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April 1, 2025

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U.S. Department of Energy (FE-34)
Office of Fossil Energy and Carbon Management
Office of Natural Gas Regulatory Activities
Attn: Natural Gas Reports
P.O. Box 44375
Washington, D.C. 20026-4375

Re: Lake Charles Exports, LLC

FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report

To: Office of Natural Gas Regulatory Activities

In accordance with the conditions of DOE/FE Order Nos. 3324 and 3324-A, issued August 7, 2013, and July 29, 2016, respectively, Lake Charles Exports, LLC submits the semi-annual report as required by ordering paragraphs M and O, respectively, describing the progress of the proposed liquefaction facility project at the Lake Charles Terminal, for the reporting period **October 1, 2024 through March 31, 2025**.

Any questions concerning this filing should be addressed to the undersigned at (713) 989-2605.

Respectfully,

On behalf of Trunkline LNG Holdings LLC,
A member company of Lake Charles Exports, LLC

/s/ Blair Lichtenwalter

Blair Lichtenwalter
Senior Director, Regulatory

Lake Charles Exports, LLC
FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report
April 1, 2025

Regulatory

On December 17, 2015, the Federal Energy Regulatory Commission (“FERC”) issued an Order Granting Section 3 and Section 7 Authorizations and Approving Abandonment (“FERC Order”) in Docket Nos. CP14-119-000, CP14-120-000, and CP14-122-000, granting the request of Trunkline Gas Company, LLC (“Trunkline”), Lake Charles LNG Export Company, LLC, and Lake Charles LNG Company, LLC (collectively referred to as “Applicants”),¹ to construct and operate the Liquefaction Project, convert Lake Charles LNG Company, LLC’s facilities and operations to NGA Section 3 jurisdiction, and authorized Trunkline’s proposal under NGA Sections 7(b) and 7(c) to abandon, construct, and operate the Pipeline Modifications Project. The Liquefaction Project and the Pipeline Modifications Project are collectively referred to herein as the “Project”. On September 16, 2020, LCLNG submitted its Notification of Abandonment of its NGA Section 7 Facilities/Certificate Authorizations to FERC, under CP14-120, et. al., effective August 21, 2020.

Regulatory activities since the last report are as follows:

On August 21, 2024, LCLNG submitted to FERC Supplemental Information to the Implementation Plan and Request for Written Authorization (Variance Request 03) regarding modification to the gas turbine supplier and model. LCLNG received an Informal Data Request from FERC on September 20, 2024, and filed its responses on October 1, 2024. On October 18, 2024, FERC issued its Letter Order approving Variance Request 03.

On October 4, 2024, LCLNG submitted to FERC Supplemental Information to the Implementation Plan and Request for Written Authorization (Variance Request 04) regarding a design variance to consolidate the flare system. LCLNG received an Informal Data Request from FERC on October 15, 2024, and filed its responses on October 31, 2024. On November 12, 2024, FERC issued its letter order approving Variance Request 04.

On October 4, 2024, LCLNG submitted to FERC Supplemental Information to the Implementation Plan and Request for Written Authorization (Variance Request 05) to modify the ethane refrigerant makeup system to remove the de-ethanizer system. LCLNG received an Informal Data Request from FERC on October 24, 2024, and filed its responses on October 31, 2024. On November 12, 2024, FERC issued its letter order approving Variance Request 05.

On October 23, 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 these facilities into service on January 1, 2024. This portion of the Pipeline Modifications Project is an integral component of the Project. Trunkline informed FERC in its first post-construction report that it completed construction and restoration activities at the four compressor stations. Trunkline reported that no problem areas or noncompliance issues were identified nor did it receive any landowner complaints during the reporting period.

Pursuant to Environmental Condition No. 9, Appendix B of the FERC Order, for the Liquefaction Project, LCLNG continues to file the required Monthly Status Reports under Docket No. CP14-120-000.

Engineering

In 2017, LCLNG completed a front end engineering and design (“FEED”) study. In April 2019, LCLNG engaged various companies to conduct a FEED verification as well as submit bids for the engineering, procurement, and

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Lake Charles Exports, LLC
FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report
April 1, 2025

construction ("EPC") related to the Project. In April 2020, LCLNG received bids for the EPC 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.

LCLNG has since 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 updated EPC contractor bids were received in May 2023.

In September 2024, LCLNG entered in an engineering, procurement and construction (EPC) contract with a joint venture between Technip Energies and KBR with respect to the Lake Charles LNG export 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. The structure of the contract provides alignment between LCLNG and the EPC contractor to achieve a high quality, cost-effective project. The commencement of EPC activities under the contract is subject to LCLNG's determination to issue a notice to proceed under the contract which in turn will be subject to LCLNG making a final investment decision to proceed with the project based on obtaining sufficient commercial offtake commitments and third-party equity to satisfy parent company Energy Transfer LP's ("ET") internal objectives.

Environmental

Environmental related activities since the last report are as follows:

On December 3, 2024, LCLNG submitted a Request for renewed Section 7 clearance submitted to the National Marine Fisheries Service ("NMFS"), and on January 13, 2025, NMFS-PRD confirmed that no new consultation was required.

On January 4, 2025, LCLNG received the renewed state-species clearance for Threatened and Endangered Species Consultation from the Louisiana Department of Wildlife and Fisheries Ecological Services and Wildlife Diversity Program, which is valid through January 4, 2026

On January 13, 2025, LCLNG submitted a Request for renewed Section 7 clearance to the U.S. Fish and Wildlife Service, and approval is pending.

On February 26, 2025, LCLNG submitted a renewal application to the Louisiana Department of Environmental Quality – Air Quality Division, and approval is pending.

On March 3, 2025, LCLNG submitted an Application for extension (Section 404/ Section 10) to the U.S. Army Corps of Engineers – New Orleans District, and approval is pending.

Status of Long-Term Contracts Associated with the Facility

LCLNG has secured all LNG export terminal land rights for the Liquefaction Project. Definitive agreements for pipeline transportation services to supply natural gas to the Liquefaction Project remain under development.

On March 29, 2022, ET, LCLNG's parent company, ENN Natural Gas ("ENN NG") and ENN Energy Holdings Limited ("ENN Energy") announced that ENN NG and ENN Energy have entered into two (2) 20-year LNG Sale and Purchase Agreements. On April 25, 2022, Energy Transfer LNG Export, LLC ("Energy Transfer LNG") filed copies of these agreement with DOE/FE under seal, and a public summary of the major provisions of these agreements. The Press Release is available from the website link below:

Lake Charles Exports, LLC
FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report
April 1, 2025

- <https://www.businesswire.com/news/home/20220328005955/en/>

On May 2, 2022, ET and Gunvor Group Ltd announced that Gunvor Singapore Pte Ltd (“Gunvor”) and Energy Transfer LNG have entered into a 20-year LNG Sale and Purchase Agreement. On May 19, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

- <https://www.businesswire.com/news/home/20220502005601/en/>

On May 3, 2022, ET and SK Gas Trading LLC (“SK Gas”) announced that Energy Transfer LNG and SK Gas have entered into an 18-year LNG Sale and Purchase Agreement. On May 19, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

- <https://www.businesswire.com/news/home/20220503005981/en/>

On June 5, 2022, ET and China Gas Holdings Limited (“China Gas”) announced that China Gas Hongda Energy Trading Co., LTD, a subsidiary of China Gas, and Energy Transfer LNG have entered into a 25-year LNG Sale and Purchase Agreement. On June 30, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

- <https://www.businesswire.com/news/home/20220603005512/en/>

On August 24, 2022, ET and Shell NA LNG LLC (“Shell”) announced that Shell and Energy Transfer LNG have entered into a 20-year LNG Sale and Purchase Agreement. On September 19, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

<https://www.businesswire.com/news/home/20220824005720/en/>

On October 3, 2024, Energy Transfer LNG and Gunvor International B.V., Amsterdam, Geneva Branch entered into a 20-year LNG Sale and Purchase Agreement. On October 22, 2024, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement.

On December 19, 2024, ET announced that Energy Transfer LNG and Chevron U.S.A. Inc. entered into a 20-year LNG Sale and Purchase Agreement. On January 10, 2025, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

- <https://www.businesswire.com/news/home/20241219500228/en/>

LCLNG is in active discussions with customers related to the remaining capacity of the Liquefaction Project.

Date Facility is Expected to Be Operational

Commensurate with the construction schedule specified in the EPC contract referred to above, the 1st Train is anticipated to be operational approximately 52 months from the beginning of construction, and Trains 2 and 3 are scheduled for completion in approximately 4 month increments after the 1st Train.

Lake Charles Exports, LLC
FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report
April 1, 2025

On August 30, 2019, a *Request for Extension of Time* (Accession No. 20190830-5193) was submitted to FERC, requesting an extension of deadlines to December 2025 for the completion of the construction of the Project, all as more fully set forth in the FERC filing. On December 6, 2019, FERC issued a Letter Order granting LCLNG's August 30, 2019 *Request for Extension of Time* to December 16, 2025 (Accession No. 20191205-3025).

On March 4, 2020, LCLNG and Lake Charles Exports, LLC ("LCE") each submitted Amendments to Authorizations for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Countries under DOE Docket Nos. 13-04-LNG and 16-109-LNG and DOE Docket Nos. 11-59-LNG and 16-110-LNG, respectively, requesting extensions of the deadlines to commence export operations. On October 6, 2020, DOE/FE issued Order Nos. 2987-A, 3324-B, and 4011-A (11-59-LNG/16-110-LNG), and Order Nos. 3252-B, 3868-A, and 4010-A (13-04-LNG/16-109-LNG) granting the LCLNG and LCE applications for the extension of the timelines for export to be consistent with the FERC certificate timeline of December 16, 2025.

On January 31, 2022, Applicants filed a request with FERC for a three-year extension of time, until December 16, 2028, to complete construction of the Project. On May 6, 2022, FERC issued an order granting the requested extension of time. *See Lake Charles LNG Company, LLC, et al.*, 179 FERC ¶ 61,086 (2022).

On May 24, 2022, LCLNG and LCE each filed an application requesting that DOE/FE grant an extension to the currently authorized export term of each of the authorizations through December 31, 2050, consistent with the Final Policy Statement Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050. On November 1, 2023, DOE/FE issued Order Nos. 2987-B, 3324-E, and 4011-D (11-59-LNG/16-110-LNG) and Order Nos. 3252-C, 3868-D, and 4010-D (13-04-LNG/16-109-LNG) granting the applications for the extension of the export terms for FTA and non-FTA exports to December 31, 2050.

On June 21, 2022, LCLNG and LCE submitted applications requesting that DOE/FE issue orders amending the existing non-FTA commencement of operations deadlines to December 16, 2028 to align with the FERC extension of time. On April 21, 2023, DOE/FE issued Orders Denying Applications for Second Extension of Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries. On May 22, 2023, LCLNG and LCE each filed a request for rehearing of the respective April 21 orders. On June 21, 2023, DOE/FE issued separate Opinions and Orders Denying Requests for Rehearing of Orders Denying Applications for Second Extension of Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries.

On August 18, 2023, as supplemented on August 22, 2023, LCE filed an application with DOE/FE seeking long-term multi-contract authorization to export domestically produced LNG up to the equivalent of 851 billion cubic feet of natural gas per year to non-FTA countries. LCE proposes to export LNG from its Lake Charles Terminal site located in Lake Charles, Louisiana to any country that has, or in the future will have, the capacity to import LNG via ocean-going carrier, with which the United States does not have an FTA requiring national treatment for trade in natural gas, and with which trade is not prohibited by U.S. law or policy. The authorization is requested for a term extending through December 31, 2050. LCE requests this authorization on its own behalf and as agent for other parties that hold title to the LNG at the time of export. On January 26, 2024, the Biden Administration announced a decision to pause pending approvals of liquefied natural gas 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 July 1, 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.

Lake Charles Exports, LLC
FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report
April 1, 2025

On December 17, 2024, DOE released an updated study of U.S. LNG exports with a 60 day public comment period that was later extended to March 20, 2025. Following his inauguration on January 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 January 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. On February 25, 2025, LCE 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. On March 20, 2025, ET submitted comments on DOE’s 2024 LNG export study. LCLNG and LCE are unable to predict the timing or outcome of DOE’s process as it relates to LCE’s application.

Construction Activities

On February 23, 2016, FERC issued its Notice to Proceed with Tree Clearing of the Liquefaction Facility Site, and LCLNG completed tree clearing in April 2017. FERC conducted various inspections and issued construction inspection reports. LCLNG installed erosion controls and is monitoring and maintaining them in accordance with the Storm Water Pollution Prevention Plan.

On February 26, 2016, FERC issued its Notice to Proceed with Test Piles, and LCLNG completed the test piles in April 2016. FERC conducted an inspection and issued a construction inspection report.

On July 15, 2016, FERC issued its Variance Approval to Relocate Existing Communication Tower. LCLNG completed the engineering work and a Geotech survey of the ACW-C site.

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.

On December 16, 2022, LCLNG filed Supplemental Information to the Implementation Plan and Request for Written Authorization to the FERC and requested written authorization from the Director of OEP for a Notice to Proceed with Enabling Projects activities. On January 23, 2023, FERC issued its Notice to Proceed with Certain Activities, including plugging and abandoning seven wells, removing the Boardwalk Louisiana Midstream, LLC (“Boardwalk”) meter station, removing the Boardwalk and Trunkline pipeline segments within the terminal footprint and isolate the Boardwalk and Trunkline pipeline segments outside the terminal footprint, abandon Granger Road, and remove the existing utilities along Granger Road within the terminal.

On December 19, 2022, LCLNG filed Supplemental Information to the Implementation Plan and Request for Written Authorization (EC-6) to the FERC, and requested written authorization from the Director of OEP for a Notice to Proceed with activities to relocate the Alcoa Pipeline. FERC approved the request on April 18, 2023.

LCLNG completed onsite activities for the supplementary geotechnical investigations, as previously discussed with FERC Staff, on January 30, 2023. The onsite activities included 25 geotechnical borings, 13 geophysical borings, three test pits, and 18 electrical resistivity soundings. Lab testing of samples procured during the onsite activities was completed in June 2023.

Lake Charles Exports, LLC
FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report
April 1, 2025

In February 2023, LCLNG completed approximately 25 acres of maintenance clearing of the Liquefaction Facility Site to support the Enabling Projects.

LCLNG completed laser scanning of the existing import facilities slated for reuse to support export operations in May 2023.

On November 23, 2022, Trunkline filed its request at FERC to commence certain construction activities associated with the Pipeline Modifications Project. On December 9, 2022, FERC issued its Notice to Proceed with Construction, granting Trunkline's request to commence certain construction activities to enable bi-directional flow at the (i) Longville Compressor Station in Beauregard Parish, Louisiana, (ii) Pollock Compressor Station in Grant Parish, Louisiana, (iii) Shaw Compressor Station in Bolivar County, Mississippi, and (iv) Epps Compressor Station in West Carroll Parish, Louisiana. On July 12, 2023, Trunkline filed two variance requests to install a flow control valve and to expand compressor station fencing at the existing Longville Compressor Station. Trunkline's July 12, 2023 request was approved by FERC in a Letter Order issued on July 18, 2023. Trunkline filed its Request to Place Facilities In-Service on December 11, 2023, as supplemented on December 18, 2023, and FERC issued a Letter Order granting Trunkline Authorization to Commence Service of the Piping Modifications on December 20, 2023. On January 3, 2024, Trunkline filed its Notice of Commencement of Service that the modified facilities commenced service on January 1, 2024.

On August 21, 2024, LCLNG submitted to FERC Supplemental Information to the Implementation Plan and Request for Written Authorization (Variance Request 03) regarding modification to the gas turbine supplier and model. LCLNG received an Informal Data Request from FERC on September 20, 2024, and filed its responses on October 1, 2024. On October 18, 2024, FERC issued its Letter Order approving Variance Request 03.

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On February 6, 2025, LCLNG filed its semi-annual report at FERC regarding its import facilities at the Lake Charles Terminal as required by Opinion No. 796 issued April 29, 1977, in Docket Nos. CP74-138, et al., by Order issued December 18, 2002, in Docket No. CP02-60-000/001 (Condition No. 23), and by Order issued December 26, 2006, in Docket No. CP06-102-000/001 (Condition No. 54). As authorized in the FERC Order, LCLNG 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, 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. LCLNG's most recent semi-annual report details the 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 U.S. Department of Transportation PHMSA requirements.

**Lake Charles Exports, LLC
FE Docket No. 11-59-LNG
DOE/FE Order Nos. 3324 and 3324-A
Lake Charles LNG Terminal
Semi-Annual Report
April 1, 2025**

LCLNG confirms that the Project area has not experienced any significant changes and the environmental and other public interest findings underlying the FERC authorizations for the Project remain valid. The Project remains an active project, fully supported by the Applicants.