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April 1, 2025

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

**Re: Mexico Pacific Limited LLC
FE Docket Nos. 18-70-LNG and 22-167-LNG
April 2025 Semi-Annual Report**

Dear Ms. Moore:

Pursuant to Ordering Paragraph J of DOE FE Order No. 4248,¹ Ordering Paragraph N of DOE/FE Order No. 4312,² and Ordering Paragraph J of DOE/FECM Order No. 4995,³ I submit to the Department of Energy's ("DOE") Office of Fossil Energy and Carbon Management ("DOE/FECM") on behalf of Mexico Pacific Limited LLC ("MXP") this semi-annual report describing the progress MXP has made in the development and commercialization of its proposed LNG production and storage facility to be located in the State of Sonora, Mexico (the "Saguaro Energía LNG Facility"). MXP has made significant progress in advancing the project since MXP filed its October 2024 Semi-Annual Report, as detailed herein.

MXP continues to work closely with Mexican federal, state, and municipal governments to advance the Saguaro Energía LNG Facility. The Saguaro Energía LNG Facility has received all federal, state, and municipal permits necessary to commence construction, including a renewed environmental impact assessment issued by the Agencia de Seguridad, Energía y Ambiente (ASEA) in October 2023 and a series of social impact assessments for the Saguaro Energía LNG Facility and associated pipelines issued by Secretaría de Energía (SENER) in November 2023, among others, and such permits remain in full force and effect. Both Secretaría de Economía and Secretaría de Hacienda y Crédito Público identify MXP's project as representing the ideal model for developing large-scale infrastructure the right way in Mexico, in a manner that respects and prioritizes the environment, communities, and indigenous populations.

MXP worked collaboratively with President Andrés Manuel López Obrador to advance the Saguaro Energía LNG Facility over his term, and has already engaged with newly elected President Claudia Sheinbaum, whose commitment to the well-being of the country and its people, along with the development of cleaner energy sources, aligns with MXP's vision for responsible energy infrastructure. The Saguaro Energía LNG Facility in Sonora forms a foundational pillar of the Sonora Plan.⁴

The Saguaro Energía LNG Facility is equally recognized as critically important to the U.S., providing a vital solution for U.S. Permian Basin natural gas producers – including project customers ExxonMobil and ConocoPhillips – to produce and evacuate over 1,000 Bcf/yr (nearly 3 Bcf/d) of associated natural gas to Asian gas markets in a manner that achieves the lowest landed price of LNG into Asia globally. MXP's strong price advantage further strengthens the objective of ensuring U.S. energy dominance across strategic global markets.

1 Mexico Pacific limited LLC, DOE/FE Order No. 4248 (Sept. 19, 2018).

2 Mexico Pacific limited LLC, DOE/FE Order No. 4312 (Dec. 14, 2018).

3 Mexico Pacific limited LLC, DOE/FECM Order No. 4995 (Apr. 28, 2023).

4 As detailed in MXP's October 2023 Semi-Annual Report, the Sonora Plan is a trilateral clean energy infrastructure and nearshoring initiative announced by the Mexican, U.S. and Canadian governments in 2023. The Sonora Plan seeks to promote clean energy development, investment, and economic prosperity for the benefit of Sonora and Mexico.

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Collectively, as of April 1, 2025, MXP and its affiliates have entered into long-term LNG offtake contracts providing for the sale of approximately 13 mtpa of LNG that will be produced by the Saguaro Energía LNG Facility. These agreements valid and in good standing condition, and evidence strong market demand for the LNG to be supplied from the Saguaro Energía LNG Facility.


As MXP stated in prior filings submitted to DOE/FECM, MXP anticipates that it will receive U.S.-sourced natural gas for liquefaction in the Saguaro Energía LNG Facility through both existing and newbuild gas transmission pipeline systems.⁵ The U.S. portion of one such newbuild pipeline system will be developed and constructed by Saguaro Connector Pipeline, L.L.C. ("Saguaro Connector"). The route of the Saguaro Connector pipeline will originate in the vicinity of the Waha Hub in west Texas and will terminate at a border crossing pipeline facility to be constructed at the international Boundary between the U.S. and Mexico in the Río Grande River in Hudspeth County, Texas. The Federal Energy Regulatory Commission (the "Commission") granted Saguaro Connector a Presidential Permit and authorization pursuant to section 3 of the Natural Gas Act ("NGA"), Part 153 of the Commission's regulations, and Executive Order Nos. 10485 and 12038 to site, construct, and operate a natural gas pipeline and related facilities for the export of natural gas at the international Boundary. *Saguaro Connector Pipeline, LLC*, 186 FERC 161,114 (Feb. 15, 2024). On July 10, 2024, the Commission issued an order addressing arguments raised on rehearing, and the Commission upheld the grant to Saguaro Connector of a Presidential Permit and authorization pursuant to section 3 of the NGA. *See Saguaro Connector Pipeline, LLC*, 188 FERC ¶ 61,029 (2024). Those decisions are currently the subject of a petition for review which has been filed with the U.S. Court of Appeals for the District of Columbia Circuit in *Sierra Club, et al v. FERC*, D.C. Cir. No. 24-1199.

MXP gave notice to the DOE of a change in control (CiC) effectuated by means of a transaction dated February 3, 2025, and a second transaction that closed on March 5, 2025, where Mexico Pacific Holdings, L.P., a Delaware limited partnership, is now the controlling owner of Mexico Pacific Limited, LLC. The change in control of MXP resulting from the described transactions was designed to strengthen the LNG export project.

MXP is currently in discussions with prospective lenders that will provide financing for the MXP project. Through its financial advisors, each of which has significant experience in North American infrastructure financing, MXP is engaging with international commercial banks, Mexican development banks, and several countries' export credit agencies in order to commence the next stage of construction and to take the project into operations.

If you have any questions regarding this submission, please contact me at (713) 589-7452.

Sincerely,



Sarah Bairstow

CEO

Mexico Pacific Limited LLC

⁵ *See, e.g.,* Supplement to Application of Mexico Pacific Limited LLC for Additional Long-Term, Multi-Contract Authorization to Export Natural Gas to Mexico and to Re-export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations- Supplemental Information on Available Pipeline Transportation Alternatives, Docket No. 22-267-LNG (Jan. 24, 2023).