

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

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ENGELHART CTP ENERGY MARKETING, LLC)	DOCKET NO. 25-35-NG
(formerly TRAILSTONE ENERGY MARKETING,)	DOCKET NO. 23-29-NG
LLC))	
_____)	

ORDER GRANTING BLANKET AUTHORIZATION
TO IMPORT AND EXPORT NATURAL GAS
FROM AND TO CANADA AND MEXICO,
TO IMPORT AND EXPORT LIQUEFIED NATURAL GAS
FROM AND TO CANADA AND MEXICO BY TRUCK,
TO EXPORT LIQUEFIED NATURAL GAS
TO CANADA AND MEXICO BY VESSEL,
TO IMPORT LIQUEFIED NATURAL GAS
FROM VARIOUS INTERNATIONAL SOURCES BY VESSEL, AND
VACATING PRIOR BLANKET AUTHORIZATION

DOE/FECM ORDER NOS. 5290 AND 4990-A

MAY 14, 2025

I. DESCRIPTION OF REQUEST

On February 20, 2025, Engelhart CTP Energy Marketing, LLC (Engelhart CTP Energy Marketing) filed an application (App.) with the Office of Fossil Energy and Carbon Management (FECM) of the Department of Energy (DOE) under section 3 of the Natural Gas Act (NGA)¹ for blanket authorization to import and export natural gas from and to Canada and Mexico by pipeline, to import and export liquefied natural gas (LNG) from and to Canada and Mexico by truck, to export LNG to Canada and Mexico by vessel, and to import LNG from various international sources by vessel, up to a combined total volume equivalent to 3,100 billion cubic feet (Bcf) of natural gas. The applicant requests the authorization be granted for a two-year term that began on February 3, 2025.² Engelhart CTP Energy Marketing is a Delaware limited liability company with its principal place of business in Austin, Texas.

Previously, on April 14, 2023, DOE granted Engelhart CTP Energy Marketing—known at the time as Trailstone Energy Marketing, LLC (Trailstone Energy Marketing)—authorization in DOE/FECM Order No. 4990 to import and export natural gas from and to Canada and Mexico by pipeline, to import LNG from Canada and Mexico by truck, to export LNG to Canada and Mexico by vessel, and to import LNG from various international sources by vessel, up to a combined total volume equivalent to 3,100 Bcf of natural gas for a two-year term beginning on June 1, 2023, and extending through May 31, 2025.

On February 20, 2025, DOE was notified that Trailstone Energy Marketing changed its corporate name to Engelhart CTP Energy Marketing, LLC, effective February 3, 2025.³

¹ The authority to regulate the imports and exports of natural gas, including liquefied natural gas, under section 3 of the NGA (15 U.S.C. § 717b) has been delegated to the Assistant Secretary for FECM in Redelegation Order No. S4-DEL-FE1-2023, issued on April 10, 2023.

² See Email from Alisha McLemore, Contract Analyst, Trailstone Group, on behalf of Engelhart CTP Energy Marketing, to DOE (Feb. 20, 2025).

³ App. at 2; see also Email from Alisha McLemore to DOE (Feb. 20, 2025)

Additionally, Engelhart CTP Energy Marketing requested that DOE vacate its existing authorization (issued to Trailstone Energy Marketing) in DOE/FECM Order No. 4990, effective February 3, 2025, to be concurrent with the retroactive issuance of the new authorization it requested.⁴

II. FINDING

The application has been evaluated to determine if the proposed import and export arrangements meet the public interest requirement of section 3 of the NGA, as amended by section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486). Under section 3(c), the import and export of natural gas, including LNG, from and to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas and the import of LNG from other international sources are deemed to be consistent with the public interest, and applications for such imports and exports must be granted without modification or delay. The authorization sought by Engelhart CTP Energy Marketing to import and export natural gas from and to Canada and Mexico, nations with which free trade agreements requiring national treatment for trade in natural gas are in effect, and the import of LNG from international sources, meets the section 3(c) criteria and, therefore, is consistent with the public interest. This Order authorizes transactions with terms of not greater than two years.

ORDER

Pursuant to section 3 of the NGA, it is ordered that:

A. Engelhart CTP Energy Marketing is authorized to import and export natural gas from and to Canada and Mexico by pipeline, to import and export LNG from and to Canada and Mexico by truck, to export LNG to Canada and Mexico by vessel, and to import LNG from

⁴ See *id.*

various international sources by vessel, up to a combined total volume equivalent to 3,100 Bcf of natural gas, pursuant to transactions that have terms of not greater than two years. This authorization shall be effective for a two-year term that began on February 3, 2025, and extends through February 2, 2027.

B. This natural gas may be imported and exported by pipeline at any point on the border between the United States and Canada, and at any point on the border between the United States and Mexico.

C. This LNG may be imported by truck at any LNG receiving facility in the United States and its territories. This LNG may be exported by truck from any departure facility in the United States and its territories.

D. This LNG may be exported by vessel from any LNG export terminal in the United States and its territories to any receiving facility in Canada or Mexico.

E. This LNG may be imported by vessel at any LNG receiving facility in the United States and its territories.

F. LNG imports that require increased security measures from the United States Coast Guard (USCG) or other branches of the Department of Homeland Security in place now or added in the future shall comply with those measures on a shipment by shipment basis to the satisfaction of the USCG. Such measures may include periodic boarding or examination of the vessel by the USCG at the load port, while the vessel is underway, at any time during the voyage, and before and during discharge of the cargo while at the discharge port, as well as other enhanced security measures.

G. **Monthly Reports:** With respect to the natural gas imports and exports authorized by this Order, Engelhart CTP Energy Marketing shall file with the Office of Regulation, Analysis,

and Engagement, within 30 days following the last day of each calendar month, a report on Form FE-746R indicating whether imports or exports of natural gas have been made. Monthly reports must be filed whether or not initial deliveries have begun. If no imports and/or exports have been made, a report of “no activity” for that month must be filed. If imports and/or exports of natural gas have occurred, the report must provide the information specified for each applicable activity and mode of transportation, as set forth in the Guidelines for Filing Monthly Reports. These Guidelines are available at <https://www.energy.gov/fecm/guidelines-filing-monthly-reports>.

(Approved by the Office of Management and Budget under OMB Control No. 1901-0294)

H. The first monthly report required by this Order is due not later than May 30, 2025, and should cover the reporting period from February 3, 2025, through April 30, 2025.

I. The blanket authorization issued to Trailstone Energy Marketing to import and export natural gas from and to Canada and Mexico by pipeline, to import LNG from Canada and Mexico by truck, to export LNG to Canada and Mexico by vessel, and to import LNG from various international sources by vessel, granted in DOE/FECM Order No. 4990 on April 14, 2023, is hereby vacated, effective February 3, 2025.

Issued in Washington, D.C., on May 14, 2025.

Amy R. Sweeney
Director, Office of Regulation, Analysis, and Engagement
Office of Resource Sustainability