gas by pipeline to Mexico; (2)" and the phrase; "and (3) use up to . . . as described herein"

Thank you for your time and attention to this matter.

Respectfully submitted,

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